

June 18, 2016

Alfred Almanza
Deputy Under Secretary for Food Safety & Acting Administrator
US Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue, S.W.
Rm 331-E, Jamie Whitten Building
Washington, DC 20250-3700

Re: Abandonment of birds at poultry establishments

Dear Mr. Almanza,

Farm Forward is a non-profit dedicated to promoting conscientious food choices, reducing farm animal suffering, and advancing sustainable agriculture. As we have worked with farms and welfare certifications to develop humane standards of care, we have seen regulatory shortcomings exasperate the conditions of animals at time of slaughter. This is especially true of poultry.

A recent Freedom of Information Act request and subsequent review by the Animal Welfare Institute reported on the abandonment of poultry where operations were found to have left large numbers of birds without food or water for extended periods of time outside abattoirs. AWI's review showed that FSIS warnings, noncompliance records, and MOI's (and even requests for state intervention) did not prevent further abandonments. Where current procedures cannot prevent the suffering and negligent death of thousands of birds at a time, FSIS should draw upon the authority granted it under the Poultry and Poultry Products Inspection Act to protect the supply of poultry products from adulteration (21 U.S.C. § 453(g)). The USDA already recognizes the connection between inhumane handling and poultry product adulteration, but only new regulations can bring some measure of enforcement to bear on poultry abandonments.

Farm Forward strongly urges you to revise current FSIS regulations in order to prevent these avoidable incidences of animal suffering, and death at poultry slaughterhouses.

Sincerely,



Ben Goldsmith
Executive Director
Farm Forward