



January 10, 2017

Roberta F. Wagner
Assistant Administrator
Office of Policy and Program Development
Food Safety and Inspection Service
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Washington DC 20250-3700
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CC: Docket Clerk
Food Safety and Inspection Service
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Mailstop 3782, Room 8-163A
Washington D.C., 20250-3700
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,

We write to express our support for Rulemaking Petition 17-06, submitted on November 15, 2017 by Mercy For Animals (MFA) 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.). This petition also asks FSIS to determine methods of slaughter for bird species that comply with requirements under the HMSA and issue directives, notices, and other policy and guidance documents for enforcement of the humane slaughter provisions at official poultry slaughter establishments.

We support the Mercy for Animals petition referenced above because of the serious welfare concerns outlined and documented in the petition, as well as in the sample of enforcement records compiled and analyzed by the Animal Welfare Institute from December 2011 to April 2014. Additionally, we believe that the protections extended to livestock through the HMSA, when adequately enforced, are not only a valuable way of protecting animals from undue cruelty, but also protecting the health and safety of workers, and the safety and quality of products derived from poultry slaughter.

Based on these premises, we conclude the following: 1) that given the abundance of documentation on abuses and cruelty cases in poultry slaughterhouses in the United States, enforceable regulatory controls are urgently needed; 2) that some standard industry practices, such as live shackling, have been scientifically documented to cause high levels of stress and undue suffering, and should be discontinued in favor of other scientifically tested methods that minimize live handling, and specifically avoid live shackling, such as controlled atmosphere stunning; 3) that poultry are scientifically known to be sentient beings, and that with regard to sentience they do not differ in any significant way from livestock protected under the HMSA; 4) that poultry constitute the overwhelming majority of animals slaughtered for food, and should be subject to the standard protections afforded to livestock under the Humane Methods of Slaughter Act, from which they are arbitrarily excluded.

As an international, farmer-founded organization with the mission of improving the well-being of farm animals and ending cruel farming practices, and in light of the arguments presented above, Compassion in World Farming supports this petition, stressing the urgency of establishing and enforcing regulatory controls in poultry slaughter. We firmly believe that it is in the best interest of regulatory entities, as well as the poultry industry to amend the HMSA in order to protect livelihoods, consumers, and the basic well-being of the animals being slaughtered for our benefit, and urge the United States Department of Agriculture to take the necessary actions to do so.

Sincerely,

A handwritten signature in black ink, appearing to read 'Monica List', written in a cursive style.

Monica List
Animal Welfare Specialist
Compassion in World Farming US