



Food Safety and  
Inspection Service

February 5, 2020

Office of Field Operations

**ORIGINAL SENT VIA UPS NEXT DAY AIR  
DELIVERY CONFIRMATION REQUESTED**

Philadelphia District  
Mellon Independence  
Center,  
701 Market Street Suite  
4100-A  
Philadelphia, PA 19106

Mr. Keith Schrader, Owner  
**Schrader Farms Meat Market (Est. 44950)**  
1937 Somerville Road  
Romulus, NY 14541

**NOTICE OF SUSPENSION HELD IN ABEYANCE**

Dear Mr. Schrader,

This letter confirms verbal notification provided to Ms. Kara Schrader, Plant Manager, by Mr. Joseph Schein, Deputy District Manager (DDM), at approximately 0945 hours on February 5, 2020, of our decision to place the Notice of Suspension (NOS), issued to you on February 4, 2020 into abeyance. FSIS is providing you with this Notice of Suspension Held in Abeyance (NOSHIA) based on your proposed corrective actions and preventive measures. FSIS determined that the suspension action will be placed in abeyance and the assignment of Inspection Program Personnel (IPP) will resume, pending FSIS verification of the adequacy of your humane handling program in achieving regulatory compliance. FSIS will be verifying your actions to ensure that you effectively implement the proffered corrective actions and preventive measures. This letter provides you with the chronology of events and conclusions, including your responsibilities as a federally inspected establishment.

On February 04, 2020, FSIS issued a Notice of Suspension (NOS) to withhold the marks of inspection and suspend the assignment of inspectors for your slaughter operation. This action was initiated in accordance with Title 9 of the Code of Federal Regulation (9 CFR) Part 500.3(b), after FSIS determined that your establishment failed to handle animals humanely, in violation of the Federal Meat Inspection Act (FMIA) [21 U.S.C 603] and 9 CFR 313.30.

In response to the suspension, you submitted written corrective actions and preventive measures on February 5, 2020. FSIS requested further clarification to your proposed actions, and you then submitted additional corrective actions on this same date.

**Corrective Actions and Preventive Measures proffered but not limited to are:**

1. Retraining of employees on the following:
  - a. Assessing insensibility utilizing Temple Grandin's document "*How to Determine Insensibility (Unconsciousness) in Cattle, Pigs, and Sheep in Slaughter Plants*".

- b. Updated Humane Handling procedures so that whomever is performing livestock stunning will observe the eyes of every animal/carcass to make sure there is no return to sensibility (e.g. natural blinking or eye tracking)
2. Only restrained personnel allowed to stun:  
(b) (6)  

3. Back-up stunning device (20-gauge shotgun) will be present on floor during electrical stunning.
4. Increased monitoring to 25% of each species per kill day and recorded on Stunning Monitoring Log

FSIS has designed a Verification Plan (VP) and will use it to monitor and verify that you have effectively implemented your proposed actions. The VP identifies your corrective actions (from your responses) submitted to FSIS, the relevant regulatory requirements, the tasks FSIS IPP will use to conduct verification activities, and the time frames that you identified. While these verification activities are targeted to your plant's animal handling, FSIS IPP will continue to ensure all humane handling/stunning regulatory requirements of 9 CFR Part 313 are in regulatory compliance. A copy of the VP is attached as a reference to assist you in understanding Agency verification activities.

As an operator of a federally inspected facility, we expect you to comply with FSIS regulations and to take appropriate corrective action when either the establishment or FSIS identifies regulatory noncompliance. FSIS has the responsibility to initiate regulatory control or other appropriate action if your establishment fails either to operate in accordance with the regulations or to operate under sanitary conditions. A final decision relative to this enforcement action will be determined based on your establishment's ability to execute and comply with your proffered corrective actions and all applicable regulatory requirements. Your establishment's failure to meet the conditions of this abeyance may result in additional regulatory and/or administrative actions in accordance with the Rules of Practice 9 CFR Part 500.

If you have any questions regarding this matter, please feel free to contact Mr. Joseph Schein, Deputy District Manager (DDM) at [joseph.schein@usda.gov](mailto:joseph.schein@usda.gov) or by phone at (215) 430-6219.

Sincerely,

**JOSEPH SCHEIN** Digitally signed by JOSEPH SCHEIN  
Date: 2020.02.05 10:36:39 -05'00'

Mr. Michael Osifat (DDM)  
Acting District Manager  
Philadelphia District Office

**Enclosure: FSIS Verification Plan for Schrader Farms Meat Market (Est. 44950)**

Verification is defined as those activities other than monitoring that determine whether an establishment's system is operating as intended and complies with regulatory requirements. On February 04, 2020 Schrader Farms Meat Market (Est. 44950) was issued a Notice of Suspension (NOS) for failure to meet regulatory compliance as defined in Code of Federal Regulations (CFR) Title 9 CFR Part 313.30. On February 04 and 05, 2020, Plant Manager, Ms. Kara Schrader, responded to FSIS with documented corrective actions with the intent to return the establishment to compliance with regulatory requirements. This verification plan is designed to verify the establishment has implemented these controls to assure FSIS of future regulatory compliance. This verification plan identifies your corrective actions, the relevant regulatory requirements, and timeframes for which FSIS officials will continue to verify implementation and effectiveness.

ESTABLISHMENT ACTION PLAN	REGULATION	HUMANE HANDLING VERIFICATION CATEGORY	FREQUENCY
<p>1. Retraining of employees on the following:</p> <p>a) Assessing insensibility utilizing Temple Grandin's document "<i>How to Determine Insensibility (Unconsciousness) in Cattle, Pigs, and Sheep in Slaughter Plants</i>".</p> <p>b) Updated Humane Handling procedures so that whomever is performing livestock stunning will observe the eyes of every animal/carcass to make sure there is no return to sensibility (e.g. natural blinking or eye tracking).</p>	9 CFR 313.30	Category VIII – Stunning Effectiveness.	<p>1a) Upon implementation, February 5, 2010. Confirm by record review once. Training document and training sign-off record should be on file.</p> <p>1b) Upon implementation, February 5, 2020. Confirm by record review (once). Confirm each slaughter day by direct observation.</p>
<p>2. Only retrained personnel allowed to perform stunning:</p> <p>(b) (6)</p>	9 CFR 313.30	Category VIII – Stunning Effectiveness.	2. Upon implementation, February 5, 2020, confirm each slaughter day by direct observation.
<p>3. Back-up stunning device (20-gauge shotgun) will be present on floor during electrical stunning of livestock.</p>	9 CFR 313.30	Category VIII – Stunning Effectiveness.	3. Upon implementation, February 5, 2020, confirm each slaughter day by direct observation.
<p>4. Increased monitoring to 25% of each species per kill day and recorded on Stunning Monitoring Log.</p>	9 CFR 313.30	Category VIII – Stunning Effectiveness.	4. Upon implementation, February 5, 2020, confirm each slaughter day by direct observation and record review.

**\*Inspection Program Personnel will perform humane handling verification every slaughter operation day to verify the adequacy and effectiveness of the establishment's compliance with the humane handling regulatory requirements of 9 CFR Part 313.**

**\*Inspection Program Personnel will ensure all humane handling/stunning regulatory requirements are in compliance daily on each slaughter day, regardless of the stunning method.**

**\*Inspection Program Personnel will review all monitoring, verification and corrective action records to verify procedures are being conducted as prescribed and at the specified frequency.**

**\*Please notify the Frontline Supervisor (FLS) and the District Veterinary Medical Specialist (DVMS) if there is any change in the establishment's corrective action or preventive measures. The verification plan will then be modified appropriately.**

CC:

**FSIS - FO/Quarterly Enforcement Report**

Mr. Mark Crowe, Director, CID, FSIS, OIEA, Washington, DC

Ms. Geraldine French, Acting EARO, FSIS, OFO, Washington, DC

Mr. Joseph Priore, Acting RD, FSIS, OIEA, Northeast Region

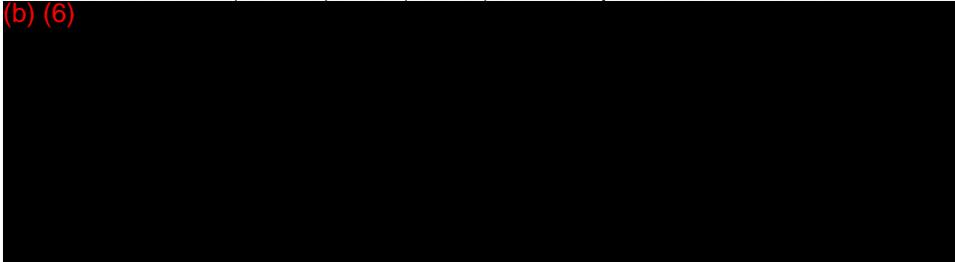
Dr. Lynda Lilyestrom, DM, FSIS, OFO, Philadelphia District Office

Mr. Michael Osifat, DDM, FSIS, OFO, Philadelphia District Office

Mr. Joseph Schein, DDM, FSIS, OFO, Philadelphia District Office

Mr. Sal Ibrahim, DDM, FSIS, OFO, Philadelphia District Office

(b) (6)



Official Files Establishment Folder – Est. 44950

FSIS- (b) (6)

