



January 9, 2018

Roberta F. Wagner  
Assistant Administrator  
Office of Policy and Program Development  
Food Safety and Inspection Service  
1400 Independence Avenue SW  
Room 350E Whitten Building  
Washington DC 20250-3700  
[Roberta.wagner@fsis.usda.gov](mailto:Roberta.wagner@fsis.usda.gov)

CC: Docket Clerk  
Food Safety and Inspection Service  
Patriots Plaza 3  
1400 Independence Avenue SW  
Mailstop 3782, Room 8-163A  
Washington D.C., 20250-3700  
[fsispetitions@fsis.usda.gov](mailto:fsispetitions@fsis.usda.gov)

Re: Mercy For Animals Petition to Include Poultry Under the Humane Methods of Slaughter Act (Petition No. 17-06)

Dear Assistant Administrator Wagner,

On behalf of Oxfam America, I'm writing to express support for Rulemaking Petition 17-06, submitted on November 15, 2017 by Mercy For Animals to the Food Safety and Inspection Service (FSIS). This petition requests that FSIS initiate rulemaking to include poultry as "livestock" under the Humane Methods of Slaughter Act (HMSA) (7 U.S.C. §§ 1901–1907) and as "amenable species" under the Federal Meat Inspection Act (FMIA) (21 U.S.C. §§ 601 *et seq.*).

Oxfam America urges you to grant this petition for several reasons. While many organizations, and millions of people, focus their energies on the treatment of animals in the food system, Oxfam is primarily concerned with the conditions facing the human beings who labor in the fields, farms, and factories. Certainly, we support improving slaughter methods so that animals do not needlessly suffer; but we also believe that workers can, and should, be treated better as well. This petition would address many of the arduous challenges they face every day.

The systems currently in place recklessly endanger poultry workers (50 percent of the slaughterhouse workforce); these workers face egregiously elevated rates of occupational injuries and illnesses. They much more frequently suffer debilitating musculoskeletal injuries, and have an increased risk of dangerous skin and respiratory infections and exposure to antibiotic-resistant bacteria.

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The HMSA has three stated goals: preventing the needless suffering of animals, making working conditions safer for slaughterhouse workers, and benefitting consumers and producers. Congress has clearly delegated you the authority under this statute to achieve these goals through meaningful regulations and policies. You should do so by including poultry under the HMSA.

Sincerely,

A handwritten signature in blue ink, appearing to read "Minor Sinclair". The signature is fluid and cursive, with the first name "Minor" and the last name "Sinclair" clearly distinguishable.

Minor Sinclair  
Director, US Domestic Program, Oxfam America