Questions on Chapter 2, Transportation Practices

All Species
1. Question: Is bedding required for cull dairy cows?
   Answer: The 2019 Guidelines and Audit Guide are not prescriptive of bedding practices (i.e. how much bedding to provide and when it should be provided) and bedding provision is considered a secondary criterion in the NAMI audit tool because bedding can become compacted during transport and difficult to measure upon arrival at the plant. A secondary criterion does not impact the pass or fail of the audit, but should be documented as part of the report.

   As stated in the 2019 Guidelines and Audit Guide, trucks must follow the plant’s policy on bedding provision and will be audited against the establishment’s written policy. Some regions transport cattle without bedding due to warm climates; this must be noted in the plant’s policy for bedding to demonstrate compliance. Furthermore, some jurisdictions may have a regulatory requirement for bedding and trucks must demonstrate compliance with such requirements.

Questions on Chapter 3, Humane Handling & Stunning at the Plant

All Species
2. Question: Are the terms “security stun” and “double knock” considered synonymous? If the two terms are not used in the same manner, is there a definition for “double knock”?
   Answer: No, a security stun and a double knock are not considered synonymous. A double knock is performed when the first knock does not render the animal completely unconscious and signs of a possible return to consciousness may be observed. A security knock is performed when, even though the animal is not showing any signs of being conscious or returning to consciousness, the operator administers a second knock to ensure the animal stays unconscious and to maintain employee safety.

Pigs
3. Question: CO2 stunning may be accompanied by a strange vocalization, but vocalization is a key component to assessing insensibility, and we state in other areas that a vocalizing animal is a definite sign of a conscious animal (p. 30 of the 2019 Guidelines and Audit Guide).
   Answer: Unusual sounds, such as a moan or gasp, can sometimes be observed, and do not represent signs of consciousness.

Sheep
4. Question: Accessible points of access for firearms are addressed in sheep (p. 22 of the 2019 Guidelines). It says that captive bolt should be used only at the top of the head. Is this standard practice for captive bolt placement in sheep?

Answer: Yes. Both the AVMA 2013 Euthanasia Guidance Document and the AVMA 2016 Humane Slaughter Guidance document recommend either the frontal or the top-of-head position when using a captive bolt gun for sheep. The brain of the sheep is located high in the head, which is why the top-of-head shot is acceptable.

**Questions on Chapter 4, Transportation Audit Guidelines**

**All Species**

5. Question: What is the recommended number of trailers to include in the transportation audit?

Answer: The 2019 Guidelines and Audit Guide states that no less than two trailers and no more than five trailers should be assessed.

6. Question: What is the method by which trailers should be selected for inclusion in the transportation audit?

Answer: An attempt should be made to assure the audit encompasses the entirety of the receiving process. This includes all types of trailers delivering, the differing unloading areas used, and the different shifts receiving livestock. It is not always practical that on each individual audit that all trailers and ramps be audited throughout all day/shifts. The establishment should design auditing schemes that account for these variations and attempt to audit the variables throughout a limited timeframe. For third party auditing, it may not be possible to audit all types of trailers, all types of ramps, and all shifts of receiving.

7. Question: Is the audit failed if a truck driver who is not a plant employee beats and kicks animals?


8. Question: Will a plant fail on falling if 5% of the animals fall during truck unloading?

Answer: Yes. Slips and falls are scored during truck unloading. The 2019 Guidelines and Audit Guide states: “Good animal welfare and quiet calm handling is impossible if animals slip or fall on the floor. All areas where animals walk should have non-slip footing. Animals should be observed during all phases of handling and if slipping or falling is observed, steps should be taken to correct the problem.”

9. Question: A pig falls down and becomes non-ambulatory on the unloading ramp. The truck driver drags it out of the way so that he can unload the rest of the pigs. Is the audit failed?

Answer: Yes. Dragging a sensible animal is an act of abuse and is grounds for automatic audit failure. Dragging a sensible animal is also a violation of the Humane Methods of Slaughter Act. Animals must be rendered insensible with a stunning device BEFORE dragging. **Note:** In the United States, a sensible animal can be carefully rolled onto a sled or other device for moving it. This is not allowed in Canada; the non-ambulatory animal must be euthanized where it lies.

**Cattle**

10. Question: Should compartments be gated for cull dairy cattle?
**Questions on Chapter 5, Slaughter Audit Guidelines**

**All Species**

11. **Question:** To pass a welfare audit does a plant have to have a passing score on all seven of the core criteria?

   **Answer:** Yes. To maintain an acceptable level of animal welfare a passing score on all seven of the core criteria is required. They are: 1) willful acts of abuse, 2) access to water, 3) falling, 4) electric prod use, 5) vocalization and gondola loading, 6) effective stunning, and 7) bleed rail insensitivity. The secondary audit items should not be used to determine whether a facility passes or fails an audit.

12. **Question:** An employee touches an animal with an electric prod, but does not push the switch to administer a shock. Does that count as electric prod use?

   **Answer:** Yes. Practical experience has shown that it is extremely difficult to determine if a shock was given. If the animal is touched with the electrical device it always counts. If a single animal is shocked more than once it still counts as one animal. The plant fails the slaughter audit on electric prod use if more than 25% of the cattle or pigs are touched with it. Electric prods should never be used on sheep.

13. **Question:** If cattle, pigs, or sheep vocalize (moo, bellow, squeal or baa) in the stockyards (lairage) does this count on the vocalization score?

   **Answer:** No. Vocalization scoring is done in the following places:
   - Pigs - restrainer, stun box, stun pen, and bleed rail
   - Cattle - restrainer, stun box, religious slaughter box. Vocalization scoring is also done while cattle are entering the stun box or religious slaughter box. Vocalization caused by electric prod use is scored. For cattle, all vocalizations in the stun box, religious slaughter box, or restrainer count. In the lead up chute (race) and crowd pen, cattle vocalizations only count during actual movement of the cattle by a person.
   - Sheep - no vocalization scoring is done

14. **Question:** Does falling down in the stun box count when it occurs BEFORE stunning or religious slaughter?

   **Answer:** Yes. If more than 1% of the animals fall, this is a failing fall score. Boxes that are designed to cause sensible animals to fall down (trip boxes) should never be used. They would receive a failing score.

15. **Question:** If an animal slips and its rear end touches the floor, is that scored as a fall?

   **Answer:** Yes. A fall is scored if any part of the body touches the floor during handling. The falling score is failed if more than 1% of the animals fall.

16. **Question:** A plant employee starts to skin the head of an animal that has blinking eyes. Is the audit failed?

   **Answer:** Yes. This is an automatic audit failure. The 2019 Guidelines and Audit Guide states, “There is a zero tolerance for beginning any procedure like skinning the head or
leg removal on any animal that shows signs of return to sensibility.” This applies to both conventional and religious slaughter. Animals with eyes that do spontaneous natural blinking are sensible.

**Cattle**

17. **Question:** A single beef steer vocalizes (moo or bellows) 8 times. Since 8% is over the 3% limit for cattle vocalizations, does the plant fail on vocalization?

   **Answer:** No. On the five core criteria of stunning efficiency, insensibility, vocalization, slips and falls, and electric prod use, all scores are on a PER ANIMAL basis. The criteria are based on how many *animals* vocalized, not how many vocalizations were heard. If the same animal moos 8 times, it still is only counted as one vocalization.

**Pigs**

18. **Question:** A pig vocalizes (squeals) when the electric stunning wand (tong) is accidentally energized before it is fully pressed against the animal. Does this count as a point off the pig vocalization score?

   **Answer:** No. This will count as a “hot wand” and will be a point off on the “hot wand” section of the electric stunning score. Hot wand scores over 1% fail on stunning. Hot wandering is a welfare issue because the sensible pig feels the shock.

19. **Question:** A pig squeals when it is halfway into the restrainer or stun box due to an electric prod. Does this count on the vocalization score?

   **Answer:** No. The pig’s rear must be past the restrainer entrance to count. A score of over 5% of the pigs vocalizing in the restrainer fails on vocalization. The reason why pigs are only scored in the restrainer is due to difficulty of counting individual pigs squealing in other parts of the facility. Cattle are scored for vocalization in both the stunning area and the lead up chutes during handling.

20. **Question:** The CO2 machine malfunctions and several pigs wake up on the bleed table, get up and attempt to jump off. Is the audit failed if an employee shackles and hoists these pigs to keep them from running away?

   **Answer:** Yes. This is an automatic audit failure. The 2019 Guidelines and Audit Guide states: “Any sensible animal on the bleed rail constitutes an automatic audit failure.” It is obvious that these pigs were fully sensible.

21. **Question:** An animal’s rear leg is kicking while it is hung on the bleed rail. Is the audit failed?

   **Answer:** No. Kicking may occur in totally insensible animals; it is just a reflex. People evaluating insensibility must look at the head. Refer to the NAMI 2019 Guidelines and Audit Guide for detailed instructions on determining insensibility.

22. **Question:** A steer rears up and knocks the electric prod out of an employee’s hand, and the end of the prod accidentally hits another steer in the eye. Is the audit failed for an act of abuse?

   **Answer:** No. The 2019 Guidelines and Audit Guide clearly states that acts of abuse have to be done intentionally. The guideline states under core criterion 1: “Any willful act of abuse is grounds for automatic audit failure. 1) dragging a conscious, non-ambulatory animal; 2) intentionally applying prods to sensitive parts of the animal like the eyes, ears, nose or rectum; 3) deliberate slamming of gates on livestock; 4) purposeful driving of livestock on top of one another; 5) hitting/beating an animal. Note any such acts observed.”
23. **Question:** The animal moves its head and the captive bolt stunner is shot in the air. Is this counted as a second shot?
   **Answer:** No. A stunner shot that shoots in the air does not count. If the bolt of the stunner touches or partially penetrates the animal, it is counted as a missed shot.

24. **Question:** How do you score plants that routinely shoot bulls, bison, and other heavy livestock twice? Do they fail?
   **Answer:** No. To verify that 95% or more are rendered insensible with one shot from a captive bolt, the auditor must check for signs of insensibility BEFORE the second shot and record the stunning score. To pass the audit, 100% must be rendered insensible before hoisting or the beginning of dressing procedures.

25. **Question:** A plant claims to have a new type of electric stunner where an animal is rendered insensible because rhythmic breathing is absent, but other signs of return to sensibility are present, such as vocalization and natural spontaneous blinking. Is the audit failed?
   **Answer:** Yes. To pass the insensibility audit, all indicators of returning to sensibility must be absent. They include: rhythmic breathing, vocalization, natural spontaneous blinking like live animals in the lairage, menace reflex, and arched back righting reflex with the head bent back while hanging on the rail. The following signs are NOT signs of return to sensibility: nystagmus (rapidly vibrating eye) and gasping like a fish out of water. An eye with nystagmus movements moves much more quickly than natural blinking. Nystagmus and gasping are not scored as return to sensibility after electric stunning. After captive bolt stunning nystagmus and gasping must be absent. See chart on page 31 of the 2019 NAMI Recommended Animal Handling Guidelines & Audit Guide.

26. **Question:** If an auditor sees an animal returning to sensibility on the bleed table or after being hoisted on the rail, but is not performing the insensibility part of the audit, does the facility automatically fail the audit?
   **Answer:** Yes. The 2019 Guidelines and Audit Guide state “Any sensible animal on the bleed rail constitutes an automatic audit failure. An animal observed returning to sensibility after being hoisted on the bleed rail is an audit failure.

27. **Question:** How should prod use be audited when there are multiple restrainers (i.e. a two-line electrical stun for pigs), when there are multiple handlers on each line and all have access to electrical prods. Shall 100 animals be audited on each restraining leadup, passing by all of the handlers and the number of animals prodded are added up to get the percent prodded?
   **Answer:** An audit should represent the plant’s process, not the number of handlers. When electric stunning in pigs is assessed, the 2019 Slaughter Audit Guide indicates that electric prod use should be evaluated at the entrance to the restrainer, but prod use can be scored where ever electric prods are used in the plant. In this case, it is recommended that the auditor split the 100 head between the two lines, and evaluate electric prodding in 50 head in each single file chute leading up to the restrainer. Scoring electric prodding should be on a per-animal basis.

28. **Question:** Can clarification be provided on the following language, taken from Core Criterion 7 in Chapter 5 of the 2019 Guidelines and Audit Guide?
“While no sensible animal should be observed on the bleed rail or bleed table during a 100-head audit, on rare occasions, it is possible that an animal with partial return to sensibility will be observed. An animal on the rail showing transition signs is NOT counted as sensible as long as the backup stunner is IMMEDIATELY accessible and a successful second stun is administered IMMEDIATELY. It is CRITICAL that animals showing signs of potential return to sensibility be re-stunned immediately. When a second application of the stunner is done in any location before the animal is hoisted, it is counted as a second stun, not as a sensible animal on the bleed rail or bleed table.“

**Answer:** As long as a back-up stun is applied before the animal regains consciousness, it is considered a security stun. Only sensible animals are scored, not animals that are displaying signs of a potential return to sensibility.

29. **Question:** Some plants have a policy that if there is any doubt about sensibility after hoisted - they need to reshoot. For example, it is policy at one plant that if any pig is showing agonal gasping on the shackle, it is re-stunned with a captive bolt, even though that is not a sign of sensibility. Is this considered a sensible animal, if the second shot is applied after the animal is hoisted?

**Answer:** Some plants have specific policy on when to administer security stuns. Regardless of the plant’s policy on administering security stuns, when a second application of a stunner is used on an insensible animal or an animal that is showing signs of potentially returning to sensibility in any location during the slaughter process, it is considered a security stun and not scored as a sensible animal when assessing effective stunning or insensibility on the bleed rail or bleed table.

**Cattle**

30. **Question:** What is the definition of chronic mounting (also applies to sheep)?

**Answer:** If an animal is being repeatedly mounted by other animals in the pen to the point of exhibiting lameness or going down, the animal being mounted should be removed from the pen.

**Pigs**

31. **Question:** The employee stunning pigs with an electric stunner places the wand (tongs) on the middle of the pig’s neck and body on 10% of the pigs. Is the stunning audit failed?

**Answer:** Yes. Electric stunners must be placed so that the current goes through the brain. Stunning on the neck bypasses the brain and will not induce instantaneous insensibility. To pass the stunning audit the wand (tong) must be placed in the correct position on 99% of the animals. Refer to the guidelines for more detail.

32. **Question:** In the text of the 2019 Guidelines and Audit Guide (p. 26) it states the minimum amperage for a market hog is 2.0 amps. In the audit (p. 114) it states the minimum amperage for market hogs is 1.25 and for sows it is 2.0 amps. Can clarification be provided?

**Answer:** The recommended amperage of 2.0 on page 26 the 2019 Guidelines and Audit Guide is correct. Ultimately, it is up to the plant to determine what works best for their facility—the recommended minimum amps for market hogs is 2.0, but plants have to determine this based on their in-plant experience. The audit form will be updated in the next revision to reflect this recommendation.

**Religious Slaughter**

*January 2, 2020*
33. **Question:** A plant that conducts religious slaughter shackles and hoists live animals BEFORE the throat is cut. Does this plant fail the audit?

   **Answer:** Yes. The 2019 Guidelines and Audit Guide states: “Cattle, calves, sheep or other animals that are ritually slaughtered without prior stunning should be restrained in a comfortable upright position. For both humane and safety reasons, plants should install modern upright restraining equipment whenever possible. Shackling and hoisting, shackling and dragging, trip floor boxes, and leg clamping boxes should never be used.

**Other Frequently Asked Questions/Clarifications**

34. **Question:** Should resting time prior to stunning be audited?

   **Answer:** No, the concept of resting time is addressed in Chapter 3 of the Guidelines and Audit Guide, which does not outline Core Criteria for audits. Many animal handling and welfare concepts are discussed in the Guidelines, but only the Core Criteria and secondary criteria are to be audited.

35. **Clarification:** Scoring for effective electrical stunning of pigs is described in Chapter 5, Core Criterion 6 of the 2019 Guidelines and Audit Guide. It is also listed on the Final Scoring Sheet for the Swine Slaughter Audit in Appendix IV. It is not, however, mentioned in the Audit Forms for Core Criterion 6. Despite this discrepancy, effective electrical stunning should be scored as part of the Swine Slaughter Audit. Future revisions of the Guidelines and Audit Guide will include a page for scoring effective electrical stunning in the Audit Forms Appendix.