USDA Q&As

United States Department of Agriculture • Office of Communications • 1400 Independence Avenue, SW
Washington, DC 20250-1300 • Voice: (202) 720-4623 • Email: oc.news@usda.gov • Web: http://www.usda.gov

USDA Press Office (202) 720-4623

Questions and Answers
Hallmark/Westland Meat Packing Co.
February 17, 2008

USDA Actions

Q. Why didn't USDA's Food Safety and Inspection Service immediately suspend operations at Hallmark/Westland Meat Packing Company?

A. On Feb. 4, FSIS issued a Notice of Suspension based on the Hallmark/Westland Meat Packing Company's failure to maintain and implement controls to prevent the inhumane handling and slaughter of animals at the facility required by USDA Food Safety and Inspection Service (FSIS) regulations and the Humane Methods of Slaughter Act. Issuing a Notice of Suspension is a normal course of action when FSIS finds egregious violations of humane handling regulations. The suspension will remain in effect and the plant will be unable to operate until written corrective actions are submitted and verified by FSIS to ensure that animals are handled and slaughtered humanely.

Q. Why didn't FSIS suspend the establishment upon learning of the allegations?

A. FSIS initiated the investigation after receiving allegations of inhumane handling of cattle at the Hallmark/Westland Meat Packing Company. The plant voluntarily ceased operations on Friday, Feb. 1, pending Agency investigation that led to verification of alleged activities documented in undercover videos.

On Feb. 4, FSIS suspended inspection at Hallmark/Westland Meat Packing Company, and the plant will not be able to resume operations until they adequately respond to the Notice of Suspension. The response must explain how these violations occurred, what actions they have planned to address the violations, when they plan to implement those changes and must demonstrate that it has acceptable corrective actions in place. When the Hallmark/Westland Meat Packing Company is permitted to resume operations, FSIS inspectors will increase oversight and verification of the plant's implementation of the corrective actions.

Q. When can Hallmark/Westland Meat Packing Company resume operations?

A. The Hallmark/Westland Meat Packing Company must first respond to the Notice of Suspension and submit a corrective action plan to address its failure to properly implement the Humane Methods of Slaughter Act and FSIS regulations. FSIS must first verify that the plan they submit fully and completely addresses the findings in the Notice of Suspension to ensure the humane handling and slaughter of animals at the facility.

Q. Has the Hallmark/Westland Meat Packing Company responded to the Notice of Suspension?

A. To date, the Hallmark/Westland Meat Packing Company has not submitted a response to the Notice of Suspension to FSIS.

Q. What will FSIS do to ensure this does not happen again?

A. The Hallmark/Westland Meat Packing Company first must respond to the Notice of Suspension. FSIS will then assess whether its response adequately addresses the findings in the suspension. If the response adequately addresses the regulatory noncompliance, FSIS then would place the suspension in abeyance, and allow the Hallmark/Westland Meat Packing Company to implement its corrective action plan and FSIS would rigorously verify the execution of the corrective action plan.

Q. How does FSIS know that this is not happening at other establishments?

A. FSIS believes this to be an isolated incident of egregious violations to humane handling requirements and the prohibition of non-ambulatory disabled cattle from entering the food supply. FSIS inspection program personnel are trained to identify these behaviors and act immediately if they witness animals being handled in an inhumane manner and to prevent non-ambulatory disabled cattle being moved to slaughter.

Public Health Veterinarians or other inspectors visit the holding pens to conduct ante-mortem inspection on an entire lot. They also randomly return to the area to observe specific humane handling activities at other times throughout each production shift.

Plant employees are required to handle animals in a humane manner that minimizes excitement, discomfort and stress. Employees also are required to immediately notify FSIS inspection program personnel if an animal becomes non-ambulatory after passing ante-mortem inspection.

There are 7,800 inspection personnel that provide inspection to more than 6,200 federally inspected establishments. USDA has continuous presence at all federally inspected slaughter facilities. FSIS is responsible for assuring that the nation's commercial supply of meat, poultry and egg products is safe, wholesome, correctly labeled and packaged. FSIS also is responsible for ensuring that establishments follow all food safety and humane handling regulations.

In 2007, FSIS issued a total of 66 suspensions to federally inspected establishments, 18 percent (12 suspensions) of which were for egregious humane handling violations witnessed by inspection program personnel.

Of the 6,200 federally inspected establishments, approximately 900 slaughter livestock and are therefore subject to the Humane Methods of Slaughter Act. In 2007, FSIS conducted approximately 167,540 humane handling verification activities which resulted in 691 noncompliance records (0.41percent noncompliance rate) at these facilities. Noncompliance records for humane handling can be issued when the violation is less than egregious, such as not having water available in pens.

Q. Why didn't FSIS personnel witness non-ambulatory animals being presented for slaughter?

A. FSIS inspection program personnel conduct ante-mortem inspection on all cattle on the same day of slaughter. If an animal becomes non-ambulatory before or at the time of being presented for slaughter, plant personnel are required to summon an FSIS Public Health Veterinarian to re-evaluate the animal.

If an animal becomes non-ambulatory after passing ante-mortem inspection, the Public Health Veterinarian may make a determination, on a case by case basis, that the animal was unable to walk due to an acute injury, such as due to a broken leg, and would therefore be eligible to move on to slaughter as a "U.S. Suspect."

FSIS inspection program personnel maintain a continuous presence at all slaughter establishments while they are operating.

FSIS inspection program personnel are stationed at various points throughout the slaughter and processing operation.

Public Health Veterinarians or other inspectors visit the holding pens to conduct ante-mortem inspection on an entire lot. They also randomly return to the area to observe specific humane handling activities at other times throughout each production shift.

Q. Has USDA increased its inspection procedures at other facilities since these allegations?

A. No. FSIS believes this to be an isolated incident of egregious violations to humane handling requirements and the prohibition of non-ambulatory disabled cattle from entering the food supply.

There are 7,800 inspection personnel that provide inspection to more than 6,200 federally inspected establishments. USDA has continuous presence at all federally inspected slaughter facilities. USDA's Food Safety and Inspection Service is responsible for assuring that the nation's commercial supply of meat, poultry and egg products is safe, wholesome, correctly labeled and packaged. FSIS is also responsible for ensuring that establishments follow all food safety and humane handling regulations.

In 2007, FSIS issued a total of 66 suspensions to federally inspected establishments, 18 percent (12 suspensions) of which were for egregious humane handling violations witnessed by inspection program personnel.

Of 6,200 federally inspected establishments, approximately 900 slaughter livestock and are therefore subject to the Humane Methods of Slaughter Act. In 2007, FSIS conducted approximately 167,540 humane handling verification activities resulting in 691 noncompliance records (0.41percent noncompliance rate) at these facilities. Noncompliance records for humane handling may be issued when the violation is less than egregious, such as not having water available in pens.

Recall Information

Q. What is a recall?

A. Recalls are voluntary actions undertaken by manufacturers or distributors to remove from commerce products that are adulterated or misbranded from commerce.

Q. How did FSIS reach the decision to issue a recall?

A. As a result of USDA's ongoing investigation, FSIS obtained evidence that the establishment had the practice of occasionally slaughtering cattle that, although the cattle passed ante-mortem inspection, became non-ambulatory prior to entering the slaughter operation. This action is not compliant with FSIS regulations.

FSIS regulations require that plant personnel notify the FSIS public health veterinarian if an animal becomes non-ambulatory after being passed during ante-mortem inspection.

The public health veterinarian then would be able to determine if the animal was unable to walk due to an acute injury, such as due to a broken leg, and would therefore be eligible to move on to slaughter.

Q. Does the recall mean that the investigation has concluded?

A. No. FSIS continues to assist USDA's Office of the Inspector General as they continue the investigation.

Q. How does the public know when a product has been recalled?

A. The public is notified through a recall release that is posted on the FSIS Web site and distributed to media in the affected area as well as through public health partners and stakeholders. FSIS might issue a public health alert if a product is not considered adulterated but there are illnesses involved or if illnesses are associated with a meat or poultry product from an unidentifiable source.

Q. What happens after the recall of Hallmark/Westland Meat Packing Company products?

A. FSIS will conduct effectiveness checks to ensure that customers have received notice of the recall and are making every effort to retrieve and destroy the recalled product or return it to the Hallmark/Westland Meat Packing Company.

FSIS personnel verify that the Hallmark/Westland Meat Packing Company has been diligent and successful in notifying and advising its consignees of the need to retrieve and control recalled product, and that the consignees have responded accordingly.

Recall and the Federal Food and Nutrition Programs

Q. Relative to Federal food and nutrition programs, what products are covered by the recall?

A. All ground beef products produced by Hallmark/Westland Meat Packing Company and delivered directly to Federal food and nutrition programs and further processed products that contain Westland products are covered by the recall. The direct delivered products include fine ground beef and one-pound chubs of ground beef. In most cases, coarse ground beef was delivered to firms that further process the product into end items. The recall applies to all Westland products delivered since February 1, 2006. State and local food program operators will need to work closely with their further processors to identify products derived from Westland coarse ground beef.

Q. How can the Westland products be identified?

A. Westland supplied fine and coarse ground beef directly to Federal food and nutrition programs. Its Federal establishment number (EST 336) will be on the shipping containers and immediate containers (i.e., chubs) of fine ground beef, as well as, a date of pack. For coarse ground beef that was further processed, the further processing firm will be able to provide information to identify and trace affected products.

Q. How does the recall impact the Federal food and nutrition programs?

A. When products subject to a recall have been distributed to Federal food and nutrition programs, USDA's Food and Nutrition Service (FNS) participates in the recall process to enable them to rapidly notify their customers at the time a recall release is issued.

Some of the Westland Meat Co. branded products were purchased for Federal food and nutrition programs and, since Jan. 30, 2008, USDA has had an administrative hold on all products from Westland Meat Co. in all of these outlets including, in the National School Lunch Program, the Emergency Food Assistance Program and the Food Assistance Program on Indian Reservations. Based on this Class II recall, officials of the Food and Nutrition Service and Agricultural Marketing Service will work closely with State food and nutrition officials to minimize any disruptions caused by the removal and disposal of recalled Westland Meat Co. products.

Q. What must be done with any Hallmark/Westland products or processed items containing Hallmark/Westland products in the Federal food and nutrition programs?

A. Any Hallmark/Westland Meat Packing Co. products in the Federal food and nutrition programs, or its derivatives, must be destroyed and cannot be used or reconditioned for human consumption. All disposal methods must be fully documented regarding type of product and destruction method and witnessed with two signatures. Entities holding 50 cases or less may destroy the product on-site by rendering the product unfit for human consumption according to destruction guidance from the State or local health authority. Quantities greater than 50 cases must be taken to a landfill, incinerated, or sent for inedible rendering. FNS has provided destruction verification forms to all affected States.

Q. Who is responsible for ensuring that product in the Federal food and nutrition programs is properly disposed?

A. For quantities destroyed on-site, an appropriate person of authority (e.g. food service director) and one other person are required to witness the destruction using approved methods to render the product inedible. In the case of incineration or landfill destruction, two witnesses must be present, one of whom must be an official from the local health department or authority.

Q. How will further processors of product destined for schools be notified of the recall?

A. Both USDA's Agricultural Marketing Service (AMS) and FNS have contact information for further processors and will contact them once the recall is announced. Furthermore, there will be a conference call for all further processors jointly held with AMS and FNS.

Q. Will the further processing costs associated with recalled end-item products in Federal food and nutrition programs be reimbursed?

A. USDA will pursue every avenue available to reimburse States for costs associated with processing the commodity beef into end-items.

Q. If Westland product in the Federal food and nutrition programs was commingled with other supplier's products during further processing, will these products have to be destroyed?

A. Yes. All products that contain the recalled Westland product in the Federal food and nutrition programs must be destroyed.

Q. Will the full value of the commingled products in the Federal food and nutrition programs be reimbursed?

A. USDA will pursue every avenue available to reimburse States for the value of products in the Federal food and nutrition programs that must be destroyed due to the recall.

Q. Will the recalled product in the Federal food and nutrition programs be replaced by USDA?

A. USDA will pursue every avenue available to provide replacement product for the products that are in Federal food and nutrition programs' inventory and subject to the recall and that are destroyed.

Q. Can the recalled product in the Federal food and nutrition programs be further donated or used as pet food?

A. No. The Federal food and nutrition program product must be destroyed by placing it in a landfill, incinerating or by inedible rendering.

Q. Can further processors file claims directly with USDA for their costs associated with the recall and disposal of Westland product in the Federal food and nutrition programs?

A. No. Further processors must submit any such costs, in accordance with their existing contracts with States, to the SDAs for payment. USDA will only reimburse States for costs associated with the recall and disposal of Westland products in the Federal food and nutrition programs.

Q. How soon can State and local program operators start disposing of recalled Westland products in the Federal food and nutrition programs?

A. The disposal may begin as soon as preparations can be made with a disposal site and State or local health officials for certification of destruction. It is important that local program operators work closely with their SDAs to ensure proper documentation is submitted for reimbursement of expenses and replacement of product in the Federal food and nutrition programs.

Q. How soon will USDA start putting product in the distribution system to make up for shortfalls to State and local food and nutrition programs caused by the recall?

A. USDA will start immediately to purchase replacement products for Federal food and nutrition programs that must destroy product that is currently in inventory. Additionally, on-going planned purchases will continue. FNS and AMS will work together to prioritize product deliveries to ensure State and local programs have ground beef items to meet their needs.

Q. What contractual actions will USDA pursue in this matter?

A. USDA has initiated a series of warranty actions against Westland to recover Federal food and nutrition program costs and costs associated with the recall. Additionally, USDA will terminate existing contracts with Westland, which will free up monies for purchasing products from eligible suppliers.

Bovine Spongiform Encephalopathy Control Measures

Q. How does USDA monitor the U.S. cattle population for bovine spongiform encephalopathy (BSE)?

A. USDA's Animal and Plant Health Inspection Service (APHIS) continues to conduct BSE surveillance activities throughout the United States. The target number for testing is 40,000 animals each year. This level of testing exceeds the testing number recommended by the World Animal Health Organization (OIE) for BSE surveillance.

Q. Is U.S. meat safe to eat?

A. Yes. What truly protects human and animal health is the system of interlocking safeguards, including the removal of specified risk materials—those tissues that studies have demonstrated could contain the BSE agent in infected cattle—from the human food chain, along with the U.S. Food and Drug Administration's 1997 ruminant to ruminant feed ban. USDA's ongoing BSE surveillance program is not for the purposes of determining food safety. Rather, it is an animal health surveillance program designed to assess any change in the BSE status of U.S. cattle, and identify any rise in BSE prevalence in this country.

This ongoing BSE surveillance program allows USDA not only to detect the disease if it exists at very low levels in the U.S. cattle population, but also provide assurances to consumers and our international trading partners that the interlocking system of safeguards in place to prevent BSE are working. USDA will continually analyze the ongoing surveillance strategy and make adjustments as needed to ensure that the most robust surveillance program that provides the foundation for market confidence in the health of U.S. cattle is maintained.

Q. What is the risk of contracting BSE infection from consuming this meat?

A. Negligible. The federal government has an interlocking system of controls to protect the food supply and to prevent animals with signs of central nervous system disorders from entering the food chain.

All cattle at the Hallmark/Westland Meat Packing Company passed ante-mortem inspection before slaughter.

While the federal government has multiple regulations regarding BSE in place, the prevalence of the disease in the United States is extremely low. Since June 1, 2004, APHIS has sampled more than 759,000 animals and, to date, only 2 animals have tested positive for BSE under the program.

Q. Why did the USDA move from the enhanced BSE surveillance program to the ongoing surveillance program in 2006?

A. Using information from the enhanced surveillance efforts, USDA scientists developed a program that is more commensurate with the extremely low level of risk in the United States.

Q. If the level of risk is so low in the United States, shouldn't USDA increase the number of animals tested to try and find the disease in the U.S. cattle population?

A. Scientifically speaking the answer to that question is no. The ongoing BSE surveillance program, which will sample approximately 40,000 animals each year, will continue to draw samples from cattle populations where the disease is most likely to be found. This level of testing in these specific cattle populations allows USDA to detect BSE at the very low level of less than 1 case per million adult cattle, assess any change in the BSE status of U.S. cattle, and identify any rise in BSE prevalence in this country.

Q. What specific cattle populations does USDA focus on in its BSE ongoing surveillance program? Where are samples collected for testing?

A. USDA's ongoing BSE surveillance focuses on cattle exhibiting signs of central nervous disorders or any other signs that might be associated with BSE, including emaciation or injury, and dead cattle, as well as non-ambulatory (downer) animals.

Samples from the targeted population will be collected from the same locations as during the enhanced surveillance program, including farms, veterinary diagnostic laboratories, public health laboratories, slaughter facilities, veterinary clinics, and livestock markets. Samples will be collected from renderers and 3D/4D facilities, with a quota set at 5,000 samples per year.

Q. Who conducts sample testing? What kind of testing is done?

A. USDA's National Veterinary Services Laboratories (NVSL) in Ames, Iowa, along with contracted veterinary diagnostic laboratories, uses rapid screening tests as the initial screening method on all samples. Any inconclusive samples will be sent to NVSL for further testing and analysis.

Q. What protections are in place to protect the food supply from downer cattle and exposure to BSE?

A. FSIS regulations prohibit non-ambulatory disabled ("downer") cattle from entering the food supply.

In July 2007, FSIS issued a final rule "Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle." This rule requires that a case by case disposition must be made by an FSIS Public Health Veterinarian for every animal that becomes non-ambulatory disabled ("downer") after passing ante-mortem inspection.

The prohibition of downer cattle from entering the food supply is only one measure in an interlocking system of controls the federal government has in place to protect the food supply. While the government has multiple regulations regarding BSE in place, the prevalence of the disease in the United States is extremely low.

Other BSE security measures include the feed ban that prohibits feeding ruminant protein to other ruminants and an ongoing BSE surveillance program that began before we experienced our first BSE positive cow in the U.S. in 2003.

As another measure to reduce the risk of potential exposure to consumers, FSIS requires the removal of specified risk materials (SRM) from entering the food supply.

FSIS line inspectors are stationed at designated points along the production line where they are able to directly observe SRM removal activities. Other off-line inspection personnel verify plant SRM removal, segregation and disposition practices.

Q. What is a non-ambulatory, "downer," animal and how are they handled?

A. Non-ambulatory disabled livestock are livestock that cannot rise from a recumbent position or that cannot walk, including, but not limited to, those with broken appendages, severed tendons or ligaments, nerve paralysis, fractured vertebral column, or metabolic conditions.

Once an animal that is ambulatory has passed ante-mortem inspection and then becomes non-ambulatory disabled, for example with evidence of an acute fracture, such an animal must be re-examined by the Public Health Veterinarian to determine whether the animal can proceed to slaughter.

Ambulatory livestock with a broken leg should be driven as little as possible to prevent inhumane handling during ante-mortem inspection. If the animal is passed for slaughter, it should be handled as humanely as possible while moving to the stunning area. In some cases, it might be appropriate for the establishment to stun the animal in the pen area to minimize discomfort, rather than forcing it to walk to the stunning area.

Q. Are downer cattle allowed to enter the food supply?

A. On July 13, 2007 FSIS issued the final rule "Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle."

This rule requires that a case by case disposition must be made by an FSIS Public Health Veterinarian for every animal that becomes non-ambulatory disabled after passing ante-mortem inspection.

If the Public Health Veterinarian determined that the animals had sustained an acute injury, then it would have been passed and eligible for processing. If the disposition was found to be a chronic condition, then the animal would be condemned and therefore considered unfit for food.

The prohibition of downer cattle from entering the food supply is only one measure in an interlocking system of controls the federal government has in place to protect the food supply.

Other BSE measures include the feed ban that prohibits feeding ruminant protein to other ruminants, an ongoing BSE surveillance program and the required removal of specified risk materials.

FSIS requires the removal of specified risk materials (SRM) from entering the food supply. According to scientific evidence, the tissues containing the infectious agent that causes bovine spongiform encephalopathy (BSE) are the brain, spinal cord, and distal ileum (small intestine), which are removed from the rest of the carcass at slaughter. Therefore, the meat products are not be expected to be infected or have an adverse public health impact.

FSIS line inspectors are stationed at designated points along the production line where they are able to directly observe SRM removal activities.

Consumer Concerns

Q. My child/school recently consumed Hallmark/Westland products. What is the risk to children's health?

A. Negligible. USDA's Agricultural Marketing Service (AMS) has every production lot of ground beef tested by independent laboratories for certain pathogens and indicator organisms. Those lots that have positive findings of *E. coli* 0157:H7 or *Salmonella* are prohibited from Federal food and nutrition programs and USDA's Food Safety and Inspection Service is notified. AMS did have one positive result and this product was removed from the AMS supply chain and not delivered to any Federal food and nutrition program.

USDA is confident in the safety of the food supply. Human and animal health is protected by a system of interlocking safeguards, which also include the removal of specified risk materials—those tissues that studies have demonstrated could contain the bovine spongiform encephalopathy (BSE) agent in infected cattle—from the human food chain, along with the U.S. Food and Drug Administration's 1997 ruminant to ruminant feed ban.

The cattle at the Hallmark/Westland Meat Packing Company passed ante-mortem inspection before slaughter. While the federal government has multiple regulations regarding BSE in place, the prevalence of the disease in the United States is extremely low. Since June 1, 2004, APHIS has sampled more than 759,000 animals and, to date, only 2 animals have tested positive for BSE under the program.

Q. How can I find out whether my school or school district served any Hallmark/Westland products to my children?

A. State Distributing Agencies that handle commodities purchased by USDA have records on where Hallmark/Westland products were delivered within the State. Contact information is available at www.usda.gov/actions.

Humane Handling

Q. How are animals inspected on ante-mortem at slaughterhouses?

A. Every head of livestock is inspected ante-mortem, before slaughter, by a Public Health Veterinarian (PHV) or other inspection personnel.

The PHV or other FSIS in-plant inspectors randomly verify, during each shift, plant humane handling practices before, during and after ante-mortem inspection and will take immediate control action if inhumane handling is observed.

FSIS recognizes that plant employees might be aware of the presence of inspection program personnel, so inspectors are instructed to conduct humane handling verification activities in a way that they are not in plain view of plant employees, when possible.

During ante-mortem inspection, an animal will be condemned once the PHV has determined the animal to be non-ambulatory disabled.

The PHV may, on a case by case basis, can make a determination on whether an animal can proceed to slaughter if the animal becomes non-ambulatory after ante-mortem inspection has been performed.

Q. How does FSIS enforce humane handling violations?

A. In 2007, FSIS issued a total of 66 suspensions to federally inspected establishments, 18 percent (12 suspensions) of which were for egregious humane handling violations witnessed by inspection program personnel.

A suspension is an administrative action during which FSIS suspends the assignment of inspection personnel, which effectively shuts down all or part of the plant's operations.

Humane handling violations might occur and FSIS inspection program personnel are trained to identify these behaviors and act immediately if they witness animals being handled in an inhumane manner.

Of 6,200 federally inspected establishments, approximately 900 slaughter livestock and are therefore subject to the Humane Methods of Slaughter Act. In 2007, FSIS conducted approximately 167,540 humane handling verification activities resulting in 691 noncompliance records (0.41percent noncompliance rate) at these facilities. Noncompliance records for humane handling may be issued when the violation is less than egregious, such as not having water available in pens.

Q. How is the FSIS workforce able to enforce humane handling violations?

A. In 2002, FSIS appointed a District Veterinary Medical Specialist (DVMS) to each District Office to serve as the liaison between the district office and headquarters on all humane handling matters.

The DVMS serves as the primary contact in each district for humane handling and is the liaison between the district office and headquarters on all humane handling and good commercial practice matters.

In Fiscal Year 2007 approximately 600 DVMS correlation visits occurred at slaughter plants. Correlation visits are used to make an assessment of a plant's humane handling activities and to determine FSIS personnel's knowledge and appropriate application of humane handling verification procedures.

Q. What training is provided to FSIS veterinarians and inspectors?

A. DVMS personnel provide training for new veterinary employees on Agency humane handling and slaughter regulatory responsibilities, including ante-mortem inspection (before slaughter). Additionally, these specialists are responsible for on-site coordination of nationally prescribed humane slaughter procedures, verification of humane handling activities, good commercial practices and correlation of information in directives, notices, and other information from headquarters through the district office to Public Health Veterinarians in the field. Inspectors are provided on the job and classroom training.

Q. Are electric prods or other devices eligible for use on live animals?

A. Electric prodding devices are common handling tools and are humane when properly used. Electric prodding devices should be used minimally and in a humane manner on ambulatory animals.

The Agency considers it unacceptable and inhumane to repeatedly prod a non-ambulatory animal in any manner.

Mechanical means, such as by forklift, to elevate an animal is not considered humane, and would be considered egregious inhumane treatment.

FSIS can take immediate regulatory action and suspend inspection if inspection program personnel observe egregious violations of humane handling, thereby prohibiting the establishment from operating until they correct the problem.

<u>International Trade</u>

Q. Does the Hallmark/Westland Meat Packing Company export products?

A. In 2007, the Hallmark/Westland Meat Packing Company exported kidneys to the Ivory Coast and livers to the Ivory Coast and Angola. The plant has not exported products to Japan or South Korea since at least 2003.

Q. Does USDA's ongoing BSE surveillance program meet World Organization for Animal Health (OIE) standards? Will international trade be affected?

A. The ongoing surveillance program the United States will collect and test 10 times more samples than required by the OIE. The OIE uses a weighted surveillance points system, which reflects international scientific consensus that the best BSE surveillance programs focus on obtaining quality samples from targeted subpopulations rather than looking at the entire adult cattle population.

The highest point values are assigned to those samples from animals with classic clinical signs of the disease. The lowest point values correspond to clinically normal animals tested at routine slaughter. The goal of this weighted approach is to ensure that countries sample those cattle populations where the disease is most likely to be found.

Now that there is an international consensus through the OIE on BSE surveillance, international trade will improve and markets will reopen under USDA's ongoing BSE surveillance effort.