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Comments of Henry Spira on the FSIS Proposed Strategic Plan

Henry Spira
Animal Rights International

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Animal Rights International

July 10, 1993

Policy Office
FSIS Hearing Clerk, Room 3171
South Building
Food Safety and Inspection Service
U.S. Department of Agriculture
Washington D.C. 20250
Attn: Linda Carey

Comments of Henry Spira
on the FSIS Proposed Strategic Plan
FOOD SAFETY INSPECTION
PREVENTION BETTER THAN...

As an organization, we promote non-violent food. But while that's certainly a contentious issue, it seems to me that there are broad areas of common ground: we can all agree that we must assure a safe food supply and do everything possible to reduce animal pain and suffering. And that's the context within which my remarks regarding the FSIS Draft Strategic Plan at the public hearing in Philadelphia on June 18, 1993 are framed. The following summarizes and expands on those remarks.

Contrary to the billing, we find the Proposed FSIS Strategic Plan neither evolutionary nor revolutionary. As in the past, the focus is almost entirely on maintaining the status quo, on dealing with effects while ignoring causes.

Clearly, there's a problem. Geoffrey S. Becker, an agricultural policy specialist with the Congressional Research Service, issued a report on June 9, 1993 stating that the FDA recently estimated the number of food-borne illnesses at between 24 million and 81 million annually.

We believe there's an urgent need to focus on the causes of these illnesses, on prevention, rather than on developing more and more methods of covering up the consequences of the unnatural and stressful conditions in which this country's food animals are raised. It is universally recognized that prevention is more cost effective and more conducive to promoting well-being than treating diseases after the fact.

- more -

ANIMAL RIGHTS INT'L. (ARI): COALITION TO ABOLISH THE LD50 and DRAIZE TESTS. COALITION FOR NONVIOLENT FOOD
Box 214 • Planetarium Station • New York, NY 10024

Coordinator: Henry Spira. Consultant: Peter Singer. Advisory Committee: Victoria Alippe, Roger A. Caras, Barbara S. Clapp, Sonia Cortis, John A. Hoyt, Paul G. Irwin, Sid and Melaine Lerner, John Mitchell, Linda W. Petrie, Gus W. Thornton, D.V.M., Jeanne Waller, Palmer Wayne.
Science Advisor: Andrew N. Rowan, B.Sc., M.A., D.Phil. Legal Advisor: Elinor Moibegott, Esq.
In Memoriam: Leonard Rack, M.D., Founding Science Advisor.

THE COALITION COMPRISES INDIVIDUALS AND ORGANIZATIONS WITH MEMBERSHIP IN THE MILLIONS

Such a prevention campaign could begin by examining the connection between the escalating abuses of intensive confinement systems, the parallel demise of animal health and the increase of food borne illnesses in humans who eat them. And current problems may well be further compounded by recycling contaminated animals into the feed of successive generations, which then winds up on America's dinner table.

As the intensity of confinement has increased, so has the prevalence of food-borne diseases. The direct relationship between stress and disease is well documented; this is true for both humans and other animals.

We urge the FSIS to join forces with APHIS (which has now expanded its activities to include the well-being of animals) in a prevention program which begins on the farm. Such a program needs to deal with stress, with overcrowding, with transport and slaughter.

Unfortunately, when special interests and logic collide, special interest lobbies tend to prevail until the public, by way of public awareness campaigns, becomes sufficiently outraged to force change.

In this connection we would like to know what steps the USDA will be taking to examine the linkages which exist between conditions for farm animals and the safety of the food supply, and how this information will be incorporated into the FSIS agenda.

In the words of a June 28th Opinion piece in Feedstuffs, "The problem can't be solved until it is defined." We can only add to that, defined fully, honestly and publicly.

cc: Mike Espy
Eugene Branstool