

The
NATIONAL HUMANE
EDUCATION SOCIETY

Fostering a sentiment of kindness to animals



December 19th, 2004

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

To Whom It May Concern:

I am writing on behalf of The National Humane Education Society (NHES) and its 400,000 supporters nationwide to strongly urge the Food and Drug Administration to include a ban on "forced molting" of poultry birds, in the agency's new requirements for egg producers. This is regarding Docket Nos. 1996P-0418, 1997P-0197, 1998P-0203, 2000N-050, and RIN No. 0910-AC14.

As a non-profit organization, which promotes the humane treatment of all animals, NHES is continually opposed to many of the methods used by factory farms and slaughterhouses. Both are inherently cruel as they often fail to provide basic physical, behavioral, and psychological needs of animals.

Forced molting is a clear example of an inhumane practice used by factory farms to achieve high profits at the sacrifice of the hens' well being. As I am sure you are aware, during the molting period, birds are left in total darkness and deprived of food and water for up to 18 days; this causes the hens' bodies to be "shocked" into egg laying. Not only is forced molting cruel, but it is an appalling manipulation of the natural process in which birds lay eggs. All too often, many thousands of hens die during the process as their bodies and minds can no longer withstand the cruel conditions in which they are forced to live.

Now, as the FDA is requiring more humane farm practices for egg-laying hens, such as improved hen house cleaning and rodent control, we strongly urge the agency to also include a ban on forced molting. The FDA's disapproval of this terrible practice will send a strong and resounding message of the humane treatment of sentient creatures—no matter their intended use.

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NATIONAL OFFICE:
P.O. Box 340
CHARLES TOWN, WV 25414-0340
PHONE 304/725-0506
FAX 304/725-1523
www.nhes.org

PROGRAM:
SPAY TODAY
P.O. Box 340
CHARLES TOWN, WV 25414-0340
Phone 304/728-8332
Fax 304/724-6765
www.nhes.org

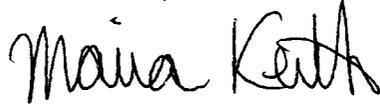
AFFILIATE:
PEACE PLANTATION
ANIMAL SANCTUARY
12752 STATE HWY. 206
WALTON, NY 13856-2327
PHONE 607/865-5759
FAX 607/865-6334
www.ppasny.org

PROGRAM:
BRIGGS ANIMAL
ADOPTION CENTER
P.O. Box 1023
CHARLES TOWN, WV 25414-1023
PHONE 304/724-6558
FAX 304/724-6765
www.baacs.org

In closing, we adamantly thank the FDA for making humane improvements to the lives of hens, and strongly encourage the agency to continue in this direction. NHES feels that the creation of laws pertaining to the humane treatment of all animals is of utmost importance. To allow animals neglect and/or abuse is a definite risk to a community and society as a whole.

Thank you very much for your time and effort regarding this issue. NHES will also continue to work for animal welfare and responsible and humane communities nationwide. I look forward to the Food and Drug Administration placing a ban on forced molting in the very near future.

For the animals,

A handwritten signature in black ink that reads "Maria Keith". The signature is written in a cursive style with a prominent loop at the end of the last name.

Maria Keith
Humane Education Assistant