

A Robust Systematic Approach to Humane Handling

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Why is There a Need to Comply with Humane Handling?

In 1958, the Humane Slaughter Act (HMSA) set forth the goal to prevent “needless suffering” in slaughtering livestock which “results in safer and better working conditions . . . ; brings about improvement of products . . . ; and produces other benefits for producers, processors, and consumers”¹ This Act was amended in 1978 to give the United States Department of Agriculture (USDA) “the authority to inspect slaughterhouses for compliance with HMSA and to penalize violators.”²

The Federal Meat Inspection Act (FMIA) gave the Secretary of Agriculture the ability to enforce the HMSA by appointing inspectors to examine “the method by which [livestock] are slaughtered and handled” to prevent any inhumane slaughtering.³

Under the authority of HMSA and FMIA, the USDA enacted 9 C.F.R. Part 313 which regulates the humane handling and slaughter of livestock and is enforced by the Food Safety and Inspection Service (FSIS) of the USDA.⁴

To ensure compliance with 9 C.F.R. Part 313, FSIS inspectors conduct periodic inspections on the humane handling practices of slaughter facilities using the humane handling

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¹ [7 U.S.C. §1901.](#)

² [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 4 \(2013\).](#)

³ [21 U.S.C. §603\(b\).](#)

⁴ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 4 \(2013\).](#)

activities tracking system categories (HATS) as a guide for determining inhumane handling in different situations.⁵ The nine HATS categories include:

- 1) Inclement weather,
- 2) Truck unloading,
- 3) Water and feed availability,
- 4) Ante-mortem inspection,
- 5) Suspect and disabled,
- 6) Electric prod/alternative object use,
- 7) Slips and falls,
- 8) Stunning effectiveness, and
- 9) Conscious animals on the rail.⁶

To best comply with humane handling regulations, facilities may create a robust systematic approach plan built around the nine HATS categories.

What is a Robust Systematic Approach?

To evaluate and maintain compliance with humane handling requirements, facilities may implement a Robust Systematic Approach (RSA). An RSA is a written humane handling program that implements the four elements of a systematic approach to humane handling and slaughter along with three additional requirements.⁷ The purpose of an RSA is to help facilities create a documented, proactive approach to compliance with 9 C.F.R. Part 313 requirements for humane handling and slaughter.⁸ Although an RSA is not a regulatory requirement, FSIS will consider if a facility has an RSA when determining if an enforcement action is necessary after an egregious inhumane handling incident.⁹

The four elements of a systematic approach are to:

- 1) “Conduct an initial assessment of where, and under what circumstances, livestock may experience excitement, discomfort, or accidental injury while being handled in connection with slaughter, and where, and under what circumstances, stunning problems may occur;”

⁵ [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 6 \(2020\).](#)

⁶ [Id. at 8-12.](#)

⁷ [Rebecca Thistlethwaite, Guidance and Outreach to Small and Very Small Meat Processors, Food Safety and Inspection Service, USDA, 31 \(2020\).](#)

⁸ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 4 \(2013\).](#)

⁹ [Id. at 5.](#) Note: In the event of any noncompliance, whether egregious or not, an inspector will issue an NR at a minimum. [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 14 \(2020\).](#)

- 2) “Design facilities and implement practices that will minimize excitement, discomfort and accidental injury to livestock;”
- 3) “Evaluate periodically the handling methods . . . to ensure those methods minimize excitement, discomfort, or accidental injury and evaluate those stunning methods periodically to ensure that all livestock are rendered insensible to pain by a single blow;” and
- 4) “Respond to the evaluations . . . by addressing problems immediately and by improving those practices and modifying facilities when necessary to minimize excitement, discomfort, and accidental injury to livestock.”¹⁰

To implement the four elements of a systematic approach, the RSA must have:

- 1) Written procedures that explain the facility’s compliance with FSIS regulations;
- 2) Written records that document the above elements, actions, and compliance efforts; and
- 3) Allow the RSA to be reviewed by FSIS.¹¹

Why Have a Robust Systematic Approach?

A facility will benefit from implementing an RSA because an RSA guides the facility into implementing a documented, systematic, preventative approach to humane handling practices to the highest of standards. The RSA is reviewed and approved by FSIS to verify the establishment complies with humane handling requirements.¹² As stated above, an RSA is not required by federal regulation. However, a facility will benefit from implementing an RSA by seeing more favorable outcomes in the event of a potential enforcement action for an inhumane handling incident if the RSA is followed and documentation is current.¹³ Noncompliance with an RSA will not result in a noncompliance record (NR) unless that action violates humane handling regulations.¹⁴ However, FSIS does consider whether a facility has an RSA when there is a potential enforcement action for an egregious inhumane handling incident.¹⁵

¹⁰ [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 4 \(2020\).](#)

¹¹ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 7 \(2013\).](#)

¹² [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 4 \(2020\).](#)

¹³ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 5 \(2013\).](#)

¹⁴ [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 4 \(2020\).](#)

¹⁵ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 5 \(2013\).](#)

In the event of an egregious inhumane handling violation, inspectors have regulatory discretion and can recommend a lesser enforcement action for facilities with an implemented RSA, such as issuing a notice of intended enforcement (NOIE) instead of a notice of suspension (NOS).¹⁶ Facilities with an RSA will be recommended to receive an NOIE by the inspector in charge so long as the six factors in FSIS Directive 6900.2 are satisfied, which are described below.¹⁷

Non-egregious noncompliance within any of the HATS categories will result in the facility receiving an NR.¹⁸ Recently updated in 2020, FSIS Directive 6900.2 considers a missed stun with an immediate, successful second stun as a non-egregious violation.¹⁹ Instead of being issued an NOS, facilities now can be issued an NR to avoid shutdown.²⁰

Why should a facility have an RSA if FSIS inspectors have broad discretion in what enforcement action they select? Facilities with an RSA are more likely to satisfy the six factors in FSIS Directive 6900.2 which guides FSIS inspectors on the steps to take in the event of an egregious inhumane slaughtering incident. FSIS inspectors look to six factors when determining what type of enforcement action to issue:

- 1) Does the facility have an RSA?
- 2) Can the facility show documentation proving it has effectively implemented the RSA?
- 3) Does the facility have a history of humane handling noncompliance (look at the number of NRs)?
- 4) Does the facility have recent humane handling enforcement actions?
- 5) Will a suspension prevent further inhumane handling?
- 6) Is the egregious violation an extraordinary circumstance in a well-functioning system?²¹

A facility with an RSA is more likely to be issued an NOIE instead of an NOS than a facility without an implemented RSA.²² Being issued an NOIE versus an NOS has impactful implications for small or very small (SVS) facilities. An NOIE allows the facility to continue harvest operations

¹⁶ [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 17-18 \(2020\).](#)

Note: However, an FSIS inspector has the discretion to issue a NOS “without prior notice” if the violation is egregious enough which will shut down facility operations. [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 20 \(2020\).](#)

¹⁷ [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 17-18 \(2020\).](#)

¹⁸ [Id. at 14.](#)

¹⁹ [Id. at 16.](#)

²⁰ [Rebecca Thistlethwaite, Guidance and Outreach to Small and Very Small Meat Processors, Food Safety and Inspection Service, USDA, 31 \(2020\).](#)

²¹ [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 17-18 \(2020\).](#)

²² [Id.](#)

while implementing immediate corrective actions, whereas an NOS suspends all harvest operations until corrective actions are approved by FSIS authorities and implemented. The median number of days of suspension for small and very small facilities was two and three days respectively between 2007 and 2019.²³ Based on the median number of days of suspension, many SVS facilities issued an NOIE are able to meet compliance requirements before the NOIE escalates into an NOS, which would shut down production.

Violations and the Implications to an RSA

Egregious violations or observations that a facility is not in compliance with the RSA can impact the RSA's status. An egregious inhumane handling violation is "an act or condition that results in severe harm to animals . . ."²⁴ Some examples of egregious violations include but are not limited to:

- 1) Cutting or skinning conscious animals,
- 2) "Excessive beating" of disabled animals,
- 3) Dragging conscious animals,
- 4) Animals falling to the ground off semi-trailers due to inadequate unloading ramps,
- 5) Running over conscious animals with equipment,
- 6) Allowing stunned animals to regain consciousness,
- 7) Failure to immediately make an animal unconscious after failing the initial stun,
- 8) Multiple failed stun attempts by:
 - a) Failing to take immediate corrective measures,
 - b) Failing "to adequately restrain an animal,"
 - c) Failing "to use adequate stunning methods,"
 - d) Insufficient operator training or inexperience, or
 - e) Prolonging "discomfort and excitement of the animal" by failing to render it unconscious after taking corrective measures
- 9) "Dismembering conscious animals,"
- 10) Leaving disabled animals exposed to harsh climate, or
- 11) Other "unnecessary pain and suffering to animals. . ."²⁵

A facility that commits an egregious inhumane handling violation will no longer be considered to have an RSA. Alternatively, inspectors can also observe and determine that a

²³ [Rebecca Thistlethwaite, *Guidance and Outreach to Small and Very Small Meat Processors*, Food Safety and Inspection Service, USDA, 28 \(2020\).](#)

²⁴ [FSIS Directive 6900.2 Revision 3, *Humane Handling and Slaughter of Livestock*, Food Safety and Inspection Service, USDA, 2 \(2020\).](#)

²⁵ [Id. at 2-3.](#)

facility is not following their RSA, at which point they will communicate that the facility no longer has a valid RSA until the deviations are corrected.²⁶

To regain compliance, the facility must take corrective action and review the RSA to determine if the RSA is robust.²⁷

What Should Be Included in a Robust Systematic Approach?

As stated earlier, an RSA must include the four elements, or steps, of a systematic approach by implementing the elements into written procedures, written records, and FSIS's review of the plan.

The first step to creating an RSA requires an initial assessment of what should be included in an RSA. This assessment should include information about areas or equipment that could cause noncompliance, proper handling procedures, stunning procedures and equipment that will prevent a missed or ineffective stun, and whether the assessment has been documented in writing.²⁸ The assessment can include a checklist, flow chart, or narrative form.²⁹ The assessment should cover all the facility's humane handling and slaughter practices, equipment, maintenance, training, and facilities.³⁰ FSIS has a sample assessment in its Compliance Guide.³¹

The second step addresses the facility's design and handling practices and expectations. Information related to handling practices, facility designs, standard operating procedures, handling training programs, refresher handling training programs, stunning device procedures and maintenance, and whether there is documentation of this information should be added to the written RSA.³²

The third step is necessary to identify the written procedures to evaluate whether the RSA is being effectively implemented. These written procedures should include methods to assess areas trafficked by animals to ensure they are in safe, operable condition, "in-house humane handling audits" using industry-accepted practices, "third-party humane handling audits" that are reviewed by facility management, monitoring and assessment of stunning

²⁶ [Id. at 7.](#)

²⁷ [Id. at 5 & 7.](#)

²⁸ [Id. at 27.](#)

²⁹ [Id.](#)

³⁰ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 5 \(2013\).](#)

³¹ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA \(2013\).](#)

³² [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 28 \(2020\).](#)

procedures to ensure animals do not regain consciousness, annual reassessment of the RSA, and “a methodology to identify developing trends” in order to solve any problems.³³

The fourth step must include a written program in order to document compliance or corrective actions to the RSA. This written program should include animal handling procedures in response to any natural disasters or “catastrophic events,” “a method to track changes made in handling methods” from problems that were identified during monitoring or an audit, and actions that employees and management take when an unforeseen inhumane handling incident occurs.³⁴

The information that should be included within the written program for these four steps is not an exhaustive list.³⁵

To satisfy the multiple steps of a systematic approach and the additional requirements needed for an RSA, a common RSA plan may be formatted with sections not limited to the following:

- Business Description³⁶
- Mission Statement³⁷
- Animal Handling Procedures/Standard Operating Procedure³⁸ such as:
 - Unloading and Holding Procedure
 - Animal Driving Practice
 - Stunning Procedure
 - Procedures for Determining if an Animal is Unconscious
 - Emergency Plans for Disasters³⁹
 - Monitoring Frequency
 - Equipment Maintenance⁴⁰
 - Corrective Action⁴¹
- Assessments and Reassessment of Handling Procedure and Facility (FSIS Comp Guide)
- Documentation of Procedure such as:

³³ [Id. at 29-30.](#)

³⁴ [Id. at 30.](#)

³⁵ [Id.](#)

³⁶ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 18 \(2013\).](#)

³⁷ [Temple Grandin, Taking a Robust Approach to Humane Slaughter, Meat + Poultry \(Dec. 30, 2016\).](#)

³⁸ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 18 \(2013\).](#)

³⁹ [Temple Grandin, Taking a Robust Approach to Humane Slaughter, Meat + Poultry \(Dec. 30, 2016\).](#)

⁴⁰ [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 18 \(2013\).](#)

⁴¹ [Marks Meat, Robust Systematic Approach to Humane Handling, 13 \(2019\).](#)

- Verification of Plan Implementation⁴²
- Training Records⁴³

Additional Tips and Resources for a Robust Systematic Approach

Each facility needs its own custom RSA and should not copy an example RSA word for word.⁴⁴ When initially developing an RSA, these resources are a good starting point to ensure the plan satisfies the humane handling requirements of 9 C.F.R. Part 313:

- [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA \(2020\).](#)
- [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA \(2013\).](#)
- [Humane Handling Institute, University of Wisconsin-River Falls \(2024\).](#)

For SVS facilities, start by reviewing and writing out existing humane handling practices and make the RSA as simple as possible.⁴⁵ Formatting RSA procedure sections corresponding to the nine HATS categories is a great starting point to satisfy the elements necessary for an RSA.⁴⁶ Determine what observations and verification activities and subsequent documentation will be used as evidence to support the written procedures. Also, consider the examples of noncompliance within the nine HATS categories described in FSIS Directive 6900.2 to understand what potential inhumane handling violations look like when formulating an RSA. A facility can also include citations to sources used to create an RSA.⁴⁷ Once the RSA is finalized, an FSIS inspector must review and declare the establishment is operating under an RSA, and the approval should be provided to the establishment in writing, at minimum via a Memorandum of Interview (MOI), provided by the frontline supervisor (FLS) or public health veterinarian (PHV).⁴⁸

Record maintenance is required to ensure that the facility stays compliant with its RSA and that any potential problems are identified before a violation. Some examples of records to keep include:

- Records demonstrating RSA implementation, most commonly via regularly documented in-plant humane handling, stunning/sensibility audits;

⁴² [FSIS Compliance Guide for a Systematic Approach to the Humane Handling of Livestock, Food Safety and Inspection Service, USDA, 18 \(2013\).](#)

⁴³ [Temple Grandin, *Taking a Robust Approach to Humane Slaughter*, Meat + Poultry \(Dec. 30, 2016\).](#)

⁴⁴ [Id.](#)

⁴⁵ [Sallee J. Dixon, *Creating an Individualized Robust Systematic Approach*, Food Safety and Inspection Service, USDA \(2019\).](#)

⁴⁶ [Marks Meat, *Robust Systematic Approach to Humane Handling*, 1 \(2019\).](#)

⁴⁷ [Id. at 15.](#)

⁴⁸ [FSIS Directive 6900.2 Revision 3, Humane Handling and Slaughter of Livestock, Food Safety and Inspection Service, USDA, 4 \(2020\).](#)

- Records demonstrating the RSA prevents potential noncompliance;
- Records of corrective actions taken when failing to implement the RSA or failing to prevent noncompliance;⁴⁹ and
- Stunning equipment and facility maintenance records.⁵⁰

Separate procedures for stunning methods of particular species or maturity states within species should be considered and written when necessary.⁵¹ In 2021, of 62 humane handling enforcement actions, “51 (82.3%) was related to stunning.”⁵² This statistic is important to consider when crafting training and backup stunning procedures in an RSA. For example, if an electrical stun is going to be a backup, electrocution concerns must be taken into account.⁵³ Thus, an RSA may also include human safety procedures such as requiring rubber-lined floors and employees to wear rubber boots and gloves.⁵⁴

Facility harvest personnel should be trained in how to identify unconscious animals from an effective stun. When assessing the unconsciousness of an animal, signs of unconsciousness include:

- Head dangling from a flaccid neck or head hanging straight down;
- Tongue hanging straight down;
- Eyelids wide open with pupils dilated and eyes appearing black at a distance;
- No rhythmic breathing; or
- No vocalization.⁵⁵

An ineffective stun may result in an animal regaining consciousness. Some signs an animal is regaining consciousness after an ineffective stun include:

- Vocalization;
- Rhythmic breathing;
- Eye (corneal) reflex when the eye is touched (not applicable in electrically stunned animals);
- Eye reflex when the eye is touched;

⁴⁹ [Sallee J. Dixon, *Creating an Individualized Robust Systematic Approach*, Food Safety and Inspection Service, USDA \(2019\).](#)

⁵⁰ [FSIS Directive 6900.2 Revision 3, *Humane Handling and Slaughter of Livestock*, Food Safety and Inspection Service, USDA, 28 \(2020\).](#)

⁵¹ [Marks Meat, *Robust Systematic Approach to Humane Handling*, 6 \(2019\).](#)

⁵² [Kurt D. Vogel, *Emphasis Should Focus on Training Personnel and Improving Restraint*, The National Provisioner \(Oct. 26, 2022\).](#)

⁵³ [Niche Meat Processor Assistance Network, *NMPAN Live Humane Handling Q&A with the Humane Handling Institute*, YouTube \(Oct. 26, 2023\).](#)

⁵⁴ *Id.*

⁵⁵ [Humane Handling Verification for Livestock and Good Commercial Practices for Poultry, Food Safety and Inspection Service, USDA, 12 \(2021\).](#)

- Spontaneous natural eye blinking without being touched in the eye or eye area (not applicable in electrically stunned animals); or
- Tense and moving tongue or lips.⁵⁶

Finally, a facility should review and reassess the RSA and related records at least annually or when significant process or equipment changes occur, whichever is more frequent, to ensure that the RSA remains robust.⁵⁷

Other helpful additional resources:

- [Rebecca Thistlethwaite, *Guidance and Outreach to Small and Very Small Meat Processors*, Food Safety and Inspection Service, USDA \(2020\).](#)
- [Temple Grandin, *Taking a Robust Approach to Humane Slaughter*, Meat + Poultry \(Dec. 30, 2016\).](#)
- [9 C.F.R. § 313 \(1979\).](#)
- [*Humane Handling and Slaughter Requirements and the Merits of a Systematic Approach to Meet Such Requirements*, Food Safety and Inspection Service, USDA \(2004\).](#)
- [Niche Meat Processor Assistance Network, *NMPAN Live Humane Handling Q&A with the Humane Handling Institute*, YouTube \(Oct. 26, 2023\).](#)
- [Marks Meat, *Robust Systematic Approach to Humane Handling* \(2019\).](#)
- [*Notice of Intended Enforcement Letter from FSIS to Est. M47248*, Food Safety and Inspection Service, USDA \(2024\).](#)
- [Sallee J. Dixon, *Creating an Individualized Robust Systematic Approach*, Food Safety and Inspection Service, USDA \(2019\).](#)
- [Kurt D. Vogel, *Emphasis Should Focus on Training Personnel and Improving Restraint*, The National Provisioner \(Oct. 26, 2022\).](#)
- [*Humane Handling and Slaughter Requirements and the Merits of a Systematic Approach to Meet Such Requirements*, Food Safety and Inspection Service, USDA \(2004\).](#)

⁵⁶ [*Id.*](#)

⁵⁷ [Sallee J. Dixon, *Creating an Individualized Robust Systematic Approach*, Food Safety and Inspection Service, USDA \(2019\).](#)

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