Good afternoon Mr. Chairman, Ranking Member, and Members of the Subcommittee. Thank you for allowing me the opportunity to appear before this Subcommittee. My name is Janet Riley and I am a senior vice president of the American Meat Institute (AMI) responsible for our Animal Welfare Committee. AMI has provided service to the nation’s meat and poultry industry -- an industry that employs more than 500,000 individuals and contributes more than $100 billion in sales to the nation’s economy – for more than 100 years.

The U.S. meat industry is unique among not only those industries in agriculture, but among all industries in America. No other industry has the level of federal oversight or the continuous presence of inspectors that is simply the norm for us. In any plant that slaughters livestock, at least one inspector, and often more than one, is assigned to oversee compliance with the Humane Methods of Slaughter Act.

This is a unique way to run a business. Unlike an auto manufacturer, for example, whose parts can be boxed and stored in a warehouse without the need to feed or water them, our raw materials are our livestock. They come in different sizes, ages and temperaments. Their moods can be affected by the weather, genetics, handling, and other factors. Some are unafraid of the presence of people because they come from operations where they interacted with humans quite often. Others, like range cattle, can be very “skittish” because they are unaccustomed to people. In any given year approximately 34 million cattle, 108 million pigs and 2.5 million sheep and lamb are processed in federal inspected plants. When considered in those terms, it becomes clear what an incredible responsibility we have.

Livestock handling and stunning in meat packing plants is done by our trained employees. We make every effort to staff any area that could affect animal welfare with people who are suited to working with livestock. Livestock handling in the pens requires patience and a keen understanding of animal behavior. Stunning requires both patience and accuracy to ensure that livestock are always made insensible. The consequences of failure are significant for both livestock welfare and for our businesses. Overseeing both the livestock and the people who handle them are United States Department of Agriculture (USDA) inspectors. They, too, have noteworthy responsibilities.
Within our industry, we have seen measurable progress in the humane handling practices that we attribute in part to a decision by the Institute’s leadership to make animal welfare a non-competitive issue within in our industry. As a result, we share information and ideas to improve animal handling and stunning. We open our doors to one another and we encourage a free exchange of ideas at our conferences and committee meetings.

The question presented today is an important one: How can we ensure that those charged with enforcing our nation’s humane slaughter laws do so in a way that is consistent with the law and achieves our shared objective to ensuring welfare? While the industry and FSIS have a regulatory-regulatee relationship, we do believe that a spirit of cooperation that flowed from our decision to make animal welfare a non-competitive issue could help enhance accomplishment of our shared mutual goal to ensure animal welfare and humane slaughter compliance.

AMI has detailed for the committee previously our long-standing relationship with Dr. Temple Grandin, who became the Institute’s animal welfare advisor in 1991. Dr. Grandin recommended that we set targets and begin auditing for various animal welfare indicators. A key part of her recommendations is that all recommendations and performance criteria be written in a very clear manner that avoids vagueness and subjective evaluations. This is a recommendation that the agency should consider in its own communications to the field.

Our industry’s use of the guidelines and audit program constitutes a truly systematic approach to animal welfare. Our program helps ensure that we identify and take steps to prevent situations where harm, discomfort or unnecessary excitement of livestock could occur. Our audits and observations help us to evaluate how well we are accomplishing this, and help us to determine areas for continuous improvement. While regulatory compliances with humane slaughter rules is a top priority, our efforts in this area go beyond just compliance. It would be helpful to have the opportunity to present our programs directly to inspection personnel so they may understand them from our perspective and understand that the voluntary efforts and regulatory compliance activities occur on two parallel tracks.

When AMI became aware of a Government Accountability Office (GAO) investigation into Humane Slaughter Act enforcement, we saw it as an opportunity to provide feedback based upon our experiences. We worked cooperatively with investigators, providing our thoughts about how to improve enforcement and, in turn, animal welfare. The industry opened plant doors to a GAO investigator who sought to learn more about our industry and practices before she critiqued agency oversight. We have been and remain eager to see the report and recommendations and would be pleased to provide supplemental comments once it is shared with us. Because we have not been able to review the report, we can only provide general comments about FSIS’ oversight of our industry’s implementation of animal welfare practices.

The GAO report was requested following the release of undercover videos from a Chino, California, plant – an episode that raised legitimate questions and concerns about how such egregious acts would occur with inspectors on-site. I can say that the meat industry was as baffled as Congress about how certain practices could have occurred with FSIS inspectors present. In our experience, USDA inspectors play a very active role in our plants and take a variety of actions to correct violations.

We recognize that USDA has made concerted efforts to improve the training of the inspection workforce to minimize inconsistencies and we applaud that effort, but it must be expanded and sustained. Although 100 percent consistency is unrealistic, we encourage the Department to enhance its training and correlation activities. We also strongly encourage the
Department to send federal veterinarians to the AMI Foundation Animal Care & Handling Conference held every Spring in Kansas City. Dr. Grandin is one of the lead instructors at the conference. Last year, several District Veterinary Medical Specialists attended, which was an excellent step that should continue and be expanded.

More broadly, it would be prudent to create new training tools to educate USDA personnel in a uniform and consistent way. As part of this, we encourage the Department to include case studies of plant suspensions to provide learnings to the industry. Presuming that the real goal is to ensure optimal welfare and consistent application of rules, then we can all learn from these real-world examples. HIKE scenarios developed by USDA have attempted to do this but at times have added confusion. We believe the use of real-world examples could be instructive and facilitate dialogue and understanding.

A hands-on mentoring program for new inspectors should also be considered to enhance training and ensure readiness for the position. Classroom training can only teach so much. Part of this mentoring program must involve education of inspectors in basic handling principles. For example, inspectors need to be trained in the concept of “flight zones” and distracting activities, like laying a coat on a chute wall, so that when they are performing their inspection activities, they do not cause animal welfare incidents.

In our soon to be released 2010 Recommended Animal Handling Guidelines and Audit Guide, we will include a grid developed with assistance from Dr. Grandin. The grid organizes complex information in an easy to follow chart. We encourage USDA to view this grid for its potential to assist inspectors in evaluating sensibility.

It is critically important to remember that sometimes efforts to penalize a plant for a perceived animal welfare failure can actually create new welfare issues. For example, if a plant is shut down on a hot day, livestock trucks that are en route or at the facility can begin to back up. Depending on how long trucks are forced to wait, livestock can suffer heat stress. Pigs are particularly vulnerable to hot and humid weather. It is essential for USDA personnel to look at the larger picture when taking an action to suspend operations. Will it truly protect livestock or will it protect one at the expense of hundreds more? The agency needs to consider whether corrective actions can be taken with the plant still operating.

We appreciate the time and resources that GAO has invested in critiquing humane slaughter enforcement activities. Inspectors who fill this role have extremely important responsibilities, as do plant personnel involved in ensuring animal welfare. We are all engaged in a unique business that can be unpredictable given the fact that 1) we process millions of head of livestock, 2) with the help of thousands of employees and 3) that this process is overseen by thousands of inspectors. Every effort should be made to ensure that training is consistent, feedback is provided and that open dialogue is maintained. Animal welfare issues involve observation and good judgment and only through sustained effort and open dialogue without fear of reprisal can we achieve the important and commendable goals of the Humane Methods of Slaughter Act.