



Jewish Vegetarians of North America

JewishVeg.com

December 20, 2004

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

Re: 1996P-0418, 1997P-0197, 1998P-0203, and 2000N-050 and RIN number 0910-AC14

On behalf of JVNA and our members across the United States, I urge The Food and Drug Administration to include a ban on forced molting as part of their requirements for egg producers. The JVNA position is based on Jewish teachings; however, one need not be Jewish to appreciate their significance, as they speak to values shared by all religions and peoples.

Judaism opposes causing unnecessary suffering to animals, known as *tsa'ar ba'alei chayim*. The Bible tells us explicitly, "The righteous man regardeth the life of his animal." (Proverbs 12:10) The Code of Jewish Law states, "It is forbidden, according to the law of the Torah, to inflict pain upon any living creature. On the contrary, it is our duty to relieve pain of any creature, even if it is ownerless." The Talmud states, "Great importance is attached to the humane treatment of animals, so much so that it is declared to be as fundamental as human righteousness."

Judaism goes further, specifically condemning the starving of animals, and therefore forced molting. The Talmud teaches, "A person should not eat or drink before first providing for his animals." Indeed, so much gravity is attached to this mandate, that we may interrupt the performance of a rabbinic commandment to ensure animals are fed.

Forced molting is a clear violation of Jewish moral law. However, the ethical principle behind such law extends not only to Jews. The many Biblical pronouncements against cruelty to animals should speak to anyone of faith. And compassion for the suffering of hens that starve for long periods, many of whom die as a result, should speak to anyone with human decency.

Please follow the precedent already set by other countries and put a stop to forced molting. Thank you.

Sincerely,

Richard Schwartz, President