

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

34-18

6/26/18

ASSESSMENT AND VERIFICATION REVIEWS OF AN OFFICIAL LIVESTOCK ESTABLISHMENT'S ROBUST SYSTEMATIC APPROACH FOR HUMANE HANDLING AND SLAUGHTER

I. PURPOSE

This notice reissues the content of FSIS Notice 04-17 in its entirety and provides additional information about the documentation of the findings from the verification review. This notice provides instructions to FSIS Public Health Veterinarians (PHVs), inspection program personnel (IPP) and District Veterinary Medical Specialists (DVMSs) about assessing and informing official livestock establishments whether their written systematic approach for humane handling and slaughter meets the criteria for being a "robust" program. This notice also outlines the expected frequency for PHV and DVMS verification reviews of an existing robust systematic approach to humane handling and slaughter.

II. BACKGROUND

A. On September 9, 2004, FSIS published a notice in the Federal Register (54 Fed. Reg. 54625) entitled "[Humane Handling and Slaughter Requirements and the Merits of a Systematic Approach To Meet Such Requirements](#)." This notice recommended that establishments develop and implement a systematic approach for humanely handling and slaughtering livestock by effectively addressing the four aspects of a systematic approach, which are:

1. Assessment;
2. Design;
3. Evaluation; and
4. Response

B. In addition and through instructions in [FSIS Directive 6900.2 Humane Handling and Slaughter of Livestock](#), the Agency further informed livestock slaughter establishments that if they developed and implemented a robust systematic approach (i.e., a written systematic approach), FSIS would consider the robust systematic approach, as well as other factors, when deciding whether to issue a Notice of Suspension (NOS) or Notice of Intended Enforcement (NOIE) action in response to an egregious inhumane handling or slaughter incident.

C. FSIS assesses and determines if systematic approaches are "robust," for those establishments that develop and implement a written animal handling program that effectively addresses the four aspects of a systematic approach by reviewing the written program and associated records. Also, verification reviews are conducted to determine if the robust systematic

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approach program is implemented and operates as described. PHVs and DVMSs will continue to assess and perform verification reviews of written systematic approaches that are considered robust. FSIS considers a robust systematic approach to be a dynamic process that an establishment is continuously maintaining.

NOTE: Establishments will find the following compliance guide on the FSIS Web site: [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock](#). This document may help establishments develop a systematic approach to the humane handling of livestock.

III. FSIS ASSESSMENT AND DETERMINATION OF A ROBUST SYSTEMATIC APPROACH

A. When establishment management wants to implement an animal handling program it believes to be a robust systematic approach, it is to request an FSIS review. IPP are to review the program and any associated records. IPP should use “ELEMENTS OF A ROBUST SYSTEMATIC APPROACH TO HUMANE HANDLING AND SLAUGHTER” (Attachment 3 in [FSIS Directive 6900.2](#)) when assessing the establishment’s written program of its robust systematic approach and when performing humane handling verification activities found in [FSIS Directive 6900.2](#).

B. The IPP and DVMS are to discuss and determine if the information presented by establishment management meets the criteria for a robust systematic approach. If the criteria are met, the IPP will inform the establishment that it currently has a robust systematic approach and document this in a Memorandum of Interview (MOI). A copy of the MOI is to be shared with the establishment and the DVMS.

NOTE: For an establishment to have and maintain a robust humane handling systematic approach, they must follow the Federal Register (54 Fed. Reg. 54625) entitled [Humane Handling and Slaughter Requirements and the Merits of a Systematic Approach To Meet Such Requirements](#) (e.g., 4 steps of the systematic approach) and the elements of a robust systematic approach found in [FSIS Directive 6900.2](#).

C. IPP are to inform establishment management that, depending on the circumstances, an incident of egregious inhumane handling or slaughter may not always result in the suspension (i.e., NOS) of slaughter activities at an establishment with a robust systematic approach (Refer to [FSIS Directive 6900.2](#) for instructions concerning the use of regulatory discretion in response to an egregious noncompliance). Whether an establishment has successfully implemented a robust systematic approach, its humane handling compliance history, and whether the egregious violation is found to be an anomaly are some of the factors to be considered by FSIS when determining whether to issue an NOIE, rather than an NOS. If the establishment is suspended (i.e., NOS), or receives an NOIE, for the egregious incident, they no longer are considered to have a robust systematic approach. IPP may reassess the robustness of an establishment’s systematic approach after FSIS has closed out the verification plan.

IV. PHV VERIFICATION REVIEW

A. PHVs, assigned to livestock slaughter establishments, are to schedule and perform a monthly verification review task of the establishment’s robust systematic approach. This task titled “*Verification of a Robust Systematic Approach*” is found in the Public Health Information System (PHIS). 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. After completing the questionnaire, PHVs are to mark it complete. PHVs are to use the “ELEMENTS OF A ROBUST SYSTEMATIC APPROACH TO HUMANE HANDLING AND SLAUGHTER” and the Humane Handling Activities Tracking System (HATS) tasks (both found in [FSIS Directive 6900.2](#)) for additional guidance when performing the verification review.

B. PHVs, when performing their humane handling verification activities, are to verify that the procedures observed and the documentation reviewed align with the establishment's robust systematic approach program and comply with the humane handling regulations.

C. The PHV, or designee, is to provide feedback to the establishment about the findings from the verification review during the weekly meeting. The PHV, or designee, is also to inform the establishment whether the information and data maintained, provided and reviewed was sufficient to make a determination regarding if the establishment has maintained their robust systematic approach. This discussion is to be documented in an MOI (entered into PHIS) and it should include a brief statement that the establishment has, or has not, maintained their robust systematic approach. (A copy of this MOI is to be shared with the establishment and the DVMS). If it is determined by FSIS that the establishment's systematic approach is no longer robust, the establishment management may object to the content of the MOI and it may document its concerns, or disagreement, in several ways as described in [FSIS Directive 5010.1](#), *Food Safety Related Topics for Discussion During Weekly Meetings with Establishment Management*.

D. The PHV is to inform the establishment that because it has a robust systematic approach, the associated program, corrective actions, and records produced will be subject to monthly verification reviews. The robust status designation may be removed if the verification review shows that the establishment is not implementing its robust systematic approach program. 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.

V. DVMS VERIFICATION REVIEW

DVMSs are to evaluate establishments' robust systematic approach programs during their Humane Handling Verification Visits ([FSIS Directive 6910.1](#), *District Veterinary Medical Specialist (DVMS) - Work Methods*). Visits are performed every 12-18 months. DVMSs are to record their findings and provide feedback to establishments during their visits.

VI. DATA ANALYSIS

The FSIS Office of Field Operations will analyze, as needed, the data collected through the monthly PHIS questionnaire to determine:

1. If the PHVs are completing the monthly verification tasks;
2. What changes in humane handling and slaughter are being observed;
3. What percentage of establishments maintain their robust systematic approach status;
4. What percentage of establishments lose their robust systematic approach status and then re-implement; and
5. How many and what type (e.g. NOIE, regulatory control action) of enforcement actions have occurred since implementation of PHV monthly verification.

VII. QUESTIONS

Refer questions regarding this notice to the Policy Development Staff through [askFSIS](#) or by telephone at 1-800-233-3935. When submitting a question, use the Submit a Question tab, and enter the following information in the fields provided:

- Subject Field: Enter **Notice 34-18**
- Question Field: Enter question with as much detail as possible.
- Product Field: Select **General Inspection Policy** from the drop-down menu.
- Category Field: Select **Slaughter- Humane Handling** from the drop-down menu.
- Policy Arena: Select **Domestic (U.S.) Only** from the drop-down menu.

When all fields are complete, press **Continue** and at the next screen press **Finish Submitting Question**.

NOTE: Refer to [FSIS Directive 5620.1](#), *Using askFSIS*, for additional information on submitting questions.

A handwritten signature in cursive script that reads "Solicitor J. Wagner".

Assistant Administrator
Office of Policy and Program Development