



# Animal Welfare Institute

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Docket Clerk  
USDA, Food Safety and Inspection Service  
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Independence Avenue SW  
Mailstop 3782, Room 8-163A  
Washington, DC 20250-3700

## **SUBMITTED VIA REGULATIONS.GOV**

**RE: Docket No. FSIS-2016-0017  
Modernization of Swine Slaughter Inspection, Proposed Rule**

The Animal Welfare Institute (AWI) submits these comments on behalf of our supporters in response to the Modernization of Swine Slaughter Inspection proposed rule published in the *Federal Register* on February 1, 2018.

AWI is opposed to certain aspects of the proposed rule, in particular the increase in slaughter line speed. We believe that increased speed will further threaten animal welfare and worker safety in pig slaughter establishments. Higher speeds have the potential to jeopardize the welfare of pigs at slaughter in three ways.

First, plant workers may be pressured to move animals at a faster pace, from the time the pigs arrive at the slaughterhouse to the time they are slaughtered. In a Memorandum of Interview, dated October 16, 2017, an FSIS inspector described an incident at Quality Pork Processors (M1620) where animal handlers were observed “driving animals too fast and with more excitement than necessary.” The inspector noted that the concern had been raised during at least two prior weekly establishment meetings.

Second, the proposed rule could result in slaughter establishments shortening the length of the stun used to render pigs insensible to pain before slaughter. Large pig slaughterhouses use either electric or gas (carbon dioxide) methods of stunning, and in both cases a shorter exposure time may result in pigs regaining consciousness prior to being butchered.

Third, the proposed rule could prevent plant workers and government inspectors from being able to identify pigs who have not been adequately stunned and are still conscious on the processing line. It is imperative that conscious animals be recognized immediately to minimize the amount of suffering they endure. The greater the number of pigs being slaughtered, and the faster the line is moving, the more difficult it is for plant personnel to stop the process and re-stun the animal. Failure to promptly intervene may result in a pig drowning in the scald tank or having their limbs removed while still conscious.

AWI supports increasing the number of off-line inspectors to monitor for compliance with the humane handling requirements of the Humane Methods of Slaughter Act. However, we are opposed to decreasing the overall number of FSIS in-plant inspection personnel.

Thank you in advance for giving thoughtful consideration to our concerns.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dena Jones". The signature is written in a cursive style with a large, stylized initial "D".

Dena Jones  
Director Farm Animal Program  
Animal Welfare Institute