One Team, One Purpose

Food Safety and Inspection Service
Protecting Public Health and Preventing Foodborne Illness
North American Meat Institute
Animal Care & Handling Conference

19-20 October 2017

P Bennett, DVM, MS, DACVPM, MPP
Humane Handling Enforcement Coordinator
19 October 2017
Outline

- FY17 Humane Handling Strategic & Annual Goals - Final
- FY18 Humane Handling Strategic & Annual Goals – Proposed
- Policy documents - Update
Strategic Plan 2017-2021: HH goals

Goal 2
- Modernize Inspection Systems, Policies, and the Use of Scientific Approaches

Outcome 2.1
- Explore and Adopt Innovative Approaches

Objective 2.1.2
- Increase Adoption of Humane Handling Best Practices

HH Measure
- Percent of slaughter establishments compliant with all livestock restraint and/or stunning requirements
Notice 04-17: Assessment & Verification Reviews of an Official Livestock Establishment’s Robust Systematic Approach Plan for Humane Handling & Slaughter

Provides instructions to FSIS personnel about assessing and informing official livestock establishments whether their written systematic approach for humane handling and slaughter meets the criteria for being a robust plan or not.

First monthly tasks assigned in April
Public Health Veterinarians (PHV) in livestock slaughter establishments are to schedule and perform a monthly verification review task of the establishment’s robust systematic approach.

The task is a questionnaire and PHVs are to answer the questions to determine if the establishment is still operating under a robust systematic approach or not.
The robust status designation may be removed if the verification review shows that the establishment is not implementing the robust systematic approach plan.

Robust status can be reinstated if the establishment brings its program back up to robust standards.

The establishment may request FSIS to review its program when it believes its systematic approach is again robust.
The PHV, or designee, is to provide feedback to the establishment about the findings from the verification review during the weekly meeting.

This discussion is to be documented in an MOI (A copy is to be shared with the establishment and the DVMS).
NOTE: Establishment may operate under a RSA during the verification period of an enforcement action (Notice of Suspension, NOIE), but this will not allow regulatory discretion by the District Office if an additional enforceable event occurs.
PHV Task to assess RSA in Livestock Plants 2017

- **April**: RSA: 327, Written SA: 392, Completed PHV Task: 680
- **May**: RSA: 250, Written SA: 309, Completed PHV Task: 488
- **June**: RSA: 315, Written SA: 380, Completed PHV Task: 601
- **July**: RSA: 361, Written SA: 428, Completed PHV Task: 693
- **August**: RSA: 344, Written SA: 404, Completed PHV Task: 662
PHV Task to assess RSA in Livestock Plants 2017

- April: 680
- May: 488
- June: 601
- July: 693
- August: 662

- April: 392
- May: 309
- June: 380
- July: 428
- August: 404

- April: 57.6%
- May: 63.3%
- June: 63.2%
- July: 61.8%
- August: 61%

Written SA as a % of Completed Tasks
PHV Task to assess RSA in Livestock Plants 2017

- April: 680
- May: 488
- June: 601
- July: 693
- August: 662

Completed PHV Tasks

RSA as a % of Completed PHV Task
- April: 48.1%
- May: 51.2%
- June: 52.4%
- July: 52.1%
- August: 52%

RSA as a % of Written SA
- April: 83.4%
- May: 80.9%
- June: 82.9%
- July: 84.3%
- August: 85.1%
89% of slaughter establishments that are compliant with all livestock restraint and/or stunning requirements
Enforcement Actions: January – September 2017

Very Small plants
• NOS/ROS: 46
• NOIE: 8

Small Plants
• NOS/ROS: 13
• NOIE: 7

Large Plants
• NOS/ROS: 10
• NOIE: 5

80 of these EA were taken because of ineffective stuns
Total EAs: 89
Enforcement Actions:
January – September 2016

<table>
<thead>
<tr>
<th>Size</th>
<th>NOS/ROS:</th>
<th>NOIE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Small</td>
<td>48</td>
<td>9</td>
</tr>
<tr>
<td>Small</td>
<td>16</td>
<td>7</td>
</tr>
<tr>
<td>Large</td>
<td>13</td>
<td>11</td>
</tr>
</tbody>
</table>

86 of these EA were taken because of ineffective stuns
Total EAs: 104
Enforcement Actions:  
January – September 2015

Very Small Plants  
• NOS/ROS: 57  
• NOIE: 9

Small Plants  
• NOS/ROS: 14  
• NOIE: 10

Large Plants  
• NOS/ROS: 8  
• NOIE: 9

85 of these EA were taken because of ineffective stuns  
Total EAs: 107
Of the plants that maintain an RSA – what is their HACCP size?
  — Persistent concern that RSA benefits large volume plants unfairly over the low volume plants

Are plants consistent month to month maintaining an RSA?
  — How many plants cannot maintain RSA month to month?

How do plants with RSAs compare to plants without RSAs relative to number and type of Enforcement Actions and NRs

How has this new policy affected compliance?
90% of slaughter establishments that are compliant with all livestock restraint and/or stunning requirements
FSIS Strategic Plan 2017-2021: Objective 2.1.2

Increase Adoption of Humane Handling Best Practices

A major reason for FSIS humane handling enforcement actions is the ineffective restraint and/or stunning of livestock. Establishments often employ a “one size fits all” approach to stunning and restraint, even though the establishment may be slaughtering several amenable species of varying sizes.

FSIS plans to develop and implement an education and outreach campaign, targeting small and very small establishments, to ensure more consistent application of humane handling best practices and compliance with humane handling regulatory requirements.

FSIS may develop this campaign in partnership with other stakeholders including industry associations.
OUTCOME 2.1: IMPROVE FOOD SAFETY AND HUMANE HANDLING PRACTICES THROUGH ADOPTION OF INNOVATIVE APPROACHES

RESULT 9 Increase Adoption of Humane Handling Best Practices

Key Action
Humane Handling Refresher Training: Develop a plan for delivering refresher training to IPP on recognizing signs of consciousness in livestock and begin its implementation.

Annual Plan Measure
Deliver refresher training to 40 percent of Public Health Veterinarians (PHVs) in livestock slaughter establishments by September 30, 2017.
## Result 9: Humane Handling Refresher Training

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Target</th>
<th>Q1</th>
<th>Q2</th>
<th>Q3*</th>
<th>Q4</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Humane Handling Refresher Training</td>
<td>Deliver refresher training to 40 percent of Public Health Veterinarians (PHVs) in livestock slaughter establishments by September 30, 2017</td>
<td>40%</td>
<td>0%</td>
<td>0%</td>
<td>53.6%</td>
<td>71.1%</td>
</tr>
</tbody>
</table>

* DVMS did not begin training on material in earnest until Q3
Result 9: Humane Handling Refresher Training

FY 2017 Goal Exceeded

PHVs to be trained: 603
PHVs trained: 429
% PHVs trained: 71.1%

FY 2017 Goal Exceeded
In partnership with OOEET,

- Develop training in AgLearn
  - Available to assigned employees by early quarter 2 FY 2018.

- Develop reference material on recognizing signs of consciousness in livestock on the IPP Help Button.
Continue to provide refresher training to FSIS personnel in livestock slaughter establishments and responsible for Humane Handling verification
Humane Handling Policy Update

**Policy:** Inhumane Handling of Livestock in Connection With Slaughter by Persons Not Employed by the Official Establishment

FSIS announced its intent to hold livestock owners, transporters, haulers and other persons not employed by an official establishment responsible if they commit acts involving inhumane handling of livestock in connection with slaughter when on the premises of an official establishment.

When the FRN publishes,
- The document will be a response to comments on and clarification of final determination
- The document will provide an implementation date.
Policy: Compliance Guide for a Systematic Approach to the Humane Handling of Livestock (last published 2013)

When the Compliance Guide publishes,

- A Federal Register Notice announcing the Compliance Guide and asking for comments will issue with revised Compliance Guide
Policy: Instructions for Writing Poultry GCP NRs & MOI Letters for Poultry Mistreatment –

The Notice provided instructions to inspection program personnel (IPP) for writing noncompliance records (NR) for noncompliances with regulations on poultry Good Commercial Practices (GCP) as well as instructions for composing a Memorandum of Interview (MOI) when documenting a meeting between IPP and establishment management on IPP observations of mistreatment of live poultry before slaughter.

Notice expired June 2017

Language from Notice to be incorporated into a Directive which is in clearance process
Acknowledgments

District Veterinary Medical Specialists

Jay Gallons

Dana Grabiner

Elaine Hite

Jenny Kiesel
Questions?

patty.bennett@FSIS.USDA.gov

(202)-720-5397