December 6, 2011

VIA ELECTRONIC MAIL

The Honorable Frank Lucas
Chairman
House Committee on Agriculture
1301 Longworth House Office Building
Washington, D.C. 20515

The Honorable Collin Peterson
Ranking Member
House Committee on Agriculture
1305 Longworth House Office Building
Washington, DC 20515

Dear Chairman Lucas and Ranking Member Peterson:

Today we write urging you to reject additional, costly, and unnecessary animal rights mandates proposed by the Humane Society of the United States (HSUS).

Collectively, we applaud the work of this Congress to unshackle our economy from additional government regulation. This proposed legislative mandate runs in complete contrast to that objective by mandating hen housing measurements. Its prescriptive nature ensures Congress will be in the egg business for years to come by specifying floor space and cage size. The HSUS egg industry agreement would require replacement of 90 percent of egg housing currently used, forcing new capital investment nearing $10 billion, at a time when capital is scarce and added costs mean fewer jobs. The World Organization of Animal Health (OIE), the world's international body for standards on animal health and welfare, has acknowledged that prescriptive standards such as those proposed, are not in the best interest of promoting true animal welfare because they cannot be adapted for different farming models. Further, prescriptive standards hinder efficient modifications as new science becomes available.

The legislation would further mandate housing notification labels on all egg cartons nationwide and make it illegal to sell eggs or egg products without these labels. While we think this proposal is an unconscionable federal overreach, our gravest concern is that this precedent could leach into all corners of animal farming, irreparably damaging the livelihoods of family farmers across the country.

This proposed federal mandate would also bring added consumer costs and limit choice, which are two consequences not to be overlooked in today's economy. As an example, this agreement would wipe out the choice of conventional eggs chosen by more than 90 percent of consumers domestically. Abroad, in nations that have mandated new animal housing standards, the side effects have been more severe.

European laws are lauded by animal rights activists as exemplary model regulation, yet the Secretary General of the European Egg Processors' Association (EEPA) recently said that a 2010

enriched cage regulation in Germany has resulted in 20% less production. In Britain, the housing conversion has increased daily operating costs by as much as 8% forcing producers to service higher capital costs. Ultimately, European animal housing requirements have cost consumers and farmers alike. We respectfully contend that the European experience is not one American livestock farmers or consumers should want to replicate.

To conclude, while our organizations continue to make considerable animal care investments with an eye toward continued animal welfare improvements, this proposal would stifle the industry for years to come. We ask simply that Congress reject any attempt to legislate unwarranted animal rights mandates.

Respectfully,

Egg Farmers of America
National Cattlemen's Beef Association
National Pork Producers Council
American Farm Bureau Federation
American Sheep Industry Association
National Farmers Union
National Turkey Federation
National Milk Producers Federation

Cc: Members, House Committee on Agriculture