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THE WELFARE OF BIRDS AT SLAUGHTER IN THE UNITED STATES

The Need for Government Regulation

ANIMAL WELFARE INSTITUTE

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ABOUT THE RESEARCH

This report presents the findings of a review of federal food inspection documents produced by the USDA between the years 2017 and 2019. The records were obtained from the USDA through numerous requests made by the Animal Welfare Institute (AWI) under the Freedom of Information Act (FOIA). This survey was conducted with the goal of determining the nature and extent of government oversight of the manner in which birds raised for meat and eggs are treated at the time of slaughter in the United States. It updates previous reviews of poultry slaughter oversight published by AWI in April 2016 and November 2017.

November 2020 (3rd edition)

IN THIS REPORT

- 2 Overview of Poultry Slaughter in the United States
- 4 Attempts to Regulate the Humaneness of Slaughter
- 6 USDA Response to Abuse of Birds Has Been Inadequate
- 9 USDA Records Indicate a Need for Regulation
- 14 Undercover Investigations Document a Need for Regulation
- 16 USDA Records Demonstrate Ineffective Oversight
- 18 Poultry Industry Misrepresents USDA Oversight
- 20 Recommendations

ABOUT THE ANIMAL WELFARE INSTITUTE

Since its founding in 1951, the Animal Welfare Institute (AWI) has been alleviating suffering inflicted on animals by people. AWI works to improve conditions for the billions of animals raised and slaughtered each year for food in the United States. Major goals of the organization include eliminating factory farms, supporting high-welfare family farms, and achieving humane transport and slaughter of all farm animals.

This report was prepared by Dena Jones of AWI, who wishes to thank her colleagues Erin Sutherland and Allie Granger for their assistance in the preparation of the report. All photos by Mercy For Animals.

Executive Summary

Regulation of the Handling of Birds at Slaughter Is Needed to Prevent Animal Suffering

In the early-to-mid 2000s, undercover investigations by animal protection organizations exposed mistreatment of chickens and turkeys in some of the nation's largest poultry slaughter establishments. The response of the US Department of Agriculture (USDA) was to issue a Notice in September 2005, reminding the poultry industry that birds must be handled in a manner that is consistent with good commercial practices (GCP), which means they should be treated humanely. Shortly thereafter, the USDA began issuing reports to plants observed violating GCP. However, no formal regulations were written. As a result, compliance with GCP remains only voluntary; in most cases, USDA inspection personnel do not take enforcement action for violations, even when intentional abuse is involved.

The research described in this report reviewed USDA records related to industry GCP for poultry handling. Findings of the research include the following:

- ✎ **The USDA's response to the mistreatment of birds has been inadequate.** The USDA's oversight of the treatment of birds at slaughter, as measured by the number of inspection records issued, has increased gradually over the past 14 years. However, between 2017 and 2019, more than one-third (35%) of federal poultry plants were issued no enforcement records whatsoever by the USDA documenting their compliance with GCP. Inspectors took action to stop the abuse of birds in only 14 percent of the incidents that were documented in the records. Moreover, only two Letters of Concern were issued by USDA officials to poultry plants for repeated noncompliance with industry GCP for bird handling. Given these facts, AWI has concluded that the USDA is not serious about preventing mistreatment of birds at slaughter, and it created the GCP oversight program mainly to dampen public and congressional concerns.
- ✎ **The USDA's own records document the need for regulation.** A review of USDA records has revealed incidents where hundreds, and even thousands,

of birds have suffered greatly due to violations of industry GCP. Included in these records are examples of intentional cruelty to birds by plant employees. Slaughter plant workers have been observed throwing, kicking, and punching birds on numerous occasions.

- ✎ **Undercover investigations by animal protection organizations document the need for regulation.** Animal protection groups have continued to conduct undercover investigations that document the same type of abuse uncovered a decade before, demonstrating that the USDA strategy of allowing the poultry industry to police itself has failed. Video captured during the investigations suggests that abuse of birds is common practice, at least at some slaughter establishments.
- ✎ **USDA records demonstrate that its strategy of voluntary compliance has been ineffective.** USDA records reveal that some poultry plants have been cited repeatedly for the same or similar violations of industry GCP. This is not surprising, given that USDA inspection personnel are not able to take any enforcement action for most of the violations.
- ✎ **The poultry industry misrepresents USDA oversight to avoid regulation.** The US poultry industry promotes the view that the USDA actively enforces humane slaughter practices for poultry, while simultaneously arguing that the USDA lacks the authority to regulate humane slaughter of birds. Leaders of the industry have issued a number of inaccurate and, in some cases, contradictory statements regarding the USDA's authority to stop the mistreatment of birds at slaughter.

Overview of Poultry Slaughter in the United States

How many birds are killed for food each year?

According to the USDA, in 2019, 9.3 billion chickens, 228 million turkeys, and 28 million ducks were slaughtered in the United States under federal inspection. This number excludes birds of these species killed under state or custom-exempt inspection, and it excludes other species of birds killed for meat, such as geese, guineas, ostriches, emus, rheas, quail, and squab (young pigeons).

How many poultry slaughter plants operate in the United States?

Approximately 300 poultry slaughter plants operate under federal inspection, and these establishments slaughter a vast majority of the 9.6 billion total birds killed every year for meat.

What are the largest US poultry companies?

According to WATT Poultry USA, in 2019, the largest US meat chicken (“broiler”) companies were Tyson Foods, Pilgrim’s Pride Corp., Sanderson Farms, Perdue Farms, and Koch Foods. The largest turkey companies that year were Butterball LLC, Jennie-O Turkey Store, Cargill Turkey, Farbest Foods, and Tyson Foods. Both the chicken and turkey top rankings have remained unchanged since at least 2014.

What methods are used to kill birds?

Birds are typically slaughtered by throat cutting to induce blood loss. To keep birds immobile for cutting, most poultry slaughter plants in the United States employ electrified water baths (see Figure 1). Alternatives to electric stunning include stunning with gas or low atmospheric pressure, which are generally considered more humane because the birds are rendered unconscious (or dead) before being shackled and inverted for bleeding purposes. While gas and low atmospheric pressure stunning both avoid conscious shackling of birds, other risks to welfare remain, including drowning in the scald tank if birds are not adequately stunned and/or cut. More than 90 percent of chickens in the United States are currently stunned

with electricity, but gas stunning has become common at US turkey plants.

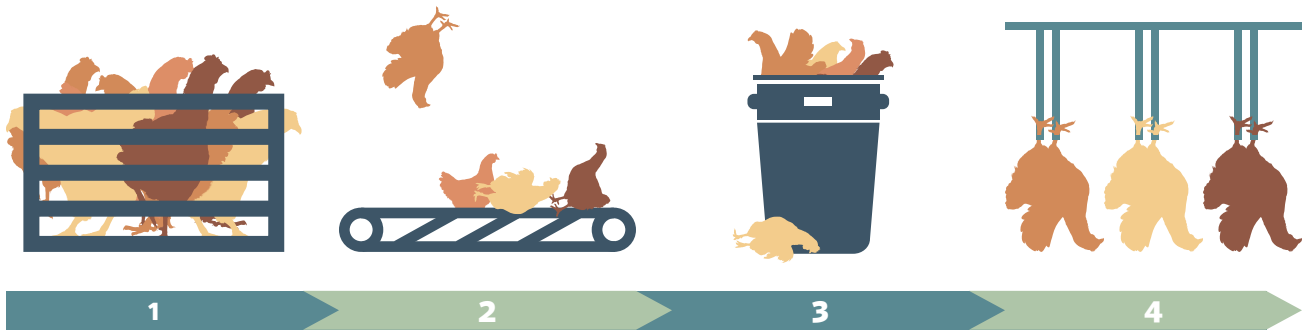
What are the differences between poultry slaughter in the United States and in the European Union?

A greater proportion of birds are slaughtered at small and mid-sized establishments in the European Union, while in the United States the poultry industry is more consolidated and integrated, meaning that fewer companies control the raising and slaughter of poultry. In the European Union, a greater proportion of birds are slaughtered by methods that use gas stunning, because stunning is viewed as a means of rendering birds insensible to pain, not just of restraining them for cutting. Although electric stunning systems are still common in the European Union, electric current levels there are set significantly higher than in the United States, in order to ensure that birds are adequately stunned. This means that in the United States, there is a greater risk that a bird will not be rendered unconscious before slaughter.

How does the US government regulate poultry slaughter?

Poultry slaughter is regulated by the federal Poultry Products Inspection Act (PPIA). Birds are killed for human consumption at slaughter plants inspected by the USDA or state departments of agriculture. Birds may also be killed at custom-exempt plants, which are inspected only once each year. In addition, there are several exemptions from inspection, one of which allows a licensed establishment to slaughter up to 20,000 birds per year for sale to any consumer, restaurant, institution, or retail outlet.

Figure 1. How Most Poultry Is Killed in the US

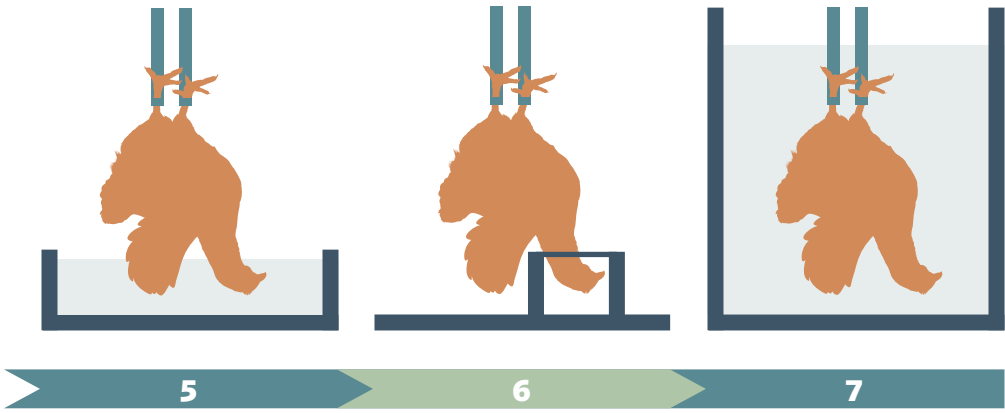


1 Arriving at Slaughter Plant
 Birds arrive crammed inside crates loaded onto large trucks. There are no legal limits on the duration of transport, or how long birds wait at the plant before slaughter. There are also no requirements that birds be protected from extreme heat or cold, or provided with adequate ventilation.

2 Dumping onto Conveyor Belt
 Workers or equipment dump birds out of their cages onto conveyor belts. Injuries to the birds, including bruising and broken bones, may occur during this step.

3 Sorting Dead and Live Birds
 Workers separate living and dead birds. Workers sometimes toss live birds onto the floor where they may be stepped on, or into garbage bins where they may become buried under dead birds and eventually suffocate.

4 Shackling on the Line
 Workers hang live birds by their legs on the slaughter line. Sick and previously injured birds may be shackled and hung. Workers struggle to keep pace with the rapidly moving line, and if they use excessive force, injuries to the birds such as broken or dislocated legs and wings may result.



5 Stunning in Electrified Bath
 The birds' heads are dragged through an electrified water bath. There are no legal minimum current levels, and it is unknown whether birds are rendered unconscious and insensible to pain or are merely immobilized. Birds who raise their heads to get stunned. the bath fail to get stunned.

6 Bleeding After Cutting
 The birds' necks are cut by an automated blade. Birds who were not properly stunned in the last step may raise their heads to avoid the knife. Workers assigned to manually cut birds that miss the blade may not be able to catch all uncut birds due to the rapid speed of the line.

7 Entering the Scald Tank
 Birds who are not adequately bled in the last step will be alive and conscious when they are dunked into a tank of scalding water (designed to loosen feathers from the carcass). Birds drowning in the scald tank are referred to as "red birds" or "cadaver birds."

Attempts to Regulate the Humaneness of Poultry Slaughter

The Humane Methods of Slaughter Act (HMSA) was enacted by Congress in 1958, and the language was amended 20 years later to provide an enforcement mechanism and to incorporate the law into the Federal Meat Inspection Act (FMIA). The explicit language of the law refers to “livestock” and neither includes nor excludes birds. The position of animal protection organizations is that the USDA has the authority to cover birds under the law, while the USDA’s view is that including birds would require an Act of Congress. A legal discussion of the subject is beyond the scope of this report; instead, this section will briefly describe attempts by animal protection advocates over the past 30 years to influence both Congress and the USDA to protect the welfare of birds at slaughter.

Animal protection advocates worked with members of Congress to introduce legislation to require humane slaughter of poultry in 1992, 1993, and 1995. The 1992 bill would have amended the PPIA to require that poultry be slaughtered according to the methods detailed in the HMSA. This would have had the effect of requiring that birds be rendered insensible to pain before being shackled. The 1993 and 1995 bills differed in that they allowed birds to be rendered insensible either before or immediately after shackling. None of the bills addressed the entirety of handling birds at slaughter, only the stunning of birds during this process. The 1993 bill received a hearing in the House Agriculture Subcommittee on Nutrition, at which the president of AWI testified. In 1996, the House Agriculture Committee requested an executive comment from the USDA on the 1995 legislation.

No further attempts were made in Congress to address poultry welfare at slaughter until 2013, when Senator Kirsten Gillibrand (D-NY) introduced the Safe Meat and Poultry Act of 2013. This comprehensive meat safety bill included a section on “good commercial practices in receiving and processing live poultry” that would have created new standards for handling birds at slaughter. Specifically, the bill required that poultry establishments

use reasonable care and other GCP during the handling and slaughter of poultry, including prompt euthanasia of severely injured or ill birds, employee training and competency requirements, and the implementation of live poultry slaughter plans that include routine veterinary oversight. It also contained provisions for escalating penalties for serious violations, civil penalties, and whistleblower protection. Congress took no action on the bill, however.

Animal protection advocates have filed two lawsuits to include birds in the coverage of humane slaughter laws. In 2005, the Humane Society of the United States and others sued the USDA in hopes of forcing the department to include chickens, turkeys, and other poultry species within the definition of “livestock” in the HMSA. This would ensure that birds are rendered insensible to pain before being shackled and killed, consistent with the language of the 1992 federal legislation. Including poultry in the HMSA would also provide humane handling of birds in connection with slaughter. However, in 2008 the district court ruled that while the definition of livestock in the HMSA is ambiguous, Congress did not intend for poultry to be covered under the law. On appeal, the circuit court found that plaintiffs did not have standing to sue and sent the case back to the district court for dismissal.

Approximately 10 years later, in June 2015, People for the Ethical Treatment of Animals (PETA) sued California, charging that the state was failing to enforce its own humane slaughter law in poultry plants. The suit is based on a 1991 amendment to the state humane slaughter law that specifically covers poultry. It challenges the state’s determination that the law pertains only to establishments that sell live birds and slaughters them for customers; these establishments are monitored by the state food and agriculture department. In its suit, PETA asked that the court direct the state to apply the law to the slaughter of birds under federal inspection.

In addition to these lawsuits, the USDA has been formally petitioned on four occasions to issue regulations addressing the humaneness of poultry slaughter. In 1995, AWI and the Animal Legal Defense

Fund submitted a rulemaking petition to the USDA, requesting that the department promulgate regulations under the PPIA to ensure adequate stunning of birds prior to slaughter. That petition argued that effective stunning was necessary to prevent animal suffering and to ensure the wholesomeness of poultry products.

In denying the petition, the USDA explained that “the promulgation of humane handling and slaughter regulations would not serve to prevent the movement or sale of adulterated or misbranded poultry products in interstate or foreign commerce,” despite the petition having provided considerable evidence demonstrating the causal relationship between inhumane handling and slaughter of birds and adulterated poultry products. The USDA denial also expressed the opinion that “the PPIA does not grant FSIS [Food Safety and Inspection Service] authority to promulgate regulations concerning the humane handling or slaughter of poultry.”

However, in 2005, the USDA issued a Notice to slaughter establishments that acknowledged the link between inhumane treatment of birds and adulterated poultry products, in direct contradiction to its stated rationale in denying the 1995 petition. (The 2005 Notice is described further in the following section.) In December 2013, AWI and Farm Sanctuary used the 2005 Notice as the basis of a second rulemaking petition to the USDA on poultry slaughter. Similar to the 1995 petition, this petition argued that the USDA has the authority to promulgate regulations concerning practices that have the potential to result in product adulteration. Unlike the previous attempt, however, this petition focused on live animal handling only and did not discuss the method of stunning.

The USDA did not respond to the AWI/Farm Sanctuary petition until November 2019, when it denied both the 2013 petition, as well as a May 2016 letter from AWI that the USDA treated as an additional rulemaking petition. This letter requested that the USDA modify its regulations and directives to prohibit behavior that has the potential to cause birds to die other than by slaughter, specifically as a result of exposure to extreme weather conditions and/or prolonged holding times

at the slaughter plant. In denying the two petitions, the USDA noted the lack of a specific federal humane handling and slaughter statute for poultry, even though the AWI/Farm Sanctuary petition did not argue that the department had authority to regulate poultry handling under any humane slaughter law, but rather that it had the authority to do so under the PPIA. The denial also explained that its existing system for monitoring the handling of birds under the PPIA is adequate. In effect, the department simultaneously argued that it has and does not have the authority to regulate bird handling. In August 2020, AWI and Farm Sanctuary sued the USDA for arbitrarily denying its petitions.

The fourth rulemaking petition was submitted by Mercy For Animals in November 2017. It requested that the USDA include birds slaughtered for food under the HMSA and FMIA, by arguing that the department has the authority to cover birds and refusing to do so is arbitrary and capricious. In March 2018, the USDA denied the petition, stating “the HMSA does not include poultry as ‘livestock’ for the purposes of the Act.”



In the United States, birds are still conscious when they are shackled by their legs and hung upside down.

USDA Response to Abuse of Birds Has Been Inadequate

Between 2003 and 2006, animal protection organizations conducted several undercover investigations at US chicken and turkey slaughter plants. These investigations revealed egregious and intentional abuse of birds by workers at plants, which outraged the public and public officials alike. According to the USDA, in the aftermath of these investigations, several members of Congress expressed concerns regarding the inhumane treatment of poultry at slaughter. The USDA also confirmed receiving over 20,000 letters from the public expressing concerns about the inhumaneness of poultry slaughter practices, as well as 13,000 email messages supporting the inclusion of poultry in the Humane Methods of Slaughter Act.

The USDA response to the documentation of animal abuse at slaughter was to issue a Notice in September 2005 that reminded poultry slaughter establishments that “under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices, which means they should be treated humanely.” The Notice stated that although there is no specific federal humane handling and slaughter statute that covers birds, “under the PPIA, poultry products are more likely to be adulterated if ... they are produced from birds that have not been treated humanely, because such birds are more likely to be bruised or to die other than by slaughter.”

A careful reading of the Notice makes clear that, although the USDA acknowledges it has the authority to require that birds be handled humanely, it is not doing so. Neither of the two regulations cited in the Notice prohibit behavior that results in mistreatment of individual birds. Section 381.65(b), which cites the term “good commercial practices,” only addresses birds drowning in the scald tank and does not refer to any other aspects of live bird handling. Section 9 CFR 381.90 requires that “carcasses of poultry showing evidence of having died from causes other than slaughter” be condemned, but it does not prohibit

behavior that can result in death other than slaughter. Moreover, the Notice fails to define “good commercial practices” other than to identify the weak National Chicken Council Animal Welfare Guidelines as one example.

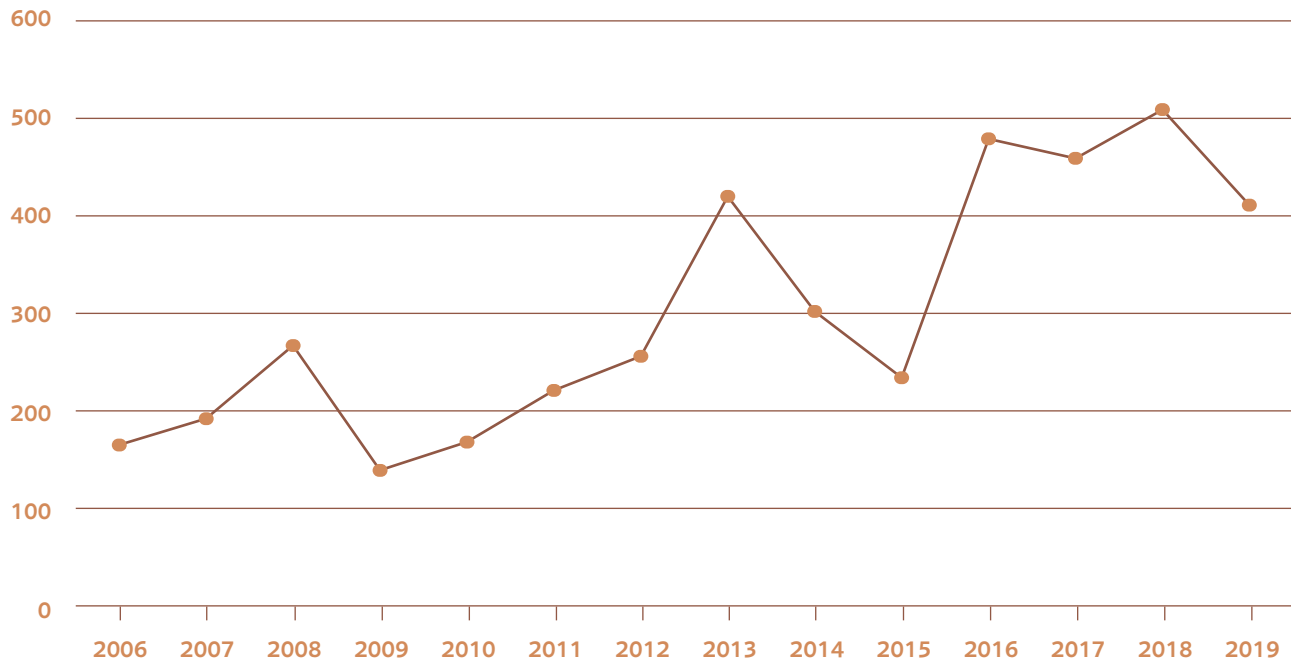
Unknown to animal protection groups and others at the time, following publication of the 2005 Notice, USDA inspection personnel began conducting verification procedures for GCP. It also began issuing official Noncompliance Records for observed instances of noncompliance with GCP standards, despite the fact that GCP standards had not been codified in regulation, and compliance with the standards was (and remains) strictly voluntary. In December 2007, assessment of GCP was added to USDA Directive 6100.3 on antemortem and postmortem inspection of poultry. Since that time, AWI has been able to verify through USDA records that government inspectors do in fact perform GCP verification tasks during each shift when slaughter is being conducted at federally inspected plants.

AWI became aware in 2011 that the USDA was citing violations of poultry good handling practices, and in 2012 the animal protection group Farm Sanctuary started submitting Freedom of Information Act (FOIA) requests for USDA records related to the humane handling of poultry. To date, Farm Sanctuary and AWI have requested and received records dating from the initiation of GCP oversight in January 2006 through December 2019. This report summarizes the content of the records received in response to those requests.

The number of inhumane handling incidents cited by the USDA has varied considerably over the past decade and a half (Figure 2). The reason for this is unknown. One possible explanation is that the USDA has not provided AWI with all relevant records in response to its FOIA requests. Regardless of the reason for the annual fluctuation, however, the number of GCP records has generally been increasing, with the highest number of records reported for the years 2016–2018.

The average number of records issued per year for the 14-year period was 302. This amounts, approximately,

Figure 2. Number of GCP Poultry Slaughter Records Generated by USDA 2006–2019



to just one record a year for each of the 300 federally inspected US poultry slaughter plants. This number is extremely low, particularly given the high volume of poultry slaughter in the United States. Consequently, AWI views GCP records as an unreliable measure of the humaneness of poultry slaughter. This position is supported by the finding that 35 percent of US poultry slaughter plants were issued no records related to the humane treatment of birds from 2017 through 2019 (Figure 3), during which time some of these plants slaughtered millions of birds. On the other hand, nine plants were issued more than 25 records each, illustrating the inconsistency in which the USDA is monitoring the humane handling of birds at slaughter. The haphazard manner in which the USDA administers GCP is not surprising, given that the standards for inspection are intended only as guidance, meaning that compliance on the part of the industry is merely voluntary.

In the summer of 2008, the USDA's district veterinary medical specialists (DVMS) underwent training on

Figure 3. GCP Records per Poultry Slaughter Plant 2017–2019

| Number of Enforcement Records | Number of Plants | Percentage of Plants |
|-------------------------------|------------------|----------------------|
| 0 | 105 | 35.0 |
| 1 | 41 | 13.7 |
| 2 | 29 | 9.7 |
| 3–5 | 44 | 14.7 |
| 6–10 | 44 | 14.7 |
| 11–15 | 16 | 5.3 |
| 16–25 | 12 | 4.0 |
| 25+ | 9 | 3.0 |

poultry handling, and in 2009 they began conducting periodic GCP verification visits at federal poultry plants. USDA Directive 6910.1, rev. 1, on DVMS work methods, was revised in December 2009 to include activities related to poultry GCP. The directive explains that, as a general rule, a DVMS is to conduct a GCP correlation visit every 12 to 18 months at each slaughter plant that handles live birds. While AWI considers that goal too modest, the USDA does appear to be meeting it. AWI has researched the number of DVMS poultry handling verification visits intermittently over the past several years and has found that most federal poultry plants are audited that often.

In 2013, AWI requested that the USDA post GCP records on its website, and the department agreed. At that time, the USDA recognized that it needed to address inconsistencies in the creation of the records, in particular the use of Noncompliance Records to document nonregulatory issues. In January 2015, the USDA issued a Notice to inspection personnel, providing instructions for writing poultry GCP Noncompliance Records (regulatory GCP violations) and Memorandums of Interview (nonregulatory GCP violations) for poultry mistreatment.

The 2015 Notice expired in February 2016. Some of the content was eventually incorporated into a new “Verification of Poultry Good Commercial Practices” directive (6110.1) published in July 2018. The directive clarifies that Noncompliance Records are to be issued only for situations where the poultry plant has lost control of its process for handling birds, illustrating the USDA view of poultry handling as a process-control issue, and not an individual bird-handling issue. In other words, mistreatment of single birds or small numbers of birds—whether it be workers intentionally punching and kicking birds or birds drowning in the scalding tank—is not a regulatory violation, and therefore cannot be documented on Noncompliance Records. In order for a regulatory noncompliance to be documented, it must involve repeated instances, according to the directive. Moreover, posting of the records on the USDA website was not included in the 2018 directive, indicating that the USDA had reversed its previous decision to make these records publicly available without a FOIA request.

In August 2018, AWI and Farm Sanctuary sued the USDA for failing to adequately respond to a FOIA request by our organizations asking for proactive disclosure of poultry and livestock slaughter records. The lawsuit is based on a 2016 amendment to FOIA that requires federal agencies to proactively post records that are subject to frequent requests. The suit, filed in the US District Court for the Western District of New York, asks the USDA to post records online relating to the enforcement of both the Humane Methods of Slaughter Act and the Poultry Products Inspection Act. Defendants’ motion to dismiss was denied in July 2019, and the lawsuit is still pending at press time.

In-plant inspection personnel take “regulatory control actions” to control product or processors that are in violation of USDA regulations. Examples include slowing or stopping the slaughter line and application of a USDA reject/retain tag that prevents the use of a piece of equipment or area of the slaughter plant until the violation is corrected. Only 14 percent of the GCP records reviewed by AWI noted that a regulatory control action was taken (Figure 4). This is not surprising, given that most GCP incidents are not covered by USDA regulation. By comparison, 45 percent of records issued under the Humane Methods of Slaughter Act for the slaughter of mammals between 2016 and 2018 indicate that a regulatory control action was taken in response to the violation.

Figure 4. Regulatory Control Actions per GCP Record 2017–2019

| Year | Number of GCP Records | Number/% of RCAs |
|--------------|-----------------------|--------------------|
| 2017 | 459 | 52 (11.3%) |
| 2018 | 509 | 86 (16.9%) |
| 2019 | 411 | 55 (13.4%) |
| Total | 1379 | 193 (14.0%) |

The USDA claims that it refers incidents of intentional mistreatment of birds to state officials, and AWI has reviewed USDA-generated Letters of Concern cautioning plant management that such action may be taken. These letters announce that the state veterinarian and state board of animal health will be notified of the situation described within the letter. However, according to records received by AWI, only two Letters of Concern were issued during 2017–2019. Moreover, it is not known whether any state agricultural agency has ever taken action against a slaughter establishment—such as referring a case for potential prosecution under the state’s cruelty statute—after receiving a copy of a Letter of Concern.

On the basis that (1) a large percentage of plants were not issued any GCP records during a recent three-year period, (2) inspectors rarely take action in response to inhumane handling incidents, and (3) only two Letters of Concern were issued by the USDA to poultry plants for repeated noncompliance with industry GCP during that time, AWI has concluded that the USDA is not serious about preventing mistreatment of birds at slaughter, and it created the GCP oversight program mainly to dampen public and congressional concerns.

USDA Records Indicate a Need for Regulation

AWI has organized the GCP records received from the USDA by type of violation. The most common violations are birds drowning in the scald tank and improper disposal of live birds (see Figure 5). Many of the GCP incidents reported by the USDA involved more than one bird; in some cases hundreds, or even thousands, were affected. The types of violations typically involving the largest numbers of birds are high dead-on-arrival (DOA) rates and mechanical problems resulting in injury or death.

Figure 5. Types of Good Commercial Practice Violations at Federal Plants 2017–2019

| Type of GCP Violation | Number of Reports | % |
|--|-------------------|------|
| Improper Shackling/ Stunning/Cutting Resulting in Birds Drowning in the Scald Tank | 485 | 30.4 |
| Live Birds Discarded onto Floor or in Trash/ Spraying Live Birds with Denaturant | 303 | 19.0 |
| Improperly Shackled/ Stunned/Cut Birds Removed from Line Before Scald Tank | 181 | 11.3 |
| Cages in Disrepair/ Cage Unloading Problems/Loose Birds in Receiving Area | 174 | 10.9 |
| Excessive Number of DOAs/Inhumane Holding Conditions/ Excessive Holding Time | 150 | 9.4 |
| Improper Dumping of Birds in Live Hang Area/ Loose Birds in Live Hang Area | 129 | 8.1 |
| Excessive Use of Force by Workers/ Improper Euthanasia of Injured Birds | 98 | 6.1 |
| Mechanical Problems Resulting in Injury or Death to Birds | 77 | 4.8 |
| Total | 1597 | 100 |

Below are examples of the different types of GCP violations. Each of the incidents described in the examples resulted in serious animal suffering. Yet, under current USDA regulations, no enforcement actions are possible in any of these situations, except for birds drowning in the scald tank, and only when large groups of birds are involved.

Examples of Violations

Birds Drowning in the Scald Tank

- ✎ 128 carcasses showed signs that the birds had drowned in the scald tank (Perdue Foods, P764, 3/22/2017)
- ✎ Multiple birds were observed entering the scald tank while still breathing with no cut to the neck; approximately 200 birds drowned (Mar-Jac Poultry, P517, 11/14/2017)
- ✎ 95 percent of the carcasses exiting the scald tank were bright red cadavers, indicating that the birds had drowned in the tank; more than 200 cadavers counted (Tyson Foods, P7044, 5/9/2018)
- ✎ Approximately 35 birds drowned in the scald tank when the back-up killer couldn't keep up with the large number of unstunned and/or uncut birds (Pilgrim's Pride, P476, 5/22/2019)
- ✎ More than 300 conscious birds drowned in the scald tank because they were not properly cut (Norman W. Fries, P6505, 11/8/2019)
- ✎ Barrels of carcasses showed evidence of the birds having died by drowning in the scald tank; birds had not been properly cut (Perdue Foods, P764, 11/12/2019)

Inadequate Shackling/Stunning/Cutting

- ✎ 28 improperly stunned birds were observed on the slaughter line during random checks by USDA inspectors (Foster Farms, P6137, 1/10/2017)
- ✎ More than 30 conscious birds with insufficient cuts to their necks were removed from the slaughter

line before entering the scald tank (Carrol Poultry, P46869, 11/2/2017)

- ✎ Automated blade missed cutting 45 birds in a random check lasting just three minutes; a retest two hours later found 12 more missed cuts (Sanderson Farms, P34308, 3/21/2018)
- ✎ Many birds on the slaughter line were observed to be cut across their face instead of neck (Tyson Foods, P19514, 11/21/2018)
- ✎ Multiple birds were observed to be shackled by only one leg, increasing the likelihood of improper stunning and/or cutting (Hain Pure Protein, P533, 3/26/2018; similar incidents cited on 2/18, 3/1, 3/15/2018)

Improper Sorting of DOA and Live Birds

- ✎ More than 20 live chickens were found buried in a pile of 200+ DOA birds (Tyson Foods, P622, 12/8/2017)
- ✎ Live birds were observed gasping for breath and attempting to free themselves from "an enormous pile of chickens, both dead and alive" at the DOA sorting tank; number of live and dead birds estimated at about 500 (Perdue Foods, P764, 1/6/2018)
- ✎ Live birds were observed in a large pile of DOA birds on the floor in the live hang area (Foster Farms, P6137, 6/15/2018)
- ✎ Worker dumped a crate containing approximately 200 dead and 130 live birds; the live birds became trapped among the dead ones (Mar-Jac Poultry, P517, 11/1/2018)
- ✎ Live birds were seen gasping for air while pressed to the bottom of a pile of injured birds to be euthanized (Tyson Foods, P481, 9/12/2018)
- ✎ At least 20 live birds were found to be at risk of suffocation while buried in a pile of more than 200 dead birds (Pilgrim's Pride, P5787, 10/31/2019)

Excessive Number of DOAs/Inhumane Holding Conditions

- ✎ Turkeys were held in a truck on the premises of the slaughter plant from just after midnight on Saturday morning until Monday morning, a total of 53 hours (Pitman Farms/Moroni Turkey Processing, P1049, 3/20/2017)
- ✎ Three truckloads of chickens had been parked immediately adjacent to one another on the asphalt parking lot with no protection from the sun and without any source of ventilation or means of cooling; 80–90 percent of the birds showed significant heat stress (Pilgrim's Pride, P17340, 7/25/2017)
- ✎ Large piles of 800+ DOA birds were found in the live hang area; bird carcasses were wet, indicating the misters had not been turned off, causing the birds to suffer from cold stress (Pilgrim's Pride, P206, 10/25/2017)
- ✎ Nearly 10,000 DOA chickens were observed during antemortem inspection; birds in cages on the trucks had been partially exposed during a time of freezing temperatures (Pilgrim's Pride, P584, 1/12/2018)



- ✎ 34,050 birds were DOA due to transport and holding during severe cold and windy conditions (Pilgrim's Pride, P5787, 1/12/2018)
- ✎ The USDA inspector observed DOA chickens too numerous to count due to holding the birds in 17-degree F weather; cages were not properly shielded from the cold (OK Foods, P165H, 1/3/2018)
- ✎ More than 6,000 DOA birds were counted after transport during minus-6-degree F weather (Pilgrim's Pride, P529, 2/9/2018)
- ✎ 50 percent of the hens on trucks were dead and the carcasses frozen solid; birds had been held on the premises 22–28 hours before being slaughtered, and the temperature was in the single digits; 9,750 DOAs counted (Butterfield Foods Company, P248B, 2/23/2018)
- ✎ Turkey hens were held without food or water on the plant premises for 26–28 hours; numerous hens had large exposed wounds as a result of the birds aggressively pecking each other (Butterball LLC, P7345, 1/28/2019)
- ✎ 3,000 birds were killed when a truck overturned on the premises of the slaughter plant; live and dead chickens were piled on top of each other inside the cages; workers spent six hours removing the birds (Peco Foods, P890, 4/30/2019)
- ✎ Nearly all the chickens on one truck were seen breathing with beaks open and at an increased respiratory rate; thermometers in the holding barns registered 95 degrees F (Foster Farms, P18909, 6/12/2019)

Cages in Disrepair/Cage Unloading Problems

- ✎ Turkeys were run over by trucks in the unloading area on multiple occasions (Jennie-O Turkey Store Sales, P544, 4/6, 5/5/2017)
- ✎ Cages were observed to be so overcrowded that birds were sitting/lying on top of one another; approximately 336 birds died from suffocation and

others had bleeding skin abrasions from rubbing against the sides of the cage (Tyson Foods, P7101, 8/10/2017)

- ↘ Dozens of turkeys were crushed and died when the floors of three cages on a truck collapsed onto birds in other cages (Sensenig Turkey Farm, P38466, 10/31/2017)
- ↘ A live turkey in a cage was impaled through his neck by a metal bar that had broken off the cage door (Cooper Foods, P2130, 6/22/2018)
- ↘ 100 chickens were “grossly mangled and killed” when a cage of live birds fell off a truck (Mar-Jac Poultry, P1307, 3/21/2019)
- ↘ 80 chickens were killed when a forklift driver mishandled a cage that dropped to the ground in the plant unloading area (George’s Processing, P208, 10/24/2019)

Excessive Use of Force in Handling

- ↘ Workers used inhumane handling practices in salvaging live chickens from a truck that had overturned, including grabbing and throwing birds, poking birds with rods, and failing to properly euthanize seriously injured birds (Sanderson Farms, P522, 1/27/2017)
- ↘ Nearly 100 hens were condemned due to severe bruising that was believed to have occurred during loading and transport (Kralis Bros. Foods, P1019, 3/1/2017)
- ↘ Worker was observed throwing live birds from one slaughter line to the other line, in some cases hitting birds hanging in shackles on the second line (George’s Processing, P208, 5/22/2017)
- ↘ 10 carcasses were observed with severe injuries, including bruises, lacerations, and joint dislocations, suggesting “significant force had been applied to the affected areas” (Tyson Foods, P9977, 8/11/2017)
- ↘ Worker was seen picking birds up by their wings and throwing them to the transfer belt; worker

was about to kick a bird when he noticed USDA inspector was watching (Case Farms of Ohio, P15724, 5/1/2018)

- ↘ Worker was seen grabbing several birds at a time and throwing them onto the conveyor belt; plant was cited for a similar incident a few weeks earlier (Mar-Jac Poultry, P517, 6/22/2018)
- ↘ Worker was observed turning a hose onto the blood trough in front of his station, causing birds on the slaughter line to be sprayed with bloody water (Perdue Foods, P21234, 11/25/2019)
- ↘ Worker was seen using a high-pressure hose to spray live birds with water in an attempt to force birds to move along the conveyor belt (Foster Farms, P6164A, 11/30/2019)

Improper Dumping of Birds

- ↘ 198 birds suffocated when the cage dumper belt continued to dump live birds on top of other birds after the live hang transfer belt stopped running (Hain Pure Protein, P533, 5/16/2017)
- ↘ 300 birds suffocated when a worker dumped two cages of birds onto the belt instead of one, resulting in a pile up (Wayne Farms, P170, 9/22/2017)
- ↘ 345 birds suffocated due to a pile up on the live hang belt; not clear if the incident was due to human or mechanical error (Equity Group, P20322, 10/26/2017)
- ↘ 300 birds “were counted to be dead due to suffocation and mismanagement” after birds piled up on the live hang belt that wasn’t running (Allen Harim Foods, P935, 6/28/2018)
- ↘ 245 birds were suffocated when workers didn’t follow proper procedure for dumping birds when both hanging lines were stopped for 28 minutes (Tyson Foods, P622, 6/5/2019)
- ↘ More than 700 chickens were suffocated due to a barrier on the live hang belt that caused a pile up (Equity Group, P20322, 10/14/2019)



The bodies of birds who drown in the scald tank turn bright red.

- ✎ 54 conscious birds drowned when the slaughter line was stopped with the birds' heads submerged in the water-bath stunner (Sanderson Farms, P522, 4/26/2019)
- ✎ Carbon dioxide stunner malfunctioned, resulting in the turkeys not being stunned and going through the cage washer while conscious; birds were wet and shivering (Jennie-O Turkey Store Sales, P544, 12/27/2019)

Mechanical Problems Resulting in Injury/Death

- ✎ 30 birds drowned in the water-bath stunner when the slaughter line stopped with the birds' heads submerged (OK Foods, P165H, 5/29/2017)
- ✎ 200 birds were piled on top of each other and suffocated when the live hang belt malfunctioned (Tyson Foods, P5842, 7/14/2017)
- ✎ 702 birds suffocated when the hydraulic controls to the cage dumper malfunctioned, causing a cage of birds to be dumped when the slaughter line was not operating (Carrol Poultry, P46869, 11/2/2017)
- ✎ Birds died after being left suspended in shackles for at least 45 minutes during line stoppage; plant cited for similar incidents in the past (Sanderson Farms, P522, 12/5/2018)
- ✎ Multiple birds had their legs ripped off when they were caught by the neck between a bar and a beam on the slaughter line (Pilgrim's Pride, P206, 3/15/2019)
- ✎ 15 birds were eviscerated when they were caught in the uncovered gears of the transfer belt (OK Foods, P165H, 5/21/2019)

Undercover Investigations Document a Need for Regulation

As noted previously, investigations by animal protection groups in the mid-2000s, which exposed serious mistreatment of birds at slaughter, prompted the USDA to encourage slaughter plants to comply with industry GCP for bird handling. Animal protection groups have continued to conduct undercover investigations that are documenting the same type of abuse uncovered more than a decade earlier, demonstrating that the USDA's strategy of allowing the poultry industry to police itself has failed.

Video captured during the investigations suggests that abuse of birds is common practice, at least at some slaughter establishments. Moreover, there appears to be no correlation between the GCP record of individual slaughter plants and the behavior captured during the investigations. While some of the investigated plants have been cited by the USDA for similar offenses, others have had very few GCP citations.



Rough handling can result in birds becoming injured before slaughter.

The following investigations were conducted at chicken slaughter plants over the past six years.

Ciales Poultry, Chicago, IL

March 2020

An investigation of a live poultry market by Slaughter Free Chicago documented birds arriving at the slaughterhouse in crates without any protection from outside elements. Many birds exhibited injuries on their wings and legs, and some were dead or dying upon arrival. Workers were shown slamming crates containing live birds on top of one another.

Undisclosed slaughter plant in Maryland

Late 2019

Mercy For Animals conducted an undercover investigation at an unidentified slaughter establishment to document the cruelty involved in high-speed chicken slaughter. Video footage shows birds being aggressively slammed into shackles, and birds left hanging upside down in their shackles for over 90 minutes during a plant-wide power outage.

Amick Farms (P7927), Hurlock, MD

November 2018

An undercover investigation conducted by Compassion Over Killing (now Animal Outlook) documented birds arriving at the slaughterhouse in overcrowded transport trucks and birds being punched and thrown onto the conveyor belt for shackling. Investigators also witnessed birds stuck in machinery due to equipment failure and birds drowning in the scald tank.

Tyson Foods (P806), Temperanceville, VA

December 2017

Compassion Over Killing (now Animal Outlook) also conducted an undercover investigation at Atlantic Farms, a supplier to Tyson Foods, which documented catching crews roughly handling chickens by throwing them into overcrowded crates for transport and birds being run over by forklifts.

Pilgrim's Pride (P584), Mt. Pleasant, TX

June 2017

During an undercover investigation, the Humane

Society of the United States captured video footage of workers violently slamming the legs of chickens into shackles and hitting birds while they were immobilized in the shackles. Birds were also flung into the shackles from a far distance, and one employee was caught repeatedly shackling and unshackling birds.

**Tyson Foods (P758), Carthage, MS
October 2015**

An undercover investigation conducted by Mercy For Animals documented workers throwing, shoving, and punching live birds during shackling. The heads of shackled birds were pulled off while alive.

**Tyson Foods (P7044), Carthage, TX
September 2015**

An undercover investigation conducted by the Animal Legal Defense Fund showed workers intentionally suffocating birds on the conveyor belt. Some birds were also crushed by machinery, and a belt malfunction caused the deaths of 200–300 birds.

**Foster Farms (P6137A), Fresno, CA
June 2015**

Mercy For Animals conducted an undercover investigation that documented workers punching, throwing, and beating birds during shackling. Workers also intentionally ripped feathers out of live birds “for fun.”

**Mountaire Farms (P7470), Robeson County, NC
April 2015**

An undercover investigation by Compassion Over Killing showed workers aggressively punching, shoving, and pushing shackled birds and intentionally ripping feathers out of birds. Workers also threw live birds into piles of dead birds.

**Wayne Farms (P445), Dobson, NC
March 2015**

Mercy For Animals conducted an undercover investigation that showed an excessive number of DOA birds. Sick and injured birds, including some with broken bones, were shackled on the line for slaughter, and a worker intentionally suffocated a bird.

**Butterfield Foods (P215), Butterfield, MN
January 2015**

An undercover investigation by the Humane Society of the United States documented 45 live birds entering the scald tank in less than 30 minutes. Workers jabbed metal hooks into transport cages to remove the birds, and sick and injured birds were thrown against the live hang wall or tossed into the trash.

**Koch Foods (P7487), Chattanooga, TN
November 2014**

Mercy For Animals conducted an undercover investigation that showed workers violently throwing and kicking birds during catching. Some birds loaded for transport were caught in cage doors. At the slaughter plant, live birds were seen entering the scald tank.

Some poultry companies have suspended or fired workers shown on undercover video intentionally abusing birds. In addition, animal protection groups conducting the investigations typically request that slaughter plant personnel be prosecuted under state animal cruelty laws. Of the 12 investigations described above, charges have been brought in only one: Mercy For Animals’ 2015 investigation of the Tyson plant in Carthage, MS, where a total of 33 animal cruelty charges were brought against seven plant workers.

To AWI’s knowledge, this represented the first time cruelty charges have been filed for mistreatment of animals at a poultry slaughter establishment. In general, local law enforcement and prosecutors appear hesitant to pursue legal action for animal abuse occurring at an inspected slaughter establishment, perhaps in part because they view the treatment of birds at slaughter as falling under the authority of the state or federal department of agriculture. Moreover, five states exempt slaughter by “approved methods” from their cruelty laws, and an additional five states exempt slaughter in general. Prosecution of animal cruelty at poultry slaughter plants in the latter states is likely precluded.

USDA Records Demonstrate Ineffective Oversight

AWI's review of USDA records revealed that some poultry plants have been cited repeatedly for the same or similar violations of good animal handling practices. This is not surprising, given that USDA inspection personnel are not able to take any enforcement action for most of the violations. If government inspectors had been able to take strong enforcement action the first time a handling problem occurred, it is possible that the problem would not have reoccurred, and the animals involved in subsequent incidents would have been spared considerable pain and suffering.

Allen Harim Foods (P935)

The plant was cited 10 times within two months in 2018 for live, conscious birds entering the scald tank and drowning. The birds had received either no cut or an inadequate cut to the neck.

Jennie-O Turkey Store Sales (P579)

The USDA cited this plant nine times within four months in 2018 for turkeys becoming grossly mutilated by malfunctioning equipment in the gas (carbon dioxide) stunning system.

Northern Pride (P425)

This plant was cited nine times within three weeks in April–May 2018 for inadequately cutting one or more turkeys, which resulted in conscious birds entering the scald tank and drowning.

Pilgrim's Pride (P1272)

The USDA documented three incidents within two months in 2018 where at least 15 chickens drowned in the water-bath stunner when the slaughter line was stopped, and the birds' heads were submerged in the water.

Pitman Farms/Moroni Turkey Processing (P1049)

The plant was cited 17 times within 11 months in late

2017–early 2018 for holding birds over for excessive periods of time, often in extreme weather. In one case, turkeys were held for slaughter an estimated 38 hours in freezing temperatures, resulting in the death of numerous birds.

Simply Essentials Poultry (P34668)

This now out-of-business plant was cited 27 times in a three-month period in late 2017 for having multiple cages in a state of disrepair. In some cases, the broken cages injured or killed birds, and in others, the broken cages resulted in birds escaping and then becoming injured.

Southern Hens (P17766)

The USDA cited this plant three times within three months in 2018 for aggressively tossing cages of live birds onto the conveyor belt from a height of about 10 feet.

Whitewater Processing Co. (P1209)

The plant was cited 11 times within three months (and 19 times within six months) in 2018–2019 for not properly stunning and/or cutting turkeys and allowing the birds to proceed on the slaughter line to the scald tank. In each case, the conscious bird(s) were removed prior to entering the scald tank.



Figure 6. Poultry Slaughter Plants with the Most GCP Records

| Company Name | Plant Number | Plant Location | Number of GCP Records (2017-2019) |
|---|--------------|--------------------|-----------------------------------|
| Allen Harim Foods | P935 | Harbeson, DE | 56 |
| Mar-Jac Poultry-MS | P517 | Hattiesburg, MS | 49 |
| Perdue Foods | P9197 | Lewiston, NC | 37 |
| Moroni Turkey Processing (Pitman Farms) | P1049 | Moroni, UT | 35 |
| Simply Essentials Poultry | P34668 | Charles City, IA | 34 |
| Whitewater Processing | P1209 | Harrison, OH | 30 |
| Jennie-O Turkey Store Sales | P579 | Faribault, MN | 29 |
| Equity Group-KY | P20245 | Albany, KY | 29 |
| Tyson Foods | P325 | Center, TX | 26 |
| OK Foods | P165H | Heavener, OK | 25 |
| Tyson Foods | P5842 | Springdale, AR | 24 |
| George's Processing | P208 | Springdale, AR | 23 |
| Pilgrim's Pride | P1272 | Douglas, GA | 22 |
| Hain Pure Protein | P533 | Fredericksburg, PA | 21 |
| Sanderson Farms | P522 | Collins, MS | 20 |
| Tecumseh Poultry (Tyson Foods) | P20251 | Tecumseh, NE | 20 |

The Most Inhumane Slaughter Plants

AWI has calculated the number of GCP records issued to each federal poultry plant during the three-year period studied (2017–2019). As noted previously, 35 percent of all US federally inspected plants were issued no GCP records, despite the fact that they likely slaughtered millions of birds during this time. It is not known whether receiving a large number of GCP-related citations reflects poor bird-handling practices or the presence of conscientious inspection personnel, or some combination of the two.

Figure 6 lists the plants that were issued the highest number of GCP records for 2017 through 2019. All the plants were issued at least 20 GCP records during the period. The fact that these plants were cited repeatedly for GCP violations illustrates the failure of the USDA's current oversight strategy. Since no consequences have resulted—other than issuance of Noncompliance Records or Memorandums of Interview—these plants have had no incentive to alter their behavior and treat birds more humanely.

Poultry Industry Misrepresents USDA Oversight

The US poultry industry promotes the view that the USDA actively enforces humane slaughter practices for poultry, while simultaneously arguing that the USDA lacks the authority to regulate humane slaughter of birds.

Following are examples of inaccurate—and in some cases, contradictory—statements by leaders of the poultry industry regarding the USDA’s authority to regulate the humaneness of slaughter and stop the mistreatment of birds.

Claim: The USDA regularly takes enforcement actions to ensure humane handling

Industry Statements

“FSIS inspectors and plant personnel continuously monitor activities in slaughter establishments ensuring that humane slaughter practices are followed.”

Tom Super, vice president of communications
National Chicken Council
(Dec. 17, 2013, NCC press statement)

“By law, the Agriculture Department provides around-the-clock, on-site inspectors who can take enforcement action for mistreatment if spotted.”

John Starkey, president
US Poultry & Egg Association
(Mar. 25, 2015, *USA Today*)

“USDA inspectors are on site. If they see abuse they have authority to stop things.”

Robert Ford, executive director
North Carolina Poultry Federation
(Mar. 16, 2015, *Raleigh [NC] News Observer*)

Fact

The current FSIS Rules of Practice (9 CFR Part 500) do not allow for inspectors to take an enforcement action in response to inhumane handling of individual birds. Consistent with this, the July 2018 USDA directive

(6110.1) on poultry good commercial practices states that **mistreatment to “only single or small numbers of birds” does not constitute a noncompliance with FSIS regulations.**

Claim: The USDA regulates humane handling

Industry Statements

“FSIS has guidelines and directives setting humane slaughter requirements under the Poultry Products Inspection Act. To the extent the extreme, exceedingly rare, and likely exaggerated examples of employee misbehavior cited in the petition [submitted by AWI and Farm Sanctuary] actually occur, they likely violate existing FSIS regulations.”

Tom Super, vice president of communications
National Chicken Council
(Dec. 17, 2013, NCC press statement)

“Humane slaughter is important to our industry, and we are governed by requirements under the Poultry Products Inspection Act.”

John Starkey, president
US Poultry & Egg Association
(Mar. 25, 2015, *USA Today*)

“The U.S. Department of Agriculture inspects slaughterhouses and sets humane slaughter requirements under the Poultry Products Inspection Act.”

Robert Ford, executive director
North Carolina Poultry Federation
(Mar. 16, 2015, *Raleigh [NC] News Observer*)

The National Chicken Council responded to a rulemaking petition to regulate the humaneness of poultry slaughter, saying that chicken slaughter is already regulated by the FSIS under the Good Commercial Practices regulations of the federal Poultry Products Inspection Act: *“These regulations address poultry slaughter, and government inspectors are present for the slaughter process in every poultry processing plant.”*

“Petition seeks to include poultry in humane slaughter law,” Nov. 20, 2017, *Feedstuffs*)

Fact

The USDA has acknowledged that its regulations contain no humane handling requirements for individual birds. Regulation 9 CFR 381.65(b), which prohibits live birds from drowning in the scald tank, has been interpreted by the USDA to only apply to large groups of birds entering the tank while still breathing, which would indicate that the slaughter system is out of control. Regulation 9 CFR 381.90 requires that carcasses showing evidence of the bird having died from causes other than slaughter be condemned; however, this section does not prohibit worker behavior that can result in the death of a bird. According to the 2015 Notice, adherence to GCP is “a process control issue and not a bird-by-bird performance standard issue.” Therefore, not one USDA regulation currently requires that individual birds be handled humanely.

Claim: The USDA does not have authority to regulate humane handling

Industry Statement

“The Poultry Products Inspection Act does not grant FSIS authority to regulate issues that do not affect food safety, wholesomeness or labeling, and, contrary to its

allegations, nowhere in this petition [submitted by AWI and Farm Sanctuary] is there a genuine link between humane handling of chicken and food safety.”

Tom Super, vice president of communications
National Chicken Council
(Dec. 17, 2013, NCC press statement)

Fact

In two statements within the same press release, the National Chicken Council asserts that the FSIS does regulate humane handling (and therefore problems of mishandling and abuse are kept in check) and that the FSIS has no authority to regulate humane handling. Both the 2013 rulemaking petition submitted by AWI and Farm Sanctuary and the litigation challenging that petition’s denial make the case that the USDA has authority to regulate handling of birds because that handling has the potential to result in adulteration of poultry products. The poultry industry itself has frequently acknowledged the connection between live animal handling and meat quality.



Slaughter lines operate at such high speeds that workers cannot catch all the birds who are inadequately cut. The ones they miss drown in the scald tank.

Recommendations

Based on its research into the welfare of birds at slaughter in the United States, AWI offers the following recommendations:

- ↘ **The USDA should promulgate regulations requiring humane handling of birds to decrease the adulteration of poultry products.** Such regulations should address worker training, holding times, conditions in holding areas, maintenance of transport crates, removal of birds from crates, shackling of birds, treatment of sick and injured birds, and measures to prevent live birds from entering the scald tank.
- ↘ **The USDA should implement a reporting system for humane handling of poultry similar to its Humane Activities Tracking System for the slaughter of mammals to document the amount of time spent by inspection personnel on humane handling oversight.**
- ↘ **The USDA should post online records related to noncompliance with poultry humane handling requirements.**
- ↘ **The USDA should refer incidents involving intentional abuse of birds at slaughter for prosecution under state animal cruelty laws.** The USDA should release any evidence in its possession that could assist in the prosecution of individuals and companies participating in cruel acts.
- ↘ **The US Congress should pass legislation requiring that all birds killed for food be rendered insensible to pain prior to slaughter.** Congress should direct the USDA to enact regulations to require methods of stunning that are determined by scientific studies to render birds insensible to pain with a minimum of distress.
- ↘ **The poultry industry should share any available research demonstrating that electrical stunning, as commonly practiced in the United States, effectively renders birds insensible to pain prior to slaughter.** If such research does not exist, the

industry should commission scientifically valid studies to determine the impact of low-current electrical stunning on bird sensibility. Most importantly, if research demonstrates that the low-current approach is ineffective, then the industry must change its practice.

- ↘ **Third-party animal welfare certification programs should require—or at a minimum, strongly recommend—that producers use stunning methods that avoid conscious shackling and cause a minimum of distress to birds.** For producers employing electrical stunning, third-party certification programs should require that producers provide evidence of the use of adequate electric current levels to render birds insensible to pain.



Animal Welfare
Institute

www.awionline.org