

**Thoughts on the
“Robust” Systematic Approach
to Humane Handling and
Slaughter**

Dr. Lucy Anthenill, DVMS
Denver District Office

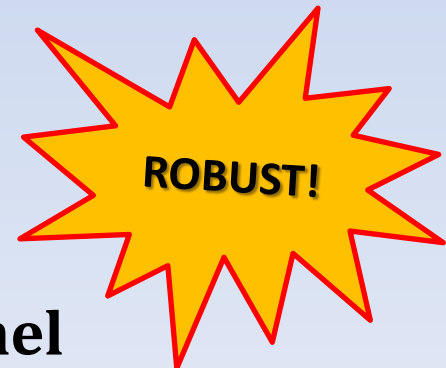
“Robust” Systematic Approach

- **No regulatory requirement for written systematic approach**
- **“Robust” approach introduced in August 2011 in Directive 6900.2 Revision 2**
- **Federal Register Notice Docket No. 04–013N, September 2004: basic Systematic approach**
- **Living Document-Adapting and Improving**

“Robust” Systematic Approach

- 1) Assess your facilities from animal arrival to bleed rail**
- 2) Design your facility and implement best practices**
- 3) Evaluate it (semi-annually, annually)**
- 4) Improve and modify based on your evaluation or any events where animals are injured or miss-stunned**

- Written Plan**
- Written Records/Audits**
- Accessible to FSIS personnel**



“Robust” Systematic Approach

FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock

	Assessment	Design facilities and practices	Periodic Evaluation	Written Plan	Written Records	FSIS Review and Designate as “Robust”
“Standard” Systematic Approach	YES	YES	YES	NO	NO	NO
“Robust” Systematic Approach	YES	YES	YES	YES	YES	YES

“Robust” Systematic Approach

➤ Develop a Written Plan

- HACCP plan for animal handling and slaughter
- Include a mission statement, a description of your animal flow (flowchart) and SOPs
- If you use the Compliance Guide example, make it yours; company logo, personal touch, mission statement

“Robust” Systematic Approach

➤ Develop a Written Plan

- Separate binder for humane written plan

Can you find it for FSIS review?

- Include SOPs for each process (plain talk)
- Emergency plan, unforeseen FSIS actions
- Risk Assessment: What’s the worst that can happen? (Address It)
- Can anything be improved? (Fix It)

“Robust” Systematic Approach

FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock

Attachment 3: Sample EST 38 Humane Handling and Slaughter Plan

Description of our business:

We are a small, family-owned business producing specialty pork products. We typically slaughter one day per week. We raise all of the pigs we slaughter on our near-by family farm and transport them to the official establishment on the day of slaughter in a family-owned livestock trailer. We hold no live swine at the official establishment longer than 10-12 hours. The rear gate of the livestock trailer doubles as the off-loading ramp. We slaughter only healthy swine and sell all unhealthy swine to a local livestock dealer.

Animal Handling Plan:

Live pigs off-load from the livestock trailer directly into one of two open-air holding pens. The pens connect by a gate to a common covered alleyway that leads to the restrainer. All holding pen and alleyway floors are waffled and sloped to facilitate drainage. Holding pens have water troughs. Interior and exterior fence construction is comprised of commercial hog fence panels and gates fastened to metal posts set in concrete. We herd swine with polyethylene sorting panels purchased

“Robust” Systematic Approach

FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock

Attachment 2: Sample Assessment Tool for Humane Handling and Slaughter

The sample assessment tool is a starting point. Not all of the parameters listed will apply to all establishments. Some establishments may have additional parameters.

Sample Assessment Tool for Humane Handling and Slaughter	
Check "True" if the item does not have the potential to result in inhumane handling or slaughter.	
Check "False" if the item has the potential to result in inhumane handling or slaughter.	
Check "N/A" if the item does not apply to the establishment.	
FACILITIES	
TRANSPORTATION OF LIVESTOCK: TRANSPORT VEHICLES	
Transport vehicles are free from protruding objects.	
Transport vehicles are free from sharp metal of any kind.	
Transport vehicles are free from loose boards.	
Transport vehicles are free from splintered planking.	
Transport vehicles are free from broken planking.	
Transport vehicles are free from openings that can trap livestock.	
Transport vehicles are free from openings that can trap livestock's feet.	
Transport vehicles are free from openings that can trap livestock's legs.	
Transport vehicles provide good footing.	

Assessment/Reassessment:
We based our initial assessment on the tool (attachment 2) in the FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock. We will reassess our plan as needed based on our monitoring results. We will document any reassessment, and summarize all changes to our plan and records, on the back of our monitoring record.

- Include this in the pages of your written plan!

“Robust” Systematic Approach

➤ Develop a Written Plan

- Training, training, training
- (Document, document, document training)
- On intake, then a refresher, retrain after NR?
- Describe training material and frequency
- Include in binder

“Robust” Systematic Approach

➤ Develop a Written Plan

- Stunning instruments; what are they, how many, where are they kept, charges, ammo
- Include in SOP details about maintaining guns, gun repair, gun parts and cleaning
- Describe what you will measure in a records log

“Robust” Systematic Approach

➤ Create a Record-keeping system

- Separate record for handling/slaughter audits, stunner maintenance

***probably not a single line on slaughter floor pre-op sheet**

- 313.1, some of 313.2: Pre-op checklist
- If you create a record for it, say something about it in the written plan

“Robust” Systematic Approach

➤ Create Record-keeping system

- Each stunning instrument needs to be identified, and should have its own record sheet
- Indicate in your written plan where records will be kept, and how they are evaluated
- Be able to find records for FSIS personnel

“Robust” Systematic Approach

➤ Create Record-keeping system

- For every slaughter day, it's a good idea to have some sort of monitoring and recordkeeping every day
- Auditing your plant operations: If you don't know that something is wrong, you don't know how to fix it*
- Record corrections and improvements (Take credit for your work!)

“Robust” Systematic Approach

➤ FSIS Access to Plan and Records

- From Directive 6900.2 Rev. 2; when you think you have a “robust” plan, you have the IIC or FLS review it and have them pronounce **“robust”** or “not robust”
- Contact your District Veterinary Medical Specialist (DVMS) for review
- During DVMS routine visit, ask them if the plan is **“robust”** or not

“Robust” Systematic Approach

➤ FSIS Access to Plan and Records

- Dr. Patty Bennett, Dr. Keith Gilmore
- NAMI, other consultants
- Don't wait until you have a U.S. Rejected tag thrown down to ask if your plan is **“robust”**



“Robust” Systematic Approach

➤ Most Important Takeaway from my travels

- If the animal is not stunned on the first shot, stun it until it is unconscious
- Ensure that your stunning SOP includes this statement
- Ensure that your employees understand the importance of this task
- Follow the advice from this meeting

“Robust” Systematic Approach

- **Thank You NAMI!**