

August 10, 2004

Elizabeth Goldentyer, DVM
Regional Director
Animal Care—Eastern Region
USDA/APHIS/AC
920 Main Campus Dr., Ste. 200
Raleigh, NC 27606-6210

Dear Dr. Goldentyer:

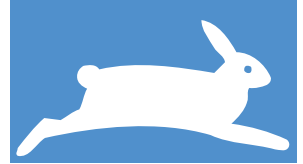
This complaint concerns USDA-licensed Class-B dealers Robin and Julie Ouderkirk, dba 6 Okes Chinchillas, 3661 E. Baker Rd., Midland, MI 48842. The Ouderkirks' certificate number is 34-B-0148. We hope that after investigating this matter, the U.S. Department of Agriculture (USDA) will conclude that it has an obligation to oversee the use of animals on fur farms. We ask that this matter be taken to the highest level at the USDA for discussion.

Along with their dealings with the fur industry, the Ouderkirks sell live animals to pet stores and laboratories, making the USDA's jurisdiction in this matter undeniable. Unfortunately, other chinchilla fur farms sell only pelts and are therefore not under USDA jurisdiction. If the Ouderkirks, who understand that they are supposed to abide by the federal Animal Welfare Act, are noncompliant in their killing practices, as this complaint asserts, it stands to reason that fur farmers, who know that they have no legal obligation to humanely treat and kill animals, may be carrying out even more inhumane practices than what the Ouderkirks employ.

The enclosed video shows Robin Ouderkirk giving instructions on how to kill chinchillas by electrocution and cervical dislocation (neck-breaking). As you can see from the video, the animals are electrocuted from head to tail instead of through the brain, as is required in order to be humane. The method used by Ouderkirk is unacceptable, according to the American Veterinary Medical Association (AVMA), because it causes painful seizures of the animals' hearts. Furthermore, cervical dislocation, which causes suffocation, may not be an appropriate killing method because of the size of the chinchillas. All emphasis in the following quotes from the "2000 Report of the AVMA Panel on Euthanasia" is ours:

Electrocution of Chinchillas

"Electrocution induces death by cardiac fibrillation, which causes cerebral hypoxia. However, animals do not lose consciousness for 10 to 30 seconds or more after onset of cardiac fibrillation. **It is imperative that animals be unconscious before being electrocuted. This can be accomplished by any acceptable means, including electrical stunning.**"



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Why Ear-to-Foot Electrocutation Is Not Acceptable

“The **electric current must pass through the brain to induce loss of consciousness before electricity is passed through the rest of the body.** ... Use of a nose-to-tail or nose-to-foot method alone may kill the animal by inducing cardiac fibrillation, but **the animal may be conscious for a period of time before death. Therefore, these techniques are unacceptable.**”

What Species Can Be Killed by Electrocutation?

“Electrocutation, using alternating current, has been used as a method of euthanasia for species such as dogs, cattle, sheep, swine, foxes, and mink. ... **It may not result in death in small animals (< 5 kg)** because ventricular fibrillation and circulatory collapse do not always persist after cessation of current flow.”

Chinchillas weigh as little as 450 grams (adult small-bodied chinchillas) and as much as 1000 grams or slightly more. Their average weight is somewhere around 500 to 800 grams—well below the 5 kilograms cited by the AVMA. The Ouderkirks should not be permitted to kill these small animals by electrocuting them.

Killing Chinchillas by Neck-Breaking

“Manual cervical dislocation [can be used for killing] poultry, other small birds, mice, rats weighing < 200 g, and rabbits weighing < 1 kg when performed by individuals with a demonstrated high degree of technical proficiency. In lieu of demonstrated technical competency, animals must be sedated or anesthetized prior to cervical dislocation. The need for technical competency is greater in heavy rats and rabbits, in which the **large muscle mass in the cervical region makes manual cervical dislocation physically more difficult.**”

Chinchillas are, on average 500 to 800 grams, and thus are on the high side of the acceptable weight limit. But the AVMA report doesn't list chinchillas under the acceptable species for killing by manual neck-breaking, leading us to believe that something about the neck structure of chinchillas saves them from death by suffocation, which cervical dislocation usually causes.

What Is the Preferred Killing Method for Chinchillas?

According to the AVMA report, electrocutation is not recommended for animals as small as chinchillas, and they are not mentioned under the report's cervical-dislocation section, but they are mentioned under the section on **carbon-monoxide poisoning.**

The only method the AVMA report mentions as acceptable for chinchillas is carbon monoxide. Other methods acceptable for rodents and other small mammals include barbiturates, inhalant anesthetics, carbon dioxide, and potassium chloride in conjunction with general anesthesia.


The AVMA report provides, “Carbon monoxide has been used to euthanatize mink and chinchillas. These animals collapsed in 1 minute, breathing ceased in 2 minutes, and the heart stopped beating in 5

to 7 minutes. ... *Advantages*—(1) Carbon monoxide induces loss of consciousness without pain and with minimal discernible discomfort. (2) Hypoxemia induced by CO is insidious, so that the animal appears to be unaware. (3) Death occurs rapidly if concentrations of 4 to 6% are used.”

Whether they are killing animals used for breeding for the pet-store trade who have outlived their usefulness, sick animals, or animals used for pelts, the Ouderkirks’ use of both electrocution techniques and cervical dislocation is improper.

We ask that you thoroughly investigate this matter and let us know if we can clarify anything in the video for you. I can be reached at 757-962-8334. Thank you.

Very truly yours,

A handwritten signature in cursive script that reads "Mary Beth Sweetland". The signature is written in black ink and is positioned above the typed name.

Mary Beth Sweetland, Director
Research & Investigations Department

enclosures: Video footage taken April 16 and 17, 2004, at the Ouderkirks’ farm in Midland, Mich.