

February 6, 2018

The Honorable Sonny Perdue, Secretary of Agriculture
Carmen Rottenberg, Acting Deputy Under Secretary for Food Safety
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Dear Secretary Perdue and Deputy Under Secretary Rottenberg,

We, the undersigned consumer, labor, public health, environmental, animal protection, and civil rights organizations, are writing to express concern over the U.S. Department of Agriculture's (USDA) proposed expansion of its high-speed pig slaughter program through the Modernization of Swine Slaughter Inspection rule. Under this rule, the New Swine Slaughter Inspection System (NSIS) would revoke maximum slaughter line speeds while transferring key inspection duties to plants themselves, presenting a number of food safety, animal welfare, and worker safety concerns. We urge the USDA to withdraw this proposal and put an end to this high-speed slaughter program, formerly known as the HACCP-Based Inspection Models Project (HIMP), instead.

Although proponents have claimed that the high-speed pilot program was designed to "yield improved food-safety and other benefits to consumers," evidence shows that it undermines food safety and puts consumers in danger. The HIMP pilot program has essentially placed key food safety oversight duties into the hands of slaughter plants. At the increased line speeds permitted under HIMP, problems often go unnoticed by plant workers. The expansion of HIMP through the NSIS would threaten consumers nationwide.

A 2013 report by the USDA's own Office of the Inspector General stated that "since FSIS did not provide adequate oversight, HIMP plants may have a higher potential for food safety risks," and concluded, "[T]he swine HIMP program has shown no measurable improvement to the inspection process," and that "three of five HIMP plants had some of the highest numbers of NRs [non-compliance reports] nationwide."¹

According to a USDA inspector who worked inside a HIMP plant: "On numerous occasions, I witnessed [plant employees] fail to spot abscesses, lesions, fecal matter, and other defects that would render an animal unsafe or unwholesome." The inspector further explained that without incentive, these plant workers "don't actually want to shut off the line to deal with problems they spot on the job. ... Obviously their employer will terminate them if they do it too many times."²

¹ USDA Office of the Inspector General, "Food Safety and Inspection Service - Inspection and Enforcement Activities At Swine Slaughter Plants: Audit Report 24601-0001-41." (Washington, DC, 2013), <https://www.usda.gov/oig/webdocs/24601-0001-41.pdf> (accessed February 1, 2018).

² Government Accountability Project. "Inspectors Warn Against USDA's High-Speed Hog Inspection Program." <https://www.whistleblower.org/blog/052130-inspectors-warn-against-usda%E2%80%99s-high-speed-hog-inspection-program> (accessed February 1, 2018).

In 2015, a Compassion Over Killing (COK) investigation of Quality Pork Processors (QPP), a plant supplying Hormel and operating under HIMP at line speeds of approximately 1,300 pigs per hour, or at least one pig every five seconds (contrasting standard line speeds of 571 to 1,106 pigs per hour, according to USDA data), verified HIMP's inherent food safety and animal welfare problems on video. COK revealed pigs covered in feces and pus-filled abscesses being processed for human consumption with a USDA inspection seal of approval. COK even exposed a QPP supervisor, who was supposed to be overseeing the stunning process, literally sleeping on the job. The investigation also found plant employees, under pressure to keep up with the facility's high operating speeds, dragging, kicking, beating, and excessively shocking pigs, as well as numerous instances of improper stunning and slaughter.³ These problems will undoubtedly be exacerbated at plants nationwide under NSIS.

After watching COK's footage, your agency's Office of Investigation, Enforcement, and Audit concluded that "evidence collected illustrated that the establishment was not in compliance with the regulations," and stated that "[h]ad these actions been observed by FSIS inspectors, they would have resulted in immediate regulatory action against the plant."⁴ The USDA's own words reinforce the need for increased government oversight of slaughter plants instead of important duties being shifted to these plants' employees.

In 2016, moved by such concerns about this program, 60 members of Congress wrote to the USDA, stating that "FSIS has not demonstrated that its hog slaughter pilot program actually reduces contamination, and therefore illness, rates. To the contrary, the available evidence suggests the hog HIMP will undermine food safety."⁵ It is illogical to expand such a problem-ridden program nationwide.

The congressional letter also highlighted a Human Rights Watch report that cited high line speeds as the greatest contributor to worker injuries in slaughter plants, already widely recognized as one of the most dangerous workplaces in America. In hog slaughter operations, plant sorters work in close proximity to one another, performing straining repetitive motions and surrounded by dangerous equipment, including knives and saws. As a consequence, they often suffer from increased musculoskeletal injuries and workplace accidents. Plants operating under the high-speed pilot program have the highest line speeds in the country and therefore may pose the greatest risk of injury to workers. The pace of the line is so great in these plants that workers also receive inadequate breaks and opportunities to use the restroom.

The increased volume of pigs raised and slaughtered due to high line speeds, along with reduced oversight, is also of grave concern for our environment. Slaughterhouses like QPP discharge

³ Compassion Over Killing. "Horrors at Hormel: USDA-Approved High-Speed Slaughter Hell." <http://cok.net/inv/hormel/> (accessed February 1, 2018).

⁴ Carl A. Mayes, Assistant Administrator, USDA Office of Investigation, Enforcement, and Audit, to Lisa Winebarger, Counsel, Compassion Over Killing, February 2, 2016.

⁵ Representative Rosa DeLauro et al., United States House of Representatives, to Secretary Tom Vilsack, USDA, January 19, 2016, available at <http://cok.net/wp-content/uploads/2017/01/Final-Hog-HIMP-Letter.pdf>.

millions of pounds of nitrogen, phosphorus, ammonia, and other contaminants in wastewater that pollute drinking water and aquatic resources, ultimately putting consumers at even greater risk.

As you consider your proposal, we hope that you will weigh these issues carefully and, ultimately, reject the NSIS. We look forward to meeting with Deputy Under Secretary Rottenberg to discuss this further. Thank you for your time.

Sincerely,

American Society for the Prevention of Cruelty to Animals
Animal Equality
Animal Legal Defense Fund
Animal Protection and Rescue League
Animals' Angels
Awakening Respect and Compassion for all Sentient Beings
Brighter Green
Center for Biological Diversity
Center for Food Safety
Compassion Champs
Compassion Over Killing
Compassionate Action for Animals
Compassionate Farming Education Initiative
CompassionWorks International
Encompass
Factory Farming Awareness Coalition
Farm Sanctuary
For All Animals
Friends of the Earth
Government Accountability Project
Institute for Agriculture and Trade Policy
Interfaith Worker Justice
Lady Freethinker
Mercy For Animals
National Employment Law Project
National Joint Council of Food Inspection Locals
North Carolina Environmental Justice Network
Oxfam America
Public Citizen
Public Justice Center
The Humane League
United Support and Memorial for Workplace Fatalities
Waterkeeper Alliance
Worksafe
World Animal Net