

## **Facilitator Guide for Situation-Based Humane Handling Training**

### **Module One – Animal Handling: Truck Unloading through Entrance to Stunning Area**

Note: Module Two will cover Stunning and Post-Stunning Situations

**Facilitator notes are in highlighted bold print. Answers to questions are in bold. Regular text represents what appears on the participant’s handout.**

#### **Required Materials for Each Participant**

- **Participant Handout**
- **FSIS Directive 6900.2 Rev. 3**
- **Exam**

**1. Explain why we are doing this: On December 22, 2010, FSIS announced several measures that will better ensure the humane treatment and slaughter of all cattle presented for processing at FSIS-inspected facilities. One of those measures was delivery of situation-based humane training for inspection personnel. In addition, FSIS has recently issued Directive 6900.2 Revision 3.**

**2. Explain that Module One covers animal handling situations and that Module Two will cover stunning and post-stunning assessment for consciousness.**

**3. Have participants read the objective and instructions in their handout. Ask if there are any questions before beginning.**

Objective: When presented with specific situations at livestock slaughter establishments, participants will be able to:

- Identify humane-related regulatory noncompliance,
- Determine whether it is egregious, and
- Select appropriate actions to be taken.

Instructions: Each situation is to be read and discussed as a group with facilitation provided by the PHV, or designee. After discussing each situation, participants should have a thorough understanding of the proper response. An exam will be given at the course end and a minimum score of 70% must be achieved for credit.

**4. Read each situation and lead inspection personnel to an understanding of a supportable decision.**

**Note: This training is not intended to cover all possible “what if” situations. It is more important to stress the thought process from the objective. It should take no more than 50 minutes to discuss the situations. Allow at least 10 minutes to complete the exam at the end.**

### **Situations**

1. Ice, snow, or mud buildup is causing cattle to slip and slide on the unloading chute. Two animals fall down but immediately rise and appear unhurt.
  - Does this scenario represent noncompliance?  
**Yes, 313.1(b) requires that the establishment provide good footing.**
  - If so, is it an egregious situation? **No, it does not meet the definition of egregious from the directive which will be covered in subsequent situations.**
  - What action should be taken by inspection personnel?  
**Notify the establishment and, if not promptly corrected, the inspector would take a Regulatory Control Action (RCA) according to 9 CFR 313.50 and 500.2(a)(4). If the establishment promptly corrects the situation after notification, a RCA would not be necessary. Document the noncompliance on a NR in either case.**

**Refer participants to the regulations provided in the directive. Point out that the regulations in 9 CFR 313 are generally divided into 3 subjects dealing with establishment responsibilities: Facilities (313.1), Handling (313.2), and Stunning (313.5, 313.15, 313.16, and 313.30).**

**Additional question for the facilitator to pose to the group: Where would the RCA (tag) be placed, if needed, according to 9 CFR 313.50?**

**9 CFR 313.50 provides notification and tagging procedures for noncompliance including location of tag (RCA) placement.**

- **When facilities are the source of the noncompliance, 313.50(a) directs the tag be placed on the chute or other appropriate part of the facility.**
- **If RCA is taken for animal handling, 313.50(b) directs the tag be placed on the alleyway to the stunning area.**  
**Note: This section of the regulations does not require that all animal movement to slaughter be restricted (i.e., placing the tag on the final alleyway before the stunning area) but that the area where the handling noncompliance occurred be controlled.**
- **If RCA is taken for stunning, then 313.50(c) directs the tag be placed on the stunning area.**

2. A sow goes down at the bottom of the truck unloading chute. Dozens of swine continue to exit the trailer for several minutes repeatedly stepping on and hitting the downed sow which vocalizes loudly in response.
  - Does this scenario represent noncompliance?  
**Yes, 313.2(d)(1) requires that disabled livestock be separated from other ambulatory livestock. If the establishment were following recommended**

handling practices they would be moving small groups of animals or there would be another person helping who could see the animal go down.

- If so, is it an egregious situation? **Yes, it meets the definition for egregious noncompliance from Directive 6900.2 Rev. 3. (READ the definition of egregious in Chapter 1, V, B-10 in the directive.)**
- What action should be taken by inspection personnel?  
**A RCA should be taken according to 313.50(b) and 500.2(a)(4) and the IIC will follow current instructions for egregious noncompliance in FSIS Directive 6900.2 Rev. 3, including documenting on a Noncompliance Record.**

**Now go over the current procedure for egregious inhumane noncompliance. From FSIS Directive 6900.2 Rev. 3, the following should happen:**

- **The IIC or designee is to immediately stop inhumane slaughter or handling of livestock of an egregious nature with an appropriate regulatory control action to prevent the inhumane handling and slaughter from continuing.**
- **The IIC is to then verbally notify the establishment management that they will correlate with the SPHV, FLS, DO, and DVMS to discuss the situation. The District Manager (DM) is to determine the enforcement action that will be taken according to 9 CFR 500.3 (b).**
- **After notifying the establishment, the IIC is to contact and correlate with the SPHV, FLS, DO, and the DVMS to receive the DM's determination and instructions for actions. The following are to be considered in the correlation:**
  - a. Whether the establishment is operating under a robust systematic approach for humane handling of animals as determined by the IIC and the DVMS, per FSIS Directive 6900.2 Rev. 3, Chapter IV, II, F and G;**
  - b. Whether the establishment has demonstrated the robustness of the program to IPP by effectively and consistently implementing all aspects of its program;**
  - c. The establishment's history of compliance as indicated by the number of NRs or noncompliance reports related to humane handling regulatory requirements;**
  - d. Whether the establishment has recent humane handling enforcement actions;**
  - e. Whether a suspension action is necessary to prevent inhumane handling from continuing; and**
  - f. Whether the egregious noncompliance represents a rare finding or an anomaly in an otherwise well-functioning system.**
- **After correlating with the SPHV, FLS, DO, and the DVMS, the IIC is to document their observations of the humane handling incident in an NR in PHIS. (See Attachments 4 and 5 of FSIS Directive 6900.2 Rev. 3, for examples of NRs that support enforcement action: suspension or NOIE.) The IIC is to then promptly provide that NR electronically to the SPHV, FLS, DO and DVMS for their use in documenting the enforcement action. A copy is to be provided to the establishment.**

**Point out that the directive provides for 2 situational exceptions to those instructions.**

- a) If the establishment is suspended (receives an NOS) or is issued an NOIE by the DO, the IIC or SPHV is to inform the establishment that they will need to proffer acceptable corrective actions and preventive measures to the DO in order to develop a verification plan. (Refer to: FSIS Directive 5100.3 “Administrative Enforcement Action Decision-Making and Methodology”).

**NOTE:** The decision to issue an NOIE is not automatic. The determination of the enforcement action, by the DO, for those establishments with robust systematic humane handling programs will be based on the findings of the 6 considerations (a-f) found above.

- b) 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), the SPHV is to consult with the DM through the chain of command to consider delaying the implementation of the suspension action until they can ensure that animals on-site or in-transit have been handled humanely.

1. In deciding whether to delay implementation of a suspension, the SPHV provides the following information to the DM for their consideration:

- a. What immediate corrective action the establishment is taking;
- b. The likelihood, given the establishment’s history, that the corrective action will be effective in preventing a recurrence of the root cause of the situation;
- c. The number of animals on premises or en route that will need to be slaughtered; and
- d. Any conditions that threaten the welfare of the animals if they are not promptly slaughtered.

**NOTE:** The SPHV or IIC should encourage establishment management to redirect as many animals that are en route as possible, per provisions in existing Good Manufacturing Practices (GMPs) for other emergency stoppages (e.g., major mechanical breakdowns, flooding) and to order the stoppage of further loading of animals onto trucks at the source location.

In this situation, the SPHV or IIC will need to move a line inspector that is trained in humane handling to an appropriate area to directly observe establishment employees handling or slaughtering animals and decrease the line speed according to staffing standards in 9 CFR 310.1.

The SPHV or IIC may allow slaughter to continue at a reduced line speed for a limited time on her or his own authority. It is not the intent of this section to provide for a “kill-out” but only for a “kill-down” to ensure that the number of animals to be held on-site meets the requirements in 9 CFR 313.2(e) for holding animals overnight. Any concerns IPP may have about allowing slaughter to continue at reduced line speeds are to be addressed through their supervisory chain for resolution.

The SPHV or IIC is to promptly effect the suspension once he or she determines that animals will not be further subjected to inhumane handling.

**Once the suspension is taken after the “kill-down,” SPHV’s or IICs are to document their observations and actions in an MOI and submit it to the DO.**

3. Cattle are left in the alleyway overnight and cannot reach the water troughs. All animals appear to be in good condition.

- Does this scenario represent noncompliance?

**Yes, 313.2(e) requires that animals have access to water in holding pens and, in this case, the alley is being used as a holding pen.**

- If so, is it an egregious situation? **No, it does not meet the definition of egregious.**

- What action should be taken by inspection personnel?

**Notify the establishment and, if not promptly corrected, the inspector would take a Regulatory Control Action (RCA) according to 313.50(b) and 500.2(a)(4). If the establishment promptly corrects the situation after notification a RCA would not be necessary. Document the noncompliance on a NR in any case.**

**Note: If failure to provide water is a repetitive finding, the IIC should notify the District Office (DO) through supervisory channels for consideration of additional enforcement action. This would also apply to other humane handling noncompliance of a repetitive nature.**

4. An electric battery-operated prod is used only occasionally on balking swine at the conveyor-restrainer entrance. The prod is never used on the anus, eyes, ears, or other sensitive parts and is not used excessively on any of the animals.

- Does this scenario represent noncompliance?

**No, the prods are being used as little as possible in accordance with 313.2(b) and 313.30(a)(2).**

- If so, is it an egregious situation? **Not applicable**

- What action should be taken by inspection personnel?

**None, however, it would be very beneficial to discuss this at the weekly meeting to give positive reinforcement for good animal handling practices.**

5. Bob veal calves are being calmly moved through an alleyway into the stunning area. One bob veal calf goes down just prior to the stunning area entrance. An establishment employee shocks the calf repeatedly with an electric prod. The calf vocalizes and tries to avoid the prodding but does not rise and the prodding continues.

- Does this scenario represent noncompliance?

**Yes, 313.2(b) requires that prods be used as little as possible and excessive use is prohibited.**

- If so, is it an egregious situation? **Yes, it meets the definition for egregious noncompliance from Directive 6900.2 Rev. 3 in Chapter I, V, B-2 and B-10.**
  - What action should be taken by inspection personnel?  
**A RCA should be taken according to 313.50(b) and 500.2(a)(4) and the IIC will follow current instructions for egregious noncompliance in FSIS Directive 6900.2 Rev. 3, including documenting on a Noncompliance Record.**
6. A local rancher is unloading a group of thirty small weaning pigs from a gooseneck trailer onto a ground level alley floor with no ramp. The pigs are jumping off the trailer and three of them, unable to gain traction upon landing, fall to the ground. The fallen pigs struggle to regain their footing and run excitedly into the alley but appear to be unhurt.
- Does this scenario represent noncompliance?  
**Yes, 313.2(a) requires that driving animals be done with a minimum of excitement and discomfort. In addition, 313.1(b) requires that the establishment provide facilities including ramps that provide for good footing.**
  - If so, is it an egregious situation? **No, it does not meet the definition of egregious.**
  - What action should be taken by inspection personnel?  
**Notify the establishment and, if not promptly corrected, the inspector would take a Regulatory Control Action (RCA) according to 313.50(b) and 500.2(a)(4). If the establishment promptly corrects the situation after notification an RCA would not be necessary. Document the noncompliance on a NR in any case.**

**Note: Larger animals may be able to step off a gooseneck trailer without slipping or falling and in that case, there would be no noncompliance.**

7. An establishment employee drags a nonambulatory disabled (NAD) conscious lamb from the front of a trailer.
- Does this scenario represent noncompliance?  
**Yes, 313.2(d)(2) prohibits dragging conscious animals.**
  - If so, is it an egregious situation?  
**Yes, it meets the definition for egregious noncompliance from Directive 6900.2 Rev. 3 in Chapter I, V, B-2.**
  - What action should be taken by inspection personnel?  
**A RCA should be taken according to 313.50(b) and 500.2(a)(4) and the IIC will follow current instructions for egregious noncompliance in FSIS Directive 6900.2 Rev. 3, including documenting on a Noncompliance Record.**

**Note: Point out the following:**

- a) **Pushing a nonambulatory disabled conscious animal across a surface is the same as dragging.**

**b) There would be no noncompliance if the animal were properly stunned according to 313.2(d)(2)**

**c) Dragging an animal on a trailer is the same as dragging in a pen or alleyway since the trailer is part of the facilities once it is on site.**

8. A cow in a chute with limited room to move (stopped animal in front and gate behind) is shocked repeatedly in the anus. The cow vocalizes loudly and tries to push against the animal ahead.
- Does this scenario represent noncompliance?  
**Yes, 313.2(a) requires that animals be driven with minimal excitement and discomfort and 313.2(b) requires that prods be used as little as possible and that excessive use is prohibited.**
  - If so, is it an egregious situation?  
**Yes, it meets the definition for egregious noncompliance from Directive 6900.2 Rev. 3 in Chapter I, V, B-2. Prodding in sensitive areas such as the anus, genitalia, eyes, and ears is particularly painful to animals. The fact that the animal cannot move forward or backward further supports the decision that it is an egregious noncompliance.**
  - What action should be taken by inspection personnel?  
**A RCA should be taken according to 313.50(b) and 500.2(a)(4) and the IIC will follow current instructions for egregious noncompliance in FSIS Directive 6900.2 Rev. 3, including documenting on a Noncompliance Record.**
9. Pens are overfilled with pigs to the extent that many cannot reach the water troughs. All of the animals appear in good condition.
- Does this scenario represent noncompliance?  
**Yes, 313.2(e) requires animals be provided with access to water in holding pens. If animals cannot get to the water source because of pen density, it is a noncompliance.**
  - If so, is it an egregious situation? **No, it does not meet the definition of egregious.**
  - What action should be taken by inspection personnel?  
**Notify the establishment and, if not promptly corrected, the inspector would take a Regulatory Control Action (RCA) according to 313.50(b) and 500.2(a)(4). If the establishment promptly corrects the situation after notification a RCA would not be necessary. Document the noncompliance on a NR in any case.**
10. Brahma-cross cattle are running down the chute and alleyway from the unloading dock. They appear very excited and some foot slippage occurs, but establishment employees are following recommended animal handling practices and do not appear to be doing anything to make them run or be excited. Floor surfaces are a slip resistant waffle-type concrete pattern and appear to be maintained as to provide good footing.

- Does this scenario represent noncompliance?  
**No, as long as the establishment is doing all that it can do to prevent unnecessary excitement and running. Some types of animals are just naturally highly excitable.**
  - If so, is it an egregious situation? **Not applicable**
  - What action should be taken by inspection personnel? **None**
11. An establishment employee is operating a forklift using its sharp, bare metal forks to roll and lift a nonambulatory disabled (NAD) conscious cow. The cow vocalizes loudly in response.
- Does this scenario represent noncompliance?  
**Yes, 313.2(d)(3) requires suitable equipment for moving disabled animals. A forklift with sharp bare metal forks is not suitable for carrying a disabled cow and rolling it with a forklift would cause unnecessary pain and suffering.**
  - If so, is it an egregious situation?  
**Yes, it meets the definition for egregious noncompliance from Directive 6900.2 Rev. 3 in Chapter I, V, B-4 and B-10.**
  - What action should be taken by inspection personnel?  
**A RCA should be taken according to 313.50(b) and 500.2(a)(4) and the IIC will follow current instructions for egregious noncompliance in FSIS Directive 6900.2 Rev. 3, including documenting on a Noncompliance Record.**
12. Establishment employees use an electric prod to shock all of the cattle when moving them up to the captive bolt stunning area even though they don't appear to be balking. Numerous animals "flinch" in response to the prodding.
- Does this scenario represent noncompliance?  
**Yes, 313.2(b) requires minimizing the use of prods. Excessive use is prohibited. Regulation 313.2(a) also requires driving animals with a minimum of excitement and discomfort and 313.15(a)(2) requires that driving animals to captive bolt stunning area be done with a minimum of excitement and discomfort.**  
**Note: There are similar regulations requiring that animals being driven to stunning areas where chemical, carbon dioxide stunning (313.5(a)(2)), mechanical, gunshot stunning (313.16(a)(2)), or electrical stunning (313.30(a)(2)) is used, be driven with a minimum of excitement and discomfort.**
  - If so, is it an egregious situation? **No, it does not meet the definition of egregious.**
  - What action should be taken by inspection personnel?  
**Notify the establishment and, if not promptly corrected, the inspector would take a Regulatory Control Action (RCA) according to 313.50(b) and 500.2(a)(4).**



**If the establishment promptly corrects the situation after notification an RCA would not be necessary. Document the noncompliance on a NR in any case.**

13. Several nail heads are protruding from the wooden boards on the inside of the unloading chute. Large clumps of hair are adhered to some nail heads.

- Does this scenario represent noncompliance? **Yes, 313.1 requires facilities be kept in good repair free from sharp or protruding objects which may injure animals.**
- If so, is it an egregious situation? **No, it does not meet the definition of egregious.**
- What action should be taken by inspection personnel? **Notify the establishment and, if necessary to prevent the chute from being used until it is repaired, take a RCA at the unloading chute according to 313.50(a) and 500.2(a)(4). You may determine, using professional judgment, that a RCA may not be necessary. For example, if the establishment promptly corrects the problem an RCA would not be needed. Document the noncompliance on a NR in any case.**

14. As a truckload of market hogs are unloaded, it is apparent that there are a considerable number of “slow moving” animals in the group. The establishment employees recognize this and sort the “slow moving” hogs into a separate lot according to the establishment’s program for handling such animals.

- Does this scenario represent noncompliance? **No, by sorting the “slow moving” hogs, the establishment is making provision to meet the regulations in 313.2(a) which require that animals be moved with a minimum of excitement and discomfort. If the establishment did not sort out the slow movers and forced them to keep up with the others, it would result in noncompliance with this requirement by creating unnecessary excitement and discomfort.**
- If so, is it an egregious situation? **Not applicable**
- What action should be taken by inspection personnel? **None, however, it would be very beneficial to discuss this at the weekly meeting to give positive reinforcement for good animal handling practices.**

15. A nonambulatory disabled (NAD) dairy cow is present in a pen of animals presented for antemortem inspection by the establishment. When the establishment employee presenting the animals for antemortem realizes the cow is unable to rise, he moves the other cows to an adjacent pen in a calm manner that avoids any injury to the NAD cow.

- Does this scenario represent noncompliance? **No, the presence of nonambulatory disabled animals that are properly segregated at antemortem does not represent noncompliance. According to 9 CFR 309.2(b) a nonambulatory**

**disabled animal is one that cannot rise from a recumbent position or cannot walk.**

- If so, is it an egregious situation? **Not applicable**
- What action should be taken by inspection personnel?  
**According to FSIS Directive 6100.1 Rev. 3, when establishments present nonambulatory disabled cattle to inspection program personnel (IPP) for antemortem inspection, IPP are to notify the PHV. PHVs are to designate these animals as US Condemned (9 CFR 309.3). After condemning nonambulatory disabled cattle, PHVs or other IPP are to verify that establishments promptly euthanize these animals (9 CFR 309.13(a)). These instructions apply to all cattle, including veal calves.**

**5. Give the exam to each participant and allow at least 10 minutes for completion. A minimum score of 70% must be achieved to receive course credit. Mail the completed exams to the following address:**

**FSIS, OEED, TTDL  
5601 Sunnyside Ave. 1-2290, Mail Stop 5270  
Beltsville, MD 20705-5270  
Or E-Fax 301-504-3372**

**or email to the [FSISAgLearn@usda.gov](mailto:FSISAgLearn@usda.gov) mailbox.**