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AND REGULATORY PRACTICE



Deregulation in the Executive Branch:

Slaughter Line Speeds

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Why Line Speeds Matter

USDA frames increased speeds as “modernization” and efficiency. Critics argue higher speeds reduce meaningful oversight while increasing systemic risk.

- Worker safety
- Animal welfare
- Food safety
- Inspection integrity
- Environmental burden



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Traditional Inspection Model

HIMP Pilot Programs

- USDA introduced HIMP (HACCP-Based Inspection Models Project) in the 1990s.
- Pilot programs tested:
 - Faster line speeds
 - Reduced federal on-line inspection
 - Greater reliance on plant employees
- USDA later used HIMP as justification for broader “modernization” reforms.

Criticisms Emerged:

- Reduction in wholesomeness
- Small pilot sample size
- Questions about removing inspection duties
- Concerns about worker and inspector burden



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NPIS and NSIS

Key changes:

- Plant employees increasingly perform sorting and trimming functions.
- Federal inspectors shifted downstream.
- USDA relied more heavily on systems-based oversight and pathogen testing.
- Line-speed waivers expanded (with increased pathogen testing and worker attestations)

Result:

- A gradual transfer of practical inspection power from federal personnel to industry-controlled systems.

**United Food & Commercial Workers Union, Local No. 663 v. USDA, 532 F. Supp. 3d 741 (D. Minn. 2021) (vacating NSIS line-speed rule as arbitrary and capricious for failure to consider worker safety).*

The 2026 Proposed Rules

Poultry

- Continued operation at speeds up to 175 birds per minute under waiver structures but without increased pathogen testing and waivers
- Expanded flexibility for high-speed establishments.

Swine

- Continuation and expansion of NSIS-style operations without increased pathogen testing and worker attestations
- High-throughput slaughter systems remain central.

USDA Justifications

- Efficiency
- Modernization
- Flexibility for plants to innovate
- No significant impact claims



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Why Whistleblowers Matter

Whistleblowers provide:

- Operational reality
- Firsthand observation
- Context absent from agency summaries
- Insight into how systems behave under production pressure

They reveal:

- What happens when staffing is thin
- How inspectors are pressured
- What cannot realistically be observed at high speeds
- The difference between policy language and daily practice

What Whistleblowers Report

Inspectors and veterinarians report:

- Limited time to document noncompliance
- Pressure against slowing or stopping production
- Thin federal veterinary coverage across multiple facilities
- Visibility problems caused by line speed and plant design
- Disease evidence removed through trimming before federal review
- Difficulty maintaining meaningful carcass-by-carcass oversight

What Whistleblowers Report

Proposed Rule

Operational Reality

“Modernization improves efficiency.”

Reduced observation time

“No significant food safety concerns.”
capacity.

Practical limits on inspection

“Data-driven reform.”

Questionable data

“No significant environmental impact.”
pollution

Increased waste, water use,

“Higher speeds does not impact animal welfare”
vision

Less HATS time, understaffing, obscured

Closing

Final Thoughts:

- The 2026 proposals continue a decades-long trend toward faster production and reduced federal oversight.
- Whistleblowers remain one of the few mechanisms capable of revealing how these systems actually function.
- The debate is ultimately about whether operational reality matches regulatory promises.



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Thank you!

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