



IN DEFENSE OF ANIMALS

October 30, 2017

VIA EMAIL

Ms. Carmen Rottenberg
Acting Deputy Under Secretary
Food Safety and Inspection Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington DC 20250-3700
Carmen.Rottenberg@fsis.usda.gov

To the Acting Deputy Under Secretary for Food Safety Ms. Carmen Rottenberg,

I write to you in light of the deeply concerning petition for a waiver of the production line speed limits in poultry plants, as proposed by the National Chicken Council (NCC) to the United States Department of Agriculture in September of this year.

We, In Defense of Animals, as an international animal protection organization with over 250,000 valued supporters and a 30-year history of protecting animals and people, hereby respectfully put forward argumentation against this waiver, which if granted, would hold dire implications for:

- I. The quality of food safety inspection
- II. The wellbeing of the industry workers
- III. The ethics of animal agriculture
- IV. The procedure for rule-making

I. The waiver would result in a reduction of safety and quality control, in favor of a higher production volume via process control. The New Poultry Inspection System (NPIS) put forward an upper line speed limit of 140 beats (birds) per minute; a rate at which honest and diligent quality control is already unmanageable, by quality testers or federal inspectors, as emphasized by the prevalence of Salmonella and Campylobacter contamination rates that are detected in random sampling of the processed poultry.



IN DEFENSE OF ANIMALS

Under current rates, Consumer reports found that “97% of the (chicken) breasts were tainted with at least one of six bacteria that can make people sick, including salmonella, campylobacter, and staphylococcus aureus (common causes of food poisoning); E. coli and enterococcus (which indicate fecal contamination); and klebsiella pneumoniae (a bug that can cause infections such as pneumonia).” (Ref. 1)

The survey cited by the NCC in support of its waiver, has a minute scope of 20 NPIS and non-NPIS plants over a short interval of 6-months. The manner in which the surveys were conducted, the other plant variables considered, the data on the rates and types of bacteria detected, and the measures used are not detailed in this deficient survey. Instead, it is summarized in total rates of Campylobacter and Salmonella, a list of survey participants and a statement that rates were “as good as if not better than their non-NPIS counterparts.” Such conjecture lacks transparency, consumer accountability, academic honesty and scientific merit; and may indicate an overall lack of concern for quality and diligence that can be expected from its processes should the waiver be granted.

II. Worker health, safety and welfare in the agriculture sector is one of the highest risks nationwide, and can only be negatively impacted by even higher production speeds; increasing the likelihood of injuries of establishment workers and inspection personnel. The Government Accountability Office published a report in 2016, demonstrating that forcing production lines to move faster will expose poultry workers to higher rates of injuries and illnesses. (Ref. 2)

The NCC’s argument of “leveling the playing field within the U.S. chicken industry” and “eliminating competitive barriers between the U.S. and international chicken producers” holds no demonstrable data or measurement detailing this phenomenon, how the waiver will viably achieve this, nor what the costs and trade-offs would be in its implementation; this is indicative of the NCC’s profit-driven motive behind the line speed waiver, under the false pretense of food safety when it would demonstrably come at the expense of workers, consumers, animal welfare, and industry ruling procedure.

III. Increased line speeds would also result in an unaddressed detriment to the ethics of the slaughtering process; increasing the likelihood of inhumane handling and the odds of the bird missing the stunning bath or throat cutter and subsequently being boiled alive. Dr. Lesley Rogers, professor of Neuroscience and Animal Behavior at the University of New England describes that “It is now clear that [chickens] have cognitive capacities equivalent to those of mammals, even primates.” Any move that would increase animal suffering runs counter to public opinion and mounting scientific evidence detailing animals’ acute pain capacity.



IN DEFENSE OF ANIMALS

IV. The request to waive the production line speed limits in poultry plants, as proposed by the NCC, would violate the Administrative Procedure Act (APA); requiring that notice of proposed rulemaking first be published in the Federal Register.

Sincerely,

Marilyn Kroplick, MD

Marilyn Kroplick
Marilyn@idausa.org
President and CEO
In Defense of Animals

References:

1. <https://www.consumerreports.org/cro/magazine/2014/02/the-high-cost-of-cheap-chicken/index.htm>
2. <http://www.gao.gov/assets/680/676796.pdf>