

# PORK QUALITY ASSURANCE PLUS®: A Transparent and Effective Tool for Addressing the Impacts of the U.S. Pig Farming Industry?

Pork Quality Assurance Plus® (PQA Plus) is a certification program developed by the U.S. pig farming industry. It aims to “offer training to pig farmers and their employees on continually improving production practices. This code of practice intends to transparently address the industry’s impacts in relation to food safety, animal well-being, the environment, worker safety, public health, and quality of life in communities located near industrial pig farms.”<sup>1</sup>

Part of the We Care<sup>sm2</sup> Ethical Principles and the PQA Plus Good Production Practices (GPPs), this code of practice comprises six ethical obligations to which every certified producer must commit:<sup>3</sup>

- **FOOD SAFETY – We affirm our obligation to produce safe food.**
- **ANIMAL WELL-BEING – We affirm our obligation to protect and promote animal well-being.**
- **PUBLIC HEALTH – We affirm our obligation to ensure our practices protect public health.**
- **OUR PEOPLE – We affirm our obligation to provide a work environment that is safe, where employees are treated fairly and with respect.**
- **ENVIRONMENT – We affirm our obligation to safeguard natural resources in all our practices.**
- **COMMUNITY – We affirm our obligation to contribute to a better quality of life in our communities.**

All these aims are of the utmost importance, considering the grave problems related to industrial animal production in general, which are well documented,<sup>4</sup> and pig

farming in particular. Industrial pig production is highly standardized and characterized by systems that (1) are typically conducive to poor animal welfare;<sup>5</sup> (2) contribute to serious public health challenges,<sup>6</sup> including antimicrobial resistance<sup>7</sup> and zoonotic epidemics;<sup>8</sup> (3) create food security risks;<sup>9</sup> (4) impair environmental sustainability;<sup>10</sup> and, as a consequence, (5) directly threaten the well-being of the demographic populations related to this industry.<sup>11</sup>

In light of this concerning scenario, this white paper investigates whether PQA Plus is an effective and

<sup>5</sup> Dominiek G. D. Maes et al., “A Critical Reflection on Intensive Pork Production with an Emphasis on Animal Health and Welfare,” *Journal of Animal Science* 98, no. S1 (August 2020): S15–26.

<sup>6</sup> Agata Augustyniak and Małgorzata Pomorska-Mól, “An Update in Knowledge of Pigs as the Source of Zoonotic Pathogens,” *Animals* 13, no. 20 (October 2023): 3281; P. R. Davies, “One World, One Health: The Threat of Emerging Swine Diseases. A North American Perspective,” *Transboundary and Emerging Diseases* 59, no. S1 (March 2012): S18–26.

<sup>7</sup> Frank M. Aarestrup, C. Oliver Duran, and David G. S. Burch, “Antimicrobial Resistance in Swine Production,” *Animal Health Research Reviews* 9, no. 2 (December 2008): 135–48; Angkana Lekagul, Viroj Tangcharoensathien, and Shunmay Yeung, “Patterns of Antibiotic Use in Global Pig Production: A Systematic Review,” *Veterinary and Animal Science* 7 (April 2019): 100058.

<sup>8</sup> Rebecca K. McLean and Simon P. Graham, “The Pig as an Amplifying Host for New and Emerging Zoonotic Viruses,” *One Health* 14 (April 2022): 100384.

<sup>9</sup> Julian Ruiz-Saenz et al., “African Swine Fever Virus: A Re-emerging Threat to the Swine Industry and Food Security in the Americas,” *Frontiers in Microbiology* 13 (October 2022): 1011891.

<sup>10</sup> Styrmir Gislason, Morten Birkved, and Alberto Maresca, “A Systematic Literature Review of Life Cycle Assessments on Primary Pig Production: Impacts, Comparisons, and Mitigation Areas,” *Sustainable Production and Consumption* 42 (November 2023): 44–62.

<sup>11</sup> D. Cole, L. Todd, and S. Wing, “Concentrated Swine Feeding Operations and Public Health: A Review of Occupational and Community Health Effects,” *Environmental Health Perspectives* 108, no. 8 (August 2000): 685–99; Elisabeth A. Stoddard and Alice Hovorka, “Animals, Vulnerability and Global Environmental Change: The Case of Farmed Pigs in Concentrated Animal Feeding Operations in North Carolina,” *Geoforum* 100 (March 2019): 153–65.

<sup>1</sup> “PQA Plus Certification,” Pork Checkoff, accessed September 11, 2024, <https://porkcheckoff.org/certification-tools/training-certification/pqa-plus/>.

<sup>2</sup> We Care is a promotional ethos that the National Pork Board, the National Pork Producers Council, and state-based pork producers’ governing bodies created to tout their stated commitments to continued improvement in pork production. PQA Plus is one of the quality-assurance programs that constitute the We Care ethos.

<sup>3</sup> Pork Checkoff, *Education Handbook* (Des Moines: National Pork Board, 2021), 2.

<sup>4</sup> Cleo Verkuijl et al., “Climate Change, Public Health, and Animal Welfare: Towards a One Health Approach to Reducing Animal Agriculture’s Climate Footprint,” *Frontiers in Animal Science* 5 (May 2024): 1281450.

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transparent tool for tackling the myriad detrimental effects of the U.S. pig farming industry. It focuses primarily on pig welfare and, through the One Health lens, explores the relationship between this aspect and other aspects considered by this certification tool.

## 1. Is the PQA Plus an effective certification scheme for protecting the welfare of farmed pigs?

When considering this question, it is first essential to understand the concept of animal welfare and what it means in relation to assessing the well-being of farmed pigs.

Animal welfare is first and foremost an individual attribute. From a scientific viewpoint, the most relevant definitions of animal welfare consider several key factors: (1) the evolutionary history and biological traits of the species to which the individual belongs, (2) the degree of health experienced by the animal in a specific environment, and relatedly, (3) the emotional states—from unpleasant to pleasurable—that the individual experiences in this particular environment.<sup>12</sup> In 1986, Professor Donald Broom provided a foundational definition of animal welfare: “The welfare of an animal is its state as regards its attempts to cope with its environment”<sup>13</sup>—how successful an animal is in coping with her or his environment. A key complementary definition later aided our understanding of best evaluating the welfare experienced by an individual animal under particular circumstances. According to Professor Marian Dawkins, “Improvements in animal welfare can be based on the answers to two questions: Q1: Will it improve animal health? and Q2: Will it give the animals something they want?”<sup>14</sup> Most recently, animal welfare scientists expanded on these foundational definitions by recognizing the need to aim beyond a mere reduction of suffering and instead begin to explore what might constitute a “good life” for an individual of a particular species.<sup>15</sup> Widely accepted definitions make clear that science regards animal welfare as “a continuum that varies from very good to very poor.”<sup>16</sup> Moreover, they

further our understanding that the absence of physical pain or illness does not necessarily equate to good welfare—that is, a good degree of physical health is a necessary but insufficient condition for experiencing a good life. In light of this, any certification scheme whose goal is to protect and promote the well-being of farmed animals—and therefore to provide them with good welfare—must take into consideration all these defining aspects, which entail the scientifically established behavioral repertoires of particular species and their related needs and preferences.

### 1.1. What does science know about the welfare of farmed pigs?

Pigs are cognitively complex mammals who share many characteristics with other animals that humans typically regard as intelligent, such as dogs and chimpanzees. Mendl et al. (2010)<sup>17</sup> and Marino and Colvin (2015)<sup>18</sup> provide comprehensive reviews on pig cognition and behavior. Although modern domestic breeds have been genetically selected merely to enhance productive traits, such as improved feed efficiency, greater and faster weight gain, and fertility (producing the most piglets per litter),<sup>19</sup> the animals currently farmed in industrial settings are quite similar to their wild ancestors in terms of cognition and behavior.<sup>20</sup> In fact, experts on pig welfare stress the similarities:

*The behavior and social organization of feral domestic pigs is much like that of the ancestral species. Pigs typically live in matrilineal family groups of two to five females with their young offspring and, during the breeding season, an adult male. Yearlings may continue to associate with the group but male offspring usually disperse to form “bachelor” groups. Family groups forage together for food that is distributed patchily both in space and time. Given this social lifestyle, pigs would likely benefit from being able to discriminate between group mates and unfamiliar intruders, remember the location and attributes of food patches, use others as*

<sup>12</sup> David Fraser, “Understanding Animal Welfare,” *Acta Veterinaria Scandinavica* 50, no. S1 (August 2008): S1–6.

<sup>13</sup> D. M. Broom, “Indicators of Poor Welfare,” *British Veterinary Journal* 142, no. 6 (November–December 1986): 524–26.

<sup>14</sup> Marian Stamp Dawkins, “The Science of Animal Suffering,” *Ethology* 114, no. 10 (October 2008): 937–45.

<sup>15</sup> David J. Mellor, “Updating Animal Welfare Thinking: Moving Beyond the ‘Five Freedoms’ Towards ‘A Life Worth Living,’” *Animals* 6, no. 3 (March 2016): 21.

<sup>16</sup> D. M. Broom, “The Scientific Assessment of Animal Welfare,” *Applied Animal Behaviour Science* 20, no. 1–2 (July 1988): 5–19.

<sup>17</sup> Michael Mendl, Suzanne Held, and Richard W. Byrne, “Pig Cognition,” *Current Biology* 20, no. 18 (September 2010): R796–98.

<sup>18</sup> Lori Marino and Christina M. Colvin, “Thinking Pigs: A Comparative Review of Cognition, Emotion, and Personality in *Sus domesticus*,” *International Journal of Comparative Psychology* 28 (January 2015): 23859.

<sup>19</sup> Jan W. M. Merks, “One Century of Genetic Changes in Pigs and the Future Needs,” *BSAP Occasional Publication* 27 (January 2000): 8–19.

<sup>20</sup> Suzanne Held, Jonathan Cooper, and Michael Mendl, “Advances in the Study of Cognition, Behavioural Priorities and Emotions,” in *The Welfare of Pigs*, ed. Jeremy N. Marchant-Forde (New York: Springer Science Business Media, 2009), 47–94.

a source of information about where food is, and even conceal information about a food source from potential competitors.<sup>21</sup>

In light of this evidence, it is not surprising that only specific captive scenarios could be conducive to good welfare. But most farmed pigs nowadays—both in the United States and around the globe—are kept in systems that have been designed and refined to maximize productivity at the expense of pig welfare.

## 1.2. Current Husbandry Conditions in the U.S. Pig Farming Industry

Over the 20th century, pig farms shifted from small, extensive (outdoor), labor-dependent conditions to large, intensive (indoor) systems characterized by intensified production and often vertical control by large multinational companies.<sup>22</sup> Globally, most industrial pig production systems are highly standardized and designed to maximize productivity while decreasing costs. This approach, which reduces labor input, resources, and space per pig, significantly impairs the animals' welfare. From a design and management viewpoint, standard intensive production systems farm high numbers of pigs under high stocking densities and typically indoors from birth to the time the animals are transported to slaughterhouses.<sup>23</sup> These farming practices significantly restrict natural behavior and reduce complexity—and therefore stimulation—in the animals' environment.<sup>24</sup> Sows are confined in crates during gestation and farrowing, and their offspring are kept in group pens with slatted or concrete floors during rearing and fattening.<sup>25</sup> Pigs also endure painful procedures that are deeply detrimental to their welfare. For instance, male pigs are typically castrated without anesthesia and analgesia in the first week of life. This painful and

stressful event is associated with complications such as hemorrhages; severe swelling; infection; poor wound healing; failure to remove both testicles; suppressed immunity; and higher incidences of inflammation, pneumonia, and related conditions.<sup>26</sup> The distal part of a piglet's tail is usually surgically removed without anesthesia and analgesia during the piglet's first days of life, causing stress and acute pain.<sup>27</sup> Furthermore, docked tails often develop neuromas in injured peripheral nerves that cause chronic pain,<sup>28</sup> and tail-docked animals may suffer higher rates of pleurisy and lung abscesses, decreased growth, and increased mortality.<sup>29</sup> Teeth resection aims to reduce the lesions that piglets' intact needle teeth cause to other piglets or their mother's teats when the newborn animals fight to establish a nursing hierarchy.<sup>30</sup> While several studies suggest that clipping or grinding the needle teeth is effective in controlling these injurious effects in farrowing-crate systems,<sup>31</sup> teeth resection, which is performed in the first days of life without anesthesia or analgesia, is also detrimental to piglets. In addition to the stress and pain of handling and the resection procedure, piglets may suffer gum and tongue injuries, tooth inflammation or abscesses, and other oral infections.<sup>32</sup>

Pigs farmed in intensive systems are typically placed together several times during the production cycle. For

<sup>21</sup> Mendl, Held, and Byrne, "Pig Cognition," R796–97.

<sup>22</sup> Timothy P. Robinson et al., *Global Livestock Production Systems* (Rome: Food and Agriculture Organization of the United Nations, 2011), 43; Apisit Kittawornrat and Jeffrey J. Zimmerman, "Toward a Better Understanding of Pig Behavior and Pig Welfare," *Animal Health Research Reviews* 12, no. 1 (June 2011): 25–32.

<sup>23</sup> Kittawornrat and Zimmerman, "Toward a Better Understanding of Pig Behavior and Pig Welfare."

<sup>24</sup> Maes et al., "A Critical Reflection on Intensive Pork Production with an Emphasis on Animal Health and Welfare."

<sup>25</sup> J. Krieter, "Evaluation of Different Pig Production Systems Including Economic, Welfare and Environmental Aspects," *Archives Animal Breeding* 45, no. 3 (October 2002): 223–35; N. De Belie, "A Survey on Concrete Floors in Pig Houses and their Degradation," *Journal of Agricultural Engineering Research* 66, no. 3 (March 1997): 151–56; Ronald D. A. Cameron, *A Review of the Industrialisation of Pig Production Worldwide with Particular Reference to the Asian Region* (Rome: Food and Agriculture Organization of the United Nations, 2000).

<sup>26</sup> M. A. Sutherland, "Welfare Implications of Invasive Piglet Husbandry Procedures, Methods of Alleviation and Alternatives: A Review," *New Zealand Veterinary Journal* 63, no. 1 (January 2015): 52–57; Armelle Prunier et al., "A Review of the Welfare Consequences of Surgical Castration in Piglets and the Evaluation of Non-surgical Methods," *Animal Welfare* 15, no. 3 (August 2006): 277–89; P. T. Smith, "Castration of Swine," *North American Veterinarian* 28, no. 1 (January 1947): 292.

<sup>27</sup> Eleonora Nannoni et al., "Tail Docking in Pigs: A Review on Its Short- and Long-Term Consequences and Effectiveness in Preventing Tail Biting," *Italian Journal of Animal Science* 13, no. 1 (January 2014): 98–106; Nina R. Taylor et al., "Tail-Biting: A New Perspective," *Veterinary Journal* 186, no. 2 (November 2010): 137–47; D. L. Schröder-Petersen and H. B. Simonsen, "Tail Biting in Pigs," *Veterinary Journal* 162, no. 3 (November 2001): 196–210.

<sup>28</sup> D. A. Sandercock et al., "Histopathological Characterization of Tail Injury and Traumatic Neuroma Development After Tail Docking in Piglets," *Journal of Comparative Pathology* 155, no. 1 (July 2016): 40–49.

<sup>29</sup> American Veterinary Medical Association, *Literature Review on the Welfare Implications of Teeth Clipping, Tail Docking and Permanent Identification of Piglets* (Schaumburg, IL: AVMA, 2014), 2–3.

<sup>30</sup> Sutherland, "Welfare Implications of Invasive Piglet Husbandry Procedures, Methods of Alleviation and Alternatives"; E. Lewis et al., "The Effect of Two Teeth Resection Procedures on the Welfare of Piglets in Farrowing Crates. Part 1," *Applied Animal Behaviour Science* 90, no. 3–4 (March 2005): 233–49.

<sup>31</sup> M. Gallois, Y. Le Cozler, and A. Prunier, "Influence of Tooth Resection in Piglets on Welfare and Performance," *Preventive Veterinary Medicine* 69, no. 1–2 (June 2005): 13–23; The Humane Society of the United States, *An HSUS Report: The Welfare of Piglets in the Pig Industry* (Washington DC: The Humane Society of the United States, 2010), 3–4.

<sup>32</sup> American Veterinary Medical Association, *Literature Review on the Welfare Implications of Teeth Clipping, Tail Docking and Permanent Identification of Piglets*, 1–2.

example, after weaning, young pigs are moved to group pens for fattening. Given their natural social structure of dominants and subordinates, placing unfamiliar pigs together often leads to increased aggression because the animals must fight to reestablish a hierarchy of access to resources.<sup>33</sup> These agonistic encounters are exacerbated by the scarcity of resources typical of intensive systems, such as insufficient space per pig, and the barrenness of their environments, which cannot meet their behavioral needs.<sup>34</sup> From a welfare perspective, aggression during group housing and transportation leads to increased stress, reduced food intake, immunosuppression, pain, injuries, and infections that could cause death by septicemia.<sup>35</sup>

Transport is one of the most challenging events in the lives of farmed pigs. In industrial settings, pigs are usually transported as (1) breeders from genetic nucleus sites to commercial farms, (2) growers to finishing facilities, or (3) finished pigs to slaughterhouses.<sup>36</sup> Frequency and duration of transport vary depending on typical pig industry practices in the relevant country or region and whether the pigs are in the fattening herd or the breeding herd.<sup>37</sup> Pig welfare during transport depends on many interacting factors, including an animal's condition at time of loading; ambient temperature; loading density; time in transit; social stress, such as mixing with unfamiliar pigs; handling; unfamiliar noises and smells; vibrations; and sudden speed changes.<sup>38</sup> Porcine stress syndrome, which causes severe distress and sometimes even death, is also associated with transport. Mortality during transport varies significantly depending on the factors above, with an estimated low of 0.06% under generally favorable conditions and an estimated high of 6.8% under challenging climatic conditions.<sup>39</sup>

<sup>33</sup> Birger Puppe et al., "A Comparative View on Social Hierarchy Formation at Different Stages of Pig Production Using Sociometric Measures," *Livestock Science* 113, no. 2–3 (February 2008): 155–62; Michaela Fels, Steffen Hoy, and Jörg Hartung, "Influence of Origin Litter on Social Rank, Agonistic Behaviour and Growth Performance of Piglets After Weaning," *Applied Animal Behaviour Science* 139, no. 3–4 (July 2012): 225–32.

<sup>34</sup> European Food Safety Authority, "Opinion of the Scientific Panel on Animal Health and Welfare on a Request from the Commission Related to Animal Health and Welfare in Fattening Pigs in Relation to Housing and Husbandry," *EFSA Journal* 564 (2007): 1–14.

<sup>35</sup> P. Llonch et al., *Aggression in Pigs and Its Welfare Consequences* (Barcelona: Farm Animal Welfare Education Centre, 2017).

<sup>36</sup> Fiona C. Rioja-Lang et al., "A Review of Swine Transportation Research on Priority Welfare Issues: A Canadian Perspective," *Frontiers in Veterinary Science* 6 (February 2019): 36.

<sup>37</sup> J. N. Marchant-Forde and R. M. Marchant-Forde, "Welfare of Pigs During Transport and Slaughter," in *The Welfare of Pigs*, ed. J. N. Marchant-Forde (Dordrecht, NL: Springer Netherlands, 2009), 301–30.

<sup>38</sup> Rioja-Lang et al., "A Review of Swine Transportation Research on Priority Welfare Issues."

<sup>39</sup> L. Faucitano and E. Lambouij, "Transport of Pigs," in *Livestock Handling and Transport*, ed. Temple Grandin (Wallingford, UK: CAB International, 2019), 307–27.

Industrial pig slaughter typically happens at slaughterhouses and is characterized by (1) large numbers of animals and (2) high slaughter speeds. The process consists of an arrival stage, including unloading from the truck, lairage, and handling or moving pigs; a stunning stage, including restraint and electrical, mechanical, or controlled-atmosphere stunning (CAS) with CO<sub>2</sub>; and a bleeding phase.<sup>40</sup> A recent report drafted by animal welfare experts for the European Food Safety Authority describes the 12 main welfare threats to pigs during slaughter—heat stress, cold stress, fatigue, prolonged thirst, prolonged hunger, impeded movement, restricted movement, resting problems, negative social behavior, pain, fear, and respiratory distress.<sup>41</sup> Additionally, current stunning methods are highly problematic.<sup>42</sup> None of the methods can prevent animal suffering during the slaughter process—pigs will always experience handling-related distress and pain, as well as the adverse effects of stunning technology itself, such as pain, fear, and—in the case of CAS—respiratory distress.<sup>43</sup>

According to this comprehensive body of evidence, it is not surprising that industrial farming practices are unlikely to keep most pigs healthy, let alone ensure that their needs and preferences are met. Consequently, intensive pig farming systems typically prove highly detrimental to the animals' welfare.

### 1.3. Which aspects of pig welfare are considered by PQA Plus?

In regard to the welfare of farmed pigs, PQA Plus strongly states: "We affirm our obligation to protect and promote animal well-being."

This certification program takes into account several main points related to this obligation:<sup>44</sup>

1. Provide training to caretakers on animal handling, animal husbandry, and euthanasia.

<sup>40</sup> EFSA Panel on Animal Health and Welfare, "Welfare of Pigs at Slaughter," *EFSA Journal* 18, no. 6 (2020): 6148.

<sup>41</sup> EFSA Panel on Animal Health and Welfare, "Welfare of Pigs at Slaughter."

<sup>42</sup> EFSA Panel on Animal Health and Welfare, "Welfare of Pigs at Slaughter."

<sup>43</sup> EFSA Panel on Animal Health and Welfare, "Welfare of Pigs at Slaughter"; Marien A. Gerritzen et al., *Review of Pig Welfare in Slaughterhouses at Stunning and Bleeding* (n.p.: EU Reference Centre for Animal Welfare, Pigs, 2017).

<sup>44</sup> The PQA Plus Adult Version 5 materials, including on-farm forms and site-assessment documents, are available online; "PQA Plus Adult Version 5 (2022 release)," Pork Checkoff and National Pork Board, <https://lms.pork.org/Tools/View/pqa-plus/program-materials>.



2. Conduct and document daily observations, and provide prompt care to pigs in need.
3. Assess the facilities and equipment daily to ensure the pigs' environment is safe and allows access to feed and water.
4. Implement a zero-tolerance policy for animal abuse.
5. Euthanize pigs in a humane and timely manner.
6. Be prepared for emergencies related to animal well-being.
7. Handle pigs using knowledge of pig behavior.
8. Handle pigs according to their size and phase of production, using proper handling equipment.

On paper, the PQA Plus certification addresses meaningful aspects relevant to pig welfare. Caretaker training must be provided, and observations must be performed at least once a day to ensure (1) provision of key resources, such as water and food; (2) appropriate environmental conditions, such as suitable temperature and good air quality (e.g., acceptable ammonia levels maintained); and (3) assessment of the degree of health experienced by individual pigs. The program recommends handling practices, including proper loading for transport and requires a written euthanasia action to be in place. Additionally, PQA Plus requires evidence of a mechanism for caretakers to report abuse and neglect. As reflected by the PQA Plus mandatory forms, however, the records relevant to these standards address only (1) basic health aspects, such as injury and disease symptoms, and mortality and euthanasia figures; and (2) proper functioning of equipment, including ventilation systems, euthanasia apparatus, feeders, and waterers. On-farm site assessments typically take place every three years; therefore, PQA Plus cannot ensure adherence to the certification standards between assessment years.

#### **1.4. To what extent are PQA Plus goals effective at protecting the well-being of farmed pigs?**

The above-discussed evidence compels the conclusion that a pig welfare certification scheme that does not require conditions that protect the animals' physical health and meet their most important behavioral needs and preferences will fail to ensure the well-being of farmed pigs. PQA Plus clearly falls short in both regards. It does not require the use of animals whose genetic traits promote better health and welfare, such as maternal disposition and

fertility that produces litter sizes that reduce competition and aggression, much less environmental conditions that are conducive to good welfare—those that allow for highly preferred natural behaviors, such as foraging and exploring. Moreover, practices that are scientifically demonstrated to be extremely detrimental to pig welfare, such as confinement in gestation and farrowing crates and painful mutilations without effective analgesia, are still permitted under PQA Plus certification. Additionally, PQA Plus' requirements disregard the animals' needs in determining key social factors, such as group size and group composition across time; instead it aims to maximize productivity and profit, severely impairing pig welfare. Tables 1–7 (see appendix or the link below) provide footage that captures several examples of stereotypies—behaviors related to chronic stress and compromised immunity.<sup>45</sup> All the above-addressed aspects are interrelated and essential for maximizing the probability that captive pigs experience good welfare. Yet they are neglected in most industrial pig farms. PQA Plus does not even demand that producers keep records that allow for meaningful evaluation of farming practices, let alone implement video surveillance systems that enable continuous monitoring for violations of the certification requirements. Consequently, PQA Plus is unable to meet its expressed goal of protecting and promoting the animals' well-being.

#### **1.5. To what extent is PQA Plus an effective tool for preventing violations of the program's code of practice?**

As we have seen, even if all its provisions are met, PQA Plus is not effective at ensuring that the conditions of PQA Plus-certified farms are conducive to good pig welfare.

An additional aspect must also be considered, however: To what extent is PQA Plus certification effective at ensuring that PQA Plus provisions are met? As mentioned, on-farm site assessments typically take place every three years, a long period in terms of number of animals involved in the production cycles that transpire. Moreover, the certification does not require installation of continuous, real-time external monitoring tools, such as well-designed video surveillance systems. Instead, for the periods between on-farm site assessments, the certification merely relies on a basic document record-keeping system that renders the PQA Plus code of practice extremely vulnerable to violations.

<sup>45</sup> Lei Pan et al., "Stereotypic Behaviors Are Associated with Physiology and Immunity Differences in Long-Term Confined Sows," *Physiology & Behavior* 249 (May 2022): 113776; D. M. Broom, "A Review of Animal Welfare Measurement in Pigs," *Pig News and Information* 17, no. 4 (1996): 109–14.

Unfortunately, footage gathered by various animal protection organizations in the past decade demonstrates that serious violations of the PQA Plus code of practice have occurred at several PQA Plus-certified farms. The welfare of farmed pigs is thus detrimentally impacted, and consumers may be misled to believe that PQA Plus is a robust preventive certification tool.

### 1.5.1. Specific Violations

Tables 1–7, linked below, provide detailed evidence of violations and potential violations of the PQA Plus provisions<sup>46</sup> at various certified farms, including investigators' explanatory comments and supporting footage. The evidence reveals a certification of dubious reliability. The violations are related to many aspects of the PQA Plus code of practice, including lack of key resources, such as food and water; improper handling; transgressions of the euthanasia protocols; and widespread acts of wilful abuse.

[Tables 1–7](#)

## 2. One Health Analysis

The evidence presented in tables 1–7 suggests that such violations are not exceptional cases but may instead be widespread in PQA Plus-certified farms—they occurred

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<sup>46</sup> Since its establishment in June 2007, PQA Plus has, to the best of our knowledge, issued and relied on five versions of an “education handbook” that lists “good production practices” that farms should employ. We have found copies of *what appear to be* **version 1** (publication date unknown), **version 3** (published January 2016), **version 4** (published March 2018), and **version 5** (published December 2021). The copy that *appears to be* of version 1 is probably of version 1 because it lacks a version label. We have been unable to locate **version 2** via public resources.

Which version of the handbook applies to an investigation depends on the time of the investigation. Accordingly, tables 1–7 take one of two approaches to each investigation:

- 1. Pre-January 2016 investigations:** Because we lack a publication date for version 1 and lack a copy of version 2, we cite versions 1 and 3, as either version 1 or version 2 must apply to any pre-January 2016 investigation, given the January 2016 publication date of version 3. By citing version 3 we demonstrate that the language of the good production practices underwent minimal change from version 1 to version 3, suggesting, although *not guaranteeing*, that version 2 uses similar language. Thus, **for pre-January 2016 investigations**, we can claim that farm activity *appears to have violated* the good production practices in force at the time.
- 2. Post-January 2016 investigations:** We cite the version that clearly applies to each investigation, based on the year of the investigation and the known publication date of the appropriate version. We have copies of versions 3–5, each of which has a publication date, so **for post-January 2016 investigations**, we can claim that farm activity *actually violated* the good production practices in force at the time.

in every investigated farm. These violations not only negatively impact pig welfare at these farms but threaten public and environmental health.

The concept of One Health neatly illustrates these problems. The World Health Organization (WHO) defines it as follows: “One Health is an integrated, unifying approach to balance and optimize the health of people, animals and the environment. It is particularly important to prevent, predict, detect, and respond to global health threats such as the COVID-19 pandemic.”<sup>47</sup> WHO further states: “One Health involves the public health, veterinary, and environmental sectors. The One Health approach is particularly relevant for food and water safety, nutrition, the control of zoonoses (diseases that can spread between animals and humans, such as flu, rabies and Rift Valley fever), pollution management, and combating antimicrobial resistance (the emergence of microbes that are resistant to antibiotic therapy).”<sup>48</sup> Relatedly, the World Organisation for Animal Health (WOAH) explains: “This approach is critical for the control of priority zoonotic diseases such as rabies, avian flu or viral haemorrhagic fevers such as Ebola. Furthermore, numerous cross-cutting issues, such as antimicrobial resistance, food safety, climate change and weak health care infrastructure, need to be addressed from a multisectoral and multidisciplinary perspective, which the One Health approach guarantees.”<sup>49</sup> WOAH also stresses that, among other factors, “unsustainable agricultural practices ... provide multiple opportunities for pathogens to evolve into new forms, making spillover events from animals to humans more frequent and intense.”<sup>50</sup>

In light of these expositions, the PQA Plus violations unveiled in this report are evidence that the certification program not only fails at reaching its stated goals but contributes to increasingly extreme problems for both human and nonhuman animals.

### 2.1. Foodborne Diseases

The footage captured at PQA Plus-certified farms unequivocally reveals practices that significantly harm both the health and the overall welfare of farmed pigs. This dire situation, however, has additional, threatening implications for the well-being of humans, domestic animals, and wild

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<sup>47</sup> “One Health,” World Health Organization, September 21, 2017, <https://www.who.int/news-room/questions-and-answers/item/one-health>.

<sup>48</sup> World Health Organization, “One Health.”

<sup>49</sup> “One Health,” World Organisation for Animal Health, accessed September 16, 2024, <https://www.woah.org/en/what-we-do/global-initiatives/one-health/>.

<sup>50</sup> World Organisation for Animal Health, “One Health.”

animals. The events described in tables 1–7 represent serious stressors that further challenge the homeostasis of animals whose welfare, as we have seen, is already harmed by the standard practices in industrial pig production (see section 1.2). Indeed, scientific evidence shows that serious stressors under farming conditions often disrupt the homeostasis of pigs, including nonambulatory and young pigs, impairing immune function and in turn increasing the likeliness of pathogen infection and disease.<sup>51</sup> Accordingly, the risk of infection from foodborne bacteria, such as *Salmonella*, *Campylobacter*, and *E. coli*, increases for consumers.<sup>52</sup> In some cases, all these risks are exacerbated by unhygienic practices at farms (see footage in tables 1–7).

## 2.2. Antimicrobial Resistance

This problem of foodborne illness is further aggravated by potential antimicrobial-resistant genes in these pathogens. WHO states: “Antimicrobial resistance (AMR) occurs when bacteria, viruses, fungi and parasites change over time and no longer respond to medicines making infections harder to treat and increasing the risk of disease spread, severe illness and death. As a result, the medicines become ineffective and infections persist in the body, increasing the risk of spreading to others.”<sup>53</sup> AMR is among the most concerning threats to planetary health, and global pig production is known to be a significant source of antimicrobial-resistant pathogens.<sup>54</sup> AMR not only affects

consumers of products carrying antimicrobial-resistant microorganisms but threatens the health of other people, domestic animals, and wildlife, should the pathogens spread throughout the environment.<sup>55</sup> Practices such as those evidenced by the footage in tables 1–7 not only necessitate increased antibiotic use to treat lesions but promote antimicrobial resistance by subjecting animals to chronic stress that disposes them to immunodeficiency and therefore microbial infection.<sup>56</sup>

## 2.3. Zoonotic Viral Outbreaks

Zoonotic viral outbreaks are also a great concern, the risks of which are aggravated by conditions such as those exemplified by the footage in tables 1–7. The inherent characteristics of the industrial animal agriculture paradigm—farming genetically homogeneous individuals under high stocking densities in environments that expose them to a multitude of infectious pathogens and are not conducive to good health and welfare—create propitious scenarios for effective pathogen dissemination and disease outbreaks.<sup>57</sup> Again, practices such as those described in tables 1–7 further compromise the health and well-being of farmed animals, thus increasing the risk of zoonotic viral outbreaks. Evidence concerning the 2008 swine flu pandemic shows that ancestors of the virus behind it had been circulating undetected in pigs for about a decade before transmission to humans.<sup>58</sup> In the United States, the ongoing H5N1 avian influenza outbreak bears out this concern, as the pathogen has already jumped from birds to many other non-avian animals,<sup>59</sup> including mammals farmed in high numbers, such as cattle; indeed, effective transmission among dairy cattle is already underway across

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<sup>51</sup> Natália Nami Ogawa et al., “Animal Welfare Assessment and Meat Quality Through Assessment of Stress Biomarkers in Fattening Pigs with and Without Visible Damage During Slaughter,” *Animals* 14, no. 5 (February 2024): 700; John R. Pluske, Diana L. Turpin, and Jae-Cheol Kim, “Gastrointestinal Tract (Gut) Health in the Young Pig,” *Animal Nutrition* 4, no. 2 (June 2018): 187–96; Temple Grandin, J. E. Oldfield, and L. J. Boyd, “Review: Reducing Handling Stress Improves Both Productivity and Welfare,” *Professional Animal Scientist* 14, no. 1 (March 1998): 1–10; Caifang Wen et al., “Environmentally Enriched Housing Conditions Affect Pig Welfare, Immune System and Gut Microbiota in Early Life,” *Animal Microbiome* 3, no. 1 (July 2021): 52.

<sup>52</sup> “Animal Welfare,” European Food Safety Authority, last modified September 14, 2023, <https://www.efsa.europa.eu/en/topics/topic/animal-welfare>; Lucas J. Lara and Marcos H. Rostagno, “Animal Welfare and Food Safety in Modern Animal Production,” in *Advances in Agricultural Animal Welfare*, ed. Joy A. Mench (Duxford, UK: Woodhead Publishing, 2018), 91–108.

<sup>53</sup> “Antimicrobial Resistance,” World Health Organization, accessed September 14, 2024, <https://www.who.int/health-topics/antimicrobial-resistance>.

<sup>54</sup> Daniel Scicchitano et al., “Dispersion of Antimicrobial Resistant Bacteria in Pig Farms and in the Surrounding Environment,” *Animal Microbiome* 6, no. 1 (March 2024): 17; Zhong Peng et al., “Antimicrobial Resistance and Population Genomics of Multidrug-Resistant *Escherichia coli* in Pig Farms in Mainland China,” *Nature Communications* 13, no. 1 (March 2022): 1116; T. Spronk et al., “Antimicrobial Use and Antimicrobial Resistance Monitoring in Pig Production in the United States of America,” *Revue Scientifique et Technique* 42 (May 2023): 52–64.

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<sup>55</sup> Xavier C. Monger et al., “Antibiotic Resistance: From Pig to Meat,” *Antibiotics* 10, no. 10 (October 2021): 1209.

<sup>56</sup> Lara and Rostagno, “Animal Welfare and Food Safety in Modern Animal Production”; Sandra Döpjan and Marian Stamp Dawkins, “Animal Welfare and Resistance to Disease: Interaction of Affective States and the Immune System,” *Frontiers in Veterinary Science* 9 (June 2022): 929805.

<sup>57</sup> Döpjan and Dawkins, “Animal Welfare and Resistance to Disease: Interaction of Affective States and the Immune System”; Xuechun Bai and Graham S. Plastow, “Breeding for Disease Resilience: Opportunities to Manage Polymicrobial Challenge and Improve Commercial Performance in the Pig Industry,” *CABI Agriculture and Bioscience* 3, no. 1 (January 2022): 6.

<sup>58</sup> Gavin J. D. Smith et al., “Origins and Evolutionary Genomics of the 2009 Swine-Origin H1N1 Influenza A Epidemic,” *Nature* 459 (June 2009): 1122–25.

<sup>59</sup> “Detections of Highly Pathogenic Avian Influenza in Mammals,” United States Department of Agriculture Animal and Plant Health Inspection Service, last modified September 10, 2024, <https://www.aphis.usda.gov/livestock-poultry-disease/avian/avian-influenza/hpai-detections/mammals>.

the country.<sup>60</sup> Since 2022, 14 human cases of infection with influenza H5 strains have been reported, all of them a consequence of exposure to poultry and dairy cattle.<sup>61</sup> In 2022, more than 125 million pigs were slaughtered in the United States. Under these circumstances, the likelihood that farmed pigs are already being exposed to H5N1—a pathogen already considered a serious pandemic risk<sup>62</sup>—is alarmingly high.<sup>63</sup> Pigs are susceptible to infection with swine, avian, and human influenza viruses; thus they are the perfect mixing tanks for new human strains with pandemic potential.<sup>64</sup>

## 2.4. Food Security

Swine epidemics not only pose zoonoses risks to human populations but can seriously compromise food security. The Food and Agriculture Organization of the United Nations defines food security as the state in which “all people, at all times, have physical and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life.”<sup>65</sup> Swine diseases such as African Swine Fever (ASF) represent an extreme risk to U.S. food security. ASF has caused significant ongoing pig losses worldwide, including in sub-Saharan Africa, China, Mongolia, Vietnam, and parts of the European Union.<sup>66</sup> The 2018–2019 outbreak in China, where this disease thrived in pig farms, illustrates how disruptive such an event can be.<sup>67</sup> In 2019 alone, total economic loss accounted for 0.78% of China’s gross domestic product, with a decrease in consumer surplus and

impacts felt in almost all economic sectors through links to the pork industry.<sup>68</sup> In fact, pork prices in China more than doubled despite a surge of exports from the European Union, the United States, Canada, Brazil, and other countries.<sup>69</sup> Although the risk of spread is very high in an increasingly globalized scenario, ASF has not yet emerged in the United States.<sup>70</sup> Despite the USDA’s anticipation of potential ASF outbreaks, evidence reveals that the country would be unable to rapidly contain an outbreak and that the disease would be a likely long-term problem, with estimated costs up to \$80 billion.<sup>71</sup> Currently cases in domestic pigs and wild boars continue to be reported across Europe and Asia, including in China.<sup>72</sup>

## 2.5. Depopulation

Viral outbreaks also create an extremely challenging problem in the way of “depopulation.” In the context of animal production, the American Veterinary Medical Association (AVMA) defines it as follows: “Depopulation refers to the rapid destruction of a population of animals in response to urgent circumstances with as much consideration given to the welfare of the animals as practicable. Urgent circumstances may include emergency situations, such as the need for immediate disease control or a response to natural or human-made disasters.”<sup>73</sup> Evidence gathered during the COVID-19 and avian influenza epidemics in the United States clearly demonstrates that the country lacks the tools for rapid large-scale depopulation through methods that are (1) scientifically validated as relatively nondetrimental to animal welfare and (2) effective in reducing the risk of further disease spread through appropriate carcass disposal

<sup>60</sup> “HPAI Confirmed Cases in Livestock,” United States Department of Agriculture Animal and Plant Health Inspection Service, last modified July 3, 2024, <https://www.aphis.usda.gov/livestock-poultry-disease/avian/avian-influenza/hpai-detections/hpai-confirmed-cases-livestock>.

<sup>61</sup> “How CDC Is Monitoring Influenza Data Among People to Better Understand the Current Avian Influenza A (H5N1) Situation,” Centers for Disease Control and Prevention, September 12, 2024, <https://www.cdc.gov/bird-flu/h5-monitoring/index.html>.

<sup>62</sup> McLean and Graham, “The Pig as an Amplifying Host for New and Emerging Zoonotic Viruses.”

<sup>63</sup> Matthew N. Hayek, “The Infectious Disease Trap of Animal Agriculture,” *Science Advances* 8, no. 44 (November 2022): eadd6681.

<sup>64</sup> Elsayed M. Abdelwhab and Thomas C. Mettenleiter, “Zoonotic Animal Influenza Virus and Potential Mixing Vessel Hosts,” *Viruses* 15, no. 4 (April 2023): 980; Wenjun Ma, Robert E. Kahn, and Juergen A. Richt, “The Pig as a Mixing Vessel for Influenza Viruses: Human and Veterinary Implications,” *Journal of Molecular and Genetic Medicine* 3, no. 1 (January 2009): 158–66; W. Ma et al., “The Role of Swine in the Generation of Novel Influenza Viruses,” *Zoonoses and Public Health* 56, no. 6–7 (August 2009): 326–37.

<sup>65</sup> Food and Agriculture Organization of the United Nations, *Food Security* (Rome: Food and Agriculture Organization of the United Nations, 2006), 1.

<sup>66</sup> “African Swine Fever,” U.S. Food & Drug Administration Center for Veterinary Medicine, last modified May 21, 2024, <https://www.fda.gov/animal-veterinary/safety-health/african-swine-fever>.

<sup>67</sup> Satoshi Ito et al., “What Can We Learn from the Five-Year African Swine Fever Epidemic in Asia?,” *Frontiers in Veterinary Science* 10 (September 2023): 1273417.

<sup>68</sup> Shijing You et al., “African Swine Fever Outbreaks in China Led to Gross Domestic Product and Economic Losses,” *Nature Food* 2, no. 10 (October 2021): 802–8.

<sup>69</sup> Fred Gale, Jennifer Kee, and Joshua Huang, *How China’s African Swine Fever Outbreaks Affected Global Pork Markets* (Washington, DC: United States Department of Agriculture Economic Research Service, 2023), i.

<sup>70</sup> U.S. Food & Drug Administration Center for Veterinary Medicine, “African Swine Fever.”

<sup>71</sup> Abagael L. Sykes et al., “Estimating the Effectiveness of Control Actions on African Swine Fever Transmission in Commercial Swine Populations in the United States,” *Preventive Veterinary Medicine* 217 (August 2023): 105962.

<sup>72</sup> “African Swine Fever (ASF) Situation Update in Asia & Pacific,” Food and Agriculture Organization of the United Nations, September 5, 2024, <https://www.fao.org/animal-health/situation-updates/asf-in-asia-pacific/en>; “African Swine Fever,” European Food Safety Authority, last modified September 2, 2024, <https://www.efsa.europa.eu/en/topics/topic/african-swine-fever>.

<sup>73</sup> American Veterinary Medical Association, *AVMA Guidelines for the Depopulation of Animals: 2019 Edition* (Schaumburg, IL: American Veterinary Medical Association, 2019), 4.



strategies.<sup>74</sup> During the COVID-19 pandemic, extremely problematic depopulation methods dominated, including VSD+ (ventilation shutdown with added high temperature, high CO<sub>2</sub> concentration, or both) and VSD+TH (ventilation shutdown with added high temperature and humidity). The AVMA guidelines permit these methods under “constrained circumstances” but otherwise recommend foam and carbon-dioxide-based methods for mass depopulation of pigs.<sup>75</sup> The two recommended methods, however, are scientifically understood to be deeply detrimental to animal welfare, causing prolonged distress, fear, and pain in pigs before loss of consciousness.<sup>76</sup> In fact, the most comprehensive literature review on depopulation methods for swine, published in 2022, concludes that “despite research over three decades, a safe and reliable way to induce rapid unconsciousness and death in larger populations of swine appears to have not been found.”<sup>77</sup> Additionally, the personnel managing and carrying out depopulation unavoidably incur serious psychological impacts.<sup>78</sup> An ASF outbreak would require rapid depopulation involving great numbers of animals. In November 2021, China had 203 reported cases of ASF and depopulated 1.193 million pigs.<sup>79</sup>

## 2.6. Biosecurity

In light of these serious limitations to effectively managing a pig epidemic, any factor that could contribute to or

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<sup>74</sup> Andréia G. Arruda et al., “A Systematic Literature Review on Depopulation Methods for Swine,” *Animals* 10, no. 11 (November 2020): 2161; Jeremy N. Marchant-Forde and Laura A. Boyle, “COVID-19 Effects on Livestock Production: A One Welfare Issue,” *Frontiers in Veterinary Science* 7 (September 2020): 585787.

<sup>75</sup> Arruda et al., “A Systematic Literature Review on Depopulation Methods for Swine”; Cori Bussolari et al., “Mass Depopulation of Swine During COVID-19: An Exploration of Swine Veterinarians’ Perspectives,” *Veterinary Sciences* 9, no. 10 (October 2022): 563; Gwendolen Reyes-Illg et al., “The Rise of Heatstroke as a Method of Depopulating Pigs and Poultry: Implications for the US Veterinary Profession,” *Animals* 13, no. 1 (December 2022): 140.

<sup>76</sup> EFSA Panel on Animal Health and Welfare, “Welfare of Pigs at Slaughter”; E. Sindhøj, C. Lindahl, and L. Bark, “Review: Potential Alternatives to High-Concentration Carbon Dioxide Stunning of Pigs at Slaughter,” *Animal* 15, no. 3 (March 2021): 100164.

<sup>77</sup> Arruda et al., “A Systematic Literature Review on Depopulation Methods for Swine.”

<sup>78</sup> Bussolari et al., “Mass Depopulation of Swine During COVID-19: An Exploration of Swine Veterinarians’ Perspectives”; Ting-Yu Cheng et al., “Swine Industry Stakeholders’ Perception on the Use of Water-Based Foam as an Emergency Mass Depopulation Method,” *PLoS One* 18, no. 10 (October 2023): 0290400; Angela Baysinger and Lori R. Kogan, “Mental Health Impact of Mass Depopulation of Swine on Veterinarians During COVID-19 Infrastructure Breakdown,” *Frontiers in Veterinary Science* 9 (April 2022): 842585.

<sup>79</sup> Yuanjia Liu et al., “Prevention and Control Strategies of African Swine Fever and Progress on Pig Farm Repopulation in China,” *Viruses* 13, no. 12 (December 2021): 2552.

worsen the outbreak should be carefully considered. Breaches in biosecurity pose a severe threat. Even the strictest biosecurity strategies are considered vulnerable to pathogen dissemination.<sup>80</sup> The evidence presented here strongly suggests that PQA Plus certification is not effective at preventing breaches of the PQA Plus biosecurity provisions and thus may increase the risk of disease outbreaks and dissemination to other pig farms, other nonhuman animals, and humans.

## 3. Additional Considerations of the PQA Plus Program

PQA Plus takes into account other matters that are beyond the scope of this work. The provisions related to these matters are listed below and should be carefully considered in assessing the efficacy of the certification program in (1) meeting its stated objectives and (2) identifying and effectively resolving potential violations. In light of the exposed breaches of PQA Plus animal welfare provisions—and their implications for the health and well-being of both humans and other nonhuman animals—investigation and examination of potential violations of the following certification obligations is recommended:

- **OUR PEOPLE – We affirm our obligation to provide a work environment that is safe, where employees are treated fairly and with respect.**
- **ENVIRONMENT – We affirm our obligation to safeguard natural resources in all our practices.**
- **COMMUNITY – We affirm our obligation to contribute to a better quality of life in our communities.**

## 4. Conclusions

The PQA Plus certification is a tool developed by the U.S. pig farming industry with the stated goal of protecting and promoting the well-being of farmed pigs. A deeper analysis into its animal welfare provisions and audit tools, however, demonstrates that aspects inherent in its design prevent this certification from meeting its core animal welfare goals. Furthermore, evidence gathered through undercover investigations at PQA Plus-certified farms strongly suggests that breaches that significantly impair animal welfare could be ubiquitous in farms certified by this program. Additionally, an analysis through a One Health lens evidences that such breaches amplify serious

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<sup>80</sup> Laura Valeria Alarcón, Alberto Allepuz, and Enric Mateu, “Biosecurity in Pig Farms: A Review,” *Porcine Health Management* 7 (January 2021): 5.

public health, animal health, and environmental risks inherent in industrial pig farming. Accordingly, the POA Plus certification program may be concluded to be an opaque tool that is not only ineffective at ensuring that its stated goals are met but risky in its potential to mislead consumers and other decision-makers.

### **Contributions:**

This report is a collaborative project of Mercy For Animals (MFA) and Animal Outlook (AO).

Frances Chrzan (MFA), Walter Sánchez-Suárez (MFA), and Piper Hoffman (AO) provided project conceptualization.

Frances Chrzan (MFA), Walter Sánchez-Suárez (MFA), and Paula Tejada Moncrief (MFA) provided project supervision.

Paula Tejada Moncrief (MFA), Erik Hastings (MFA), Scott David (AO), and Erin Wing (AO) provided footage.

Erik Hastings (MFA), Paula Tejada Moncrief (MFA), and Walter Sánchez-Suárez (MFA) reviewed footage.

Walter Sánchez-Suárez (MFA) provided technical expertise and wrote the original draft.

Walter Sánchez-Suárez (MFA), Trenton Morton (MFA), Frances Chrzan (MFA), Erik Hastings (MFA), Paula Tejada Moncrief (MFA), Luiza Schneider (MFA), and Piper Hoffman (AO) reviewed the draft.

Brooke Mays (MFA) and Eric Ford (MFA) edited the draft.

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## 5. Appendix

Tables 1–7 below present evidence of violations and potential violations of PQA Plus provisions at various certified farms, including investigators’ explanatory comments and supporting footage.

**Table 1.** Farm A, Colorado, 2014

Investigation conducted by Mercy For Animals

B-roll: [MercyForAnimals.org/WhitePaper/FarmAColorado](http://MercyForAnimals.org/WhitePaper/FarmAColorado)

PQA Plus provision	Possible guideline violation	Quote from investigator’s report
<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beating of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker willfully hits pig with solid object.</p>	<p>During this process, I observed my coworker [worker 1] leaning over piglets we were loading and striking them on their bodies and faces using the red gasoline can that he was carrying. [Worker 1] would bring the gasoline can to his shoulder and then force it straight out to hit the piglets. I was stood to his left, by the loading door, when I observed him doing this, and saw him doing it several times during the loading process.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beating of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker willfully hits pig with solid object.</p>	<p>Shortly after, my coworkers and I began to load the second truck that arrived. During the loading process, I observed my coworker [worker 2] on his knees by the loading door striking piglets on their bodies using the red plastic gasoline can that he was carrying. [Worker 2] would bring this can to his shoulder and force it straight out to hit the piglets. I was stood to his left, by the loading door, when I saw him doing this.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 90.</b> Water Availability Water must be available at least twice daily and in a quantity sufficient to fully satisfy the pigs.</p> <p><b>PQA Plus Version 3 (January 2016) Page 38.</b> Feed and Water Availability All pigs must have free access to water at least once each day.</p>	<p>Animal lacks access to food and water.</p>	<p>This sow has an eartag with the number 11951. She also had a black stripe drawn down her back. I had first observed this sow in the corridor yesterday around 1200HRS and had been told by [worker 3], the assistant manager, that she was having trouble getting up so the employees had taken her from the farrowing crate to which she was confined and placed her in the corridor so she would have more room, and hopefully stand up.</p> <p>When I first saw sow #11951 today, she was alert and moved on the floor in a semi-circle using her front legs. She did not have any food or water available to her. She stood up on all four legs but very quickly lifted her back left leg up off the ground. She then laid back down on the ground. I reported what I had seen to [worker 3], and he said he was going to try to move her down the hallway today. Shortly after, I saw sow #11951 further down the hallway. Food and water was available to her. I did not see her eat, but I did see her drink. When I left work, sow #11951 was still alive and in the corridor outside farrowing room 8.</p>

<p><b>PQA Plus handbook (version prior to January 2016), page 89.</b> Timely Euthanasia 1) Timeliness Timely euthanasia will minimize animal pain or distress.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 45.</b> Timely Euthanasia Caretakers must confirm animals insensible and dead after the euthanasia method is applied and before being removed from the facility.</p>	<p>Euthanasia is delayed.</p>	<p>Throughout the day, I saw many piglets dead in farrowing crates. I also saw many that were laying on their sides with their eyes closed, struggling to breath. I asked my coworker [worker 4] what we should do with the dead and dying piglets. He said to just leave them where they were.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 90.</b> Water Availability Water must be available at least twice daily and in a quantity sufficient to fully satisfy the pigs.</p>	<p>Animal lacks access to food or water.</p>	<p>At approximately 0705HRS I saw sow #11951 laying down in the corridor that connects the farrowing rooms. This sow has been laying in the corridor since approximately 1200HRS on Friday 2014-08-08. This sow was in the same spot where I had last seen her yesterday, shortly before I left work. The food and water that had been made available to her had been spilled over onto the floor. Sow #11951 is alert but unable to bear weight on her left back leg. I provided water to her and did so throughout the day. None of the other employees provided food or water to this sow while she was in the corridor.</p> <p>At approximately 1445HRS I saw my supervisor, the assistant manager [worker 3], attempting to get this sow to her feet. [Worker 3] did this by putting both his hands on the sow's rump and rocking her back and forth. I asked [worker 3] if he was going to have to euthanize sow #11951. He said he didn't want to euthanize her, as she was due to farrow (give birth) in two days. [Worker 3] said he needed to get the sow out of the corridor and into farrowing room 12 where she belonged. He said he did not want her giving birth in the corridor in the middle of the night, as "the rats will get the piglets." [Worker 3] said he would get another employee to help him move sow #11951 from the corridor to farrowing room 12. When I checked at approximately 1530HRS, the sow was no longer in the corridor.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beating of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers willfully hit pigs with solid objects that can cause pain.</p>	<p>During the loading process, I observed two of my coworkers striking the piglets with red plastic gasoline cans. The piglets were struck in the face and on the body. Piglets were also being pushed hard with the gas cans and the boards, sometimes losing their footing and falling over. As they were doing this, I was leaning over the piglets trying to usher them with my hands toward the loading door when I was struck on the right side of my head by the gas can that [worker 1] was using to strike the pigs. This was a good solid strike to my head, and I felt pain.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beating of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers willfully hit pigs with solid object.</p>	<p>During the loading process, I observed two of my coworkers striking the piglets with red plastic gasoline cans. The piglets were struck in the face and on the body. Piglets were also being pushed hard with the gas cans and the boards, sometimes losing their footing and falling over.</p>



<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beatng of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker forcefully beats pig.</p>	<p>I saw [worker 2] appear to become frustrated at the pigs for not moving and also with his coworkers. I saw [worker 2] ball his fists up, raise them over his shoulder, and he proceeded to hit a gilt several times with the edge of his fists. [Worker 2] was shouting at this animal when he did this. [Worker 2] hit this gilt on the top of the head, the snout, and the nose.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beatng of an animal.</p> <p><b>PQA Plus Handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers willfully hit pigs with solid objects.</p>	<p>During the loading process I observed two employees striking the piglets with the gas cans.</p>
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<p><b>PQA Plus handbook (version prior to January 2016), page 74.</b> Attention should be given to make sure the caretakers are trained and proficient in tasks before they perform them without supervision.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 36.</b> New caretakers who have not yet completed training should be directly supervised by someone who is trained.</p>	<p>Caretaker lacks training.</p>	<p>This conversation with [worker 5] is the first time since I have started working for Seaboard Foods that an employee or supervisor has explained to me what is allowed/not allowed when handling an animal.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 95.</b> Handling Piglets Piglets should be picked up under the rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Piglets may squirm and wiggle when picked up, so care should be used so that they are not dropped. Piglets should not be tossed or thrown.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 56.</b> Handling Piglets Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go.</p>	<p>Caretaker improperly handles piglets.</p>	<p>During processing of piglets, I observed [worker 2] returning piglets to the pens to which they were confined by dropping them face first from the level of his waist. I saw [worker 2] doing this approximately 10 times. I also saw [worker 2] throwing piglets back into the pens several times. Each pen is approximately eight feet long, and [worker 2] would throw them from the front to the back.</p>

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<p><b>PQA Plus handbook (version prior to January 2016), page 95.</b> Handling Piglets Piglets should be picked up under the rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Piglets may squirm and wiggle when picked up, so care should be used so that they are not dropped. Piglets should not be tossed or thrown.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 56.</b> Handling Piglets Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go.</p>	<p>Caretaker improperly handles piglets.</p>	<p>I was stood in a pen during the wean shot process with [worker 2] and observed him picking piglets up by the ears and then dropping them back into the pen from waist level once they were vaccinated. I saw [worker 2] flicking his fingers across the eyes of some of the piglets he was holding. I then saw [worker] looking at the other employees present to see if they were watching him. [Worker 2] then attempted to force a marker stick into the mouth of the piglet he was holding. This marker stick is tube shaped and sized approximately four inches long by one inch wide. As he was doing this, [worker 2] kept looking to see if he was being watched. I observed [worker 2] and the piglet throughout this, and [worker 2] was unable to force the marker stick into the piglet's mouth. I was stood approximately two feet away from [worker 2] as he was doing these things to these piglets.</p>
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<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beatng of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers willfully hit pigs with solid objects.</p>	<p>During the loading of piglets onto a truck this morning, I saw two employees striking piglets on their bodies and their heads with plastic gasoline cans.</p>

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<p><b>PQA Plus handbook (version prior to Jan. 2016), page 95.</b> Handling Piglets Piglets should be picked up under the rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Piglets may squirm and wiggle when picked up, so care should be used so that they are not dropped. Piglets should not be tossed or thrown.</p> <p><b>PQA Plus handbook version 3 (Jan. 2016), page 56.</b> Handling Piglets Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go.</p>	<p>Caretaker improperly handles piglets.</p>	<p>I observed [worker 2] committing the following acts upon approximately 150 piglets that he handled. These piglets are approximately three weeks old:</p> <ul style="list-style-type: none"> <li>• Forcing a marker stick into the right side of a piglet’s mouth and then claiming the piglet bit the stick.</li> <li>• Balancing piglets on bars of farrow crates that are approximately four feet from the ground and then walking away. These piglets would fall to the ground.</li> <li>• Dropping them to the ground from his chest and waist level onto their faces.</li> <li>• Throwing piglets down to the ground from his chest and/or waist level.</li> <li>• Throwing piglets the length of an eight-foot-long farrow crate where they then hit the wooden boards surrounding the crate.</li> <li>• Forcefully pulling piglets’ ears across their eyes and faces.</li> <li>• Holding down a piglet by his/her head and rump forcefully over a gate, the head being on one side and the rump on the other.</li> <li>• Picking up piglets by one or both ears.</li> <li>• Kicking piglets intentionally with his feet.</li> </ul>
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**Table 2.** Farm B, Colorado, 2015

Investigation conducted by Mercy For Animals

B-roll: [MercyForAnimals.org/WhitePaper/FarmBColorado](http://MercyForAnimals.org/WhitePaper/FarmBColorado)

PQA Plus provision	Possible guideline violation	Quote from investigator's report
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<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beatng of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers willfully hit pigs.</p>	<p>While doing this, I observed that the other five employees were hitting almost every single pig that they shipped (which was over 1,000, according to the stats on the board in the office). I saw that they used their hands, shaker containers, red plastic dividers, and the two segmented metal dividers to hit them and forcefully move them. I observed that they used said tools to hit them often in the face, as well as the back and hindquarters. I also saw one employee sit on a pig to try to move him/her and then stick both of his hands into the pig's mouth and hold his/her snout and shove the pig approximately ten feet onto the loading ramp while referring to the pig as "motherfucker."</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beatng of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers willfully hit pigs with objects that cause injuries.</p>	<p>While doing this, I saw the five other workers I was with hitting almost every pig in the face, sides, back, and hindquarters with their hands, feet, the shaker bottles, metal and plastic sort boards, metal gate rods, plastic buckets, and the metal wire on the handheld snares. I observed that many of the pigs appeared to have cuts and abrasions due to this. I also saw two workers ... grab 3 different pigs by their front legs and flip them over on their backs in an attempt to change their direction. I also observed those two employees as well as a third ... drag pigs by the ears when the pigs wouldn't move. One of those pigs that was dragged by the ears appeared to be too injured to stand up and walk.</p>

<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beatng of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers willfully hit and kick pig.</p>	<p>I observed later a pig that appeared to be in too much pain to walk on his/her front legs and had his/her face on the ground only standing on his/her hind legs. I saw the workers kick, hit, and drag the screeching pig into an empty pen for euthanization with a bolt gun. I observed that the pig's front knees appeared to be cut and bloodied from being forcefully shoved and moved.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 89.</b> Timely Euthanasia 1) Timeliness Timely euthanasia will minimize animal pain or distress.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 45.</b> Timely Euthanasia Caretakers must confirm animals insensible and dead after the euthanasia method is applied and before being removed from the facility.</p>	<p>Euthanasia is delayed.</p>	<p>Today ... I observed ... [worker 4] point out a pig that was very small and appeared to be very sick and say that management had told him a month ago to euthanize the pig. I also saw him and [worker 5] talking about a pig that he said needed to be euthanized due to health reasons, but they decided to wait until tomorrow. I observed the pig was very sickly looking and had his/her head hung low and cocked to the side at an extreme angle and appeared to have much difficulty walking.</p>
<p><b>PQA Plus handbook (version prior to January 2016), page 100.</b> Willful Acts of Abuse Willful acts of neglect or abuse are unacceptable. Willful abuse and neglect are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: 2. Malicious hitting/beatng of an animal.</p> <p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker willfully hits and kicks pig.</p>	<p>I also saw [worker 4] grab a pig by the ear and yank the pig around while attempting to fix the snare tool onto the pig's snout to hold the pig while he euthanized him/her. I saw him kick and use a hammer to push and move pigs.</p>



**Table 3.** Farm C, Oklahoma, 2016

Investigation conducted by Mercy For Animals

B-roll: [MercyForAnimals.org/WhitePaper/FarmCOklahoma](http://MercyForAnimals.org/WhitePaper/FarmCOklahoma)

PQA Plus provision	Guideline violation	Quote from investigator's report
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect                      Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers strike pigs with solid objects that can cause pain, bruising, or injury.</p>	<p>When workers move sows from the breeding barn to the farrowing barn, a rattling paddle is used, as well as a waist-high plastic board. Workers will walk behind sows while holding the plastic board in front of themselves and hit the sows with the paddles. Workers will hit sows in the back or sides.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 56.</b> Handling Piglets                      Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go.</p>	<p>Caretakers improperly handle piglets.</p>	<p>When moving piglets, workers are supposed to ensure 2 points of ground contact before releasing piglets (per [worker 1]), such as both front paws. I've observed workers releasing piglets with no ground contact. For example, when moving piglets from the farrowing stalls to the food bins or when placing piglets to be euthanized from the stall to the floor. I estimate the distance dropped to be between 8 inches to about waist high.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect                      Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers strike pigs with solid objects that can cause pain, bruising, or injury.</p>	<p>Observed workers moving sows today. Workers used paddles that rattle to move sows. Workers will hit sows on their backs and sides.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect                      Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers strike pigs with solid objects that can cause pain, bruising, or injury.</p>	<p>During weaning today, sows were led from the farrowing rooms back to the breeding barns by workers who used rattling paddles to hit the sows in order to get them to continue forward. Workers hit the sows on the back and sides.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect                      Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker willfully kicks pig.</p>	<p>Today I observed [worker 2] moving a sow from the farrowing barn to the breeding barn. [Worker 2] walked behind the sow, leading her toward the breeding barn by hitting the sow with his boot on her sides and using his knee to apply pressure to her back in order to get her to move.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect                      Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretakers strike pigs with solid objects that can cause pain, bruising, or injury.</p>	<p>I observed [worker 3] ... moving sows by hitting them with a rattling paddle on the back and sides.                       I observed [worker 4] moving sows by hitting them on the back and butt area with a paddle.</p>

<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker strikes pigs with solid object that can cause pain, bruising, or injury.</p>	<p>Today I observed [worker 2] moving sows from the farrowing rooms to the breeding barn using a paddle. [Worker 2] used the paddle to hit sows on the back, sides, and face. At one point [worker 5] also used his foot to shove the sow forward.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker strikes pigs with solid object that can cause pain, bruising, or injury.</p>	<p>Today I observed [worker 4] moving sows from the farrowing rooms to the breeding barn using a paddle. [Worker 4] used the paddle to hit sows on the back and butt area.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker strikes pigs with solid object that can cause pain, bruising, or injury.</p>	<p>Today I observed [worker 4] moving sows from the farrowing rooms to the breeding barn using a paddle. [Worker 4] used the paddle to hit sows on the back and butt area.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker kicks and strikes pigs with solid object that can cause pain, bruising, or injury.</p>	<p>[Worker 2] and [worker 4] moved piglets today using a red board and a rattling bottle. Both workers shook the bottle and hit the sides of the crates with the bottle in order to make noise and get the piglets to move forward. Both workers also kicked the piglets forward at times, and [worker 4] at one point used the rattling bottle to hit the piglets to get them to move.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 43.</b> Euthanasia Euthanasia is defined as humane death occurring with minimal pain or distress.</p>	<p>Euthanasia method of CO<sub>2</sub> asphyxiation is not performed correctly, causing pain or distress.</p>	<p>Today the gas in the euthanizing box ran out. After finding about 6 piglets still alive after running the euthanizing box for about 15–20 minutes, Farrowing Manager [worker 1] ... asked [worker 4] to thump the piglets instead. After about 30 minutes, [worker 4] thumped about 6 piglets.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker strikes pigs with solid object that can cause pain, bruising, or injury.</p>	<p>Today I observed [worker 3] moving sows from the breeding barns to the farrowing rooms using a paddle. [Worker 3] used the paddle to hit sows on the back and butt area.</p>

**Table 4.** Farm D, Kentucky, 2017

Investigation conducted by Mercy For Animals

B-roll: [MercyForAnimals.org/WhitePaper/FarmDKentucky](https://www.mercyforanimals.org/WhitePaper/FarmDKentucky)

PQA Plus provision	Guideline violation	Quote from investigator's report
<p><b>PQA Plus handbook version 3 (January 2016), page 45.</b> Timely Euthanasia            Caretakers must confirm animals insensible and dead after the euthanasia method is applied and before being removed from the facility.</p>	<p>Euthanasia is performed ineffectively, and caretaker does not confirm animal's death.</p>	<p>At approximately 6:10 AM I observed [worker 1] thump a pig, meaning he held the piglet by the upper hock and threw him onto the concrete floor with incredible force. The piglet appeared to land on his neck. I heard him screaming while he dangled by the leg and was spiked to the floor. After he hit the floor with a loud smack I observed him twitch and move his legs in rapid motion, with his eyes open, for approximately 30 seconds, lying sideways in a pool of his own blood. After that his eyes closed and he continued to move slightly as I lost sight of him.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect            Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker forcefully strikes pig with solid object that can cause pain, bruising, or injury.</p>	<p>I then observed [worker 2] use a metal rod, approximately the size of a 2-foot-long pencil, weighing approximately half a pound, which she had removed from the hinge of the open gate, to hit and jab this sow in the face. I observed her do this with a considerable amount of force.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect            Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker forcefully inserts fingers into pig's nose to make her move.</p>	<p>One sow did not appear willing to walk down the hallway after she had left her original crate. I observed her try repeatedly to turn around in the hallway and run past [worker 3]. I also observed her plant herself where she was and stop moving, all while observing [worker 3] slapping her on her side with his palm and pushing her at the rear end with his knees. The last method I observed [worker 3] try was grabbing her by the nostrils, inserting his fingers into them, pulling and twisting her head. This sow started to scream when he did this to her, and after this had gone on for approximately 25 seconds, she turned around and ran away from him.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 56.</b> Handling Piglets            Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go.</p>	<p>Caretaker improperly handles piglet.</p>	<p>I observed [worker 1] let go of a piglet immediately after [worker 2] gave her a vaccination behind the ear. This piglet appeared to be bracing her hooves against the edge of the cage while she hung by one leg from [worker 1]'s hand, and when he let go of her leg, she tipped forward, spun through the air and landed on her upper back. All of the piglets I observed being handled during vaccinations and unloading today appeared to be very anxious, scared, and were screaming throughout the entire procedure.</p>

<p><b>PQA Plus handbook version 3 (January 2016), page 43.</b> Euthanasia Euthanasia is defined as humane death occurring with minimal pain or distress.</p>	<p>Euthanasia method is performed ineffectively, resulting in added pain and distress.</p>	<p>I observed [worker 1] load a captive bolt pistol and approach the sow slowly and from behind. He placed the pistol against the sow's forehead and pulled the trigger. I heard the sow scream a high-pitched yelp as the pistol punctured her upper forehead but she simply began to run away. I saw a small trace of blood dripping from her wound. She did not appear to have been stunned at all by the shot. I then observed [worker 1] try again, but he once more missed his target as she frantically tried to get away from him. [Worker 1] instead shot the sow in the neck as she flailed her body around. This wound also bled. By this point the sow appeared to have become even more frightened and frantic as she darted away from us even faster. [Worker 1] then grabbed a wire contracting noose from the wall of the hallway we were in. This tool appeared to loosen the noose at the end when the two ends of the rod were pushed together and tighten it when they were pulled apart. I observed [worker 1] snare the sow around the snout by sticking the noose inside her mouth so that her upper jaw was tightly held. Then, while this sow was trapped in this manner, [worker 1] delivered a final shot to her forehead and she immediately fell to the floor, twitching. She appeared to stop moving and die approximately 1 minute later.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 56.</b> Handling Piglets Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go. ... Piglets should not be tossed, thrown or picked up by ears.</p>	<p>Caretakers toss and throw piglets.</p>	<p>For approximately 45 minutes I observed [worker 4] and [worker 5] tossing piglets by swinging them from the hind leg and [worker 1] doing the same but from a much greater height and distance, approximately four feet from the section of floor that piglets were being released on. I observed piglets flipping through the air as they fell, sometimes tumbling over the side of the farrowing pen, and landing on their necks, backs and sides.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker forcefully kicks pig to cause pain.</p>	<p>After the final attempt to get back to the farrowing room and [worker 1] successfully getting her to walk towards gestation barn 2, I observed [worker 1] kick her with the steel-toe end of his boot with extreme force in her midsection. I heard the sow scream after she was kicked and start running in the same direction she was heading.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 56.</b> Handling Piglets Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go. ... Piglets should not be tossed, thrown or picked up by ears.</p>	<p>Caretaker improperly handles piglets.</p>	<p>I observed him pick up piglets from inside their farrowing pens and throw them at high speed, in an approximate 5-foot arc, into the processing cart.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker beats pigs with solid object that can cause pain, bruising, or injury.</p>	<p>I observed [worker 6] use a paddle to hit sows as he stood behind them, yelling and pushing them with a cutting board. The paddle he used had a plastic shaft approximately ¾ in. thick and a hollow plastic board at the end of it, which he slammed down onto gilts repeatedly. I observed him continuously hitting most of the sows he moved, often with a significant amount of force to the sows' backs.</p>

<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker strikes pigs with solid objects that can cause pain, bruising, or injury and uses electric prod excessively.</p>	<p>I observed the truck driver use a cutting board and paddle as well to try and move gilts, hitting them with both of these objects on their backs and sides. The gilts often did not appear willing to go in the direction he was urging them, and after a while I observed the truck driver put down his paddle and pick up an electric prod. I observed him use this prod on approximately 20 gilts, and each of them screamed, apparently in a lot of pain, when the prod was jabbed into their rear ends.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 45.</b> Timely Euthanasia Caretakers must confirm animals insensible and dead after the euthanasia method is applied and before being removed from the facility.</p>	<p>Euthanasia is delayed.</p>	<p>[A pig] was lying on her side in a group pen in barn 2 with her face sticking out of the side of the pen. I attempted to get her to her feet and I heard her yelling, sounding anguished and pained. However, instead of euthanizing this sow, [worker 6] said it was time for break and we would kill her afterwards. The break lasted approximately 20 minutes. After break, [worker 5] used a captive bolt pistol to shoot her in the forehead while she was still lying on her side in the same spot as before.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 56.</b> Handling Piglets Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go. ... Piglets should not be tossed, thrown or picked up by ears.</p>	<p>Caretaker improperly handles piglets.</p>	<p>Throughout the process of catching piglets I observed [worker 1] continuously drop and underhand-toss piglets at a maximum of four feet through the air over the side of the farrowing pens and onto the floor. I observed many of these piglets hit the ground very hard on their heads, backs, and sides. Many appeared to have trouble getting up for a few moments afterward.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 56.</b> Handling Piglets Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go. ... Piglets should not be tossed, thrown or picked up by ears.</p>	<p>Caretaker improperly handles piglets.</p>	<p>While sorting through the last cart I closely observed what [worker 1] was doing. I saw him repeatedly, for every piglet, grab them by an ear and lift them from the cart as he checked to see if they were male or female.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker forcefully beats pig with solid object that can cause pain, bruising, or injury.</p>	<p>I observed [worker 1] use the hooked end of a metal gate rod to forcefully hit a sow approximately 50 times. The metal gate rod is approximately 2.5 ft. long and weighs approximately 2 lbs. I observed [worker 1] begin hitting this sow with force on the back as she stood inside a farrowing pen. ... I then observed this sow plant her hooves in this walkway, as [worker 1] grabbed tufts of her hair on the back and side of her body and pulled them forward. This sow still did not budge and then very suddenly turned around and started moving the other way down the path, away from the door leading to the gestation barns. As soon as this sow turned around I observed [worker 1] hit her with extreme force two times on the back. Once this sow reached the far wall of the farrowing room, I observed [worker 1] attempt to turn her around by pushing her head to the side with his knees. At this point I heard the sow begin to scream loudly. She did not appear to have enough room to turn. I then observed [worker 1] hit this sow with extreme force by slamming the hooked end of the metal gate rod he was holding down onto her face. The sow appeared to be in a lot of pain and finally turned around and ran toward the door. I observed [worker 1] running after her, slamming the gate rod onto her back approximately four more times before she ran into the hallway.</p>



<p><b>PQA Plus handbook version 3 (January 2016), page 56. Handling Piglets</b> Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go. ... Piglets should not be tossed, thrown or picked up by ears.</p>	<p>Caretaker improperly handles piglets.</p>	<p>I occasionally observed [worker 2] holding piglets by one ear, dangling them from her hand, as she fiddled with the tools on her moving cart or prepared needles for injections. These piglets appeared to wince in pain as they dangled from an ear, swirling their limbs about and often screaming loudly.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40. Willful Acts of Abuse and Neglect</b> Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker forcefully strikes pig with solid object that can cause pain, bruising, or injury.</p>	<p>I observed [worker 8] swing a plastic paddle into the air and bring it down onto the neck of a gilt with so much force that [worker 8] lost control of the paddle and it flew into the next pen over. I heard him yell, "I'm gonna beat the fuck out of you!" as he did this. I observed [worker 8] slam his cutting board into the faces of two different gilts, hitting one of them three times in rapid succession with extreme force.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 40. Willful Acts of Abuse and Neglect</b> Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (e.g., sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker repeatedly kicks and punches pigs to cause pain.</p>	<p>His outbursts seemed to begin any time a boar would mount a gilt from behind. The first time a boar did this, I observed [worker 8] pummel this boar in the face with a clenched fist approximately ten times. He appeared to use a staggering amount of force as he punched the boar in his eye and other parts of his face. I observed [worker 8] kick these two boars approximately ten times each, and each kick appeared very forceful as he slammed his feet into boars' faces, guts, and rear ends. In one instance I observed [worker 8] grab the fence behind him with both hands, and then, hoisting his lower body into the air while balancing his weight on his arms, slam both of his feet simultaneously into the side of one of the hogs. Towards the end of heat checking, I also observed [worker 8] slap a boar in the face with an open hand.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 56. Handling Piglets</b> Piglets can either be moved by herding or by picking them up and moving them by hand or with a cart. Piglets should be picked up by holding them under their rib cage or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. Before releasing a pig to the ground the pig should have a point of contact such as a front leg, before the handler lets go. ... Piglets should not be tossed, thrown or picked up by ears.</p>	<p>Caretaker improperly handles piglets.</p>	<p>Observed [worker 1] flinging and dropping piglets from approximately five feet in the air onto the hard cement floor. I observed him toss many of these while he was standing near the center of the farrowing crate he was catching piglets in, throwing them approximately four feet horizontally as well. I observed many of these piglets hit the floor with a smack and then hesitate to stand up for several moments. One piglet I observed hit the wall after he was thrown, crashing into it with a loud thud, and then hit the floor, landing on his back.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 43. Euthanasia</b> Euthanasia is defined as humane death occurring with minimal pain or distress.</p>	<p>Euthanasia method is ineffectively performed, resulting in added pain and distress.</p>	<p>Once in the hall, she stood still and [worker 9] shot her with two bullets from the captive bolt pistol he had in his possession. I heard her yell a loud, piercing shriek the first time she was shot in the forehead. This sow did not appear to die after the first bolt to the head, but instead only sank to her knees and slowly began moving her head back and forth.</p>
<p><b>PQA Plus handbook version 3 (January 2016), page 43. Euthanasia</b> Euthanasia is defined as humane death occurring with minimal pain or distress.</p>	<p>Euthanasia method is ineffectively performed, resulting in added pain and distress.</p>	<p>After [worker 9] shot this sow the first time, he said, "That didn't do it." He instructed [worker 2] to "hold her snout" with a contracting metal loop at the end of a long metal rod, which she did by looping through the top of her snout and between her top and bottom rows of teeth.</p>

**Table 5.** Farm E, Minnesota, 2020

Investigation conducted by Animal Outlook

B-roll: [MercyForAnimals.org/WhitePaper/FarmEMinnesota01](https://www.mercyforanimals.org/whitepaper/farmeminnesota01)

PQA Plus provision	Guideline violation	Description of video clips
<p><b>PQA Plus handbook version 4 (March 2018), page 43.</b> Handling Piglets</p> <p>Piglets should be picked up by holding them under their rib cage, over the back, or by grabbing a rear leg, above the hock, and then gently setting the piglets into a cart, alleyway or pen. ... When being held for an extended period of time, piglets should be held under the rib cage next to the handler's body or by both rear legs using two hands.</p>	Piglet is improperly handled.	An employee picks up and holds a piglet by the arms while the piglet screams and struggles to get away. Dangling, the piglet struggles as the employee smiles.
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect</p> <p>Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	Caretaker strikes pig with solid object that can cause pain, bruising, or injury.	An employee lifts a rattle paddle over his head and brings it down to strike a sow.
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect</p> <p>Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	Caretaker forcefully strikes pig with solid object that can cause pain, bruising, or injury.	An employee hits sows in the butt with a paddle, making a loud noise.
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect</p> <p>Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	Caretaker kicks pig. Caretaker hits pigs with solid object that can cause pain, bruising, or injury.	An employee kicks a sow in the butt, while another uses a rattle paddle to hit sows, jabbing the animals hard with the paddle.
<p><b>PQA Plus handbook version 4 (March 2018), page 33.</b> Feed and Water Availability</p> <p>Assess the facilities and equipment daily to make sure the pigs' environment is safe and allowing access to feed and water.</p>	Environment is unsafe for piglets.	A piglet's severed leg is stuck in the flooring. An employee says the piglet had been alive, and he had pulled the piglet from the floor, tearing two of the animals' legs off. The employee says he then euthanized the piglet.
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect</p> <p>Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	Caretaker strikes pig with solid object that can cause pain, bruising, or injury.	A worker uses a rattle paddle to hit and move sows.
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect</p> <p>Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	Caretaker kicks animal to cause pain.	<p>Two workers push a sow who can't walk. One stomps on the sow's back to get her into position. One shoves a bolt gun against the sow's face multiple times, and eventually the sow is euthanized.</p> <p>Employee 1: "See, her leg works fine."</p> <p>Employee 2: "There's a little bit of brains on there."</p>

<p><b>PQA Plus handbook version 4 (March 2018), page 33.</b> Feed and Water Availability Assess the facilities and equipment daily to make sure the pigs' environment is safe and allowing access to feed and water.</p>	<p>Environment is unsafe for piglets.</p>	<p>Eleven piglets had fallen through a hole in a crate's floor. One piglet is covered in black excrement.</p>
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable.</p>	<p>Caretaker willfully mishandles piglet.</p>	<p>An employee shakes, stretches, squeezes, and pretends to throw a piglet. Employees laugh when one pokes the piglet and the animal squeals faintly.</p>
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker strikes pig with solid object that can cause pain, bruising, or injury.</p>	<p>An employee jabs a rattle paddle into a sow. Later, he raises the paddle up over his head and swings it down on multiple sows. One sow is hit twice in the head.</p>
<p><b>PQA Plus handbook version 4 (March 2018), page 35.</b> Timely Euthanasia Caretakers must confirm animals insensible and dead after the euthanasia method is applied and before being removed from the facility.</p>	<p>Euthanasia method is not performed correctly, and caretaker does not confirm deaths of all animals after using a CO<sub>2</sub> chamber.</p>	<p>Piglets squeal in a euthanasia machine. The investigator tells an employee that a pig in the machine who had been gassed is still alive and that the gas concentration in the box may not be high enough. The employee replies, "I know."</p>
<p><b>PQA Plus handbook version 4 (March 2018), page 35.</b> Timely Euthanasia Severely injured or non-ambulatory pigs with the inability to recover are euthanized immediately. An animal should be considered nonambulatory if it cannot get up or if it can stand with support, but is unable to bear weight on two of its legs.</p>	<p>Euthanasia of nonambulatory pig is delayed.</p>	<p>A sow unable to walk is left in a hallway. She appears to be cold and, despite some effort, cannot move her body much. The farm's hallway is not heated, so it is normally a cold area, and the floor is wet.</p>
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker strikes pig with solid object that can cause pain, bruising, or injury.</p>	<p>An employee strikes a sow's back repeatedly with a rattle paddle, while another slaps the animal twice. In one clip, two sows are stuck in an aisle, and as one attempts to turn around, she gets her head stuck by a feeder. An employee then shoves the other sow into the one who is stuck. In another clip, an employee pushes a sow down an aisleway, and another employee reaches over the side of a barrier and slaps the sow four times.</p>
<p><b>PQA Plus handbook version 4 (March 2018), page 34.</b> Euthanasia Euthanize pigs in a humane and timely manner. Timely euthanasia, as well as using the appropriate methods and equipment, is critical to the well-being of these pigs.</p>	<p>Euthanasia is delayed.</p>	<p>An employee instructs workers not to use the euthanasia machine on piglets until they have several piglets in the box. He instructs workers to write a note on the crate they removed an injured piglet from so they can record the death on the following day's sheet. In the clip, the investigator says that they probably won't run the gas machine again until tomorrow. An employee confirms this and says, "It was not worth running for one."</p>
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker kicks animal to cause pain.</p>	<p>An agitated employee kicks a sow and yells at her to "move it." The employee kicks her again. After these kicks, more angry screaming and what sounds like the employee striking the sow can be heard.</p>
<p><b>PQA Plus handbook version 4 (March 2018), page 27.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerable. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker forcefully kicks pig multiple times.</p>	<p>An employee kicks a sow twice in the side. Later in the clip, the employee kicks the sow again in the same area but with greater force and then stomps on and kicks her several times.</p>

**Table 6.** Farm E, Minnesota, 2022

Investigation conducted by Mercy For Animals

B-roll: [MercyForAnimals.org/WhitePaper/FarmEMinnesota02](https://www.mercyforanimals.org/WhitePaper/FarmEMinnesota02)

B-roll, euthanasia extended: [MercyForAnimals.org/WhitePaper/FarmEMinnesota03](https://www.mercyforanimals.org/WhitePaper/FarmEMinnesota03)

PQA Plus provision	Guideline violation	Quote from investigator's report
<p><b>PQA Plus handbook version 5 (December 2021), page 38.</b> Proper Care: Prolapses These animals should be identified and isolated or treated as quickly as possible to prevent further injury and to enhance the chance of full recovery.</p>	<p>Suspected prolapse is not quickly treated to promote full recovery.</p>	<p>We came across a sow in a crate who was on her side and the front half of her body was red, and she appeared to be panting and somewhat lethargic. At her bottom end were two dead piglets in a pool of bloody liquid. ... He guessed that this sow had probably had a prolapse (either of the anus or uterus) and had become twisted during her previous farrowing (he also went on to guess that when they were putting semen inside her, they probably couldn't get very far in), and now she was coming untwisted and the dead babies were expelled from her body. He said she would probably recover and go on to still "make us money."</p>
<p><b>PQA Plus handbook version 5 (December 2021), page 54.</b> Willful Acts of Abuse and Neglect Willful acts of neglect or abuse are unacceptable and are not tolerated. Willful acts of abuse are defined as acts outside of normally accepted production practices that intentionally cause pain and suffering including, but not limited to: Malicious hitting or beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sort board, rattle paddle, etc.) or other hard or solid objects that can cause pain, bruising or injury.</p>	<p>Caretaker uses solid object to cause pain.</p>	<p>[Worker 1] then said something about another prolapsed pig and went to her crate. It was again witnessed that he took a metal hitch pin and was stabbing the prolapsed sow to get her to rise.</p>
<p><b>PQA Plus handbook version 5 (December 2021), page 40.</b> Euthanasia Euthanize pigs in a humane and timely manner. Euthanasia is defined as humane death occurring with minimal pain or distress.</p>	<p>Euthanasia method is not performed correctly, causing pain and distress.</p>	<p>Again, [worker 1] cinched the snare over the sow's upper snout, and [worker 2] bolted the sow. She immediately began vocalizing, and blood flowed out of her right nostril. It was suggested she needed another shot, which [worker 2] proceeded to administer. The sow immediately buckled and began convulsing. A third bolt was administered a few moments later. She, too, was then dumped into the mortality room after having her ear tag removed.</p>
<p><b>PQA Plus handbook version 5 (December 2021), page 41.</b> Table Aw.5: Euthanasia Methods Appropriate to Pigs of Different Sizes (Weights) Non-penetrating captive bolt: Pigs greater than 12 lbs</p>	<p>Euthanasia method is inappropriate for pig size.</p>	<p>As far as euthanasia, he said their procedure is any piglet 0–5 days is euthanized with a captive bolt, while the older pigs are transferred to a room and gassed, which he said he didn't completely agree with.</p>

**Table 7.** Farm F, Nebraska, 2023

Investigation conducted by Mercy For Animals

B-roll: [MercyForAnimals.org/WhitePaper/FarmFNebraska](https://www.MercyForAnimals.org/WhitePaper/FarmFNebraska)

PQA Plus provision	Guideline violation	Quote from investigator's report
<p><b>PQA Plus handbook version 5 (December 2021), page 41.</b> Timely Euthanasia            Animals are euthanized in a timely manner, defined as: Severely injured or non-ambulatory pigs with the inability to recover are euthanized immediately. An animal should be considered nonambulatory if it cannot get up or if it can stand with support, but is unable to bear weight on two of its legs.</p>	<p>Euthanasia of animal with medical emergency is delayed after euthanasia is deemed necessary.</p>	<p>One sow was observed with a large prolapse. Blood covered the slat floors of her enclosure and her hindquarters. She remained on her side while staff removed her piglets to foster moms. She was scheduled for euthanasia the following day.</p> <p>The following day the same sow was observed and this is the quote about the observation.</p> <p>I continued to observe the sow as she began to shake on her legs and struggle to remain upright. After a few seconds her lower body relaxed and later her front legs gave out as her head dropped into her feed trough. She remained there unmoving for some time. [Worker 1] repeated that [worker 2] was supposed to cull her yesterday.</p>
<p><b>PQA Plus handbook version 5 (December 2021), page 40.</b> Euthanasia            Euthanize pigs in a humane and timely manner. Timely euthanasia, as well as using the appropriate methods and equipment, is critical to the well-being of these pigs.</p>	<p>Euthanasia of injured piglets is delayed.</p>	<p>One piglet was trapped up to her neck and was turning deep purple around her face. I attempted to free her lower body trapped underneath the mother. When she shifted her weight I was able to free one piglet. This piglet was not responsive and took rhythmic, open-mouthed gasps with eyes shut. I placed her under the heat lamp and began to pry the other piglet that remained trapped from the waist down. I pulled the piglet free and I observed her body. Her legs were twisted in an unnatural position. I informed the next technician that entered the facility. She grabbed the piglets to inspect their injuries and left them under the heat lamp.</p>
<p><b>PQA Plus handbook version 5 (December 2021), page 40.</b> Euthanasia            Euthanize pigs in a humane and timely manner. Timely euthanasia, as well as using the appropriate methods and equipment, is critical to the well-being of these pigs.</p>	<p>Euthanasia of piglets is delayed.</p>	<p>I asked [worker 1], my direct report, why we used hotboxes for piglets to be euthanized. She stated that it was an easy hold container for them, and it was not practical to retrieve each piglet bound for euthanasia and individually euthanize them, as it was wasting CO<sub>2</sub> gas. So they were saved until the end of the day and in the meantime were left under the heat lamp.</p>
<p><b>PQA Plus handbook version 5 (December 2021), page 42.</b> Timely Euthanasia            Caretakers must confirm animals insensible and dead after the euthanasia method is applied and before being removed from the facility.</p>	<p>Caretaker performing euthanasia does not confirm death after using CO<sub>2</sub> chamber.</p>	<p>During the dead removal, a live piglet that had survived the CO<sub>2</sub> chamber was recovered during the dumping process.</p>
<p><b>PQA Plus handbook version 5 (December 2021), page 39.</b> Feed and Water Availability            All pigs must have free access to water at least once each day.</p>	<p>Free access to water is restricted for unknown period.</p>	<p>I used a shovel to throw out the old food and to uncover the water spout at the bottom. Multiple sows had gone an unknown amount of time with their water spout covered by their food and pushed past my shovel to begin drinking once I cleared it of food.</p>
<p><b>PQA Plus handbook version 5 (December 2021), page 39.</b> Feed and Water Availability            All pigs must have free access to water at least once each day.</p>	<p>Animals do not know how to trigger water dispensers, restricting their free access to water.</p>	<p>I entered the wash-in/wash-out room at approximately 0629 hours. I began my shift by hand feeding and shoveling out old food in farrowing rooms 1, 2, 3, and 4. Multiple sows had dry feed troughs. They were newly placed into the farrowing rooms and did not know how to use the water dispenser. I went through each row and triggered their water. I observed them move immediately to drink after triggering them.</p>