

**TEXAS DEPARTMENT OF STATE HEALTH SERVICES
MEAT SAFETY ASSURANCE
AUSTIN, TEXAS**

<h1 style="margin:0">MSA DIRECTIVE</h1>	6100.1 Rev. 3	5/7/20
---	------------------	--------

ANTE-MORTEM LIVESTOCK INSPECTION

I. PURPOSE

This directive provides instructions to inspection program personnel (IPP) on how to inspect livestock before slaughter (ante-mortem inspection) and the methods used to verify that livestock offered for slaughter have received ante-mortem inspection. MSA is reissuing this directive to incorporate the instructions for verifying the handling of non-ambulatory disabled veal calves, removing the requirement that ante-mortem inspection must be performed in holding pens, and updating the disposition instructions for recumbent cattle. Also, MSA has updated the directive to provide a definition for “promptly” (as it pertains to euthanasia).

KEY POINTS:

- *Provides procedures for IIPs to use in performing ante-mortem inspection of livestock*
- *Provides methodology to IIPs for verifying that livestock offered for slaughter have received ante-mortem inspection*
- *Provides instructions to IIPs for entering dispositions in PHIS*
- *Clarifies to IIPs and Circuit Veterinarian (CVs) the disposition requirements for non-ambulatory disabled cattle*

II. CANCELLATIONS

MSA Directive 6100.1, Rev 2, Ante-mortem Livestock Inspection, 7/24/14

III. BACKGROUND

- A. As required under the Texas Meat and Poultry Inspection Act, IICs are to conduct antemortem inspection on each and every livestock animal before slaughter to determine whether the animals are fit for human food. Thus, if an establishment does not present animals for ante-mortem inspection in accordance with HSC 433 and 9 CFR 309.1, IICs that conduct post-mortem inspection are not able to determine that carcasses are not adulterated and, therefore, cannot permit the carcasses to be marked as “inspected and passed”. There are certain animal health conditions that can only be assessed when the livestock are alive.
- B. On March 18, 2009, FSIS published a final rule, “Requirements for the Disposition of Cattle that Become Non-Ambulatory Disabled Following Ante-mortem Inspection,” ([74 FR 11463](#)). The final rule requires that all non-ambulatory disabled cattle, including non-ambulatory veal calves, that are offered for slaughter (including those that have passed ante-mortem inspection) be condemned and properly disposed of in accordance with 9 CFR 309.13. It also requires establishment personnel to notify IICs when cattle become non-ambulatory disabled after passing ante-mortem inspection (9 CFR 309.3 (e)). However, 9 CFR 309.13 (b) provides that veal calves that are unable to rise from a recumbent position and walk because they are tired or cold, after they are US Condemned but before they are euthanized, may be set apart and held for treatment but only under appropriate MSA supervision. The regulations

pertaining to the disposition of cattle that become non-ambulatory disabled after passing ante-mortem inspection are listed in Attachment 1.

- C. On July 18, 2016, FSIS published a final rule, "Requirements for the Disposition of Non-Ambulatory Disabled Veal Calves," (81 FR 46570). The final rule removed a provision that permitted establishments to set apart and hold for treatment veal calves that are unable to rise from a recumbent position and walk because they are tired and cold. The final rule also amended the regulations to require all non-ambulatory disabled cattle to be promptly disposed of after they have been condemned. Additionally, the final rule amended the regulations by removing a provision that requires ante-mortem inspection to be conducted in pens.
- D. As detailed in Title 25, Texas Administrative Code (TAC), Chapter 221.14 (a)(1), custom exempt establishments in Texas may only slaughter healthy animals, exhibiting no abnormalities. Non-ambulatory animals are not allowed at custom exempt establishments, and if an animal becomes non-ambulatory disabled after they are delivered to a custom operation, the custom operator must contact the owner of the animal to determine if the custom operator wants to voluntarily condemn the animal or remove the animal from the custom slaughter establishment under the care of the animal owner's veterinarian.

IV. REVIEWING THIS ANTE-MORTEM LIVESTOCK INSPECTION DIRECTIVE

The IICs at all establishments that slaughter livestock are to review this directive as soon after issuance as practical. Circuit Managers (CM) are to verify that IICs have reviewed, understand, and implement this directive, as written.

V. IICs PERSONAL SAFETY

When IICs conduct routine ante-mortem examination of livestock, personal safety is paramount. IICs are to conduct ante-mortem verification with establishment helpers (9 CFR 307.2 (a)) from a safe and suitable vantage point, taking into consideration the size and temperament of livestock. CVs are to conduct physical examination, if necessary, of segregated livestock (e.g. potential Suspects, Condemns) with establishment helpers and suitable controls (e.g. restraining chute).

VI. MSA VERIFICATION OF LIVESTOCK OFFERED FOR SLAUGHTER

- A. IICs are to be aware that establishments are required to present livestock for ante-mortem inspection on the day of slaughter (9 CFR 307.2(a) and 9 CFR 309.1(a)), be aware that the establishment is required to identify those animals that need ante-mortem inspection to IICs, and to do so in a manner that will allow IICs to conduct and document that ante-mortem inspection has been performed. This documentation is necessary to facilitate IICs verification of the slaughter class and number of animals presented for ante-mortem inspection and to reconcile that number with the number of animals slaughtered.

NOTE: IICs must provide ante-mortem inspection on the day of slaughter. If an animal that received antemortem is not slaughtered on that day, the animal must receive antemortem inspection again on the actual day that it is slaughtered.

- B. IICs are to document the following information:

1. The date and time ante-mortem inspection was performed;
2. The pen/lot number;
3. The number and slaughter class (subclass) of livestock in the pen/lot that were offered for and passed ante-mortem inspection; and

4. The IIC's signature or initials.

VII. IICs PROCEDURES FOR VERIFICATION OF THE NUMBER OF LIVESTOCK OFFERED FOR ANTE-MORTEM INSPECTION

- A. IICs are periodically to verify the accuracy of the number of livestock presented for ante-mortem inspection recorded by the establishment.
- B. IICs are to perform the verification after the establishment has identified and presented livestock for ante-mortem inspection.
- C. If the count reveals that the number provided by the establishment is accurate, then IICs are to complete ante-mortem inspection.

VIII. IICs PROCEDURES FOR IDENTIFYING, CONTROLLING, AND ACCOUNTING FOR LIVESTOCK DURING ANTE-MORTEM INSPECTION

- A. IICs are to perform ante-mortem inspection, account for animals that pass ante-mortem inspection, and follow the instructions below for identifying, controlling, and accounting for livestock that do not pass ante-mortem inspection.
- B. IICs are to inspect and pass those livestock found to be healthy on ante-mortem inspection.
- C. IICs are to request that establishment personnel humanely segregate livestock that need further examination by the CV.
- D. IICs are to condemn livestock found dead in the pen and tag them as Condemned.
- E. CVs make one of the following dispositions for these segregated livestock:
 1. Passed for normal slaughter;
 2. Passed for slaughter but tagged, or handled, as a Suspect animal (9 CFR 309.18 (a)); or
 3. Condemned and tagged as a Condemned animal (9 CFR 309.18 (c)).
 4. Account for the segregated livestock by using an acceptable method. Proper disposition paperwork will be filled out for each animal.

IX. IICs VERIFICATION PROCEDURES FOR DETERMINING THAT LIVESTOCK SLAUGHTERED AT AN ESTABLISHMENT HAVE RECEIVED ANTE-MORTEM INSPECTION

- A. IICs are to verify that only livestock that have passed ante-mortem inspection are moved to slaughter.
- B. IICs can conduct this activity as part of the Humane Handling Activities Tracking System (HATS) verification. However, verification of animal handling, over time, is not to be limited to the ante-mortem inspection location (refer to MSA Directive 6900.2, *Human Handling and Slaughter of Livestock*).
- C. IICs are to verify that the number of livestock slaughtered (during a slaughter shift) is no more than the number of livestock that have passed ante-mortem inspection.

- D. If IICs find that there is a discrepancy, they are to discuss with establishment management why the numbers do not agree and determine how to reconcile these figures. IICs are to inquire whether any documentation maintained by the establishment will assist in determining the correct numbers.
- E. If IICs determine that livestock were slaughtered without ante-mortem inspection, then IICs are to follow the instructions in section X. I. for livestock not receiving ante-mortem inspection.

X. STEPS IICS FOLLOW WHEN CONDUCTING LIVESTOCK ANTE-MORTEM INSPECTION

- A. When IICs perform ante-mortem inspection, they are to follow the instructions in MSA Directive 6900.2, for how to verify that the establishment is meeting humane handling requirements. All animals that are on the premises of the establishment, on vehicles that are on the premises, or animals being handled in connection with slaughter (e.g., livestock on trucks being staged for slaughter) are to be handled humanely. Establishment employees are to handle these animals in accordance with the requirements for the humane handling of livestock (9 CFR 313.2).
- B. IICs are to perform ante-mortem inspection on the day of slaughter by observing **all** livestock:
 - 1. At rest; and
 - 2. In motion. IICs are to observe livestock from **both** sides in order to determine whether they are fit to slaughter for human consumption.
- C. When performing ante-mortem inspection (9 CFR Part 309), IICs are to observe:
 - 1. The overall condition of each animal, including the head, with attention to the eyes, the legs, and the body of the animal;
 - 2. The degree of alertness, mobility, and breathing; and
 - 3. Whether there are any unusual swellings or any other abnormalities.
- D. Non-ambulatory disabled cattle are not eligible for slaughter. If non-ambulatory disabled cattle are offered for slaughter, IICs are to:
 - 1. Identify and secure the animal. To execute the holding of an animal and to restrict the animal's movement, IICS are to apply a "Texas Retained" tag to the pen containing the affected animal; and
 - 2. Promptly notify the CV assigned to that establishment.
- E. CVs are to conduct ante-mortem inspection on all non-ambulatory disabled cattle offered for slaughter, unless the establishment elects to condemn and humanely destroy the non-ambulatory disabled cattle before the CV inspects and makes a disposition.

NOTE: Non-ambulatory disabled livestock are livestock that cannot rise from a recumbent position or that cannot walk. Non-ambulatory livestock may include, but are not limited to, those animals with broken appendages, severed tendons or ligaments, nerve paralysis, fractured vertebral column, or metabolic conditions (9 CFR 309.2(b)).

- F. The IIC is to contact the MSA Central Office (CO) through supervisory channels, if he or she has not received a slaughter permit when an establishment presents for ante-mortem inspection animals used in a research investigation involving an experimental biological product, drug, or chemical (9 CFR 309.17).
- G. If an establishment fails to present animals for ante-mortem inspection (21 U.S.C. 603 and 9 CFR 309.1), IICS are to:

1. Retain the animals or carcasses (if slaughtered);
2. Notify the CM immediately; and
3. Issue a noncompliance record (NR) under the “Slaughter HACCP” verification task.

H. Use of Secondary Entrances

1. IICs are to determine whether the establishment is using secondary or alternative entrances (e.g. side doors) when bringing livestock into the stunning area that are not typical of the normal flow (e.g. alleyways) of livestock to the stunning area. Also, IICs are to determine whether the establishment is using these entrances under conditions that meet the relevant statutory and regulatory requirements, such as:
 - a. Treating livestock humanely; or
 - b. Not slaughtering uninspected livestock or nonambulatory disabled cattle or deads.
2. If IICs determine that the establishment is using secondary or alternative entrances, IICs are to:
 - a. Discuss this use with establishment management and document, on the weekly meeting MOI, that the establishment is using secondary or alternative entrances.
 - b. Refer to MSA Directive 6900.2 for instructions for IICs verification activities of the establishment’s use of secondary or alternative entrances. This verification is part of HATS Category VIII – Stunning Effectiveness. In performing this verification, assess the conditions under which animals are being brought for stunning, e.g., are they walking under their own power? Are they being dragged? IICs are to document any findings they may make and take enforcement actions, if necessary.

XI. PROCEDURES RELATED TO SUSPECT LIVESTOCK

- A. CVs are to examine and take the temperature (or direct establishment employees to take the temperature), as necessary, of abnormal or diseased livestock including those set apart by the establishment or IICs.
- B. When an establishment offers recumbent livestock for ante-mortem inspection, the establishment may help an animal that is capable of rising by providing the animal support (e.g., providing a steady hand). Such support may not be by mechanical means, nor is the establishment permitted to lift the animal in any way. Also, once the animal has risen, it is to ambulate without assistance, so that the CV can observe it in motion. The establishment must treat the animal humanely when attempting to have it rise or ambulate. MSA does not consider forcing an animal to stand or ambulate by kicking or prodding (e.g., electrical prodding) to be humane.
- C. Cattle that are known to have reacted to the tuberculin test are to be identified as Texas Suspects and handled accordingly by inspection staff (9 CFR 309.2(d))(see MSA Coversheet and FSIS Directive 6240.1, *Inspection, Sampling, and Disposition of Animals for Tuberculosis*)
- D. Livestock that have readily detected lesions on ante-mortem inspection (9 CFR 309.18(a)) are handled as Texas Suspects.

XII. CV DISPOSITION OF CATTLE THAT BECOME RECUMBENT OR NON-AMBULATORY DISABLED AFTER PASSING ANTE- MORTEM INSPECTION

A. When the CV is notified by the establishment (or IPP) of cattle that have previously passed ante-mortem inspection that have become recumbent (lying down) or non-ambulatory disabled (9 CFR 309.3 (e)), CVs are to use sound professional judgement when examining these cattle and determine:

1. If the animal is ambulatory. If so, it may proceed through the slaughter process. Refer to the thought process in the examples below when making determinations; or

EXAMPLES:

- Cattle (that have passed ante-mortem inspection) driven to the restrainer sometimes go down in the restrainer and have difficulty standing up; this may be due to floor conditions, design of restraint systems, or animals unaccustomed to being restrained. CVs need to closely evaluate such situations to determine if the animals are non-ambulatory disabled or whether the animal would otherwise be ambulatory except that the establishment's facilities restrict the animal from rising or ambulating.
- Young cattle (steers and heifers), that have passed ante-mortem inspection, if observed by the CV, injuring themselves due to establishment facility issues (missing grates), that leads to a recumbent animal must be closely evaluated to determine if the animal is non-ambulatory disabled or whether the establishment's facilities caused an otherwise ambulatory animal to go down.
- Cattle (that have passed ante-mortem inspection) driven to the restrainer that are entrapped must be closely evaluated by the CV to determine if the animals are non-ambulatory disabled or whether the establishment's facilities or handling practices caused an animal that would otherwise be ambulatory to become entrapped.

2. If the animal is non-ambulatory disabled. If so, CVs are to condemn non-ambulatory disabled cattle (9 CFR 309.3(e)) and tag the cattle as "Texas Condemned" (or to direct the tagging of condemned cattle) and have them disposed of in accordance with 9 CFR 309.13.

NOTE: "Promptly" means within a reasonable time in view of all of the facts and circumstances, including whether the animal is suffering (e.g., injured, dehydrated, or vulnerable to being stepped on by ambulatory cattle), and extenuating circumstances such as weather conditions and emergencies ([80 FR 46570, 46574](#)).

B. The establishment may elect to humanely destroy cattle that become non-ambulatory disabled after the cattle received ante-mortem inspection instead of waiting for a CV disposition. In this case, the establishment is still required to notify IPP, and the CV or other IPP are to condemn and tag the dead animal or condemn and direct the tagging of the dead animal.

XIII. PROCEDURES FOR CONDEMNED LIVESTOCK

A. "Texas Condemned" tags are placed on:

1. Livestock that are dead or in a dying condition when offered for slaughter on the premises of the official establishment;
2. Livestock that are plainly showing on ante-mortem inspection any disease or condition that, under 9 CFR part 311, would cause the CV to condemn the carcass when inspecting postmortem;

3. Any swine have a temperature of 106°F or higher, and any cattle, sheep, goats, horses, mules, or other equines having a temperature of 105°F or higher;

NOTE: If there is doubt as to the cause of the high temperature, an establishment may hold an animal for further observation, at the discretion of, and under the supervision of the CV. The CV is to re-examine the animal, including taking the temperature when the establishment again offers an animal for ante-mortem inspection. If the temperature is still 106°F or above for swine or 105°F or above for other livestock, the CV is to condemn the animal. Animals may have high temperatures because of a bacterial infection. Animals may also have increased temperatures for reasons other than disease. For example, in the summer, animals may develop heat stress from elevated environmental temperatures.

4. All animals in a comatose or semi-comatose condition;
5. All non-ambulatory disabled cattle that are offered for slaughter; and
6. All animals that have any other condition that would preclude the release of the animal for slaughter, including all livestock exhibiting clinical signs of central nervous system disorders. Clinical signs of nervous system disorders on ante-mortem inspection include, but are not limited to, the following: excitement or depression; deviation or rotation of the head; drooping of the lips, eyelids, cheeks, and ears; convulsions and tremors; paralysis; sudden onset of fainting; head pressing; aimless walking; ataxia; and blindness. Other diseases may mimic nervous system disorders. For example, lameness may be difficult to differentiate from ataxia or paresis, and shivering from the cold may be difficult to differentiate from tremors. IICs are to retain any animal exhibiting signs of nervous system disorders for veterinary disposition (9 CFR 309.4(a)).

B. If an establishment requests to hold livestock, including veal calves that cannot rise from a recumbent position or that cannot walk because they are tired or cold, for treatment or to treat the livestock set apart (9 CFR 309.13(b)), the IIC is to:

1. Verify that the establishment maintains the identity of the animals and holds the animals in an area that bears the documented identification of the animals, or that the establishment has received permission from the appropriate local, State, or Federal livestock sanitary official having jurisdiction to move the animals off premises (9 CFR 309.13(d));
2. Just before the animal is shipped, remove, or direct the removal of, the "Texas Condemned" tag on animals that are to be treated off premise. This does not apply to Texas Condemned veal calves.

C. IICs are to:

1. Verify the disposal of condemned livestock by the establishment (9 CFR 314), and that the establishment maintains the required records (9 CFR 320), or that the animals are set apart and held for further observation or treatment under supervision of a MSA program employee; and

NOTE: It is the responsibility of the IIC to verify that an animal that is identified as "Texas Condemned" is either disposed of properly or held for further observation or treatment by the establishment (see 9 CFR 309.13(a)(b)).

2. Complete and MSA-64 form, for each animal identified as "Texas `Condemned" on ante-mortem inspection.

D. IICs may record multiple deads (e.g., dead-on-arrivals) and the associated serial "Texas Condemned" tag numbers on a single MSA-64 form.

XIV. RECORDKEEPING AND DOCUMENTATION

- A. IICs shall document establishment ante-mortem information on MSA-53 form daily and submit it monthly to the MSA Central Office.
- B. CVs are to complete MSA-64, for each animal identified as a "Texas Suspect" or "Texas Condemned" on ante-mortem inspection and file the form in the inspection office. IICs are to retain the form with the establishment documentation information.
- C. CVs or designees are to record the appropriate ante-mortem information into PHIS as necessary.

XV. QUESTIONS

Refer questions through supervisory channels.



James R. Dillon, DVM, MPH
Director, Texas State Meat and Poultry Inspection Program
Department of State Health Services