

## Compassion Over Killing Meeting Outline: Modernization of Swine Slaughter Inspection Rule

August 11, 2017

- **Introduction:**

- Scott David conducted Compassion Over Killing's (COK) 2015 investigation at Quality Pork Processors (QPP), which operates under the USDA's HIMP pilot program with line speeds of about 1,300 pigs/hour.
- The investigation documented numerous food safety and animal welfare problems that can be attributed to HIMP. HIMP allows facilities to run slaughter lines at higher speeds, while shifting inspection and food safety control measures into the hands of the slaughter plants.

- **Food safety issues:**

- **Investigation findings:** Scott documented a multitude of carcasses covered in either feces or abscesses full of pus. About 6% of the carcasses had feces on them, and 9% had growths, abscesses, and lumps, some of which contained green or yellow pus.
- **HIMP's role:** HIMP reduces the number of on-line, post-mortem government inspectors, replacing them with employees of plants themselves. The USDA claims that "[m]arket hog carcass inspection is conducted more efficiently under HIMP than under the non-HIMP inspection systems because establishment personnel have already sorted and removed diseased animals." However, Scott's evidence found that plant inspectors routinely missed these problems under HIMP's high line speeds while at the mercy of their employers to keep the lines moving. One plant supervisor was even observed trying to sleep on the job while he was supposed to be overseeing the slaughter process.
- Several former USDA inspectors have spoken against the expansion of this program:
  - "It's impossible to see any defects now. We used to be [allowed to] stop the line for bile contamination, chronic pleuritis, hair/toenails/scurf and have these defects trimmed/removed, under HIMP, these are considered "Other Consumer Protections" and we are no longer allowed to stop the line so they may be removed." (Joe Ferguson, as quoted in [Salon](#))
  - "Food safety has gone down the drain under HIMP. Even though fecal contamination has increased under the program (though the company does a good job of hiding it), USDA inspectors are encouraged not to stop the line for fecal contamination." ([Huffington Post](#))
  - "Not only are plant supervisors not trained, the employees taking over USDA's inspection duties have no idea what they are doing. Most of them come into the plant with no knowledge of pathology or the industry in general." ([Huffington Post](#))

- **"Downer" pigs not marked as suspect:**

- **Investigation findings:** All pigs Scott observed at QPP were those who passed an initial "ante-mortem" inspection by a public health veterinarian, and cleared for human consumption, i.e. not found to be diseased or disabled. However, he documented animals every day who were non-ambulatory, who the workers at QPP referred to as "downers."
- **HIMP's role:** QPP operates at line speeds of approximately 1,300 pigs per hour--greatly exceeding standard line speeds of 571 to 1,106 pigs per hour, according to USDA data. Workers were responsible for separating out these "downer" pigs, but with the high volumes and speeds at QPP, some workers did not do this in order to save time. These

pigs, therefore, intermixed with pigs to be slaughtered in the normal manner, all heading for the food supply.

- **Improper stunning:**

- **Investigation findings:**

- Animals were documented regaining sensibility after they already had their throats cut. Footage shows an animal exhibiting a “righting reflex,” which is when an animal cranes his/her neck to try and return the body to a normal orientation. According to American Meat Institute guidelines, “Dressing procedures such as skinning, scalding, limb removal, etc. must never be performed on an animal showing any sign of a return to sensibility. The animal MUST be restunned.” However, the line was not stopped, and the animal continued upwards into the scalding tank, still sensible. Several other pigs also continued to show signs of sensibility after having their throats slit, and may have proceeded to the scalding tank also while still sensible.
- Workers were also instructed to stun or “euthanize” “downers” prior to sticking by one of two methods: either knocking them with a captive bolt pistol twice, or by applying the electric stunner twice, then following up with a captive bolt shot. However, Scott observed very few downer hogs properly stunned prior to sticking. He witnessed five or six downer hogs electrocuted per day, but only observed electrocuted hogs receive a subsequent captive bolt knock, as instructed, on a total of 3 or 4 occasions over the course of approximately three weeks.
- **HIMP’s role:** QPP’s Animal Welfare Supervisor Laura Coffey herself acknowledged that the pigs sometimes regain sensibility after stunning, stating, “You want to stick them as soon as possible, otherwise they have the risk of returning .... Sometimes they come back, like zombies.” At such high speeds, the margin for worker error is high, and Scott saw this numerous times with workers’ ineffective stunning of pigs. This not only violated facility procedures, but also the Humane Methods of Slaughter Act, which dictates that “all animals are rendered insensible to pain by a single blow ... that is rapid and effective, before being shackled, hoisted, thrown, cast, or cut.”

- **Humane handling and excessive force:**

- **Investigation findings:**

- In all of the cases of workers using captive bolt guns on sick and injured animals, the workers neglected to check those animals for sensibility before placing a metal hook in the pig’s mouth and dragging him or her away. In one case, the pig was not bolted at all and was instead dragged away fully sensible. These “downer” animals were also frequently pushed out of the way by the workers to make room for other pigs, and workers would also try to lift them up by their tails to move them. A supervisor acknowledged that workers were supposed to be using a sled to move these sick animals but admitted that they simply did not have time.
- Shortcuts were also taken in driving the healthy animals to the stunner. We documented workers frequently hitting the animals in sensitive areas such as the face and genitals with the rattle paddles and even with the electric prods. Scott also saw multiple instances of workers repeatedly jabbing the same animal with the electric prods.
- **HIMP’s role:**

- The American Meat Institute guidelines consider dragging a conscious animal to be an act of willful abuse and grounds for failing an audit. Under the Federal Meat Inspection Act, establishments are also required to implement humane handling and slaughter procedures, per the Humane Methods of Slaughter Act. Dragging, excessively prodding, or driving animals in a way that does not minimize discomfort is a violation of federal humane handling regulations ([FSIS Directive 6900.2](#)), yet these workers were documented routinely doing these things in order to save time. HIMP plants like QPP may operate more than twice as fast as regular plants--and workers cannot keep up in this high-speed, high-pressure environment.
- According to the American Meat Institute's guidelines, "Intentionally applying prods to sensitive parts of the animal such as the eyes, ears, nose, anus or testicles" also constitutes willful abuse and would result in automatic failure of an audit. Workers were supposed to only use the prods once on an animal, but the increased speed meant that supervisors would often push workers to drive hogs as fast as possible.

- **Conclusion:**

- The changes implemented in the HIMP program have negative repercussions for both food safety as well as animal welfare. A 2013 report by the USDA's own Office of the Inspector General [stated](#) that "since FSIS did not provide adequate oversight, HIMP plants may have a higher potential for food safety risks," and concluded, "[T]he swine HIMP program has shown no measurable improvement to the inspection process," and that "three of five HIMP plants had some of the highest numbers of NRs [non-compliance reports] nationwide."
- After watching COK's footage, the USDA's Office of Investigation, Enforcement, and Audit concluded that "evidence collected illustrated that the establishment was not in compliance with the regulations," and stated that "[h]ad these actions been observed by FSIS inspectors, they would have resulted in immediate regulatory action against the plant." The agency's own words highlight the need for increased government inspection--not less.