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**Reference: The Compassion over Killing Investigation of a Hog Slaughter Facility in Minnesota**

To Whom It May Concern:

I am a licensed veterinarian in the state of Minnesota and received my Doctor of Veterinary Medicine from the University of Wisconsin School of Veterinary Medicine in 2006. This is my review of a video provided by Compassion Over Killing regarding an investigation of a hog slaughter facility located in Minnesota. The video is 01:37:12 in length and was filmed during the months of September and October 2015. The video was divided into eight sections:

1. Dragging Conscious Hogs
2. Improper Stunning
3. Improper Euthanasia/Stunning or Injured/Down Hogs
4. Excessive Force –Excessive Use of Electric Prodders
5. Excessive Force – General
6. Improper Handling/Conduct
7. Downers Not Marked As “Suspect”
8. Potential Food Safety Violations

I composed my professional veterinary opinion in the paragraphs that follow concerning the treatment of the hogs at this facility.

**Video for Section 1: Dragging conscious hogs**

In this video, a significant number of hogs are dragged while conscious. ‘Dragging a conscious, non-ambulatory animal’ is classified as a willful act of abuse(egregious act) in the American Meat Institute Foundation’s *Recommended Animal Handling Guidelines and Audit Guide: A Systematic Approach to Animal Welfare*. (Grandin, July 2013, p. 2). One incident (minute 2:20) shows a downer hog that is breathing, blinking, obviously alive, being dragged by a hook placed in the mouth. Other examples in the section of the video show stunned hogs, who appear to be sensible, being dragged. Physical stunning via captive bolt and electrocution both can cause tonic and clonic muscle movements, which can make assessment of insensibility challenging. Signs indicating that a hog is sensible, seen in the incidences documented by this video, include breathing, vocalizing, moving of head, blinking, and attempting to right him/herself.

**Video for Section 2: Improper stunning**

This section shows evidence indicating that improper stunning has occurred. Stunning requires precision to be performed correctly. Thus hogs are processed through a restrainer that holds them, including the head, firmly in place. If stunning is performed improperly, the effects can be ephemeral and hogs can become sensible again. Two techniques of stunning are practiced at this

facility: penetrating captive bolt and electrocution using a head-heart stunner wand. Some hogs on this video are not properly restrained (examples at minutes 09:04, 18:03, 25:04), which leads to higher likelihood of improper stunning. All downer/injured hogs seen being stunned are not properly restrained in a restraining device.

This video includes footage of hogs that appear sensible post-stunning as confirmed by signs of vocalizing, moving of mouth, and attempting to right him/herself. For example, the hog hanging from the shackle just right of the pole (center of the screen) has an arched back and slightly lifted head, which are associated with the righting reflex of a sensible hog (20:07-20:49). After being stunned, pigs continue to an adjunctive method of euthanasia, exsanguination, which is ideally performed as soon as possible. Per the *AVMA Guidelines for the Euthanasia of Animals* exsanguination is not an acceptable sole means of euthanasia because of the anxiety associated with extreme hypovolemia. (AVMA, 2013, p. 41) Hogs maintaining or regaining sensibility post-stunning and subsequently dying due to exsanguination represents an animal welfare concern.

### **Video for Section 3: Improper euthanasia/stunning or injured/down hogs**

As mentioned in the previous section, proper stunning requires restraint. During head-heart stunning, proper placement and timing is required to ensure that the current goes through the brain to the heart. According to Grandin (2013), an expert on humane slaughter procedures, an electrical ‘current path that fails to go through the brain will be painful for the animal. It will feel a large electric shock or heart attack symptoms, even though it may be paralyzed and unable to move.’ (p. 21) To ensure proper current flow, the electrocution stunner wand should cross the body midline thereby touching the head at or in front of the brain and the opposite side of the body. This video shows improper stunning that does not cross the midline (minute 40:57).

The video also demonstrates continued negligence by the workers to confirm insensibility such as visualizing the absence of a blink reflex. Many downer/injured hogs were stunned via electrocution. Per Grandin (2013), the stunning to bleed time for electric cardiac arrest is recommended to be 60 seconds maximum. (p. 28) The efforts required for proper USDA veterinary inspection and transport to the sticking table often via hanging from shackles would prevent this ideal 60 second timeframe from being implemented. To summarize, downer/injured hogs are stunned without proper restraint by staff, who are possibly less trained in stunning techniques, and then have delayed transport to exsanguination. This is a recipe for a higher chance of hogs regaining sensibility under horrid conditions.

### **Video for Section 4: Excessive Use of Electric Prodders**

Grandin (2013) states that ‘handlers should be quiet and calm. Yelling, banging on walls with paddles and arm waving will excite and agitate animals.’ (p. 14 ). The company’s posted signs seen during the video show that electric prods should not be used near the face or rear end. ‘In practical terms, the prod should not be used on the animal’s head. Prods must not be used on an animal that has been identified as non-ambulatory or disabled.’ (Grandin, 2013, p. 16) These guidelines are repeatedly ignored as demonstrated in this video. Electric prods are used in the areas around the face of one hog and rear of the other. With the confusion and thrashing,

inappropriate areas are being zapped whether on purpose or by accident. Multiple downer/injured hogs are prodded so as to encourage them to walk. Rattle paddles are also used to jab. The decreased surface area by jabbing or hitting on the side causes increased pain for the hogs. In addition, we see hogs inappropriately prodded or paddled to move forward onto other hogs in front of them causing increased stress and chaos.

### **Video for Section 5: Excessive Force – General**

‘Federal humane slaughter regulations prohibit dragging of downed or crippled livestock in the stockyards, crowd pen or stunning chute. This also includes pushing, pulling and scooting (if the animal is euthanized, it may be dragged). It is important that water and shelter be provided to injured and non-ambulatory livestock.’ (Grandin, 2013, p. 31) The video includes at least 16 incidents of downer/injured hogs being pushed, pulled, or scooted along with inappropriate prodding and paddling not limited to the following examples at minutes 101:10, 1:03:58, 1:05:29, 1:05:55, 1:06:07, 1:06:51, and 1:07:33.

‘Incorrect use of handling tools may include, but is not limited to, striking the animal with the tool (a strike is when the hand of the handler rises above their shoulders), or hitting the animal or abusing the animal with malicious intent.’ (Grandin, 2013, p. 42) As hogs are marched to the restrainer, all efforts should be focused on reducing stress on the hogs. Instead, the priority at this facility seems to be quick processing thus the misguided use of excessive paddling, prodding, pushing, etc. The video shows in excess of 25 inappropriate usages of tools with many incidences where the hand rises above the shoulder while striking. Incident 119 at 1:05:53 shows an employee aggressively hitting hogs. During incident 130 at 1:09:32, an employee is striking with the side of his paddle.

Willful acts of abuse include deliberate slamming of gates on livestock and malicious driving of ambulatory livestock on top of one another either manually, and hitting or beating an animal (Grandin, 2013, p. 49). In incident 108 (1:03:02), we see a worker using the gate and paddles to move hogs causing two hogs to climb onto other hogs. In addition, it appears the capacity of the circle pen at that time (minute 1:03:03) is more than the “10 Hog Max Capacity” as posted on company signs state (see signs at 1:05:39). Crowding causes additional stress and may be a common practice especially in the holding pens.

### **Video for Section 6: Improper Handling/Conduct**

This sections shows incidences of neglect for the well being of living, sentient animals. Hogs are overly stressed, as they are crowded into small pens. They scramble on top of each causing multiple lacerations on their fellow hogs. Other video sections show multiple downer/injured hogs in distress left without proper attention for extended periods of time including over breaks per the Compassion Over Killing investigator. The most humane action would be to end the hogs’ misery via humane euthanasia as soon as possible if gentle, appropriate care is not going to be pursued. Once euthanasia is performed, steps should be taken to ensure death and/or insensibility such as checking for a blink reflex.

### **Video for Section 7: Downers Not Marked as “Suspect”**

This section continues to show numerous incidents of downer/injured hogs. The suffering is obvious as in incident 178 (1:23:46) where the hog attempts to walk away on his/her front legs, because the rear legs are injured. Unlike in the case of cow slaughter, per federal regulations, downer/injured hogs can be processed after USDA inspection. Numerous examples demonstrate that downer/injured hogs occur commonly and thus an appropriate protocol for identifying and handling is called for.

## **Video for Section 8: Potential Food Safety Violations**

In this video, at least six hog carcasses had abnormally bright red skin. This can be associated with improper euthanasia via exsanguination. The bright red skin results as hogs, still full of blood, are passed through the scalding tank, which removes hair. If the hog is sensible through the scalding process, this form of inhumane treatment is a clear violation of the *AVMA Guidelines for the Euthanasia* (2013) and represents two major welfare concerns:

1. Adding suffering to already stressed animals.
2. Denying these hogs with a humane death.

Hogs being processed with fecal material, open wounds and significant abscesses could allow introduction of contaminated tissue into processing and lead to potential food safety violations. Feces from a healthy hog contain many types of bacteria including *Escherichia coli*. The types of microbes in abscesses, unidentified sick hog feces, and open wounds are unlimited.

As a veterinarian, I pledged 'to use my knowledge and skills for the benefit of society through the protection of animal health and welfare [and] the prevention and relief of animal suffering,' as defined by the AVMA Veterinarian's Oath. The stress and neglect that these pigs suffer during the slaughter process is egregious. Humankind has an obligation to use our intelligence and resources to care for animals being used for food consumption before and during the slaughter process to minimize suffering. After watching this video, it is difficult to believe that any compassionate person would not wonder about where the failure is in our society to allow such inhumane treatment of animals to occur. This video demonstrates significant evidence of on-going, routine, inhumane handling of live, conscious animals. Therefore, I suggest production be halted while significant improvements are made by the company to end the suffering of these helpless, sentient animals.

Thank you in advance for working to end animal cruelty.

Sincerely,



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## **References:**

AVMA Members of the Panel on Euthanasia. (2013). *AVMA Guidelines for the Euthanasia of Animals: 2013 Edition*. Retrieved from <https://www.avma.org/KB/Policies/Documents/euthanasia.pdf>.

Grandin, Temple. (2013). American Meat Institute Foundation's *Recommended Animal Handling Guidelines and Audit Guide: A Systematic Approach to Animal Welfare*. Retrieved from <http://animalhandling.org/ht/a/GetDocumentAction/i/93003>.