



CENTER FOR FOOD SAFETY

FSIS Docket Clerk
Department of Agriculture
Food Safety and Inspection Service
Room 2534 South Building
1400 Independence Avenue, S.W.
Washington, DC 20250-3700

January 15, 2014

Re: Petition 13-08

Comments to FSIS on Poultry Product Inspections Act and Petition 13-08

I am writing on behalf of the Center for Food Safety (CFS) in support of Petition 13-08 on the basis of human health and food safety grounds.

CFS is a nonprofit public interest advocacy organization dedicated to protecting human health and the environment by curbing the proliferation of harmful food production technologies and promoting sustainable agriculture. As a membership organization, CFS represents nearly 400,000 farmer and consumer members who reside in every state across the country, and who support safe, sustainable food systems.

Petition 13-08 requests FSIS to use its authority under the Poultry Product Inspections Act (PPIA) to promulgate regulations for the humane handling of poultry, specifically calling for the adoption of poultry handling regulations that identify and prohibit practices that lead to adulteration, and require that all poultry establishments comply with such requirements.

Meat and eggs from poultry that are raised and slaughtered under unsanitary conditions present serious risks of *Salmonella* or *E. coli* contamination. *Salmonella* contamination in poultry occurs most often during slaughter and processing, because live birds carry pathogens on their feathers and in their intestines that can be transferred to the carcass during slaughter¹.

Accordingly, the risk of contamination is directly related to the way in which the animals are raised. Inhumane treatment of egg-laying hens and chickens often overlap with unsanitary conditions that, together, promote disease.

¹ Center for Science in the Public Interest, Klein, S. and Smith DeWaal, C. *Risky Meat: A CSPI Field Guide to Meat and Poultry Safety* 8 (2013) available at http://cspinet.org/foodsafety/PDFs/RiskyMeat_CSPI_2013.pdf (last visited Jan. 16, 2014), referencing USDA, *Progress Report on Salmonella and Campylobacter Testing of Raw Meat and Poultry Products, 1998-2011*, available at <http://www.fsis.usda.gov/wps/wcm/connect/fsis-content/internet/main/topics/data-collection-and-reports/microbiology/annual-progress-reports/2011-annual-report> (last visited Jan. 16, 2014).

Hens raised in animal factories are regularly kept in unsanitary conditions. Just some of the documented conditions include hens covered in liquid manure from shallow manure scraping pits, moving between barns through manure trenches or on egg conveyors, and walking amidst manure overflows on barn floors². In animal factories that use battery cages, hens are often: confined in overcrowded cages with the rotting corpses of other birds or birds suffering bloody injuries, covered in feces from birds in overhead cages, and prone to drown in manure trenches that run underneath the cages and into pipes leading to outside cesspools³.

Decaying dead hens are customarily left on floors, in cages, and on cage ledges and tops, often in direct contact with live hens and eggs⁴. When animals are not only exposed to feces and decaying carcasses but live in and among them, the risk of contamination is dire. One primary indicator of the connection between animal factory conditions and contamination is the higher risk of *Salmonella* that caged hens have consistently been proven to present⁵.

A 2010 study reported that housing laying hens in conventional battery cages is a significant risk factor for *Salmonella* Enteritidis and/or Typhimurium, and that *Salmonella* shedding in caged flocks was twenty times more likely than in non-caged flocks. The study attributed this to several factors, including larger hen flocks⁶ on cage farms, the reuse of cages without cleaning them between production rounds, the high density of animals, and low air quality due to indoor confinement⁷.

Together, these factors create unsanitary conditions that cause bacteria to spread, and stressful conditions that cause poultry to shed bacteria they may be harboring. These risks are exacerbated by the excessive use of antimicrobial feed additives and non-therapeutic antibiotics, which contribute to the emergence of resistant strains of pathogens. This causes disease to proliferate and spread among animals that are then introduced into the food supply, which has direct implications for public health.

CDC recognizes that “there are specific situations in which the widespread use of antimicrobials in agriculture has resulted in an increase in resistant infections in humans.”⁸ Six antibiotic-

² Humane Soc’y of the U.S. (HSUS), *Undercover at the Largest U.S. Egg Producer* 1-4 (2010), available at http://www.humanesociety.org/assets/pdfs/farm/cal-maine_investigation_report.pdf (last visited Jan. 16, 2014); and John W. Thorsky, FDA District Director, Letter to Austin Decoster, Owner, Quality Egg LLC (Oct. 15, 2010), available at <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2010/ucm229805.html> (last visited Jan. 16, 2014).

³ HSUS at 2.

⁴ *Id.*

⁵ HSUS, *Cage Confinement of Laying Hens Increases Salmonella Risk*, http://www.humanesociety.org/issues/confinement_farm/facts/salmonella.html#.UpzFLOkkGik (last visited Dec. 16, 2013).

⁶ S. Van Hoorebeke et al., *Determination of the Within and Between Flock Prevalence and Identification of Risk Factors for Salmonella Infections in Laying Hen Flocks Housed in Conventional and Alternative Systems*, 94 J. Preventive Vet. Med. 94, 94-100 (2010).

⁷ *Id.* at 99.

⁸ Lydia Zuraw, *CDC Acknowledges Role of Farms in Antibiotic Resistance*, Food Safety News (Sept. 17, 2013), www.foodsafetynews.com/2013/09/drug-resistant-infections/ (last visited Jan. 16, 2014).

resistant microorganisms are linked to foodborne illness⁹. It is thus beyond dispute that how animals are raised and slaughtered directly impacts public health.

We urge you to adopt mandatory poultry handling regulations that identify and prohibit practices that lead to adulteration, and require that all poultry establishments comply with such requirements.

Sincerely,

Elizabeth Kucinich
Director of Policy

⁹ *Id.*