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Animal Welfare Concerns Related to the Pig HIMP Proposed Rule

Our organizations have not had the opportunity to review the forthcoming proposed rule for the Hazard Analysis and Critical Control Points (HACCP) Inspection Models Project (or HIMP) for pig slaughter. It is our understanding that the proposed rule will include allowing company workers to take over the current duties of USDA inspectors at certain meat inspection stations, thus shifting some government inspectors from “on-line” to “off-line” duties. This change would eventually lower the number of inspectors at hog slaughter plants.

Another feature of HIMP is that it permits increased line speeds, from approximately 1,000 pigs slaughtered per hour to approximately 1,300 pigs per hour. Increased speed allows for a greater number of pigs to be killed in the same amount of time, resulting in increased production and greater profits.

Our organizations’ opposition to HIMP is related to the negative impacts of higher slaughter speeds on animal welfare. High-speed production jeopardizes the welfare of pigs at slaughter in three ways.

First, under the demands of a higher-output system such as HIMP, plant workers are pressured to move animals at a faster rate, from the time the pigs arrive at the slaughterhouse to the time they are slaughtered. Employing excessive force to drive pigs, including the use of electric prods and other abusive tools, causes discomfort and distress to the animals. In some cases, individual pigs may be overtaken, and even trampled, by other animals attempting to escape an overly aggressive worker.

Second, in an attempt to increase speed, slaughter plants may shorten the length of the stun used to render pigs insensible to pain before slaughter. Large pig slaughterhouses use either electric or gas (carbon dioxide) methods for stunning, and in both cases a shorter exposure time may result in pigs regaining consciousness prior to being butchered. Due to this concern, the North American Meat Institute recently revised its animal handling guidelines to recommend auditing insensibility in pigs stunned by gas or electricity twice—prior to bleeding and again on the processing line.

Third, faster slaughtering speeds may prevent plant workers, and government inspectors, from being able to identify pigs who have not been adequately stunned and are still conscious on the processing line. It is imperative that this be dealt with as expeditiously as possible to minimize the amount of animal suffering that occurs. The greater the number of pigs being slaughtered, and the faster the line is moving, the more difficult it is to stop the process and re-stun the animal. Failure to promptly intervene may result in a pig drowning in the scald tank or having their limbs removed while still conscious.

Attached are several USDA humane slaughter enforcement actions that illustrate the potential for HIMP—specifically the line speed increase—to result in animal pain and distress.

Animal Welfare Institute

ASPCA

Mercy for Animals