Humane Handling: A Systematic Approach

Erika L. Voogd
Voogd Consulting, Inc.
evoogd@voogdconsulting.com
1-630-293-9444

Agenda

- Introduction
- Review of FSIS Systematic Approach
- Government Verification
- Components of a Robust Systematic Approach
- Common Humane Handling Challenges and Solutions
- Open Discussion and Questions

Introduction

- Reasons for Changes to FSIS Directive 6900.2, Revision 2 “Humane Handling and Slaughter of Livestock”
- Webinar Objectives

Reasons for Changes to 6900.2, Rev. 2:

- The new directive incorporates:
  - FSIS Directive 6900.1 related to humane handling of disabled livestock
  - FSIS Notice 06-11 related to Humane Handling at All Entrances and the APHIS Twenty eight hour law regarding transport

Reasons for Changes to 6900.2, Rev. 2:

- The new directive provides:
  - A definition of “egregious inhumane handling”
  - Actions to take if a violation occurs

Reasons for Changes to 6900.2, Rev. 2:

- Instructions for Inspection Program Personnel (IPP):
  - For verification when an establishment has a written animal handling program that incorporates a “robust systematic approach”
  - For actions if IPP observe inhumane handling of animals under Custom Exempt (issue an MOI)
The new directive:

Provides instructions to inspectors to verify that an establishment:
- Does not use any secondary entrances or equipment to handle livestock inhumanely or to violate the Humane Methods of Slaughter Act (HMSA) or
- the Federal Meat Inspection Act (FMIA)

NMA Webinar Objectives

To understand the benefit of developing and implementing a written humane handling program incorporating the components of the “Systematic Approach” and how managing humane handling can prevent regulatory action.

NMA Agenda

- Introduction
- Review of FSIS Systematic Approach

NMA Systematic Approach

September 9, 2004: Notice 04-13N:
- With a systematic approach, establishments focus on treating livestock in such a manner as to

NMA Systematic Approach

- Minimize excitement, discomfort, and accidental injury the entire time they handle livestock in connection with holding and slaughter

NMA Systematic Approach

Livestock Establishments can
1) Conduct an initial assessment to determine when animals can experience excitement, discomfort or injury
2) Design facilities and practices to minimize the possibility of excitement, discomfort or injury

Livestock Establishments can
3) Periodically evaluate handling methods including stunning

4) Improve practices and modify facilities when necessary

Step 1
1) Animal movement
2) Livestock type and genetics
3) Electric prod use is minimized
4) Access to water

5) Sufficient room in holding pens for animals held overnight (feed)

6) Training of personnel on prod use, stunning and proper animal restraint
7) Whether potential weather conditions could lead to inhumane treatment
Step 2: Analyze compliance

1) pens, driveways and ramp design
2) pens prevent injuries

Step 3 Evaluate methods

1) Handling
2) Stunning
- Be sure to document evaluations!

Step 4 If deficiencies are found, improve practices
- Be sure to document actions and changes!

If the plant states that it has an animal handling program that equates to a robust systematic approach: IPP will verify that:
- Procedures are observed
- Documentation is reviewed
- Establishment’s program is followed
- Program complies with the humane handling regulations

After issuance of this directive IPP will:
- Hold a meeting with establishment management
- Inform the plant that if it has a robust systematic approach:
  - FSIS will take that into consideration should it be necessary to determine how to proceed in the circumstances involving an egregious inhumane treatment incident.

Voluntary!

If the plant states that it has an animal handling program that equates to a robust systematic approach:
- IPP will verify that:
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  - Documentation is reviewed
  - Establishment’s program is followed
  - Program complies with the humane handling regulations

Introduction
- Review of FSIS Systematic Approach
- Government Verification:
  - HATS
  - Enforcement and Non-Compliance
  - Benefits of the Systematic Approach
  - Egregious inhumane handling
**NMA HATS**

**Definition:** Humane-handling Activities Tracking System

- Part of eADRS (electronic Animal Disposition Report System)
- Activities should be performed at random times
- At least one activity performed each slaughter shift (15 minutes or more for larger plants)

**NMA HATS**

Prioritize based on:
- previous activity
- historical documentation and
- DVMS (District Veterinary Medical Specialist) direction

**NMA HATS Categories**

Inspectors verify (based on ISP code 04C02):

I) Adequate measures for inclement Weather  
II) Truck Unloading  
III) Water and Feed Availability

**NMA HATS Categories**

IV) Handling during Ante-Mortem Inspection  
V) Handling of Suspect and Disabled Livestock  
VI) Electric Prod and Alternative Tool Use

**NMA HATS Categories**

VII) Observations for slips and falls  
VIII) Stunning Effectiveness  
IX) Check for Conscious Animals on the rail

**NMA Systematic Approach**

For establishments with a "robust systematic approach", IPP verify through:
- Observation  
- Record review  
- Establishment is following its animal handling program  
- Taking corrective action when appropriate.

*Photos by Temple Grandin*
**NMA Systematic Approach**

If the IPP observes that the plant is not following the program:
- Discuss their observations with plant management.
- Document discussion in MOI (Memorandum of Interview)
- If IPP continues to observe ineffective implementation, notify the District Office (DVMS or DDM) by email.

**NMA Enforcement: Non-egregious**

If IPP observe a non-compliance that is not egregious:
- Facility condition
- Actions of employees
- HH non-compliance that does not involve injury or distress to livestock
  - (Ex: Animals driven faster than a normal walking speed)

**NMA Enforcement**

IPP will:
- Inform the establishment to correct or stop the NC
- Issue an NR

If IPP does not receive adequate response or CA or NC continues, IPP will take regulatory control action

**NMA Enforcement**

IPP will:
- Verify that the establishment takes the appropriate corrective or preventative actions before removing the regulatory control action.

If NC continues or is not adequately corrected, IIC will contact FLS and DVMS to determine if an NOIE should be issued

**NMA Enforcement: Egregious**

If IPP observe a non-compliance that is of an egregious nature, IIC will:
- Immediately stop the inhumane slaughter or handling of livestock
- Take regulatory control action
- Orally notify plant management
- Correlate with FLS, DO or DVMS to discuss and recommend that a suspension action be taken

**NMA HOWEVER:**

In a situation where an establishment:
- Does not have any recent HH related enforcement actions
- Has consistently been meeting HH regulatory requirements
- Has been operating under a written animal handling program that the plant considers a “robust systematic approach”
- Has demonstrated the robustness of the program by effectively and consistently meeting all aspects of the program
NOIE, not Suspension:
The IIC, based on consideration of the above, may recommend in an MOI to the FLS, DO, and DVMS that the egregious act be subject to enforcement discretion and recommend issuance a Notice of Intended Enforcement (NOIE) rather than a notice of suspension.

Decision Points:
The decision to recommend this enforcement action is based on the Rules of Practice regulation (9 CFR 500.3(b)) that states: “FSIS also may impose a suspension without providing the establishment prior notification because the establishment is handling or slaughtering animals inhumanely.”

In determining whether the egregious act is an “anomaly”, and whether the plant should be allowed to continue to operate, IIC, FLS, DO and DVMS are to consider:

Considerations:
Whether the establishment:
1. is operating under an animal handling program that provides for how the establishment will respond if an unforeseeable event of this type occurs;
2. has any basis for concern that the planned response in the establishment’s animal handling program will not effectively address the problem;
3. has consistently and effectively implemented their animal handling program over time.

Decision Points:
In situations where the establishment has:
• no written animal handling program or
• IPP have not determined that the establishment has implemented a robust systematic approach
• where an immediate suspension action would be warranted but is likely to result in inhumane treatment of additional animals (e.g., a line stoppage that may result in animals having to stay on a truck during an extremely hot day)

Suspension Delay:
• the IIC may delay implementation of the suspension action until he/she can ensure that animals on-site or in-transit have been handled humanely.

Suspension Delay:
In deciding whether to delay implementation of a suspension, the IIC is to consider:
• What immediate corrective action the establishment is taking?
• How likely is it, given the establishment’s history, that the corrective action will be effective in preventing a recurrence of the root cause of the situation?
• How many animals are on premises or en route that will need to be slaughtered?
• What conditions threaten the welfare of the animals if they are not promptly slaughtered?
Suspension Delay:

The IIC:
- will move an inspector trained on HH to directly observe handling and slaughter
- may allow slaughter to continue at reduced line speed
- is to promptly effect the suspension once he or she determines that animals will not be further subjected to inhumane handling
- is to document their observations and actions on an MOI and submit this to DO

Linking NR’s:

To determine whether a non-compliance trend exists, IPP will answer the following questions:
- How much time has lapsed since the previous NR was written?
- Was this non-compliance from the same or related cause as the previous NR?
- Were the establishment’s further planned actions effectively implemented?
- Is the establishment implementing additional planned actions that reduce the possibility of recurrence?

Benefits of a Systematic Approach:

- Chances of the IIC observing a non-compliance are greatly reduced!
- If a non-compliance is observed, the presence of a written, robust systematic approach can prevent a plant suspension
- By considering potential non-compliances and outlining corrective actions, the plant team will be better prepared for an “anomaly” or non-egregious HH situation

Egregious Situations

Making cuts on or skinning a conscious animal
Excessive beating or prodding of animals
Dragging a conscious animal

Egregious Situations

Driving animals off a truck or over a drop-off without providing adequate unloading facilities
Running equipment over conscious animals
Stunning of animals and then allowing them to regain consciousness

Egregious Situations

Multiple attempts, especially in the absence of immediate corrective measures, to stun an animal versus a single blow or shot
Dismembering a conscious animal
**Egregious Situations**

- Leaving disabled livestock exposed to adverse climate conditions while awaiting disposition
- Otherwise causing intentional or unnecessary pain or suffering to animals including situations on trucks

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**Written Program**

Describes:

- Procedures implemented to stay in compliance
- Records kept to demonstrate that program is implemented as written
- Records to demonstrate the program will prevent potential non-compliances
- Actions the establishment will take when it fails to implement program as written or fails to prevent a non-compliance

**Initial Assessment**

Include:

- Diagrams or blueprints of the animal handling systems
  - Receiving area
  - Holding pens and alleys
  - Crowd pen and lead up chute
  - Stunning area
  - Restrainers
  - Bleed rail

Can Include:

- Flowcharts (risk assessment)
- Written evaluations
- Photographs (before and after)
- Minutes of team meetings
- Written Standard Operating Procedures (SOP’s)
Factors that Affect Animal Handling: Issues

Make a table to outline areas where the following humane handling issues can occur:

- Slips and falls
- Bruising and cuts
- Truck discomfort
- Ease of movement

Factors that Affect Animal Handling: Causes

- Lighting
- Reflections
- Sunlight/shadows
- Machinery noise
- Other noise
- Air flow/smell
- Insensibility issues

Facility Design and Handling Practices

Address:

- SOP’s for live animal handling:
  - Providing water and feed
  - Providing ample pen space (stocking density)
  - Special procedures for disabled or young animals
Employee Training

Training should include:
- Initial training for animal handlers and truckers, prior to working with animals.
- Training methods
- Training materials (videos, slides, etc.)
- A quiz to measure understanding
- Visual review (verification) of practices to assure effectiveness
- Quarterly or annual retraining

Implementation and Ongoing Evaluation

Monitoring and documentation should include:
- Work orders and records for corrective actions
- Maintenance records for stunners and other equipment used to handle animals
- A log book works well for small plants

Implementation and Ongoing Evaluation

Monitoring can include:
- Internal audits of HH practices (follow AMI and industry formats, document frequency and points reviewed)
- 3rd party or corporate audits of HH practices
- Video surveillance, including review of live feed or recordings
- Statistical Process Control (SPC) or trending to review measures and deficiencies
- Program Reassessment at least annually

Pro-active Actions

Document actions to take and actually taken when issues occur:
- Emergency management plan for livestock: considering floods, tornados, power outages, fire or mechanical breakdowns, etc.
- Corrective action documentation for deficiencies identified during daily activities and monitoring
- Guidance for employees when unanticipated incidents occur:
  - AW Corrective Action Report

Corrective Actions

Example of Program Corrective Actions for audit deficiency:
1. Notify supervisor and superintendent of the failure. Recheck in 30 minutes.
2. Notify supervisor and superintendent of the failure. Recheck in 30 minutes.
3. Notify supervisor and superintendent of the failure. A 10% line speed reduction until 2 consecutive rechecks at 30 minutes apart meet the process control standards.

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**NMA Slipping and Falling**

**Short Term:**
- Barn lime
- Sand
- Salt

**Medium Term:**
- Scrub Cement
- Acid Etch Cement
- Utilize Mats ([ddfamilymats.net](http://ddfamilymats.net))

**Long Term:**
- Score or stamp concrete
- Add rebar or cleats

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**NMA Distractions and Balking**

**Noise:**
- Sound Baffles and Silencers

**Light / Contrast:**
- Spot Light
- Tarp

**Visibility:**
- Cardboard
- Curtains
- Walls

**NMA Balking**

**Keep animals calm!!!**
Reduce electrical prod use
- Alternative:
  - Vibrating Prod
  - Air operated engraver with softened carbide tip
  - [http://www.mcmaster.com/#1564t68/=3thywv](http://www.mcmaster.com/#1564t68/=3thywv)

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**More Info**

AMI Website:
- www.animalhandling.org
- www.grandin.com

Auditing: Interpreting AMI Guidelines
Humane Handling

1. Use a systematic approach
2. Minimize animal excitement, injury
3. Facility design and maintenance are critical
4) Provide employee training
5) Measure results

THANKS!!!!!!!

www.voogdconsulting.com
evoogd@voogdconsulting.com