

July 27, 2012

Standards Council
National Fire Protection Association
1 Batterymarch Park
Quincy, MA 02169-7471

**Re: Request for Approval of Amendment to NFPA 150 Requiring
Sprinklers in Animal Housing Facilities (the “Amendment”)**

Dear Members of the Standards Council:

The undersigned organizations respectfully request that you approve and adopt the above-referenced Amendment. The Amendment is important, ethically, as a way to protect animals from the unnecessary pain and suffering caused by being burned to death. It also makes good business sense for those who raise and house animals. Finally, we note that delegates voted to approve the Amendment in a floor session at NFPA’s national conference last month.

Fires are a regular occurrence at animal facilities, in part, according to one news article, because high-powered ventilation in the facilities provides an unusually abundant source of oxygen. Consider the documented, fire-related tragedies at animal facilities in just the past several months:

- July 2012: 2,500 hogs and one building destroyed in Kansas¹
- June 2012: 17,000 chickens and one building destroyed in Nevada²
- June 2012: 7,000 turkeys and one building destroyed in North Carolina.³
- June 2012: “Many” turkeys and two buildings destroyed in Minnesota⁴
- May 2012: 500,000 chickens and three buildings destroyed in Colorado⁵
- March 2012: 1,000 hogs and one building destroyed in New York⁶
- March 2012: 200 hogs and one building destroyed in Maine⁷

Ethical Considerations

Farm animals are intelligent, inquisitive, and behaviorally complex animals with the full range of personality and individuality of dogs and cats. Primatologist Dr. Jane Goodall explains that “farm animals feel pleasure and sadness, excitement and resentment, depression, fear, and pain. They are far more aware and intelligent than we ever imagined . . . they are individuals in

¹ http://articles.kwch.com/2012-07-11/hog-farm_32636846

² <http://www.nvdaily.com/news/2012/06/fire-destroys-poultry-barn-and-17000-chickens.php>

³ http://www.wral.com/news/news_briefs/story/11202911/

⁴ http://www.twincities.com/localnews/ci_20865624/fire-destroys-buildings-turkeys-west-concord

⁵ <http://wtvr.com/2012/05/01/500000-chickens-killed-in-egg-farm-fire/>

⁶ <http://www.wivb.com/dpp/news/local/crews-battle-flames-at-pig-farm>

⁷ <http://bangordailynews.com/2012/03/26/news/aroostook/200-pigs-killed-in-sherman-barn-fire/>

their own right.” Their suffering should be considered in the same way you would consider the suffering of dogs or cats.

Being burned alive is said to be the most painful way to die. Yet for animals in concentrated animal feeding operations, the prevalent animal farming system in the U.S. today, it actually gets worse. These animals are hyper-confined in ways that under normal conditions cause severe stress. Add an inescapable death by searing heat, and it’s hard to imagine a worse fate. In a fire, the animals shriek loudly in terror, bang desperately against the bars of their cages or crates, and pile on one another in their panic and fear at being trapped and killed.

Financial Considerations

In addition to causing almost unfathomable suffering, a fire at an animal facility typically causes losses in the hundreds of thousands of dollars. For example, the 2011 fire that killed 9,000 turkeys in Pelican Rapids, Minnesota caused \$750,000 in losses.⁸ Yet according to the American Fire Sprinkler Association, the cost to retrofit an existing building with sprinklers is only \$1.50 to \$2.50 per square foot.⁹ Thus, for the 300’ by 60’ hog facility (housing 2,500 animals) destroyed in Benton Kansas this month, a \$500,000 loss could likely have been prevented by a sprinkler system costing only \$36,000.

Animal farming organizations routinely oppose any measure which purports to regulate them, and it comes as little surprise that these organizations object to the Amendment. However, we believe their objections are not based on an accurate assessment of the costs and benefits of installing sprinkler systems. For example, in an article titled “Fire Sprinklers Save Lives and Money ... The Economics of Retrofit,” Kenneth Isman of the National Fire Sprinkler Association lists a number of economic benefits of installing fire sprinklers.¹⁰ These include, among others, savings on insurance premiums, income tax deductions, and mitigation of business interruption losses. Typical insurance premiums, according to Isman, are more than 80% lower for warehouse buildings with sprinklers than for those without. We believe that notwithstanding the industry’s instinctive opposition to the Amendment, the measure actually makes sound economic sense for animal food producers and, as Isman and other commentators advise for any commercial enterprise, will save them money in the long run.

With nearly one billion farm animals confined in U.S. facilities on any given day, the risk of a fire-related tragedy is very real. As shown above, 528,000 animals have met this excruciating end in just the past four months (and these are just the publicly-reported cases).

⁸ <http://www.myuscountry.com/pages/11065518.php>

⁹ <http://www.firesprinkler.org/pressarea/fact2.html>

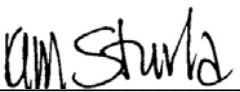
¹⁰ <http://www.firemarshals.org/pdf/F2%20-%20FIRE%20SPRINKLERS%20SAVE%20LIVES%20AND%20MONEY.pdf>

Farmers have an ethical duty to protect the animals whose lives they have exclusive control and responsibility over. Installing sprinklers so that animals do not burn to death is a minimal, yet fundamental, part of that duty. We hope you will enforce this one small obligation by adopting the Amendment.

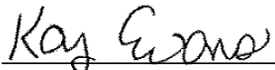
Thank you for your consideration.

Sincerely,

ANIMAL PLACE

By: 
Kim Sturla
Executive Director

CHOCOWINITY CHICKEN
SANCTUARY

By: 
Kay Evans
President

ANIMAL PROTECTION & RESCUE
LEAGUE

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COMPASSION OVER KILLING

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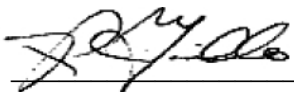
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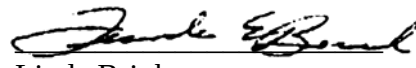
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Bruce Friedrich
Senior Director for Strategic
Initiatives

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Editor

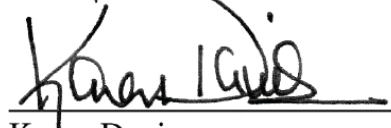
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SANCTUARY

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Linda Brink
President & Director

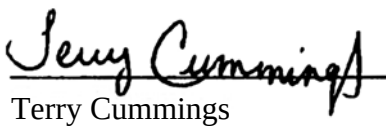
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Nathan Runkle
Executive Director

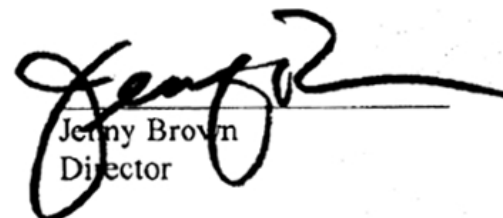
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President

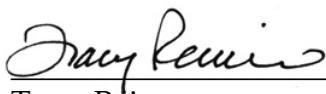
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Director

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By: 
Jenny Brown
Director

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TREATMENT OF ANIMALS

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Tracy Reiman
Executive Vice President