



600 Pennsylvania Avenue SE  
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August 29, 2018

The Honorable Sonny Perdue  
U.S. Department of Agriculture  
Jamie L. Whitten Building  
1400 Independence Ave., S.W.  
Washington, DC 20250

**Re: Modernization of Swine Slaughter Inspection Rule, 83 Fed. Reg. 4780-4823**

Dear Secretary Perdue:

Attached, please find an appeal from 19,952 supporters of the American Society for the Prevention of Cruelty to Animals (ASPCA), urging the U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) to stop drafting the proposed Modernization of Swine Slaughter Inspection Rule, 83 Fed. Reg. 4780-4823 (Feb. 1, 2018). The proposed rule creates a New Swine Slaughter Inspection System, which would eliminate maximum line speeds at pig slaughterhouses and transfer key inspection duties from trained FSIS inspectors to plant employees, who lack the adequate training to identify violations. Adoption of the proposed rule will diminish animal welfare and increase the likelihood of violations of federal animal protection laws, in addition to compromising worker safety and food safety.

Recently, reports have surfaced of incidents at pig slaughterhouses where pigs were nearly scalded alive while still conscious – a clear and egregious violation of the Humane Methods of Slaughter Act (HMSA) and the Federal Meat Inspection Act (FMIA). These incidents occurred at a facility where maximum slaughter line speeds were in place. Even so, the lines were too fast to ensure that animals were properly sedated, and the facility was forced to slow down the slaughter line in order to resume operations. A Compassion Over Killing investigation at Quality Pork Processors, one of the five plants already operating with faster line speeds under the agency's HACCP-Based Inspection Models Project program, showed that the pressure to keep up with the speed lines resulted in egregious mistreatment of pigs at the facility. FSIS records and whistleblower accounts confirm that fast line speeds result in repeated HMSA violations.

If this rule is adopted and the New Swine Slaughter Inspection System goes into effect, it will negatively impact the welfare of millions of pigs each year and increase the likelihood of violations of federal animal protection laws. We urge you not to finalize this dangerous rule and instead, to retain current line speed limits at pig slaughterhouses.

Sincerely,



Ingrid Seggerman  
Director of Regulatory Policy  
Government Relations  
ASPCA®



Suzanne McMillan  
Content Director  
Farm Animal Welfare Campaign  
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Enclosure

cc: Carmen Rottenberg, Administrator, FSIS  
Roberta Wagner, Assistant Administrator, Office of Policy and Program  
Development, FSIS