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September 12, 2014

Docket Clerk

U.S. Department of Agriculture (USDA), FSIS

Patriots Plaza 3

1400 Independence Avenue, SW

Mailstop 3782, Room 8-163A

Washington, DC 20250-3700

**Re: Docket FSIS-2014-0031; FSIS Compliance Guideline for Training Establishment Carcass Sorters in the New Poultry Inspection System (NPIS)**

We write on behalf of the Animal Welfare Institute (AWI) and Farm Sanctuary, national non-profit organizations dedicated to reducing the suffering of animals, to submit comments on the draft FSIS Compliance Guideline for Training Establishment Carcass Sorters in the New Poultry Inspection System (“Guideline”).

The New Poultry Inspection System (NPIS) will replace Food Safety and Inspection Service (FSIS) personnel with establishment employees for certain aspects of poultry carcass inspection. Because under the conventional inspection system FSIS personnel monitor carcasses for signs of noncompliance with industry Good Commercial Practices, NPIS has the potential to negatively impact the welfare of birds at slaughter. Consequently, it is essential that establishment workers be properly trained to observe for signs of a breakdown in the establishment’s humane handling procedures.

**Bruises**

The entry on Bruises (pp. 34-35) includes the following note: “If sorters find increased numbers or clusters of severely bruised carcasses at the sorting station, this finding may be an indication that there has been a breakdown in the establishment’s good commercial practices. Appropriate establishment personnel should be notified of the findings.” We strongly support the inclusion of this note.

**Cadaver**

Cadavers (discussed on pp. 17-18) result from birds who did not bleed out properly due to a poor or missed cut of the neck veins before entering the scalding tank. Therefore, a cadaver is the carcass of a bird who died by drowning in scalding water. This represents egregious animal suffering and indicates a problem with either the establishment’s stunning or cutting procedures. We recommend that a note be added to instruct workers to notify appropriate personnel if cadavers are observed: “Finding a cadaver

at the sorting station is an indication that there has been a breakdown in the establishment's good commercial practices. Appropriate establishment personnel should be notified of the finding."

### **Dead on Arrival (DOA)**

The turkey and chicken industries have established maximum DOA rates for flocks transported to slaughter. Increased DOAs indicate a serious animal health and welfare situation. While most DOAs are removed from transport containers and disposed of, some are shackled and processed for slaughter. Establishment sorters should be instructed to notify appropriate personnel of increased DOAs. A note should be added to the DOA section of the Guideline (pp. 18-19): "Increased DOAs are inconsistent with Good Commercial Practices and should be reported to appropriate establishment personnel."

### **Broken Bones**

We were surprised to see that broken bones (wings and legs) are not covered in the Guideline. Establishment sorters should be responsible for inspecting carcasses for the presence of broken or dislocated bones, and this subject should be addressed in the Guideline, with Good Commercial Practices language similar to that which is used in the Bruises section.

Incidentally, we noted that the page numbers in the current Table of Contents for the "Cadaver" and "Dead on Arrival" sections are incorrect.

We appreciate your consideration of these comments and recommendations.

Respectfully submitted,



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