

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P687	House of Raeford	XRA262 205233 1N-1	05/31/2017	04C05	381.65(b)	<p>At approximately 0150 hours on the morning of 05/31/2017 while performing a Good Commercial Practice (GCP) in the Live Hang Area I observed the following Good Commercial Practice noncompliance: Birds (32) that died from causes other than slaughter. The birds were hanging by their feet in shackles while their heads were still submerged in water inside the Stunner. As I observed the birds there was no chest movement or any signs indicating that they were still alive. I took regulatory control by placing US RETAINED TAGS # B33564115 and # B33564128 on the Kill Line at the point where the birds entered and exited the Stunner. I asked a plant employee to locate his Supervisor and ask him to come to Live Hang. When (b) (6) arrived I showed him the birds in the Stunner which were not breathing and informed him a Good Commercial Practice noncompliance with the above cited regulations existed due to birds had died other than by slaughter. Live Hang employees removed the birds from the Stunner, placed them in condemned barrel where they were denatured and then transported to the Offal Area. The Kill Line initially stopped at approximately 0120 hours on 5/31/17 due to mechanical breakdown. (b) (6) observed a second GCP noncompliance at approximately 0230 hours on the morning of 5/31/17. The Kill Line had stopped due to another mechanical breakdown at 0215 hours. Upon (b) (6) arrival to Live Hang she observed seventeen birds (17) which had died other than by slaughter on the Kill Line in the Stunner. She asked (b) (6) to remove the deceased birds from the line. After the birds were removed from the line they were placed in a condemn barrel; denatured and taken to the Offal Area. She notified (b) (6) of her findings. This is a Other Consumer</p>	CLOSED

**Table: Noncompliance Reports in Response to foia2018-062**

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						Protection noncompliance due to establishment's failure to implement the process/procedure to prevent birds from dying other than by slaughter. All noncompliance and noted potential noncompliance are discussed with plant management during weekly meetings between USDA and plant management personnel. This NR was submitted to plant management on 06/01/2017.	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P843	Pilgrims Pride	PZA490 404361 ON-1	04/10/2017	04C05	381.65(b)	<p>On 04/09/2017, the following noncompliance was observed. As I was giving the USDA inspector relief breaks starting at approximately 0430 hours, I condemned 3 birds as cadavers. I notified (b) (6) that I was seeing increased numbers of cadavers. I continued to condemn birds as cadavers after this notification. The inspectors at all stations were also condemning birds as cadavers during this time. After the relief breaks were over, I proceeded to the scald tank area. There was a back-up killer located at the bleed tank before the birds enter the scald tank. He constantly was having to cut the necks of live birds that had missed the kill machine or had miscuts so that they were still alive with eyes blinking, and breathing as they were approaching the scald tank. While I was observing him at approximately 0505 hours, I saw a bird that he overlooked about to enter the scald tank. This bird was awake with its head up, looking around, eyes blinking, and had rhythmic breathing. The back up killer was attending to other birds which had been missed by the kill machine. I took regulatory control by stopping the line and pointed out the missed bird. He cut the neck and I restarted the line. In the period of about 3 minutes, I had to stop the line several times in order for him to attend to birds about to enter the scald tank alive. At no time did he attempt to stop the line on his own as he was trying to keep up with the birds that were alive with rhythmic breathing. (b) (6) came during the time I was stopping the line. He observed the situation and left. Then the establishment stopped the line. I went to the kill machine and saw that there were several people looking at it. I went back to the second back up killer location. Once the line started again, the problem was not resolved and instead appeared to be worse and I continued to stop the line multiple times for uncut birds or birds with missed</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						<p>cuts that were not bleeding out completely and were still alive, blinking, and breathing as they were about to enter the scald tank. (b) (6) told me that I needed to speak with (b) (6) and that he was on his way. I took regulatory control and stopped the line and did not restart it again at this time (approximately 0517 hours). (b) (6) came and we discussed the situation. I informed him of the lack of process control and the resulting noncompliance with the above regulation. He stopped hanging birds and I allowed the line to restart in order to move the birds along that were already on the line. As there were still many uncut or miscut birds that needed the attention of the second back up killer, I continued to ensure the line was stopped periodically so that no bird entered the scald tank alive. (b) (6) investigated the situation during this time and reported that the bicycle wheel was not working properly and the water had been turned off. Adjustments were made and then I relinquished regulatory control and verified that the process was back in control (approximately 0529 hours).</p>	
P4734	New Lee's Live Poultry Market Inc.	XKD380 709180 9N-1	09/09/2017	04C05	381.65(b)	<p>On 9/09/17 at 0645 hours approximately, while doing a routine GCP task, I observed one employee throw into barrel one young chicken without drained the bleeding in the metal cone. The young chicken still moving into the barrel. I stopped the operation and talk immediately with plant manager Mr. John about this non-compliance. The plant failed to comply with 9CFR 381.65(b) Poultry must be slaughtered in a manner that will result in thorough bleeding of the carcasses. The young chicken was put into de metal cone again to complete properly bleeding and death process. There was no adulterated product associated with this non-compliance and no adulterated product entered commerce.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P15724	Case Farms of Ohio, Inc	EVC050 903161 4N-1	03/14/2017	04C05	381.65(b)	<p>On March 14, 2017 at approximately 0836 hours (b) (6) made the observation described below while performing the review and observation component of the routine poultry good commercial practices task. The floor behind the hourly employees in the live hang department was covered with dead on arrival birds. The area involved was approximately 10-12 feet long, 3-4 feet wide, and approximately 6-8 inches high. While observing the DOA's in the previously described area, (b) (6) observed two birds that were alive being buried by the dead birds. One bird had the front half of its body up to the rib area buried by the dead birds and was trying to escape the pile by moving its legs in an attempt to pull itself out free. Another bird was located in the middle of the pile and was soaking wet with spontaneous respirations and was approximately half way buried as well. (b) (6) got the attention of one of the hourly employees working in the area and told him she needed him to stop and get (b) (6), or (b) (6). The employee stated (b) (6) was driving the forklift and then proceeded to return to work. While (b) (6) was making the observations described the hourly establishment employees continued to toss dead birds on the living birds that were intermingled with the dead. (b) (6) left the area to locate (b) (6) so the observations could be discussed with her. The observations described are non-compliant with 9CFR381.65(b).</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P15724	Case Farms of Ohio, Inc	EVC381 203411 5N-1	03/15/2017	04C05	381.65(b)	<p>On March 15, 2017 at approximately 1150 hours while performing the review and observation component of the routine poultry good commercial practices task; (b) (6) made the following observation. Upon observation of the exit of the kill line from the stunner two birds were in the water. Upon further observation it was observed the heads of the birds were under the water in the stunner. (b) (6) pointed this observation out to (b) (6) who directed (b) (6) to remove the birds. The birds were dead. Based on the fact that the stunner is located at least 4 feet off the floor it is reasonable to conclude the birds drowned in the stunner water. The observation described above is non compliant with 9CFR381.65(b). This NR is linked to the NR issued on March 14, 2017.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P17340	Pilgrim's	UQB58 150753 26N-1	07/25/2017	04C05	381.65(b)	<p>On 07/25/2017 at approximately 1255 hours while performing a good commercial practices verification task IPP (b) (6) and (b) (6) observed that the establishment lost control of its process for handling birds resulting in their dying from a means otherwise than slaughter, and hence failed to slaughter poultry in accordance with good commercial practices. Specifically, while performing verification activities, (b) (6) and I observed that the truck cooling shed bays (8) were at full capacity and that three trucks (two full and one partially filled) had been parked (immediately adjacent to one another) on the asphalt parking lot with no protection from the sun and without any source of ventilation or other means of cooling (water misters used in conjunction with fans for evaporative cooling). Upon further inspection, we observed another full trailer of birds (with no source of cooling/ventilation/misters) which had been parked on the interior line-up of empty trailers located on the asphalt trailer parking lot, and noted that 80-90 percent of the birds contained in that trailer were panting heavily. Upon closer inspection of the birds contained within the interior trailer, we observed that 80-90 percent of birds were showing significant heat stress, as evidenced by heavy panting, secondary to the high environmental temperature and humidity, and negligible ventilation. The aforementioned environmental conditions could best be described as stifling. Upon inspection of the birds in the trailer that were most exposed to direct sun, we observed a significant increase in heat related morbidity and mortality, as evidenced by gasping and heavy panting in greater than 90% of all birds on the trailer. We observed many birds that were staggering around and aimlessly jumping about in the in the cages while others were violently flapping their wings and gasping for air via an</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						<p>outstretched neck, in a final futile attempt to cool them themselves (evaporative cooling from the surface of the lungs). We also observed that numerous birds had already succumbed to heat stress, and that others were somnolent or moribund. At the time the aforementioned observations were made the environmental temperature was in excess of 90 degrees Fahrenheit. Upon entering the hanging area (new side), I observed that the floor immediately behind the live hangers was littered (large accumulation of carcasses) with the carcasses of dead birds and that the live hangers were throwing dead birds off the hanging belt and onto the floor. Upon further inspection, I observed that the back side of the hanging conveyor belt was similarly littered with the carcasses of dead birds. I also noted that the dead bin adjacent to the cage dump area was full. (b) (6) and I also noted that trailers loaded with empty cages (previously dumped) were present in the truck unloading areas despite there being trailers containing birds exhibiting heat stress parked on the asphalt parking lot with no protection from the sun. Upon entering the evisceration floor, I observed an increased amount of DOA birds which had been retained by on-line IPP for veterinary disposition, which I subsequently condemned post inspection. (b) (6), was immediately notified (verbally) of the aforementioned noncompliance. She was advised that the establishment had failed to appropriately schedule the delivery of poultry to the establishment in such a manner so as to accommodate the volume of incoming trucks with their facilities' capability, and that the birds had endured needless suffering as a result of a lack of shelter/protection from the sun and lack of ventilation or other means of cooling. She was also advised that FSIS personnel had notified her regarding the above noted conditions when we</p>	



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						observed that the establishment had failed to implement any readily apparent corrective actions in response to the aforementioned conditions. (b) (6), was also notified of the noncompliance. Based upon my observations of the birds' condition and the establishment's failure to implement any readily apparent corrective actions (prior to FSIS notification regarding the aforementioned), I can say that a large number of birds died by a means other than by slaughter on the regulated premises as a result of the demonstrable loss of process control.	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P1249	George's Chicken, LLC	UVG30 210157 30N-1	01/27/2017	04C05	381.65(b)	<p>At approximately 17:55 hours, while performing the Poultry Good Commercial Practices Verification Task, I, (b) (6), observed a cadaver bird on kill line 2 as it traveled through the picking room. I followed this bird to the Evisceration Department and removed it at the rehang station. Immediately I went to the Live Receiving Department and notified (b) (6) and (b) (6) of my findings. Thereafter, I went back to the Evisceration Department and found 5 cadavers in the inedible barrel. This was confirmed by (b) (6) who observed with me that there were five small birds with the heads still attached and no kill cuts on the necks. The birds were also deep purple in color due to not having bled out. (b) (6) notified (b) (6) and (b) (6) of these findings. At approximately 20:50 hours, I continued my verification task and once again saw a cadaver on kill line 2 in the picking room. I followed this bird, removed it from the line in the Evisceration Department and then checked the inedible barrel. In addition to the bird taken directly off the line, there were 9 more cadavers in the inedible barrel. Immediately I informed (b) (6) and he confirmed my findings. At approximately 21:12 hours, (b) (6) was also notified. The problem was addressed when (b) (6) made adjustments to the kill blade and took over the position of backup cutter. This issue was initially expressed as a concern on 1/25/17 however, subsequent actions taken did not adequately address the problem. (See MOI #UVG10000151251.) This is a failure of 381.65(b) which states: "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. Blood from the killing</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						operation must be confined to a relatively small area."	
P7903	Perdue Foods, LLC	UYN471 008451 5N-1	08/15/2017	04C05	381.65(b)	<p>At about 1345, I was called downstairs because a food inspector on line 2 had retained some birds for veterinary disposition. The food inspector had retained two cadavers. One cadaver still had the head attached, and there was no neck cut. The other cadaver was missing the head and had a bloody neck. While I was examining the birds, the food inspector pulled off a second cadaver that still had the head attached and no neck cut. I proceeded to the rehang table for line 2 and looked through the large blue container that held birds from line 2. In the container were five more cadavers with the heads still attached and no neck cuts and two cadavers with the heads missing and bloody necks. I demonstrated the cadavers to N/S (b) (6) and (b) (6). (b) (6) informed me the reason for the cadavers was the N/S back up cutter on line 2 had temporarily left his position to retrieve equipment he needed for work. I informed (b) (6) and (b) (6) this was a noncompliance according to 9 CFR 381.65(b), and a NR would be forthcoming. The establishment is reminded that NRs for noncompliance with 381.65(b) and MOIs for GCPs when finalized are posted for public review on the FSIS website and that the information associated with NRs and GCPs can be FOIA requested by individuals from the general public.</p>	CLOSED

**Table: Noncompliance Reports in Response to foia2018-062**

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P1241	Tyson Foods, Inc.	MGJ06 210102 04N-1	01/04/2017	04C05	381.65(b)	At approximately 1555 hours, while I was performing a Poultry Good Commercial Practices task, I observed, within a 1 minute time frame, 2 chickens enter the scalding tank while fully conscious and still breathing. Neither of these chickens were bleeding from the neck area, which indicated that these chickens were not cut at all by the kill machine or the back-up killer. Upon further investigation, I observed that the back-up killer was an individual who was inexperienced at that position. This finding showed that process control was lost for handling live birds and that the establishment was not operating in accordance with poultry good commercial practices. I notified (b) (6) of the noncompliance and of the impending noncompliance record. (NR# 6)	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P1241	Tyson Foods, Inc.	MGJ56 100354 01N-1	03/01/2017	04C05		<p>On 3/1/17, while performing a good commercial practices task at approximately 0950 hours, I observed one cadaver bird past the pickers. I immediately told (b) (6). I immediately went to verify at a location prior to the scald tank that no additional live birds were entering the scald tank. At 0958 hours, I observed 2 birds with their heads lifted, vocalizing and no kill cut enter the scald tank over a 3 minute time period. On my second verification at 1008 hours, I observed 3 birds enter the scald tank with their head lifted, vocalizing and no kill cut over a 2 minute 49 second time period. After each verification and observation of live birds entering the scald tank, I informed (b) (6), and observed her pull a total of 7 birds with either no kill cut or a small cut on the back of the head as they exited the final picker, which corresponded in time to the live birds I observed enter the scald tank. On my third verification at 1016 hours, I observed a bird enter the scald tank breathing with the head lifted, vocalizing and no kill cut. I immediately informed (b) (6) and (b) (6), I was taking regulatory control action over the line due to a lack of process control and the birds were stopped from hanging. Three (3) addition cadavers were pulled off the line after the last picker, which corresponded in time to the live bird I observed enter the scald tank. I informed both (b) (6) and (b) (6). I will write a NR due to (b) (6) non-compliance with 9 CFR 381.65(b). A meeting shortly followed with Shane Carpenter (Plant manager), (b) (6), (b) (6), and (b) (6) and myself, were I was given some immediate measures the establishment would take to prevent live birds from entering the scald tank including a different person designated as the backup killer and a</p>	CLOSED

**Table: Noncompliance Reports in Response to foia2018-062**

08:44 Wednesday, November 8, 2017 14

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						member of management with the backup killer to verify training. (NR#52)	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P1241	Tyson Foods, Inc.	MGJ56 100354 01N-2	03/01/2017	04C05	381.65(b)	<p>On 3/1/17, while performing a good commercial practices task at approximately 0950 hours, I observed one cadaver bird past the pickers. I immediately told (b) (6). I immediately went to verify at a location prior to the scald tank that no additional live birds were entering the scald tank. At 0958 hours, I observed 2 birds with their heads lifted, vocalizing and no kill cut enter the scald tank over a (b) (4) time period. On my second verification at 1008 hours, I observed 3 birds enter the scald tank with their head lifted, vocalizing and no kill cut over a (b) (4) time period. After each verification and observation of live birds entering the scald tank, I informed (b) (6), and observed her pull a total of 7 birds with either no kill cut or a small cut on the back of the head as they exited the final picker, which corresponded in time to the live birds I observed enter the scald tank. On my third verification at 1016 hours, I observed a bird enter the scald tank breathing with the head lifted, vocalizing and no kill cut. I immediately informed (b) (6) and (b) (6), I was taking regulatory control action over the line due to a lack of process control and the birds were stopped from hanging. Three (3) addition cadavers were pulled off the line after the last picker, which corresponded in time to the live bird I observed enter the scald tank. I informed both (b) (6) and (b) (6). I will write a NR due to (b) (6) non-compliance with 9 CFR 381.65(b). A meeting shortly followed with Shane Carpenter (Plant manager), (b) (6), (b) (6), and (b) (6) and myself, were I was given some immediate measures the establishment would take to prevent live birds from entering the scald tank including a different person designated as the backup killer and a</p>	CLOSED

**Table: Noncompliance Reports in Response to foia2018-062**

08:44 Wednesday, November 8, 2017 16

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						member of management with the backup killer to verify training. (NR#52)	



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P727+V727	Simmons Prepared Foods, Inc.	VCF1810072727N-1	07/26/2017	04C05	381.65(b)	<p>On July 26, 2017, at approximately 06:30 hours, IPP informed me that the establishment was going to early break on Line (b) (6) and (b) (6) but was uncertain of the reason. Since Kill line 2 was stopped, I went to the live hang area to observe that the birds were being slaughtered in accordance with good commercial practices due to two different issues related to maintenance break downs. I observed four birds with no cut immediately prior to the guide bar. As I was determining whether the birds were alive or suffocated, (b) (6) entered and shortly there after, they restarted Kill Line 2. Both back-up killers for Kill Line 2 were unprepared for the starting of the line. One quickly grabbed his knife and began performing kill cuts on those missed by the machine. The back-up killer was struggling to perform kill cuts on the birds that had been missed by the kill machine and the other back up killer was retrieving his knife. Since I was unable to determine how many carcasses had been missed by the kill machine, I went to observe carcasses exiting the scalders/pickers. I observed one carcass in which the breast, neck, and head was bright red to purple in color. I observed three other carcasses that the head and neck were red to purple in color. The first carcass in which nearly the entire carcass was red to purple was disposed of via a condemn barrel by an evisceration supervisor. The other three carcasses were also disposed of via the condemn barrel. At this point, IPP requested assistance with an insanitary condition. After completing providing assistance, I returned to the office at approximately 07:05 hours. At 07:10 hours, (b) (6), entered the office to discuss the insanitary condition at the rehang table. After completing that conversation, I notified (b) (6) that allowing carcasses to enter the scalders without ensuring that breathing has stopped prior to scalding is not consistent with being slaughtered</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						in accordance with good commercial practices. Since cadavers have been discussed previously as documented in MOI (VCF1013040021E) and based on my observations which indicate a loss of process control, I informed (b) (6) that at least an MOI if not a noncompliance would be forthcoming. These observations indicate a loss of process control and the establishment failed to ensure that poultry are slaughtered in accordance with good commercial practices to result in a through bleeding and ensure that breathing has stopped prior to scalding. This indicates noncompliance with 381.65(b).	
P165H	OK Foods Processing Plant	DAF332 205502 9N-1	05/29/2017	04C05	381.65(b)	<p>While conducting a GCP verification on the evisceration/slaughter floor, I observed the following non-compliance. At 2138 hours, I (b) (6) observed that Evisceration line 1 and (K) Line 1 had stopped for an unknown length of time. As I made my way back to the stunner at approximately 2139 hours, I observed that the stunner for Line 1 had not been lowered. Approximately 30 birds were submerged, limp, and lifeless in the stunner. These birds had drowned in the stunner. At 2141, an employee arrived to lower the stunner, which was too late. These birds had already expired. Line 1 started back up at approximately 2142. I took a visual regulatory control action and had the line stopped. (b) (6) arrived and he and an employee removed the drowned/dead birds from line 1 in my presence. After the birds were removed, I observed the stunner, to ensure no other birds had died by drowning. The kill line was released and restarted at approximately 2145. I continued to observe the slaughter process, to ensure no other non-compliances. These birds died other than by slaughter. The requirements of 9 CFR 381.65(b) were not met.</p>	OPEN

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P550	Simmons Prepared Foods, Inc.	XWN35 020253 10N-1	02/02/2017	04C05	381.65(b)	<p>On 2/2/2017, at approximately 2100 hours while giving line inspector breaks on evisceration line 2 I was being presented birds that were small in size and had poor neck cuts, some only having the tops of the heads cut off not the neck cut with varying amounts of clotted blood pooling in the neck region of carcasses. During this time while giving breaks on line 2 there was one carcass that was condemned being a cadaver, there was a cut on the back of the neck but the vessels of the neck had not been severed. (b) (6)</p> <p>(b) (6) was notified of the poor neck cuts and informed me management had made adjustments and the small birds were being missed by the head puller. At approximately 2136 hours, once I completed line inspector breaks, as I entered the live hang area of the establishment I observed approximately 50 live chickens scattered on the floor around the live hang conveyor belts in the middle of the room. (b) (6)</p> <p>(b) (6) was outside the door to live hang and notified of the condition of the live hang area. Once he observed the birds scattered on the floor he immediately instructed the employees to go to break. The department supervisor and lead employee were not present at the time. I observed the kill line 2 backup kill employee from the window in the room, the backup killer was having to cut 4-6 birds in a row with 2-3 birds in between before getting 4-6 birds in a row again needing the necks cut after the kill machine. (b) (6) also observed this taking place as the birds emptied on the line. (b) (6)</p> <p>(b) (6) was notified of the loss of process control at the backup kill station and the noncompliance with 9CFR 381.65(b) for not maintaining control of the kill process. Verbal corrective actions given by (b) (6) were the stunners were adjusted for the small bird size, an additional backup kill employee was placed at the station and the kill line speed slowed to</p>	CLOSED

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						(b) (4) bpm. I verified these corrective actions prior to production resuming in the area. This noncompliance is being associated to NR#XWN2605122419/1N issued on 12/19/2016 for similar cause of loss of process control for the kill process.	
P550	Simmons Prepared Foods, Inc.	XWN3405055101N-1	04/28/2017	04C05	381.65(b)	Friday, April 28, 2017 at approximately 1207 hours while observing the kill process as part of the good commercial practices check, I observed the back-up killer for kill line 2 step down off his stand and leave his station. I observed a chicken that did not get a neck cut by the kill machine go past the back-up killer's station. I stopped the line to prevent this bird from entering the scalding alive. I notified (b) (6) of the noncompliance. He had the (b) (4) lead replace the back-up killer to take him to the office for counseling. I then restarted the kill line at approximately 1210 hours. The above described event reflects a lack of process control in the kill area. The establishment failed to meet the requirements of 9 CFR 381.65(b) which requires poultry to be slaughtered with good commercial practices that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding."	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P550	Simmons Prepared Foods, Inc.	XWN59 140651 14N-1	06/14/2017	04C05	381.65(b)	<p>On Wednesday, June 14 2017 at approximately 1350 hours while performing a good commercial practices check, I observed that the back-up killer was not on his stand on the kill line that feeds evisceration lines (b) (6) and (b) (6). When I saw a bird not killed by the machine, I stopped the line. The back-up killer appeared from the blood tunnel. The supervisor came and I talked to him about the problem, then we restarted the line. I also discussed it with the superintendent, then went to the evisceration area. A supervisor told me an inspector on line (b) (6) had just hung back two birds for me. I went to look at them, and determined that they were cadavers. I then went to the picking room to look at the birds going to the scalding on that kill line. I was accompanied by the (b) (6). I observed the birds heading from the blood tunnel to the scalding. I saw one that was alive with no neck cut at all. I pointed it out to (b) (6), who pulled it from the line. The above described event reflects a lack of process control in the kill area. The establishment failed to meet the requirements of 9 CFR 381.65(b) which requires poultry to be slaughtered with good commercial practices that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding." A similar finding in which the same back-up killer left his station was documented on an NR #XWN3405055101/1N on 04/28/2017. The further planned action given by the establishment to that NR was "Employee was terminated." This further planned action was not implemented or was insufficient to prevent today's finding. Associated noncompliances are discussed in the weekly meeting with plant management. The weekly meetings are documented on an MOI and a copy of the MOI is provided to plant management. Continued repetitive noncompliance with regulatory requirements could result in increased</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						administrative/regulatory actions as described in 9 CFR 500.4. You have the right to appeal this decision as delineated by 9 CFR 381.35.	
M13289+P 963	Cargill Meat Solutions Corp.	NRD43 070626 24N-1	06/24/2017	04C05	381.65(b)	<p>Today at approximately 0700 hours while performing a good commercial practices check to ensure birds were being processed according to regulation 9CFR 381.65(b), I observed a non-compliance. A bin containing approximately 25-30 birds on the north end of the live hang area appeared to be very red in color. The birds had been picked but not opened. Upon further inspection the birds exhibited the signs of having died by means other than slaughter. The skin was very red, severe congestion in the proximal neck near the head and inadequate or no cuts for bleeding were observed by me, (b) (6) and (b) (6). I then checked birds on the kill line and observed several hens and shorter toms improperly cut and still breathing but not yet to the scalding. A bird had been pulled off of the line at the scalding and was sitting in the floor because it had not died on the line prior to the scalding. A regulatory control action was taken by stopping the kill line. (b) (6) was notified of the non-compliance and shown the breathing and improperly cut birds. He investigated the situation and after approximately 15 minutes to alleviate the concern placed another backup killer downstream to catch any missed birds and identify birds prior to the scalding to allow them time to bleed before going into the scalding. It appeared that all the cadavers seen in the condemned bin in the live hang area had been removed at the hock cutter area. The live bird on the floor was removed and dispatched properly and the birds improperly killed on the line were re-cut and allowed to bleed properly. The establishment's process for ensuring birds meet the regulatory requirements was not adequate as evidenced by the cluster of cadaver's and the other situations described above.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P72	Tyson Foods, Inc	JPJ1319 054904 N-1	05/03/2017	04C05	381.65(b)	<p>At approximately 0425 hours on the morning of 5/4/17 (Night shift for 5/3/17) I was completing a GCP for Live Hang Area. When I arrived and my eyes were adjusting to the dark conditions I noticed DOA birds piled down the left wall of the hanging belt and a large pile at the end of the belt. After a few minutes I noticed movement from the pile of DOA birds at the front end of the belt (The end away from the dumper). At this point I turned my light on and observed approximately 6 birds in different positions struggling to breath with DOA carcasses piled on top of them. I also noticed several birds with feet sticking out from under DOA carcasses that were kicking; some vigorously at times. It was very apparent that the live birds buried under the DOA's were smothering from pressure and lack of oxygen. At this time I stopped both live hang lines and requested (b) (6) get (b) (6). At 0437 hours (b) (6) arrived and began digging thru the birds down the left wall; he found approximately 3 to 5 live birds buried in this pile as well. There were approximately 100 – 150 DOA's piled up with approximately 20 live birds buried completely or partially. At 0445 hours I observed the DOA belt going outside; the carcasses on the outside appeared to be disposed of correctly and humanely. At 0447 hours maintenance arrived to work on the DOA belt. After speaking to management I learned that a truck had turned over during the night and the large amount of DOA's were a result of this. Management was aware and (b) (6) stated that he had watched a couple of the cages of birds being dumped. Management failed to notify USDA in any manner. (b) (6) was notified at approximately 0430 hours by (b) (6) that numerous Cadavers were being found on his line. At approximately 0420 hours on my way to the live hang area, I noticed several Cadavers in the transfer area both on the belt and</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						in the floor. The plant failed to meet 9CFR 381.65(b). Production was shut down from 0425 hours until end of shift.	
P468	Peco Foods, Inc.	JVD062 205480 6N-1	05/06/2017	04C05	381.65(b)	<p>P468, Peco Foods; Regulation 381.65(b); On Saturday May 6th 2017 at approximately 21:30 hours, I (b) (6) observed the following noncompliance while performing a Good Commercial Practice verification task, (3) three birds within five minutes on line 2 entered the scalding still breathing and multiple birds not properly bled out. I immediately took regulatory control action by slowing the line speed from (b) (4) birds per minute to (b) (4). I reported my observations to (b) (6) (b) (6) who was the individual to slow the line speed. I returned to observe line 2 for another 5 minutes and verified that the pattern of birds dying other than by slaughter had discontinued. I verified line 1's speed at (b) (4) birds per minute of the same lot and observed birds being bled and slaughtered in conjunction with agency statutes and regulations. During the time of this regulatory failure P468 was slaughtering heavier than average birds (projected weight of 9.91-10.21/bird) then what they are normally used to; lot AR origins. The process the establishment is using to slaughter poultry on line 2 is not in a manner that ensures that breathing has stopped before scalding, so that the birds do not drown, and that slaughter results in thorough bleeding of the poultry carcass (9 CFR 381.65(b)). P468 failed to implement their Animal Welfare Guidelines under the heading of slaughter. The line speed remains at (b) (4) bpm for line 2 during heavier than average bird weight slaughtering, ensuring the slaughter process is under control, birds do not enter the scalding breathing, and that adequate bleed out times for these larger birds are met (b) (6) was notified of the forthcoming non-compliance</p>	CLOSED



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
M7100+P7 100+V7100	Tyson Foods, Inc.	ZHB532 106202 8N-1	06/28/2017	04C05	381.65(b)	<p>On Wednesday, June 28, 2017, at approximately 1820 hours the following noncompliance was observed: (b) (6) on Line 1 station 4 stopped the line and rung the buzzer for me (b) (6). She informed me that while inspecting she had condemned several cadaver carcasses one behind the other. She stated that after the third carcasses she informed plant management but nothing was done to correct the problem and the cadaver continued to come down the production line and were condemned. The evisceration line was stopped and the inspectors were evacuated to the office because of (b) (4) chemical spill in the chemical room. The plant was notified of the process out of control and the forth coming noncompliance. (b) (6) stated that the killing machine blade was not working properly. Evisceration line was started and (b) (6) verified that the stunner, killing machine blade and back-up killer was working properly and process was back in control.</p> <p>The plant was notified of the process out of control and the forth coming noncompliance. (b) (6), stated that the killing machine blade was not working properly. The total numbers of cadavers condemned for the shift were 24. This does not meet the regulatory requirements of 9CFR381.65 (b).</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
M7100+P7 100+V7100	Tyson Foods, Inc.	ZHB432 208470 8N-1	08/07/2017	04C05	381.65(b)	<p>On Monday, August 7, 2017 at approximately 22:25, while performing GCP Task, I observed the following noncompliance: after the line 1 second head puller, 4 birds were flapping and breathing as they headed to the scalders; at the same location another 5 were flapping and blinking and breathing when the line 1 second head puller pulled their head off; additionally, approximately 25% of the remaining birds had kill cuts to the back and side of their neck instead of across the front and both jugular veins. Some of these birds had shallow cuts on the skin of the neck and into the trachea but had clearly missed the major vessels of the neck. I pointed the noncompliance out to (b) (6), who had maintenance adjust the kill machine. (b) (6) arrived and observed 3 more birds flapping as they by-passed the line 1 second head puller heading for the scalders. (b) (6) reported that maintenance was making adjustments to the kill machine. When I had not observed any further conscious birds at that location for 3 minutes, and continued on my task to complete Ante Mortem inspection, before returning to verify the kill machine adjustment on the slaughter line. However, I returned to find three more birds flapping and breathing and by-passing the line 1 second head puller heading for the scalders. I took the regulatory control action of stopping the slaughter line while I explained that continuing to allow birds to die by other than slaughter is egregious and asked how the issue would be corrected. (b) (6) again instructed maintenance to adjust the kill machine. He accompanied me to verify the effectiveness of the corrective adjustments of the kill machines. We observed three more birds, two of which had no throat cuts at all, at the same location. I also pointed out that the line 1 first neck puller was not set correctly, as it was hitting the birds exiting the blood tunnel at the level of the shoulder and the jouncing of the</p>	OPEN

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						carcass bodies against each other prevented many heads from being pulled at that station and had the added benefit of stimulating any of the birds that had not been properly cut by the kill machine. By approximately 23:20, the kill machine adjustments had brought the process back into control. If the noncompliance had not been found by USDA, birds would have continued to die by other than slaughter and not being appropriately bled out as the process remained out of control while not operating in accordance with good commercial practices and adulterated product could have been produced. This does not meet the regulatory requirements of 9 CFR 381.65 (b).	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
M7100+P7 100+V7100	Tyson Foods, Inc.	ZHB382 308572 1N-1	08/21/2017	04C05	381.65(b)	<p>On Monday, August 21, 2017 at approximately 21:35, while performing GCP Task, I observed the following noncompliance: before the line 1 second head puller, 2 uncut and conscious birds were headed to the scalders. I immediately stopped the kill line 1 as a regulatory control action. Upon returning to the line 1 second head puller station, I was able to count 6 uncut and conscious birds.</p> <p>(b) (6) observed the noncompliance and asked if he could re-start the kill line. I explained that continuing to allow birds to die by other than slaughter is egregious and asked how the issue would be corrected. I asked what he would do for the live birds on the line heading for the scalders. He did not answer. Next, (b) (6), and (b) (6), arrived and observed the noncompliance. When asked how he would rectify the situation, (b) (6) stated he would remove the live birds and adjust the kill machine and replace the relief back-up killer. The live birds, totaling 21, were removed from the line as the adjustments were made. By approximately 22:20, the kill process had been brought back into control. When I had not observed any uncut birds or birds showing any signs of consciousness for ten minutes, I requested a meeting with APM Josh King and (b) (6). When asked what measures were taken to bring the process back into control and compliance, (b) (6) stated that the kill machine blade was raised to better cut the smaller framed birds and the normal back-up killer was back in place. I asked how they intended to prevent similar incidents from happening again. Mr. King stated that the establishment policy of stopping the kill line to prevent uncut birds from continuing down the line to the scalders was in place. I pointed out that it had not prevented a large number of uncut and conscious birds long past the back-up killer station</p>	OPEN

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						<p>and heading toward the scalders. Mr. King re-stated that the policy is in place to prevent death by other than slaughter. He also stated that the relief back-up killer from this incident would not be allowed to perform that job again. I asked how would they insure that the kill machine was also adjusted per lot of chickens. Mr. King stated that it was not always possible to adjust the kill machine to kill birds of greatly varying sizes within a lot. I pointed out that adjustments had reduced the number of conscious birds along with the placement of a competent and conscientious back-up killer. (b) (6), was notified of the forthcoming NR and linkage. NR ZHB4322084708N/1 dated 8/7/2017, describes a similar occurrence where the establishment failed to death of birds by other than slaughter. The establishment has not answered that NR as yet. If the noncompliance had not been found by USDA, conscious birds would have continued to die by other than slaughter and not being appropriately bled out as the process remained out of control while not operating in accordance with good commercial practices and adulterated product could have been produced. This does not meet the regulatory requirements of 9 CFR 381.65 (b); nor does it meet the establishment humane handling training policy.</p>	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
M13456+P 13456+V13 456	Tyson Foods, Inc.	BQB060 808472 5N-1	08/25/2017	04C05	381.65(b)	August 25, 2017 at 0530 hours, I saw a plant employee retrieving a cadaver from Line 2 near the rehang table and throwing it into a condemn barrel. The condemn barrel contained seven cadavers. I was told that there were problems with the stunner. I went to the kill area and noticed that both back up killers were in place. At 0630 hours, I observed a cadaver on each line, heads still on. I pulled one from the line, requested reduction in line speed for both kill lines. The request was not granted. I requested for the kill to be stopped, all birds on line at that time pass through for inspection for I was going to pull inspectors from the line. The request was refused. The inspectors and myself walked to the USDA office. The cadaver was presented to the complex manager. Complex manager made sure that both kill lines were reduced to slower speeds than both evis lines. I observed process to make sure that it remained in control.	OPEN

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P206+V206	Pilgrim's Pride Corporation	KCC552 302381 5N-1	02/15/2017	04C05	381.65(b)	<p>At approximately 2130 hours, while walking through the picking room, I observed a cadaver on the east picking line. The cadaver was removed by the pinner/sorter and I requested it be hung back on the rack. (b) (6)</p> <p>(b) (6) was shown the cadaver. He stated that he would take care of it. At this time, the (b) (4) from the (b) (4) Cabinets was strong, so I elected to have QA check the concentration. While performing this check, an additional 2 cadavers were removed by the pinner/sorter from the east picking line. After the check was completed, at 2145 hours, I elected to observe the birds at the pinner/sorter stands on the east picking line. In approximately 3 minutes, there were 4 more cadavers observed. Three of the four carcasses were not cut on their necks. (b) (6)</p> <p>(b) (6) was again shown the cadavers and informed of the noncompliance. Immediately, after informing him of the noncompliance, two more cadavers were observed on the east picking line. The cadavers observed were bright red carcasses. The cutaneous ulnar vein on the wing was distended on several of the carcasses, indicative that the birds were not bled out properly. Three of the carcasses had no cut on their neck to allow proper bleeding and two carcasses were cut extremely high on the neck, near the beak, not allowing them to be properly bled out. There were a total of nine cadavers observed in this given time frame. The establishment has failed to comply with 9 CFR 381.65(b) as poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses. The number of cadavers observed indicates a loss of process for handling birds and therefore the establishment is not operating in accordance with Good Commercial Practices, allowing poultry to enter the scald tanks alive. Poultry that are not slaughtered in accordance</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						with GCPs are considered adulterated and must be condemned according to the Poultry Products Inspection Act (PPIA). This noncompliance will be forwarded to the Front Line Supervisor, District Office, and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. This document serves as written notice that continued failure to meet regulatory requirements can lead to enforcement actions described in 9 CFR 500.4. (b) (6) P206	



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P206+V206	Pilgrim's Pride Corporation	KCC2016044525N-1	04/24/2017	04C05	381.65(b)	<p>At 1530 hours I was informed by (b) (6) that there was a Dead on Arrival truck full of live and DOA birds. (b) (6) accompanied me to observe the truck in live hang truck unloading area. Once I entered live hang I notice DOA birds piled 4 feet high on the floor and more DOA birds being dumped onto the conveyor belt. I proceeded to go outside to observe the DOA truck. I witnessed an entire truck with 90% of the birds DOA. Two cages were completely dented in as if rammed by something large. I proceeded to ask (b) (6) what was the procedure for handling the live birds. (b) (6) stated that they would sort the live birds from the DOA birds. At 1645 hours I returned to check the progress of the DOA sorting and didn't see the truck. (b) (6) stated that the truck was moved to the holding barn to be sorted at the end of the shift. I requested (b) (6) escort me to where the birds were being held. Upon arrival to the holding barn I witnessed live birds among the DOA birds. Some live birds were still on top of the cages. At 1918 hours I was instructed by (b) (6) to stop live hang. I applied U.S. Rejected Tag NO. B38087084 at 1928 hours and informed (b) (6) that the live birds are not allowed to be held with DOA birds until the end of the night. At 1936 hours the plant brought the DOA truck back up to live hang and began dumping the DOA birds onto the conveyor belt to begin sorting again. I released the tag at 1937 hours. At 2022 hours I informed (b) (6) that the plant began the sorting process but the birds were still alive with the DOA birds stacked on the side of the live hang dumper with live birds still in the cages with the DOA birds. I spoke with (b) (6) and (b) (6) whom stated the birds will be put to the side to be hand sorted. (b) (6) stated all live birds would be euthanized. I then witness only</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						<p>two people sorting the entire truck of DOA birds. At 2107 hours I applied U.S. Rejected Tag NO. B38087081 to live hang and instructed (b) (6) that the tag would not be removed until all live birds had been sorted from DOA birds. At 2147 I observed that all DOA birds had been sorted and proceeded to remove the tag from live hang. Live birds in cages with Dead on Arrival birds will result in birds dying by crushing and is not consistent with Good Commercial Practices. It is important to treat poultry in a way that ensures they do not die by means other than slaughter. Employing methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce and unadulterated product. As preventive measures (b) (6) told me he would document a standard procedure for the proper sorting of DOA birds.</p>	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P206+V206	Pilgrim's Pride Corporation	KCC121 105503 ON-1	05/30/2017	04C05	381.65(b)	<p>P206, Pilgrim's Pride; Regulation 381.65(b); On Tuesday, May 30, 2017 at approximately 0815 hours, I, (b) (6), observed the following noncompliance of regulation 381.65(b). While performing Operational SSOP Review and Observation task, approximately 12 cadaver birds were observed at the Pinning/Sorting station in the Picking Room. The birds were bright cherry red in color. Some did not have a cut on the neck to indicate that they had gone through the kill machine properly. On the others, it was difficult to discern if there were cuts because the carcasses had gone through two head pullers prior to getting to the stations. I notified (b) (6) who in turn notified the Live Hang Supervisor. In the meantime, cadavers continued to intermittently arrive at the Pinning/Sorting station. The Live Hang supervisor stated that she had a new person backing up the kill machine. Since the plant had stopped hanging for the 0830 company break, I instructed (b) (6) that when they started up after break, they were to decrease the linespeed in evisceration from (b) (4) birds per minute to (b) (4) bpm to assure that the employees performing backup killing duties could adequately back up the equipment to prevent birds from getting by and entering the scalding still breathing. I proceeded to inform (b) (6) and Ms. Tonja Byers, Plant Manager of the increased incidence of cadavers. The establishment investigated the incident and found that the back up killers did not have sufficient training to prevent birds from getting by the kill blade and into the scalding. Also, the blade on the kill machine was not the appropriate size for the birds that were being slaughtered at the time. The appropriate sized blade was put onto the kill machine. The establishment also adjusted to stunners to get a more complete stun so that birds would enter the kill machine more</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						<p>uniformly. An extra back up killer was added to the line. At startup after break, the there were no incidences of cadavers reaching the Pinner/Sorter station. The plant was allowed to slowly increase the linespeed after demonstrating with each increase that the problem had been taken care of. There were a total of 27 cadavers that reached the station and all were condemned. The PPIA (21 U.S.C. 453(g)(5)), and 9 CFR 381.90, provide that poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned. Pleaser refer to NR# KCC2016044525, dated 4/24/17 for a similar noncompliance of the establishment's failure to adhere to performance of Good Commercial Practices. You are hereby advised of your right to appeal this decision as delineated by 381.35 of 9 CFR.</p>	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P7044	Tyson Foods, Inc.	GJJ222 201022 6N-1	01/26/2017	04C05	381.65(b)	<p>While in the picking room verifying conditions a cadaver was observed on line one at approximately 7:55pm. The carcass had the head attached with no neck cut, the body was red in color and the head was dark red to purplish. A second cadaver was observed on line one at approximately 8 pm. The carcass had the same appearance as the first cadaver without a neck cut. A third cadaver was observed on line one at approximately 8:08 pm. This carcass had the same appearance as the first two cadavers but had a cut on the back of the head with no neck cut. (b) (6) was notified and shown the cadavers. All three birds were condemned. Line speed on line one was reduced 10% from (b) (4) birds per minute to (b) (4) birds per minute. (b) (6) added an additional back up cutter for the remainder of the evening. This is noncompliance with 381.65(b) which states "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding". (b) (6)</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P7044	Tyson Foods, Inc.	GJJ442 201453 1N-1	01/31/2017	04C05	381.65(b)	<p>While in the picking room performing a Good Commercial Practice Task a cadaver was observed on the floor next to the drain. The carcass had the head attached, the body was red in color and the head was dark red to purplish in color. At approximately 5:56pm a second cadaver was observed on line two. The carcass had the head attached, the body was red in color and the head was dark red to purplish. A third cadaver was observed on line one at approximately 5:57pm. The carcass had the same appearance as the first cadaver. A forth cadaver was observed on line one at approximately 6:01pm. This carcass had the same dark red color to the body with a dark red flaccid neck but no longer had a head attached. A fifth cadaver was observed on line one at approximately 6:01pm. The carcass had the head attached, the body was red in color and the head was dark red to purplish. A sixth cadaver was observed on line two at approximately 6:17pm. This carcass had the same appearance with the head attached and dark red to purplish in color and the body red in color. (b) (6)</p> <p>(b) (6) was notified and shown the first five cadavers while (b) (6) was notified and shown the sixth cadaver. All six birds were condemned. Line speed was reduced 10% from (b) (4) birds per minute to (b) (4) birds per minute on both lines. (b) (6) had maintenance adjust the blade on the automatic knives due to a change in bird size and added an additional back up cutter for the remainder of the evening. This is noncompliance with 381.65(b) which states "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding". Regulatory control was released at 7:53 pm and line speed increased back to (b) (4) birds per minute. (b) (6)</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P7044	Tyson Foods, Inc.	GJJ230 006171 7N-1	06/16/2017	04C05	381.65(b)	<p>On 6-16-17 at approximately 5:20pm while in the picking room verifying conditions 17 cadavers were observed on the floor next to the drain. The carcasses had the heads attached, the body was red in color and the heads were dark red to purplish in color. There was also a cadaver with the head attached on the floor next to the hock cutter on line two. At approximately 5:27pm two more cadavers were observed on the picking lines and removed. The carcasses had the heads attached, the body was red in color and the heads were dark red to purplish. Another cadaver with head attached was in the catch bin below the hock cutter on line two. (b) (6) was notified and shown all 21 cadavers. All 21 birds were condemned. (b) (6) had maintenance adjust the blade on the automatic knives and adjusted the stunners. This is noncompliance with 381.65(b) which states "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding". (b) (6)</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P7091	Pilgrim's Pride Corporation	SBF091 902332 1N-1	02/20/2017	04C05	381.65(b)	<p>On February 20 , 2017 at approximately 2000 hours, while performing a Good Commercial Practices verification, one cadaver bird was observed in shackles exiting the final picker on the picking line before reaching the rehang table. The carcass was deep red to purple in color with a very large, engorged head and did not have a single bleeding cut on the neck. (b) (6) was notified and shown the carcass. (b) (6) was also notified. (b) (6) provided the corrective actions of immediate disciplinary actions issued for the back up cutter employee and preventative measures of GCP training was scheduled for the end of the shift for all team members that back up kill including the supervisors. The back up kill personnel will also be issued a different type of eye protection to help the team member to visualize the birds for the task at hand. Measures to prevent the needless suffering, discomfort or death of poultry throughout the entire slaughter process failed to do so in this incident. In this incidence, poultry were not slaughtered in a manner that resulted in thorough bleeding of the poultry carcass and did not prevent the needless suffering and discomfort of poultry to ensure breathing has stopped before scalding. This is a noncompliance with 9 CFR 381.65(b) which states in part: " Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. " and 9CFR 416.4 (d) which states "product must be protected from adulteration during processing, handling, storage, loading and unloading at and during transportation from official establishments." Documented by (b) (6)</p>	CLOSED



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P7091	Pilgrim's Pride Corporation	SBF121 102242 5N-1	02/25/2017	04C05	381.65(b)	<p>On February 25, 2017, at approximately 0815, I examined a carcass that was hung back for the PHV disposition. I observed a carcass that was erythematous in the neck area, the viscera pack was congested with blood and the intestinal vessels were injected with blood. I notified (b) (6) of the cadaver. At approximately 0930 the same day, I observed another carcass hung back for the PHV disposition. This carcass exhibited the same characteristics but was even more erythematous in the cervical neck region, the trunk of the carcass, and the vent area. Upon observation of the viscera pack, the intestinal blood vessels appeared to be distended, the pack was congested. I notified (b) (6) again of the disposition, cadaver. The evisceration line was slowed to (b) (6) birds per minute. This is a noncompliance with 9CFR 381.65(b) which states in part: "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding." Refer to a similar noncompliance written on 2/21/2017, SBF0919023321N/1. (b) (6)</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P7091	Pilgrim's Pride Corporation	SBF312 103472 4N-1	03/24/2017	04C05		On 03 24 2017 at approximately 2020 hours while performing the weekly record keeping portion of the Good Commercial Practice for Poultry Slaughter Task, (b) (6) observed the following noncompliance: Upon review of the Slaughter Area Animal Welfare sheets, in the upstairs QA Office above Cut Up and Cold Rehang, first shift has been incorrectly recording the amount of birds checked for each column criteria ( for example: Proper Stun Check - recorded number = 1/10 in opposition to recording out of the 500 bird check as the procedure is written). All of the records have been reviewed from 03 01 2017 to 03 24 2017, with every first shift document being recorded in the same manner save one that only recorded the number of birds observed with the specified column's check criteria (for example: Proper Stun Check - recorded number = 5). Each column has an action number specified with which it appears the first shift has been using as the base number for each check (for example action number (b) (4)).	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P7091	Pilgrim's Pride Corporation	SBF312 103472 4N-2	03/24/2017	04C05		<p>On 03 24 2017 at approximately 2020 hours while performing the weekly record keeping portion of the Good Commercial Practice for Poultry Slaughter Task, (b) (6) observed the following noncompliance: Upon review of the Slaughter Area Animal Welfare sheets, in the upstairs QA Office above Cut Up and Cold Rehang, first shift has been incorrectly recording the amount of birds checked for each column criteria ( for example: Proper Stun Check - recorded number = 1/10 in opposition to recording out of the 500 bird check as the procedure is written). All of the records have been reviewed from 03 01 2017 to 03 24 2017, with every first shift document being recorded in the same manner save one that only recorded the number of birds observed with the specified column's check criteria (for example: Proper Stun Check - recorded number = 5). Each column has an action number specified with which it appears the first shift has been using as the base number for each check (for example action number (b) (4)). Though this record is not a CCP in the Hazard Analysis, it is a part of the GCP monitoring that is included in the HACCP plan. This is a failure to comply with 9 CFR 417.4(a) 2 (iii) which states in part "Ongoing verification activities. Ongoing verification activities include, but are not limited to:...(iii) The review of records generated and maintained in accordance with § 417.5(a)(3) of this part." and 9 CFR 417.5 (a) 3 which states in part "(a) The establishment shall maintain the following records documenting the establishment's HACCP plan: (b) (4)</p> <div style="background-color: black; width: 100%; height: 100%; min-height: 150px;"></div>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						<p>(b) (4)</p> <p>and 9 CFR 381.65 (h) "Operations and procedures, generally. (h) Recordkeeping requirements. Official poultry slaughter establishments must maintain daily records sufficient to document the implementation and monitoring of the procedures required under paragraph (g) of this section. Records required by this section may be maintained on computers if the establishment implements appropriate controls to ensure the integrity of the electronic data. Records required by this section must be maintained for at least one year and must be accessible to FSIS." Documented by (b) (6)</p>	
M17250+P 6+V6	Tyson Foods, Inc.	UQI151 107432 9N-1	07/29/2017	04C05	381.65(b)	<p>July 29, 2017 at approximately 10:44 am, while performing verification of GCP, I observed a chicken that was trapped between the floor of the cage and the frame of the cage battery. the door of the bottom left cage was bent at the corner and another chicken was caught in it. When the battery didn't completely empty, the battery was lifted back to allow the cage dump operator to remove the bird stuck in the door and put it on the live hang transfer belt. The operator continued to attempt to empty the cage, dumping it forward and lifting it back to dislodge the remaining chickens. Unfortunately, he could not see that the chicken trapped between the floor and the bottom frame was working in conjunction with the bent door to both crush the chicken and jam the door. Once he was able to move the cage to the return belt, he could understand the problem. He was able to remove the stuck chicken but it was already dead. The battery had to be removed from the dump and placed on the tarmac for the chickens to be extracted. This is documentation of noncompliance with regulation 381.65(b), due to failure to maintain cages in good repair.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P522	Sanderson Farms, Inc. (Processing Div)	IKB351 001203 ON-1	01/27/2017	04C05	381.65(b)	<p>On Friday, January 27, 2017 at approximately 1226 hours, (b) (6) and I observed the following loss of process control on the regulated premises at Sanderson Farms, Inc. P-522 when an attempt to salvage birds from a chicken truck which had overturned was observed. While performing a Good Commercial Practice verification check at the back corner of the establishment premise the following observations were made. Crew personnel were grabbing birds from damaged cages and throwing the birds to the ground. Many times 2-3 birds were grabbed at one time per hand. A pile of birds was created on the ground, several layers high, of birds on top of birds. Birds identified in this pile included live birds, moribund birds, dead birds and birds with traumatic injuries such as broken legs, broken wings, head injuries, and birds with torn flesh revealing muscle. Birds that appeared to be salvageable were grabbed from this pile of birds and put into cages on a second trailer in order to be taken to slaughter. Birds that were determined to be unsalvageable were thrown into the back of a pickup truck to be disposed of at Rendering. (b) (6) and I examined this truck bed filled with birds. We observed live and moribund birds in the pile of carcasses. No attempt to euthanize breathing birds prior to throwing birds into the bed of the pickup truck was made. I stopped the practice of throwing birds from the cages to the ground. I requested the Plant Manager come to the scene. I detailed to the Plant Manager the treatment of the birds that (b) (6) and I had witnessed. At this point, crew personnel were instructed to euthanize breathing unsalvageable birds. AVMA guidelines for the euthanasia of poultry were not followed. I observed birds grabbed and held by their heads as their bodies were swirled in a circle. I observed personnel grab birds by the head and force the head down towards the breast of the bird in an attempt of</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						cervical disarticulation. (b) (6) and I observed crew members poking and jabbing live and dead birds with rods in attempts to shove birds to the front of the cages for easy retrieval by other crew members. One rod utilized appeared to be constructed from metal while the other rod looked as if it was made from a one inch diameter PVC pipe. Gary Delancey, Plant Manager, was notified of this noncompliance verbally and in writing with the noncompliance record.	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P522	Sanderson Farms, Inc. (Processing Div)	IKB321 907262 5N-1	07/25/2017	04C05	381.65(b)	<p>Today, July 25th, 2017, the following noncompliance was observed by me, (b) (6) at P-522, Sanderson Farms, Inc: While returning from giving breaks on the evisceration line, I observed that one of the picking lines was stopped. I proceeded to the live hang area and observed that most of the live birds had been removed from the stopped picking line. There were still birds on the line in the stunner and continuing on through the neck cutter and into the blood tunnel. Most of these birds were dead and their necks were cut. Live birds were observed in the following locations: There were four (4) live birds at the entrance to the stunner. The birds were blinking, moving their heads and wings, and breathing rhythmically. There was water spraying onto the legs of the birds and running down their bodies to their heads and faces. Some of the birds had their eyes closed. There were two (2) live birds at the exit of the stunner. I looked into the stunner exit from above and observed two birds who were breathing as evidenced by the rhythmic movement of their vents. I set my stopwatch to begin recording the amount of time that the birds were left hanging on the line. I then alerted (b) (6) Mr. Barry Sparks, Plant Manager, and (b) (6) of my findings. (b) (6) stated that the stunner had been drained. All three members of management stated that the live birds could not be removed from the stunner because it was still on. I asked if it was possible to turn the stunner off and was told that it was not possible to do so without turning off both stunners. I asked if the live birds could be removed from the line somehow. I was told that the live birds would not be removed from the line. At approximately 1816 hours, employees left the area as this was the company lunch break. I continued to observe the live birds in the stunner</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						<p>and did not leave the area myself. After the birds had been hanging on the line for 23 minutes, the line began to move forwards. I as birds from the stunner passed through the automatic neck-cutting machine. I observed as two of the last birds on the line missed the automatic neck cutting machine's blade. The birds had flexed necks and were not stunned, and no part of their body entered the neck cutter. The employee who works in this area as a backup cutter was not present. I quickly proceeded to the scalding entrance and observed as a total of four (4) live birds entered the scalding. The first two live birds that entered the scalding were located earlier in the line than the two I'd seen skip over the neck cutter. Subsequently, I saw two more live birds enter the scalding alive; these two were in the very last group of birds on the line. The above observations represent a loss of process control. The slaughter system was not adequately staffed and the stunning equipment was not fully operational. As a result, four live birds entered the scalding and drowned.</p>	



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P6651	Tyson Foods Inc.	MSO23 180955 08N-1	09/08/2017	04C05	381.65(b)	<p>On Friday September 8, 2017 at approximately 1149 the following Good Commercial Practice noncompliance was observed by (b) (6) [REDACTED]. At the entrance to the scald tank that feeds evisceration line two (B line) the first live bird was observed entering the scald tank. There was a superficial cut across the trachea that did not penetrate the trachea or any major vasculature. The bird was blinking, had pupillary reflexes, rhythmic breathing and was flapping its wings. (b) (6) [REDACTED] was immediately notified and informed that this would be officially documented. Over the next several minutes additional birds (three total) were seen approaching the scald tank that were rhythmically breathing with superficial cuts to the right side of the neck that the Supervisor manually removed the head just prior to entering the scald tank. Line two was stopped momentarily and the Supervisor stepped away. At this time there was a bird just prior to the scald tank with an uplifted head, no cut to the neck, blinking, rhythmically breathing and pupillary reflexes. (b) (6) [REDACTED] immediately informed the supervisor of this bird and he was able to remove it from the line prior to it entering the scald tank. Without USDA intervention this bird would have entered the scald tank alive as well. At 1159 hour two additional birds were observed entering the same scald tank with superficial nicks just causing abrasions to the right side of the neck not cutting any vasculature that were blinking, with pupillary reflexes, rhythmic blinking and flapping. Another bird was seen in the same exact manner entering at 1206 hour. At this time (b) (6) [REDACTED] was informed that this would be documented as a noncompliance and due to the numerous birds seen entering the scald tank alive in a short period of time and that it was advised to stop hanging birds until adjustments could be made. The above incidents were discussed with (b) (6) [REDACTED]</p>	OPEN

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						(b) (6) as well. The establishment elected to stop hanging birds and make appropriate adjustments to the kill blade as well as manually decapitate birds approaching the scald tank that still had their head attached. This is a violation of 9 CFR 381.65(b) which states in part, "poultry must be slaughtered in accordance with good commercial practices. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. Past similar Good Commercial Practice MOI MSO5921094601I dated September 1, 2017 for live birds entering the scald tank on the same evisceration line in which previous preventative actions either weren't implemented or were ineffective.	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P192	Pilgrims Pride Corporation	OOB01 190233 28N-1	02/28/2017	04C05	381.65(b)	<p>On Tuesday February 28, 2017 at approximately 1456 the following Good Commercial Practice noncompliance was observed. The kill wheel on line two was cutting birds just caudal to the beak, very close to the head, in a much more distal than typical location. The back-up killer was cutting numerous birds and appeared to have difficulties keeping up with the number of birds that required an additional cut as many birds were missed and still flapping / minimally bled further down the line. Several maintenance employees were observing the kill wheel at this time. I then went to observe where birds enter the scalding and saw two birds enter that were rhythmically breathing and flapping their wings. I was able to observe these birds closely as the line was paused at this time. I immediately notified (b) (6) of the situation and she informed me that the wheel was cutting birds low and would get an additional back-up kill person to help keep up. While waiting on the additional employee I went to further observe for live birds entering the scalding. At 1500 an additional live, rhythmically breathing, flapping and actively moving bird entered the scalding. At this point an additional back-up killer had still not arrived to correct the issue. I informed (b) (6) that the process was out of control at this point and to not hang any more birds until further corrective actions could be taken. U.S. rejected tag No. B38027079 was applied to the line. This is a violation of 9 CFR 381.65(b) which states in part, "poultry must be slaughtered in accordance with good commercial practices".</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P320	Sanderson Farms, Inc.	MRA08 050215 08N-1	02/03/2017	04C05	381.65(b)	<p>At approximately 0620, while performing ante mortem and GCP verification, the live hang area was observed in an out of control process. Numerous (over 100) birds were observed piled on the floor at the East end of the live hang conveyor, at least three feet high (the height of the conveyor). Also observed, along the North wall behind the hangers, was a pile of birds approximately two feet high. While most of the birds were dead, some were not and left to suffocate in the piles. Also observed were several dead birds on the West end of the conveyor and approximately 75 live birds in paw operations, an area outside of the live hang area. (b) (6)</p> <p>██████████ was present and regulatory control was taken by instructing management to stop hanging. While disposing the dead birds, employees were observed not following the proper procedure for disposal which requires the removal of the heads of the dead birds. Plant manager Dusty Evans was informed and shown this noncompliance. Poultry must be slaughtered in accordance with good commercial practices, in a manner that results in thorough bleeding of the poultry carcass and ensures that breathing has stopped before scalding, so that the birds do not drown (9 CFR 381.65(b)). This noncompliance will be discussed in the next weekly establishment awareness meeting.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P1307	Mar-Jac Poultry-AL	KIL1114 035106 N-1	03/06/2017	04C05	381.65(b)	<p>At approximately 13:45, while monitoring operations in the rehang area of 1st Processing, I observed the rehang employees condemn three cadavers within approximately a minute time frame. I checked the plant's record for condemnations at the rehang and observed that there had already been four cadavers condemned at 13:40. I also noted that between 11:30 and 13:40, there were approximately 15 cadavers condemned. I looked inside the kill room, and observed that the kill machine backup person was working continuously to cut the necks of birds that were missed by the kill machine. I proceeded to the scalding area to observe birds entering the scalding. During a two minute observation period, I observed three birds enter the scalding which had their eyes open and appeared to be alive. Two of the birds had small superficial neck cuts, but the third had no neck cut at all. I concluded that the establishment's process was out of control. I proceeded to the live hang area to tag the hanging pen, but discovered that live hang operations had already finished. I notified (b) (6) of my findings, and informed him that this warranted a noncompliance record (NR). I asked (b) (6) what the plant's preventive measures were, and he responded that maintenance would work on the stunner after the shift ended.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P6137A	Foster Farms	NJN570 603342 3N-1	03/22/2017	04C05	381.65(b)	<p>At about 2315 hours on 3/22/17, a USDA online inspector hang back a suspected carcass on line A, station #3, for PHV disposition. I observed the carcass had limp neck, viscera congested and a bit of foul odor. After careful consideration, I determined the carcass was a DOA. The (b) (6) (b) (6) and (b) (6) (b) (6), were both present to observe the carcass. Then at 0300 hours on 3/23/17, I was called by another USDA online inspector to make a disposition on another hang back carcass on line B, station #1. This carcass in question also had a limp neck. There was a putrid odor emanating from the cavity, the back was reddish and viscera congested. I determined it was a DOA. I showed it to night (b) (6) and (b) (6) (b) (6). DOA carcasses are to be condemned at ante-mortem inspection and should not be dressed or conveyed into any department of the official establishment where poultry products are prepared or held (9 CFR 381.71(a)). Poultry that die otherwise than by slaughter are adulterated under 21 U.S.C. 453(g)(5) of the Poultry Products Inspection Act (PPIA). In addition, under 21 U.S.C. 458(a)(1) of the PPIA, it is a prohibited act to process any poultry products that are capable of use as human food except in compliance with the requirements of the law. A DOA carcass is considered to create insanitary conditions, in that, it is adulterated and not intended for human food.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P6137A	Foster Farms	NJN420 403283 1N-1	03/30/2017	04C05	381.65(b)	<p>On the night of 3/30/17, (b) (6) hang back one carcass on line A, station #1 at 2320 for PHV disposition. I observed the organs were hyperemic, the back and part of breast areas were reddish and the neck was limp. I determined it was a DOA and communicated my finding to (b) (6).</p> <p>Twenty minutes later, at 2340 hours, (b) (6) called me to make another disposition on a suspect carcass. This one also had congestion of the organs, floppy neck, foul odor and the liver was friable. These are signs pertaining to DOA carcasses and I made the determination that it was a DOA. I informed (b) (6) of the forthcoming NR. A DOA carcass is considered to create insanitary conditions in that it is adulterated and not intended for human food. DOA carcasses are to be condemned at ante-mortem inspection and should not be dressed or conveyed into any department of the official establishment where poultry products are prepared or held [9 CFR 381.71(a)].</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P9897	New Stockton Poultry	ZQE130 902191 3N-1	02/13/2017	04C05	381.65(b)	<p>On Monday, February 13, 2017, at approximately 0507 hours, (b) (6) observed the following noncompliance of regulation 381.1(b)(v) and 381.65 (b) while observing the killing procedures of Silky Chickens. The following observation was observed and noted: (b) (6) was using a knife to make cuts in the necks of birds at a position next to the scalding entrance, apparently making cuts to correct inappropriate cuts performed by the employee making cuts near the stunner. I asked (b) (6), while the line was still running, why the line was still running when there was a problem with making appropriate cuts. (b) (6) stated to me that he could not stop the kill or the line. I then observed 5 birds entering the scalding tank that had reacted to the hot scald water by attempting to lift their heads out of the water and flapping their wings vigorously. I took immediate regulatory control action by stopping the line and kill operation and applied U.S. Reject tag B21581214 to the live hang line, and also applied US Reject tag B42127000 to the evisceration line. I immediately contacted (b) (6) at approximately 0511 hours and explained the occurrence, and notified P9897 plant owner Mr. Minh Luu of the regulatory control action. There were approximately 50 birds that were on the shackles inside the scalding tank and approximately 50 birds on the post-picker conveyor (there were no birds that were rehanged onto the evisceration line shackles). (b) (6) inspected the birds on the post-picker conveyor, and inspected approximately 20 birds; 10 of those birds had very shallow cuts in the necks, and one bird with no neck cut. Management failed to meet 9 CFR 381.1 (b), (v) and 381.65 (b) and PPIA Section 4 (g) (5) to prevent birds still breathing from entering scalding tank. After the regulatory control action was taken and after operations were stopped, the establishment removed all of</p>	CLOSED



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						the birds from the scalding and removed all the birds from the post-picker conveyor and condemned and denatured the birds. The establishment stated that their corrective action and preventive measure will be to remove the employee who had made improper neck cuts, and place an employee who is experienced with making proper neck cuts. They will also create a monitoring and record keeping program for ensuring appropriate neck cuts and thorough bleeding of carcasses prior to entering the scalding, and provide training to personnel on observing/documenting the neck cuts and how to take immediate corrective action. On February 13, 2017, at 1200 hours, following the establishment's submittal of appropriate corrective actions and preventive measures, U.S. Reject tags B21581214 and B42127000 were removed from the evisceration line and live hang line by (b) (6).	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P533	Hain Pure Protein Corporation - FreeBird East	AKB0712053216N-1	05/16/2017	04C05	381.65(b)	<p>P533; Hain Pure Protein; Regulation 381.65b; On May 16, 2017 at approximately 0715 hours there was the following noncompliance of regulation 381.65(b). (b) (6) noted a large number of empty shackles at the conclusion of giving online inspection breaks. (b) (6) went to live receiving where he found plant management removing dead birds from the live receiving belt. He was informed that there was a mechanical issue with the dumper to hang room transfer belt and live birds had smothered due to the dumper belt continuing to dump live birds on top of each other. At this point no more birds were being added and plant management was fixing the equipment. (b) (6) verified that condemned birds were dead. (b) (6) then notified me, (b) (6). I traveled from another establishment and by the time I arrived to live receiving all dead birds had been removed, condemned, and operations were operating normally. I met with (b) (6). He stated that 198 birds had died by means other than slaughter and that it was due to the transfer belt 'slipping' and not operating as intended. The belt had been tightened and the plant wants to install an independent turn off switch for the dump belt that allows the transfer and hang room belts to be run to clear without that dumper belt continuing to run. The PPIA (21 U.S.C. 453(g)(5)), and 9 CFR 381.90, provide that poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned.</p>	OPEN

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P533	Hain Pure Protein Corporation - FreeBird East	AKB3509071618N-1	07/12/2017	04C05	381.65(b)	<p>P533; Hain Pure Protein; Regulation 381.65b; On July 12, 2017 at approximately 1130 hours there was the following noncompliance of regulation 381.65(b): (b) (6) noted a large number of empty shackles while on the evisceration floor. (b) (6) went to live receiving where he found plant management removing a couple of dead birds from the live receiving belt. He was informed that there was an issue with moving birds from the dumper to the live hang room transfer belt. At this point everything had been resolved and operations were normal. I was informed of the incident. In total 58 birds had died by means other than slaughter. Plant management cited personnel error in dumping too many birds onto the belt. A camera has been installed as a corrective action. The PPIA (21 U.S.C. 453(g)(5)), and 9 CFR 381.90, provide that poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned.</p>	OPEN

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P533	Hain Pure Protein Corporation - FreeBird East	AKB0809095222N-1	09/21/2017	04C05	381.65(b)	<p>At P533; Hain Pure Protein on September 21, 2017, at approximately 1100 hours there was the following noncompliance. On 9/21/2017, at 1130 hours, (b) (6) contacted me, (b) (6) and told me of the following incident. On September 21, 2017, at approximately 1100 hours, he noted empty shackles while on the evisceration floor. (b) (6) went to live receiving where he found a large pile of dead birds on the floor. There were a total of 335 dead birds. This is consistent with the malfunction of the belts that transport the birds from the unloading area to the shackling area. Previous preventive measures have failed in preventing the reoccurrence of these similar circumstances as documented in the previous noncompliance reports on 7/18/2017 NR AKB3509071618N and on 5/16/2017 NR AKB0712053216N. (b) (6) informed (b) (6), of his observations that he was going to contact the SPHV. This large number of dead birds at the end of the belts from the unloading area to the shackling area is evidence of a process out of control and is a Noncompliance with 9 CFR 381.65(b).</p>	OPEN

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
M7559+P1 34	David Elliot Poultry Farm Inc.	SNA331 106011 9N-1	06/16/2017	04C05	381.65(b)	On 06-16-17 10000 Cornish chickens arrived for slaughter at P134, after the conclusion of the day's slaughter it was determined that there were 525 Dead On Arrival (DOA) chickens. The increase in DOAs is likely consistent with the effects from heat, as the temperature on this day was 75°F. The Poultry Products Inspection Act (PPIA) (21 U.S.C. 453(g)(5)), 9 CFR 381.65(b), and 9 CFR 381.90 provide that poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned. The regulations also require that poultry be slaughtered in accordance with GCP, which means treated humanely. It appears that the Est. has lost control of its process for handling birds and thus is not operating in accordance with Good Commercial Practices for Poultry. On 06-13-17 1337 DOA were noted at this Est. The increased number of DOAs today is a noncompliance with 9 CFR 381.65(b) which states in part that Poultry must be slaughtered in accordance with GCP. I informed Mr. Moshe Fink, establishment owner, of this noncompliance.	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
M7559+P1 34	David Elliot Poultry Farm Inc.	SNA270 709502 7N-1	09/25/2017	04C05	381.65(b)	<p>On September 25, 2017 while performing a Good Commercial Practices task at approximately 11:30am, I observed several crates of chickens unloaded from the truck each containing approximately 10-15 birds that were all dead on arrival (DOA). At the conclusion of the day, it was determined that there were 435 DOAs out of the (b) (4) that arrived at the establishment for slaughter. The increase in DOAs on this day was likely due to the effects of heat, as the temperature on this day reached at high of 92F. The Poultry Products Inspection Act (PPIA) (21 U.S.C. 453(g)(5)), 9 CFR 381.65(b), and 9 CFR 381.90 provide that poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned. The regulations also require that poultry be slaughtered in accordance with Good Commercial Practices, which means that they are handled in a way that prevents needless injury and suffering. Based on today's findings, it appears that the Est. has lost control of its process for handling birds and thus is not operating in accordance with Good Commercial Practices for Poultry. The increased number of DOAs today is a noncompliance with 9 CFR 381.65(b) which states in part that Poultry must be slaughtered in accordance with Good Commercial Practices. Mr. Moshe Fink, establishment owner, was notified of this noncompliance.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
M7559+P1 34	David Elliot Poultry Farm Inc.	SNA560 709572 7N-1	09/26/2017	04C05	381.65(b)	On September 26, 2017 while performing a Good Commercial Practices verification task at approximately 8:30am, while in the live hang area I observed several crates containing dead on arrival (DOA) chicken carcasses. At the conclusion of the slaughter there were approximately 1,522 dead on arrival out of the (b)(4) chickens that were presented for slaughter. The increase in DOAs on this day was likely due to the effects of heat, as the temperature on this day reached high of 91F. The Poultry Products Inspection Act (PPIA) (21 U.S.C. 453(g)(5)), and 9CFR 381.90 provide that poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned. The regulations also require that poultry be slaughtered in accordance with Good Commercial Practices which means that they are treated humanely. The increased number of DOAs demonstrates that the establishment has likely lost control of its process for handling birds and is thus not operating in accordance with Good Commercial Practices for poultry. This is a noncompliance with 9 CFR 381.65(b) which states in part that poultry must be slaughtered in accordance with Good Commercial Practices. Mr. Moshe Fink, establishment owner, was notified of this noncompliance.	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P34508	Kam Fung Wong	LRR300 607340 8N-1	07/07/2017	04C05	381.65(b)	Today July 7th 2017, at approximately 0615 hours while during my pre-operational procedure in poultry receiving area I observed the live birds which were left over night was not fed and watered. Immediately I asked (b) (6) he did not response. I called (b) (6) and ask him the same but no response. Immediately I applied a USDA retain tag no B37056148. When the corrective action was taken I removed the USDA retain tag and allow them to start killing. This was a noncompliance regulation 381.65(b) ( OPERATIONS and PROCEDURES GENERALLY) poultry must be slaughtered in accordance with good commercial practices in a manners. Continued failure to meet regulatory requirements would lead to further enforcement actions.	CLOSED
P44826	Case Farms Processing, Inc	000140 703391 6N-1	03/16/2017	04C05	381.65(b)	On 3-15-2017 at approximately 1500 hrs while verifying GCPs in the unloading area I observed two live birds in the combo used to store DOAs. I informed (b) (6) of my findings who in turn notified the live hang supervisor. I continued to search through the rest of the DOA combo and located two additional live birds underneath numerous carcasses. This document serves as notice of the establishment's failure to comply with 9CFR 381.65(b).	CLOSED
P44826	Case Farms Processing, Inc	000390 304392 6N-1	04/25/2017	04C05	381.65(b)	At approximately 4:31 AM while performing Poultry good commercial practices for poultry slaughter task at the chicken dumper in the live hang station I observed the employee who operates the dumper, dumped a cage full of birds on top of birds which were on the conveyor belt. He should have waited till the conveyor get cleared and there were no more birds on the conveyor. This is incompatible with 9 CFR 381.65(b). (b) (6) was notified of the noncompliance.	CLOSED



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P45045	Bee Bee Farms, LLC	000391 604500 4N-1	04/04/2017	04C05	381.65(b)	I (b) (6) on 4-4-2017 was assigned to establishment 45045 Bee Bee Farms. At approximately 1425hrs just prior to going to break I noticed and employee in the doorway between the processing room and kill area. The plant was getting ready to go on break and the end of the birds hanging on the line were in the processing room. That is when I notice the employee in a yellow rain suit grabbing birds from the inedible barrel and hanging them on the line for inspection. At this time (b) (6) was standing next to me working with the trimmer. I stopped the line and asked her to walk over with me. I noticed (b) (6) and had him meet us. I informed both of them of the employee taking the birds out of the inedible and hanging them on the line (b) (6) talked to another employee standing there in Spanish and asked him how many he had put on the line. The employee said 10. At that time all the birds from the corner to the inspection station were condemned. The company had mechanical problems and didn't run the rest of the day.	OPEN
P45068	NY Livestock Market Inc.	000460 807252 9N-1	07/29/2017	04C05	381.65(b)	At approximately 8:00 am while performing operational inspection (b) (6) noticed that the slaughterers are slitting the throats of the chickens and putting them directly into barrels with other chickens rather than allowing the chickens to bleed out in cones. This practice is not in accordance with good commercial practices and is noncompliant with regulation 381.65 (b). The slaughterers were told to immediately cease slaughtering. The establishment manager Winnie Wu was notified.	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P45131	Farbest Foods, Inc.	000420 504512 8N-1	04/26/2017	04C05	381.65(b)	04/26/2017 at approximately 1100hrs., while performing CI duties, I observed a bird with a substantial amount of airsacculitis in the cavity. This was an unmarked bird. Upon closer examination I saw another bird with airsacculitis in the cavity. I notified (b) (6). I looked at more unmarked birds and they were also infected with airsacculitis. After viewing marked birds and unmarked birds there were approximately 40+ birds that had airsacculitis in the cavity that wasn't removed (b) (6) was also notified. I continued observing both marked and unmarked airsacculitis birds with airsacculitis in the cavities until approximately 1230hrs., when the lot change occurred. Reg. 381.84 Carcasses of poultry with evidence of extensive involvement of the air sacs with airsacculitis or those showing airsacculitis along with systemic changes shall be condemned. Less affected carcasses may be passed for food after complete removal and condemnation of all affected tissues including the exudate.	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P51165	Summit Poultry, Inc.	FIY3122 083728 N-1	08/17/2017	04C05	381.65(b)	<p>On 08-17-2017 at 13:15 hours on (b) (6) and (b) (6) called for correlation on higher number of cadaverbirds arriving at their inspection stations for PM disposition. At 1347 hours, I inspecting the carcasses in US condemned barrels showed characteristic signs of birds that died other than slaughter. These birds had irregularly slaughter marks on their necks, side of heads, on back of necks, extensive mutilation of necks and heads, slit open jaws and entire skins of neck. Some with protruding eye balls some decapitated and several with small nick on side of neck no blood vessels or tracheas cuts. I stopped the evisceration line, took regulatory control rejected the production line under tag# B41-145983 and notified the establishment (b) (6) (b) (6) and (b) (6) (b) (6). In exit meeting with above mentioned establishment designees that evisceration process is out on control, there is regulatory violation of 9CFR 381.65(b), establishment slaughtering adulterated product [9CFR 381.1(b) (v) and PPIA Sec.4 (g)(5)] and per 9CFR 500.2(a)(2&amp; (3) regulatory control action is taken by placing reject tag. I asked plant management for corrective action and preventive measures to bring the process under control. I explained them that in the PPIA Section 453(g) (5), a poultry product is adulterated if, among other circumstances, it is in whole, or in part, the product of any poultry which has died otherwise than by slaughter. The regulations require that poultry be slaughtered in accordance with good commercial practices, in a manner that will result in thorough bleeding of the poultry carcass and will ensure that breathing has stopped before scalding (9 CFR 381.65 (b). Establishment responded that quit using mal-functioning of kill machine, reduction in line speed, adding three employees back up by hand slaughter, extra</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						person at scalders to prevent breathing birds enter scalders and adjustment of kill machine. At the end of shift from Poultry Condemnation Certificate (FSIS Form 9061-2) I calculated that there 218 cadavers. Out of 677 condemned carcasses 218 cadavers were 32.2 % of condemned birds.	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P51165	Summit Poultry, Inc.	FIY5513 081721 N-1	08/18/2017	04C05	381.65(b)	<p>On 08-18-2017 after my report to (b) (6), both of us visited Summit Poultry to evaluate the corrective actions/ preventive measures adopted by establishment and following was observed: Earlier (b) (6) also took regulatory control rejecting kill machine and scalding under us tag# B42-145895 and B41-861010. He notified plant manager Jack Walton, (b) (6) and part owner Rory Botto for corrective preventive measures at 12:15 hours. At 12:35 hours on inspecting the birds leading for PM disposition process out of control carcasses had irregularly slaughter marks on their necks, side of heads, on back of necks, extensive mutilation of necks and heads, slit open jaws and entire skins of neck. Some decapitated and several with small nick on side of neck no blood vessels or tracheas cuts showing corrective action adopted by establishment were not effective and not sufficient enough to control GCPHP violation and bring process under control. I stopped the evisceration line, took regulatory control rejected the production line under tag# B41-8610110 and notified the establishment Manager Mr. Jack Walton, Rory Botto part owner and (b) (6). In exit meeting with above mentioned establishment designees management were informed that evisceration process is out of control, there is regulatory violation of 9CFR 381.65(b), establishment slaughtering adulterated product per [9CFR 381.1(b) (v) and PPIA Sec.4 (g)(5)] and per 9CFR 500.2(a)(2&amp; 3) regulatory control action is taken by placing reject tag. On further investigation I observed one plant employee removing cadaver birds coming out of pickers preventing to reach rehang table and throwing on floor, these were 17 cadaver birds were counted. FLS noticed one live bird running inside stunner to get out and removed by plant employee. A cage rack next to</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						<p>scalded had three birds with partially cut necks, slowly bleeding. (b) (6) was asked to follow GCPHP to kill those birds to end suffering. This NR is linked to # F13122083728N dated 08-17-2017. There was no significant improvement from Corrective action / preventive measures submitted by establishment on 08-17-2017 and adopted on 08-18-2017 were either not sufficient or not fully implemented by the establishment to control re-occurrence. On checking the manual slaughter at kill unit, three plant designated employees were not trained enough to perform humane slaughter. (b) (6) was asked to demonstrate and conduct training. At the end of shift from Poultry Condemnation Certificate (FSIS Form 9061-2), I calculated that there were 59 cadavers. Out of 949 condemned carcasses 59 were cadavers' amount to 6.2 % of condemned birds. There is no count available on birds coming out of pickers and thrown into drains.</p>	

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P51165	Summit Poultry, Inc.	FIY2618 084928 N-1	08/21/2017	04C05	381.65(b)	<p>On 08-21-2017 after my two reports to (b) (6) in SDO, at 10:30 am I was called in for correlation on excessive number of cadavers by on line food inspectors at Summit poultry. I visited Summit Poultry to evaluate past two corrective actions/ preventive measures submitted by establishment to control reoccurrence of cadavers and keeping process under control and following was observed: On inspecting the birds reaching for PM disposition had had irregularly slaughter marks on birds necks, back of necks and heads side, extensive mutilation of necks and heads and decapitated but trachea not cut. Some with small nick on sides of neck no blood vessels or tracheas cuts showing corrective action adopted by establishment were not effective and not sufficient enough to control GCPHP violation. Overall there was no significant improvement from Corrective action / preventive measures submitted by establishment on 08-17-2017 and adopted on 08-18-2017. On further investigation I observed one plant employee removing cadaver birds coming out of pickers preventing to reach rehang table and throwing on floor. On checking FSIS Form 6000-16 Poultry Inspection –Lot Tally sheet showed 99 carcasses out of 394 were condemned in cadaver category this amount to be 25.1% of condemned birds during inspection. This reflected that birds were still breathing on entering the scalding die from drowning not from slaughter and are, therefore, considered adulterated and unfit for human food. These cadavers were condemned on postmortem inspection per 9 CFR 381.90. On checking the manual slaughter at kill unit, three plant designated employees were not trained enough to perform humane slaughter. I stopped the evisceration line, took regulatory control rejected the production line under tag# B41-861011 and notified the establishment Manager Mr. Jack</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
						Walton, Roray Botto part owner and (b) (6) . In exit meeting with above mentioned establishment designees management were informed that evisceration process is out on control, there is regulatory violation of 9CFR 381.65(b), establishment slaughtering adulterated product per [9CFR 381.1(b) (v) and PPIA Sec.4 (g)(5)] and per 9CFR 500.2(a)(2& (3) regulatory control action is taken by placing reject tag. This is third NR is linked to NR # FIY5513081721N/1 dated 08-18-2017 On reviewing past corrective preventive measures There was no significant improvement from Corrective action / preventive measures submitted by establishment on 08-17-2017 and adopted on 08-18-2017 were either not sufficient or not fully implemented by the establishment to control re-occurrence.	



EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P51179+V5 1179	Sanderson Farms, Inc.	000420 803082 ON-1	03/20/2017	04C05	381.65(b)	<p>On March 20, 2017 at 0815 hours while performing a PHIS Good Commercial Practices task at the beginning of the live bird dumper. I observed the dump operator remove one live bird from the dumper tracks outside the cages while leaving one remaining live bird alongside it. The remaining bird was crushed alive, slide forward and crushed again by the establishment employee operating the bird dumper. I approached the establishment employee and informed him I observed that there was a live bird that was crushed by the dumper. The dump operator stated that "he knew". This statement leads me to assume the dump operator intentionally and knowingly left the bird to die the way it did, instead of removing it along with the other live bird next to it. I immediately notified (b) (6) of my observation. (b) (6) stated that the employee will be written up for the incident. Live birds in the dumper outside of the cages will result in birds dying by crushing and is not consistent with Good Commercial Practices. It is important to treat poultry in a way that ensures they do not die by means other than slaughter. Employing methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce and unadulterated product. As preventive measures (b) (6) told me he would take disciplinary action against employee.</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	Regs	Description	Status
P45939+V4 5939	Petersburg Poultry Processing	000370 608271 ON-1	08/09/2017	04C05	381.65(b)	During todays Slaughter operations 8/9/2017 at approximately 7:30am, 8:15am and 8:20am one of the plant managers came into the processing room with NO head cover or NO apron on while the production line was running and birds where hanging on the shackles. The manager had blood from the kill floor on his outer clothing and NO apron on. 9 CFR 416.5(b) clearly states Clothing, Aprons, frocks, and other outer clothing worn by persons who handle product must be of material that is disposable or readily cleaned. Clean garments must be worn at the start of each working day and garments must be changed during the day as often as necessary to prevent adulteration of product and the creation of insanitary conditions. Not only is this a federal regulation but in the plants Food Safety System it states; Food Safety System Section 4 Employee Hygiene & Facility Information Page 2of3 Facility Information 1. Clothing color code a. Slaughter-Blue Apron This is a Non-Compliant issue. 9CFR416.5(b)	CLOSED

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M1328 9	Cargill Meat Solutions Corp.	04C05	NRD43150 20122G	2017-02-22	Verified GCP and AM on lot # 1 at 1445 hours. Birds appeared healthy, but hot. Birds in cages were panting, due to it being 76 degrees, sideboards up on cages, no fans on. Notified (b) (6) [REDACTED], fans were turned on for better air circulation. (b) (6) [REDACTED] stated that with it being February, the establishment had not anticipated warmer weather.
M1725 0	Tyson Foods, Inc.	04C05	UQI050701 3012G	2017-01-12	(b) (6) [REDACTED], the District Veterinary Medical Specialist from the Dallas District visited P6 on an unannounced review of Good Commercial Practices. His entrance meeting with the IIC and plant management started at approximately 11:00 am on January 9, 2017. He outlined his intention to perform an audit of slaughter operations on both shifts; including a review of the holding sheds, cage dump, live hang, kill room operations and bird condition before and after the pickers. (b) (6) [REDACTED] was accompanied on his audit by the plant manager Hunter Wray, the (b) (6) [REDACTED] (b) (6) [REDACTED] and one of the three area supervisors in the department. He observed the holding shed and the unloading area (where cages are unloaded from trailers, staged under partially-covered staging bays) and by Hyster, are placed onto the cage dump's transfer belt. He observed the cage dump and the live hang operations. Then (b) (6) [REDACTED] entered the kill room and performed observations and collected counts on animal welfare indices like, stunning and kill-knife efficiencies, the activity of the backup killers, number of broken/bruised legs and wings, and sensibility entering the scald vat. When he completed is site visit, he had an exit meeting of sorts with the IIC. He said that his observations reflected his review of tasks and records in PHIS, that the establishment was compliant with regulations. He suggested a screen to protect staged trailers from direct sunlight and suggested the establishment choose random times to perform daily monitoring activities, instead of within the first two hours of operations. He stayed to repeat his review of second shift operations.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M17250	Tyson Foods, Inc.	04C05	UQI2221033122G	2017-03-22	<p>On Monday, March, 20, 2017 at approximately 2105 hours I performed a good commercial practice verification in the picking room. I positioned myself at a point where I can directly view both lines entering the scald vats. On picking line 2 I observed one small bird, still breathing with no visible neck cuts, entering the scald vat. The bird was hanging limply so it appeared to be properly stunned but its head was tucked; thus allowing it to miss the kill blade. While waiting for the cadaver to exit the pickers, I continued to monitor both lines further in addition to the backup killers. I retrieved the bird from the line once it exited the pickers and then shared my findings with (b) (6). We briefly discussed the drastic difference in bird size with the cadaver vs. other birds on the line and he stated he would address this issue with the backup killers and implement increased monitoring in the area. I returned to the same vantage point approximately 20 minutes later and observed line 2 for 15 minutes and observed no deficiencies as described above. This incident appears to be isolated; no regulatory action was taken and a noncompliance record was not written. FSIS encourages establishments to abide by good commercial practices in the production of poultry to ensure a wholesome product is being produced. The PPIA and FSIS regulations require that poultry be handled in a manner that is consistent with good commercial practices (GCPs), and they not die by means other than slaughter. Management can find useful information in the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005; it contains FSIS recommendations concerning treatment of live poultry before slaughter. Sincerely, (b) (6)</p> <p>cc (b) (6)</p> <p>(b) (6)</p> <p>David Thompson, DVM – Deputy District Manager</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M1798 0	Pilgrim's Pride Corporation	04C05	ZBB271102 2623G	2017-02-23	<p>While observing slaughter operations during a Good Commercial Practices verification task, I observed the following which resulted in the mistreatment of poultry: At approximately 1230 hours on 2/22/2017, I observed two birds hung up on the live hang transfer belt after the cage dumper. I notified (b) (6) and he stopped the dumping after the cage dumper to release the birds. There was one dead bird (cause of death undetermined) and one live bird that were hung up in the gap between the junction of two transfer belts and the teflon bar placed along the edge of the belts. The establishment took corrective actions and resumed operations. I showed (b) (6) my observations where the birds got hung up and he stated that to prevent a recurrence it would be fixed after slaughter operations ended during the down shift. At approximately 1045 hours on 2/23/2017, I verified that the gap between the two transfer belts was closed using a durable flexible plastic so that birds could no longer get hung up in this area. I notified (b) (6) and (b) (6) of this MOI.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M1886 6	Jennie-O Turkey Store Sales, LLC	04C05	WJL33120 44705G	2017-04-05	<p>To: Mr. Nate Weber, plant manager, p551, Jennie-O Turkey Store (b) (6) p551, Jennie-O Turkey Store</p> <p>This Memorandum of Interview will discuss the finding of multiple cadavers at establishment p551, Jennie-O Turkey Store, 2505 Willmar Av. SW, Willmar, MN 56201. The total number of cadavers for the month of March 2017 is well above average and there are some shifts with numerous, multiple cadavers. On the day shift at p551, there were 43 cadavers for the month of March 2017. There were also some shifts with multiple cadavers. For example, there were 17 cadavers on March 16, 2017; 11 cadavers on March 30, 2017, 4 cadavers on March 15, 2017, and 4 cadavers on March 27, 2017. There are other shifts with more than one cadaver.</p> <p>The noticeable increase in cadavers has been discussed many times with plant management, both in weekly meetings and in individual meetings with establishment supervisors.</p> <p>Cadavers were discussed in the following weekly meetings: 2/24/17, MOI dated 3/3/17 3/17/17, MOI dated 3/17/17 3/31/17, MOI dated 4/5/17</p> <p>Various causes have been offered by the establishment management and observations and potential causes proffered by FSIS. As taken from the weekly meeting notes: "On Monday (2/27) and Tuesday (2/28) there were at least 8 carcasses held back for PHV inspection with the knife cut across the jaw or face. The cut needs to be accurate to ensure complete bleed out. The establishment adjusted the auto-knife up which resolved the issue." (b) (6), Weekly Meeting MOI dated 3/3/17</p> <p>"On Thursday (3/16/17) there were 17 cadavers in 2 lots (4 in lot 5278 and 13 in lot 5279). These cadavers were the result of improper cuts. Some hens were cut across the beak, some toms were cut too shallow. (b) (6) discussed this with (b) (6) and (b) (6). Some of the miscuts occurred when the backup killer employee was the regular person and when it was another employee. Some of these cadavers were miscut by the auto killer, where the blade was not set properly resulting in cuts in the wrong location or of inadequate depth." (b) (6), Weekly Meeting MOI dated 3/17/17</p> <p>"Many of the cadavers appear to be miscut; the major blood vessels of the neck are not cut. (b) (6) has discussed this with the various supervisors,</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>including (b) (6), and (b) (6). This has also been discussed in previous weekly meetings. The various causes as told to me by the supervisors include the automatic killer blade set too high or too low, on 3/30/17 the CO2 concentration was a bit higher than usual, and on 3/30/17 it was Halal slaughter so the back up person to the automatic killer blade was not the usual back up person. (b) (6) mentioned that there was a supervisor change in hang and kill around the beginning of March. The supervisor who was in hang and kill for many years transferred to the night shift. (b) (6) stressed this needs to be corrected. (b) (6) also said he would be discussing this with (b) (6) next Monday, 4/3/17." (b) (6), Weekly Meeting MOI dated 4/5/17 Discussions have occurred with individual supervisors as well, including (b) (6) (b) (6) and (b) (6). Various causes as offered by establishment management include: the automatic killer blade is set too low or too high, the blade does not cut deep enough, or the normal back up person for the automatic killer is not there but rather someone with less experience. There were 7 cadavers on 4/4/17. Discussions occurred with (b) (6) (b) (6) and (b) (6) on 4/4/17. (b) (6) indicated that he learned today there are additional adjustments to the automatic killer blade that he was not previously aware of. He as been adjusting the automatic killer blade vertically (up and down), but learned today the blade can also be adjusted horizontally (make the cut deeper or shallower). (b) (6) told me today that (b) (6) and (b) (6) until about one month ago, will review the set up of the automatic killer tomorrow morning. Also, there are now two people to back up the automatic killer instead of the usual one person. (b) (6) and (b) (6) had a discussion regarding cadavers on the morning of 4/5/17. (b) (6) informed (b) (6) that he had met with (b) (6) the previous supervisor of hang and kill, on the morning of 4/5/17; and (b) (6) had reviewed with (b) (6) how to set up the automatic killer blade. In summary, the majority of the cadavers have been caused by miscuts; either the cut was too low, too high, too shallow, or in the wrong location, relative to a given carcass, and the major blood vessels were not cut at all or only partially cut.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M1886 6	Jennie-O Turkey Store Sales, LLC	04C05	WJL18070 93512G	2017-09-12	<p>In attendance: Nate Weber, Plant Manager; (b) (6)</p> <p>(b) (6)</p> <p>On Wednesday morning at 12:46 AM, I observed a turkey crushed between the truck hoist and wall in the live receiving area. The bird had fallen down from the walkway where plant employees remove turkeys from the trailers and place them into the conveyor system to the CO2 stunner. This turkey became wedged between the hoist and the wall, and when the hoist was moved, the bird was crushed to death. I did not see the turkey fall, but I arrived after it was already wedged and crushed. I have occasionally seen turkeys on the ground that have fallen from the walkway. I also regularly observe plant personnel checking under the truck and trailer as the hoist is lowered after unloading is complete. This incident was discussed at the time with the supervisor of this area, (b) (6), who had an idea for a barrier to prevent turkeys from being wedged and crushed in this way. This incident was discussed with plant management at the weekly establishment meeting held on 9/8/2017. At the weekly meeting, (b) (6), the plant engineer, said he will investigate possible solutions. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialists in case additional follow-up is recommended. Respectfully, (b) (6)</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M1963 6	Tyson Foods Inc	04C05	MLG42130 12023G	2017-01-23	<p>Establishment P19636, Tyson Foods On 01/23/2017 at approximately 0925 hours while performing a good commercial practices verification task, I noted a live chicken in the establishment's dead bin which was almost completely entombed by a heavy accumulation of feathers, fecal material, and dead birds. Initially, I observed a pair of yellow legs/feet sticking straight up out of the aforementioned detritus, and upon further observation noted that they were moving. I immediately pulled the bird out and noted that it was conscious and alert. (b) (6), was notified of the aforementioned incident. (b) (6) emptied the dead bin to ensure that all other birds in the bin were dead. (b) (6), was also notified of the aforementioned soon after the incident of poultry mistreatment occurred. In discussion with (b) (6) later that afternoon (1345 hours), he stated that a written response from the establishment would be forthcoming. Federal Register Notice Docket No. #04-037N dated September 28, 2005, "Treatment of Live Poultry Before Slaughter," encourages those involved in the slaughter of poultry to abide by Good Commercial Practices. I advised (b) (6) and (b) (6) that a copy of this MOI would be forwarded to the Jackson District Office and the (b) (6).</p> <p>Respectfully, (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M2032 2	Equity Group Eufaula Div LLC	04C05	ATF170103 2222G	2017-03-22	<p>On March 22, 2017, at approximately 0100 hours, I, (b) (6) [REDACTED] was conducting an observation of Good Commercial Practices in the live hang area. I observed over 30 live birds on the floor, 4 of which were under the wide (dumping) belt, covered with very wet fecal matter. At the end of the live hang belt, there was a pile of dead birds, numbering more than 20. Upon moving several dead birds, I uncovered two live birds. The (b) (6) [REDACTED], came over to this pile of dead birds just as I was starting to unbury the live birds. He then picked them up and placed them on the live hang belt. It is a logical to conclude that these birds I had uncovered, would have died from asphyxiation, without USDA intervention. This would have been death by other means than slaughter. At approximately 0105 hours, (b) (6) [REDACTED], was notified of my findings and subsequent issuance of this GCP MOI. Per Federal Register Docket #04-37N, the establishment is to treat poultry in a manner consistent with good commercial practices and take steps to prevent the mistreatment, harm, and injury by means other than slaughter. Also, such abuse of poultry and the treatment in a manner not consistent with good commercial practices, and death by means other than slaughter, will render the poultry adulterated.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M248B	Butterfield Foods Company	04C05	GXN30170 33113G	2017-03-13	<p>Est. P215, Butterfield Foods Company, March 13, 2017, 1630 hours. In attendance: (b) (6) (b) (6)</p> <p>(b) (6) At 1540 hours on 03/13/2017, while performing a Good Commercial Practices Task in the pinning room, I observed an establishment employee holding a cadaver bird with no neck cut. I notified (b) (6) (b) (6) and immediately presented him with the bird which he proceeded to show the employees at the kill machine. He suggested that there may have been two birds on one shackle causing the bird to not get cut. At approximately 1543, I observed an additional cadaver bird exit the feather pickers. I confirmed that this bird also had no neck cut. I immediately presented the second cadaver bird to (b) (6) who made adjustments to the kill machine. I did not observe any live birds enter the scald tank. At 1630, I discussed my findings with (b) (6) (b) (6). At this time a definitive cause could not be identified by the establishment for the cadavers with no neck cut. It is required that establishments slaughter poultry in accordance with Good Commercial Practices and that all birds are bled out to ensure breathing has stopped prior to entering the scalding.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M2738 9	Pitman Farms	04C05	NCO02070 71721G	2017-07-21	<p>On July 20, 2017 At approximately 03:47 hours while performing a Poultry Good Commercial Practice task, I (b) (6) walked into the new duck line Wax Room. I then headed toward the Live Hang area from the East end of the establishment. At that distance I was able to view a section of the module and one employee grabbing a duck from the cage on the module. This employee did an over-hand tossing motion with a bird to the opposite end of the module. He then pushed the cage in the module and pulled another cage out to remove ducks from the cages. At this point I was able to view the entire module and the employees on the opposite side of the module which was hanging birds on the shackles going into the Stunning/Wax Room. At this point I observed the same employee grab two ducks with one hand and repeated the same over-hand motion he was previously doing to get the ducks to the opposite side of the module. He released both ducks while still in the passing motion. I clearly observed one bird land on its back and the other landed on its side. I observed this unacceptable behavior deeming the process out of control. The employee was unaware that I was approaching and continued to individually pass five more ducks from the cage and on to the module. At this point I was at a close enough distance to ask them to stop hanging birds and to locate a (b) (6) arrived and I informed him of what I had witnessed. I then informed (b) (6) that live hang was stopped for the time being and that I would discuss this occurrence with the (b) (6). During my walk toward the USDA Office I informed (b) (6) and (b) (6) of my findings. After informing (b) (6) of the occurrence, she instructed that both evisceration lines be stopped until further instruction from (b) (6). US reject tag (NO.B41201075) was applied to the live hang equipment. (b) (6) went to Live Hang, confirmed that no birds were being harmed and informed the supervisors of the forthcoming GCP Memorandum of Interview. Both lines were released per (b) (6) instructions and (b) (6) confirmed that the process was back to an acceptable level of Good Commercial Practices.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M2738 9	Pitman Farms	04C05	NCO56060 95405G	2017-09-05	<p>At approximately 2345 hours while performing a Poultry Good Commercial Practice Task, I (b) (6) walked into the new duck line to the CO2 chamber. As I was observing the ducks coming out of the CO2 chamber, I noticed the ducks were not gased and were fully awake. I saw one jump out the green open module (height of jump was approximately well over 6 feet). At this time (b) (6) was observing the situation. She immediately took action by picking up the duck and checked to see if it was hurt, then handed the duck to (b) (6). I proceeded to watch to see what the establishment was going to do with the rest of the ducks that were trying to jump out. As they proceeded to keep hanging live and fully awake ducks, I observed six ducks jump out of the green modules. I immediately told (b) (6) to cover the green modules because the ducks were continuing to jump approximately over 6 feet out of the green modules onto the cement floor. I observed this behavior to be unacceptable and that the process was out of control. I also questioned (b) (6) on the functionality of the CO2 chamber and if the establishment was utilizing their backup stunner. He replied "the CO2 is being worked on and that he will have the ducks go through the back up stunner." I informed (b) (6) that I would be documenting an MOI and that I would discuss this occurrence with the (b) (6). During my walk toward the USDA Office I informed (b) (6), and (b) (6) of my findings. After informing (b) (6) of the occurrence, she immediately walked to the duck line. After she noticed that one duck was running on the floor and another leaped (approximately over 6 feet) from the open green module she instructed (b) (6) and (b) (6) to stop hanging birds until they were able to get the CO2 chamber to function properly. (b) (6) instructed me to observe the establishment's corrective action until all ducks that were not gased and sitting in the three open modules were stunned appropriately. And that no ducks are to be transported on the unloading conveyor without being anesthetized with CO2. At approximately 1227 hours, I confirmed the CO2 gas chamber was functioning properly and that the establishment had their process under control. I stated that there will be a forthcoming GCP Memorandum of Interview.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M32130	Dakota Provisions LLC	04C05	JEB4912031321G	2017-03-21	<p>Est. 32130, Dakota Provisions, 03/21/17, 1135 hours. Meeting Attendance: (b) (6) and (b) (6). On 03/21/17 at 1110 hours, while performing ante-mortem inspection in the live hang department, I noticed a turkey coop in line to be stunned with a turkey's leg that had fallen through the top cage deck and hanging into the next floor below. The cages are designed with 3 compartments/levels per coop. The fiberglass floor was in disrepair which allowed the bird's leg to completely fall through the floor and become trapped. I immediately notified (b) (6), of my observations and concern of the welfare of the bird. He grabbed a small ladder and was able to push the leg up out of the hole. I was unable to determine if the bird was injured while still in the cage. I retained the cage with US Retain Tag. No. B42252089 and when the cage was emptied after stunning, the cage was sent for repair. Further observations of the cage included the following: Approximately a 14 in. by 6 in. hole in the center of the top cage's floor in which the bird's leg had fallen through, a 14 in. slit in the middle cage floor, and the lower level also had a 4 in. by 4 in. slit in the fiberglass floor. There were also 4 broken wires on the outside of the cage that needed to be repaired. A discussion was held with (b) (6) of my observations and concern for animal welfare. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with good commercial practices increase the likelihood of producing unadulterated product.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
M32130	Dakota Provisions LLC	04C05	JEB2709052011G	2017-05-11	<p>Est. 32130, Dakota Provisions, 05/11/17, 0835 hours. Meeting Attendance: (b) (6) and (b) (6). On 05/11/17 at 0810 hours, while performing ante-mortem inspection, (b) (6) and I observed a turkey with his wing caught between the framework and the fiberglass floor above him. The bird was discovered in trailer #10, front cage, bottom tier under the trailer shed outside. The cages are designed with 3 compartments/levels per coop and the floors are comprised of green fiberglass material held to the cage framework with rivets. I immediately notified (b) (6), and (b) (6) of my observations and concern of the welfare of the bird. (b) (6) tried to free the wing from the floor above but the weight of the birds above made it impossible to free the wing without harm. The establishment then brought out a bar to leverage between the floor and framework which took pressure off the wing and allowed the wing to be dislodged. I evaluated the turkey and didn't see that the wing was broken or dislocated from the entrapment. I placed US Reject Tag No. B42252120 on the cage so it could be evaluated later today. A discussion was held with (b) (6) of my observations and concern for animal welfare at 0835 hours. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with good commercial practices increase the likelihood of producing unadulterated product.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M3213 0	Dakota Provisions LLC	04C05	JEB230705 5916G	2017-05-16	<p>Est. 32130, Dakota Provisions, 05/16/17, 0710 hours. Meeting Attendance: (b) (6) and (b) (6). On 05/16/17 at 0647 hours, while performing ante-mortem inspection, I observed a turkey with his right wing caught between the framework and the fiberglass floor above him. The bird was discovered in trailer #1, front cage, bottom tier under the trailer shed outside. The cages are designed with 3 compartments/levels per coop and the floors are comprised of green fiberglass material held to the cage framework with rivets. I immediately notified (b) (6) of my observations and concern of the welfare of the bird. (b) (6), was also notified. (b) (6) used a bar to leverage between the floor and framework which took pressure off the wing and allowed the wing to be dislodged. I evaluated the turkey and didn't see that the wing was broken or dislocated from the entrapment. It did have a superficial cut. I placed a US Reject Tag No. B42252160 on the cage so it could be repaired. The fiberglass floor was inadequately riveted in place which allowed the wing to become trapped. This was previously discussed and documented in MOI JEB0206055711I written on 5/11/17. It was also discussed in the establishment weekly meeting on 5/11/17. A discussion was held with (b) (6) of my observations and concern for animal welfare at 0710 hours. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with good commercial practices increase the likelihood of producing unadulterated product.</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M3213 0	Dakota Provisions LLC	04C05	JEB510905 2418G	2017-05-18	<p>Est. 32130, Dakota Provisions, 05/18/17, 0530 hours. Meeting Attendance: (b) (6) and (b) (6) On 05/18/17 at approximately 0500 hours, while performing ante-mortem inspection, I observed (b) (6) observing a bird on a trailer that had his right wing caught between the framework and the fiberglass floor above him. The bird was discovered in trailer #31, front cage, bottom tier under the trailer shed outside. The cages are designed with 3 compartments/levels per coop and the floors are comprised of green fiberglass material held to the cage framework with rivets. (b) (6) used a bar to leverage between the floor and framework which took pressure off the wing and allowed the wing to be dislodged. I evaluated the turkey and didn't see that the wing was broken or dislocated from the entrapment, but the wing was bruised. I placed a US Reject Tag No. B42252164 on the cage so it could be repaired. At approximately 0600 hours, the establishment had to free another bird with his wing trapped on trailer #3. Once dislodged, this bird had a small laceration and was bleeding, but the wing did not appear broken. I placed US Reject Tag No. B42252163 on the cage to follow up with the cage repair. The fiberglass floors are inadequately riveted in place which allowed the wings to become trapped. This was previously discussed in two other instances which were documented in MOI JEB02060557111 written on 5/11/17 and MOI JEB2207055216L written on 5/16/17. It was also discussed in the establishment weekly meeting on 5/11/17. A discussion was held with (b) (6), of my observations and concern for animal welfare at approximately 0530 hours. (b) (6) instructed Quality Control personnel in the live hang department to look at all cages today and place hold tags on the cages needing repair. All cages will be repaired May 19th and 20th. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with good commercial practices increase the likelihood of producing unadulterated product.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
M322A	Pilgrim's Pride Corporation	04C05	CNC47130 62323G	2017-06-23	<p>During day shift production at P322/Pilgrim's Pride, Corp., Cold Spring, Minnesota on the 23rd of June 2017, the following observations were made by (b) (6) in the evisceration production space and picking room area upon alert by on-line USDA food inspectors in the evisceration department: Between 09:20am and 09:35am, 6 carcasses came through USDA inspection on line 1 demonstrating dark red to purple coloration of the neck, upper breast and wings. Three of the carcasses had heads attached with no neck cut observed. The heads were swollen and red/purple colored. Viscera on all six carcasses demonstrated poor bleed out of the liver, with two demonstrating blood pooling in the cavity. Of the three carcasses without heads attached, two had neck skin removed exposing dark red/purple tissues along the neck muscle, with the third carcass having the neck with a dark red/purple appearance. The viscera on these three carcasses demonstrated poor bleed out of the liver, with one demonstrating pooling in the cavity. From 09:35-09:45am, two additional carcasses came through USDA inspection demonstrating dark red to purple coloration of the neck, upper breast and wings. The heads were removed. Eight carcasses were retained by USDA with Retain Tag: B38189060. The carcasses demonstrate poor bleed out in violation of the requirements of 9CFR 381.65(b): "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses...". The carcasses demonstrated characteristics of uncut cadaver carcasses. (b) (6) was notified at 09:35am of the initial carcasses. No supervisor was available in the evis. department for discussion with me. (b) (6) reported to me at 09:40am of verbally notifying (b) (6) (b) (6). Walking through the evisceration process to the rehang table, (b) (6) was observed carrying a headless carcass with dark purple/red coloration of the upper breast skin, wings and neck and placed in a condemned barrel. In that condemned barrel, two additional headless carcasses were observed with the aforementioned dark purple/red coloration of the upper breast skin, wings and neck. No fewer than 8 swollen heads with dark purple/red coloration were also found in this barrel. The barrel was located at the right side of the rehang table. Upon walk through the dip tank room on the way to the</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>picking room space, one cadaver carcass with a head attached was on the shackle line. Upon arrival to the picking room space, one manual (est. employee) back-up cutter was present covering both production lines. Birds appeared unresponsive between the stunner and back-up stunner system. The machine/manual cutter appeared to be performing on a majority of carcasses through the line. One bird missed the manual cutter and was cut by the back-up cutter. The previous Good Commercial Practices (GCP) verification performed at 06:20am did not have any observed deviations between the stunner to rehang table. GCP of the slaughter process right before and during the 09:25am evisceration event could not be verified. While walking back to the evisceration department space, a second condemned barrel was observed near the rehang space behind the rehang crew at the middle of the rehang table space. This barrel was observed to have two carcasses with the head attached with the aforementioned dark purple/red coloration of the upper breast skin, wings and neck. One carcass was observed to be headless. The multiple locations of these cadaver carcass findings along the slaughter process demonstrate loss of process control. No corrections were made to the process as it was reported to USDA that the cadaver events occurred around a grower/lot change. In-house documentation was cited for the est. personnel involved. USDA personnel discussed with establishment management (b) (6) ) when sporadic uncut cadaver events occurred during slaughter production the 20th and 22nd of June 2017. Cadavers observed during production were discussed during the 13th of June 2017 (MOI CNC3110062314G), 11th of April 2017 (MOI CNC0816044212G), and 14th of March 2017 (MOI CNC1818033414G) weekly meeting.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M322A	Pilgrim's Pride Corporation	04C05	CNC41050 72207G	2017-07-07	<p>The purpose of this Memorandum of Interview is to document the recent events regarding an increase in poorly bled carcasses condemnable as cadavers at USDA inspection stands over the past two production nights at P322/Pilgrim's Pride, Corp., Cold Spring Minnesota. During night shift production the morning of the 6th of July 2017, I made the following observations in the evisceration production space upon alert by on-line USDA food inspectors: During the 4:15 inspector relief break, I was told by an inspector that she had condemned 3 cadavers within approximately a one hour time frame on line 2 stand 1. The condemn barrels had been emptied before I got there however so I could not verify those carcasses. While performing post mortem inspection during that 10 minute break on line 2 stand 1, I condemned one carcass that had come through USDA inspection demonstrating dark red to purple coloration of the upper breast, back and wings and although the head had been pulled off it also had neck skin removed exposing dark red/purple tissues along the neck muscles. After performing the second 10 minute inspector relief break on line 2 stand 2, I went to line 2 stand 3 where the inspector had hung back two cadavers. One of the carcasses had the head attached with no neck cut. The head was swollen and red/purple colored and both had neck, breast, back and wings discolored dark red/purple. I retrieved two other cadavers with similar appearance as above from the condemn barrel on line 1 stand 1 that an inspector notified me of. I set aside these 5 carcasses (see photo) on the table in front of the quality office in evis. at approximately 4:40 am and notified (b) (6) who said he would inform (b) (6) I saw (b) (6) and showed her the cadavers and she said no one notified her and that she would address it. I walked to the evisceration rehang table and saw a cadaver in the white tote next to the rehang table with a head on and no neck cut. The head was dark red/purple in color and swollen and the neck, upper breast and back and wings were dark red/purple. At the end of the rehang table in the catch bin there were no fewer than 15 dark purple to red swollen cadaver heads (see photo). There was an additional head on uncut cadaver in a condemn barrel located near the right end of the rehang table as well. When I walked through kill and pick at approximately 5:00am, there were very</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>few carcasses on the line and the birds on the line at that time appeared unresponsive between the stunner and back-up stunner system. The machine neck cutter appeared to be performing cuts on a majority of carcasses through the line. One bird missed the manual cutter and was cut by the back-up cutter. While in live receiving I noticed all of the blue hats at the far end near where the trucks exit loading drawers manually into mods. Good Commercial Practices (GCP) of the slaughter process right before and during the 4:15am USDA inspector relief breaks could not be verified. The previous GCP verification performed at 12:10am did not have any observed deviations between the stunner to rehang table. However, over the past several weeks it has been noted that one manual (est. employee) back-up cutter was present covering both production lines, whereas it had previously always been two back-up cutters. During the night shift of July 7th I asked the line inspectors to hang back all cadavers for me to verify. From start up to midnight there were only three cadavers condemned by USDA that I collected and put in the condemn barrel. Between 12 am and the lunch break at 2:04am, the line inspectors had hung back a total of 10 cadavers. Three cadavers were head on without a neck cut. They had dark swollen heads and red/purple discoloration to the head, neck, breast, back and wings. The remaining 8 did not have heads but had the characteristic red upper breast, back, and to varying degrees wings. I set all carcasses on the table outside of the Quality Office and notified (b) (6) and (b) (6). (b) (6) told me that he would notify (b) (6). Later, I spoke again with the (b) (6) and he said that both employees that were responsible for back up cutting had be counseled and that they would be staffing the back up cutter with two cutters for the rest of the shift on 7/7. He mentioned that employees at the 1st processing rehang table have been instructed to remove all heads and that he will discuss with (b) (6) regarding the procedure moving forward. These carcasses demonstrate poor bleed out in violation of the requirements of 9CFR 381.65(b): "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses...". The carcasses demonstrated characteristics of uncut or inadequately cut cadaver carcasses. Additionally, pulling off cadaver heads at</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>rehang could be interpreted as establishment intending to interfere with USDA line inspectors ability to identify and thus condemn cadavers. (b) (6) discussed with establishment management (b) (6) ) when sporadic uncut cadaver events occurred during slaughter production the 20th and 22nd of June 2017. Cadavers observed during production were discussed during the 13th of June 2017 (MOI CNC3110062314G), 11th of April 2017 (MOI CNC0816044212G), and 14th of March 2017 (MOI CNC1818033414G) weekly meeting.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M4412 1	Pelleh Poultry Corp.	04C05	000141603 1505G	2017-03-05	<p>At establishment 44121P, Pelleh Poultry, a meeting was held with (b) (6) at 15:00 to discuss good commercial practices and mistreatment of poultry. During ante mortem and prior to the start of slaughter operations while unloading the poultry crates from the receiving trailer many chickens were observed dead on arrival, (DOA). Later in the day it was determined that approximately 1,200 chickens had been received DOA. During the MOI meeting with (b) (6) he stated that the trailer had arrived at the establishment at around 04:38 A.M. The temperature outside was between 0 and 20 degrees fahrenheit during time of transportation and receiving. We determined that the chickens had froze to death with the majority occurring during transport. The trailer of chickens was protected with outside plastic or tarp, however it was insufficient to prevent the deaths of the chicken during extreme cold. The establishment does not have an inside protected truck and trailer bay to hold live birds thus, the load is delivered outside and left there prior to employees beginning work. I determined that the chickens had been mistreated while they are required to be handled in a manner that prevents needless injury or suffering. Preventing mistreatment of poultry decreases the production of adulterated carcasses. There is not an ongoing trend of birds dying otherwise by slaughter at the establishment and this appears to be a rare circumstance and incident due to the severe cold. The establishment contacted the flock owner, however I am unaware of the conversation that took place. (b) (6) had no further comments to provide during the MOI. The establishment may go to their individual documents and add a response in the plant response text field or upload an attachment if they have access to E Authentication, PHIS account. I am not certain at the time if they have this access. Secondly, the establishment may provide a written response to this MOI in regards to the mistreatment of poultry if they decided to.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M4513 4	Birdsboro Kosher Farms Corp.	04C05	000041601 2023G	2017-01-23	On 01/23/2017 at approximately 1200 hours, while (b) (6) and I were performing Good Commercial Practice task in receiving area, we observed about 12 cages on a truck being held in the truck bay, were broken with a hole of 3-5 inches which is enough for passing heads and wings of chickens and expose them to injury. In the entrance meeting, we addressed this issue with (b) (6), and Mr. Urieta, Plant Manager. We clarified that damaged cages are not in accordance with Good Commercial Practice. The establishment stated that they had already addressed it and are going to implement a record keeping for monitoring of the cages.
M4513 4	Birdsboro Kosher Farms Corp.	04C05	FKJ240809 4605G	2017-09-05	On 09/04/2017 at approximately 720 hours, I was walking through the ante-mortem area and looked inside the DOA barrel and found a slaughtered bird that wasn't completely dead and still aive. I stopped the line and informed Mr. Urieta, Plant Manager and (b) (6). The bird was removed from the barrel and put in the area specified for that situation until it died and stopped moving, and then was moved to DOA barrel. It is not consistent with Good Commercial Practices to have live birds in a situation where they could be smothered by dead birds. Under the Poultry Products Inspection Act (PPIA) and Agency requirements, live poultry must be handled in a manner that is consistent with good commercial practices, which means they should be treated humanely. (b) (6)



EstNbr	EstName	Task_Code	MOI#	Date	Description
M56	PILGRIMS PRIDE CORPORATION	04C05	MBJ0612020902G	2017-02-02	<p>On 2/2/17 at around 6:55am I, (b) (6), was performing Good Commercial Practices. In live hang, I observed a large pile of DOAs (about 20-25 birds) at the end of the live hang belt. I immediately began to sift through the pile and found a live bird at the very bottom. The bird's left leg was splayed so it was not able to move itself. On the other side of the pile, I found another live bird buried under several birds. I removed both live birds from the pile. I observed as a live hang employee picked up a few birds before returning to the line, and then a floor man picked up all of the DOAs. Shortly after, I spoke to (b) (6) and (b) (6) about my findings and how live birds buried underneath DOAs was unacceptable. (b) (6) informed me that he would talk to live hang personnel about picking up DOAs in a timely manner. I informed (b) (6) that my findings would be documented. My findings are not in keeping with Good Commercial Practices. Measures should always be taken to ensure that poultry are handled and kept in conditions that will not result in death or injury unnecessarily. In addition, "employing humane methods of handling and slaughtering that are consistent with good commercial practices increases the likelihood of producing unadulterated product". Establishment P56 is hereby advised to address the above observations and take preventative measures to reduce the likelihood of occurrence. (b) (6) Cc'd (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M56	PILGRIMS PRIDE CORPORATION	04C05	MBJ0909051224G	2017-05-24	<p>On 5/23/17 at around 1:50pm I, (b) (6), was in live hang performing Good Commercial Practices. I noticed there to be a pile of about 10 DOAs at the end of the conveyor belt. The pile was moving up and down in a rhythmic pattern at the top right corner. I found there to be a live bird underneath a DOA and, wedged between 2 DOAs and a wall of chicken feathers/dirt. Upon my uncovering the live bird, the bird began to gasp for air. I was attempting to remove the bird out of the way of falling DOAs when (b) (6) appeared. I informed him of my findings and brought his attention to the live bird. (b) (6) said he would immediately pick up the DOAs and I observed him do so. He put the live bird back on the belt. At the weekly meeting at 2:15pm I informed management of my findings. I explained that warmer temperatures meant that DOAs would be presenting more frequently and that the establishment was responsible for making the necessary provisions to keep up with the increase. Lastly, I emphasized that it was not acceptable for live birds to be buried under DOAs. My findings are not in keeping with Good Commercial Practices. Measures should always be taken to ensure that poultry are handled and kept in conditions that will not result in death or injury unnecessarily. In addition, “employing humane methods of handling and slaughtering that are consistent with good commercial practices increases the likelihood of producing unadulterated product”. Establishment P56 is hereby advised to address the above observations and take preventative measures to reduce the likelihood of occurrence. (b) (6) Cc'd (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
M56	PILGRIMS PRIDE CORPORATION	04C05	MBJ10090 63002G	2017-06-02	<p>On 5/31/2017 (b) (6) conducted a Good Commercial Practice Correlation Visit at Est. P-56. At approximately 12:54 PM she and (b) (6), were in the pinning room observing the birds prior to entering the scalders. (b) (6) saw a live conscious bird about to go into the scalders. She informed (b) (b) (6) who was able to remove the bird from the shackle before the bird could enter the scalders. My above findings are noncompliant with 9 CFR 381.65(b): "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. Any deviation from Good Commercial Practices is unacceptable. Since this is an isolated incident, it will not be registered as a noncompliance record because the establishment's process appears to be in control, and no further birds were observed entering the scalders. This MOI serves as a written notice that future deviations may result in the taking of additional administrative actions. Please submit documentation of corrective and preventive measures to prevent a recurrence.</p> <p>(b) (6) at Est. P-56 cc: (b) (6) Raleigh District (b) (6), Raleigh District Dr. Roger Murphy, DDM, Raleigh District (b) (6), Harrisonburg Circuit (b) (6) Est. P-56</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M5842	Tyson Foods, Inc.	04C05	NPF14120 11618G	2017-01-18	<p>TO: Matt Evans, Plant Manager, Est. 5842P, Tyson Foods Berry Street Plant, Springdale AR. Subject: Issues with Good Commercial Practices on the 18th of January 2017. On Wednesday January 18th, 2017 while on our way to give inspector breaks on the evisceration lines at approximately 0730 hours, I observed in the area between the backup venter station and the venter machine, 1 carcass hanging on a grey evisceration line shackle moving down the line with the neck having no apparent cut and the head still attached. The carcass was not bled out at all, was bright red in color, and appeared to have died of other means than the normal slaughter process. This was shown to (b) (6) at the time of the observation by (b) (6) who was present at the time of the observation and the carcass was condemned. (b) (6) informed (b) (6) of the issues and informed him that IPP would be documenting an MOI. (b) (6) performed follow up observations of the killing process and no further issues were observed and it was assumed by (b) (6) that it was an isolated incident and there was no loss of process control. The issue was conveyed to (b) (6) as well as (b) (6) at approximately 1200 hours on the 18th of January 2017. (b) (6) Est. 5842P Springdale, AR</p>
M5842	Tyson Foods, Inc.	04C05	NPF20230 35314G	2017-03-14	<p>Subject: Issues with Good Commercial Practices. On Tuesday March 14, 2017 while providing breaks to the Food Inspectors at approximately 2145 hours, I observed one of the carcasses presented for inspection at Post Morten inspection station 3 evisceration line 2, with the neck intact, having no apparent cut and the head still attached. The carcass was not bled out and was bright red in color, and appeared to have died of other means than the normal slaughter process. This carcass was removed from the line and shown to (b) (6) and (b) (6) and I (b) (6) informed (b) (6) that IPP would be documenting an MOI. At 22:20 hours, (b) (6) performed follow up observations of the killing process and no further issues were observed, it appeared that it was an isolated incident and there was no loss of process control. (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M5842	Tyson Foods, Inc.	04C05	NPF41060 42603G	2017-04-03	<p>TO: Hunter Wray, Plant Manager, Est. 5842P, Tyson Foods Berry Street Plant, Springdale AR. Subject: Issues with Good Commercial Practices on the 3rd of April, 2017.</p> <p>On Monday, April 3rd,, 2017 while on our way to give inspector breaks on the evisceration lines at approximately 0600 hours, (b) (6) and (b) (6) observed in the area between the backup venter station and the venter machine, 1 carcass lying on the floor next to a yellow condemned barrel having no apparent cut and the head still attached. The carcass was not bled out at all, was bright red in color, and appeared to have died of other means than the normal slaughter process. This was shown to (b) (6) at the time of the observation by (b) (6). The carcass was taken by (b) (6) to show to the responsible parties to insure no further issues would arise and then condemned by (b) (6) informed (b) (6) of the issues and informed him that IPP would be documenting an MOI. (b) (6) performed follow up observations of the killing process and no further issues were observed and it was assumed by (b) (6) that it was an isolated incident and there was no loss of process control. The issue was conveyed to (b) (6) at approximately 0700 hours on the 3rd of April 2017. (b) (6) Est. 5842P Springdale, AR</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M5842	Tyson Foods, Inc.	04C05	NPF38000 40208G	2017-04-08	<p>Subject: Issues with Good Commercial Practices. On Friday April 7, 2017, while providing breaks to the Food Inspectors at approximately 1605 hours, I observed one of the carcasses presented for inspection at Post Mortem inspection station 1, evisceration line 2, with the neck intact, having no apparent cut and the head still attached. The carcass was not bled out and was bright red in color, and appeared to have died of other means than the normal slaughter process. Also at the same station three DOA carcasses were presented to me for inspection, the carcasses were purplish in color the viscera appeared congested. The carcasses and viscera were exhibit signs of decomposition (visceral organs, carcass discoloration and condition odor). These carcasses were removed from the evisceration line 2. Another DOA carcass was presented for inspection at Evisceration line 1, station 2, and was removed by (b) (6). All the carcasses were shown to (b) (6) and (b) (6). After discussing this observation with management. I (b) (6) and (b) (6) elected to observed production at rehang area, 5 more DOA carcasses were observed in the condemned barrels. These carcasses were also shown to management. (b) (6) was present went I (b) (6) informed (b) (6) that all the DOA carcasses should be condemned at ante-mortem inspection and not brought into the slaughter process. He was also informed of my intentions of documenting an MOI. At 1700 hours, I (b) (6) performed follow up observations of the killing process and no further issues were observed. (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M5842	Tyson Foods, Inc.	04C05	NPF46080 74307G	2017-07-07	<p>TO: Hunter Wray, Plant Manager, Est. 5842P, Tyson Foods Berry Street Plant, Springdale AR. Subject: Issues with Good Commercial Practices on the 7th of July, 2017. On Friday, July 7th,, 2017 while giving inspection relief breaks on Evisceration Line #1at inspection station #2, at approximately 0749 hours, (b) (6) observed 1 carcass presented for post mortem inspection having no apparent cut and the head still attached. The carcass was not bled out at all, was bright red in color, and appeared to have died of other means than the normal slaughter process. This was shown to (b) (6) at the time of the observation by (b) (6). The carcass was presented to (b) (6) at approximately 0800 hours who verified that the bird had died from other means than slaughter. (b) (6) informed (b) (6) of the issues and informed him that IPP would be documenting an MOI. (b) (6) performed follow up observations of the killing process and no further issues were observed and it was assumed by (b) (6) that it was an isolated incident and there was no loss of process control. The issue was conveyed to (b) (6) at approximately 0830 hours on the 7th of July 2017. (b) (6) Est. 5842P Springdale, AR</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
M5842	Tyson Foods, Inc.	04C05	NPF58110 74514G	2017-07-14	<p>GCP MOI Day, Date and Time of Meeting: Saturday 7/8/2017 from approximately 1105 to 1111 Place Meeting Held: Est. M5842 Live Hang Room Persons Attending: FSIS Attendees - (b) (6) . Tyson Foods Attendees - (b) (6) (b) (6) on shift 1. Author(s) of this Meeting Report: (b) (6) Date this Meeting Report was Written: Saturday Friday 7/14/2017. Subject: GCP Poultry Mistreatment MOI. Background concerning this Poultry Good Commercial Practice (GCP) Non-Regulatory Issue: On Saturday 7/8/2017 from 1009 to 1022 CST (b) (6) performed a station 1 Poultry Good Commercial Practices (GCP) PHIS task by observing carcasses entering the first scald tank on kill line 2 located in the picker room at Est. M5842. At 1014 during this check (b) (6) observed 1 live bird that had no cut on its neck, was conscious, eyes open, neck curved upward looking around, panting and alert. (b) (6) removed this live bird from kill line 2 at 1014, immediately before the bird would have entered the first scald tank on kill line 2, and placed this live bird on the picker room floor. The bird stood up on the floor with its neck extended, head up, eyes open breathing rapidly. (b) (6) showed this bird to plant picking room attendant at approximately 1015; then (b) (6) continued this GCP station 1 check. The plant Live Hang Supervisor and Evisceration GPM both arrived at on the scene at approximately 1017 and (b) (6) met with them at this time and showed them the live bird. (b) (6) then continued the station 1 check, which was completed at 1022 with no more live birds observed. (b) (6) Then met with the plant Live Hang Supervisor at the station 1 check site and told the Live Hang Supervisor that he would go to the USDA office to get more station 1 check forms then return to the picker room to perform follow up checks. (b) (6) returned to the Picker Room to perform these follow up checks at 1033. (b) (6) then performed a GCP Station 1 follow up check #1 on kill line 2 from 1034 to 1042, follow up check #2 on kill line 1 from 1044 to 1052 and follow up check #3 on kill line 2 from 1054 to 1102. No GCP NCs or non-regulatory concerns were observed during any of these 3 follow up checks. (b) (6) met with the Live Hang Supervisor, who remained at the check site locations during the entire follow up check process, briefly after each of the 3 follow up checks. Discussion notes for the meeting with Plant</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>Evisceration GPM on Saturday 7/8/2017 from 1105 to 1111 concerning this GCP poultry mistreatment incident: (b) (6) met with the establishment evisceration GPM on shift 1 in the SPHV's office from 1105 to 1111 on Saturday 7/8/2017. During this meeting (b) (6) described his observations concerning this incident as outlined above (b) (6) told the establishment evisceration GPM at this meeting that due to the results of the 3 follow up checks on 7/8/2017 performed from 1034 to 1102 the 1 live bird he'd observed and removed from kill line 2 at 1014 before it entered the first scald tank during the GCP check that day was deemed by IPP to be an isolated incident and not a loss of plant killing process control. Thus IPP will issue this Poultry Mistreatment MOI in lieu of a GCP NR concerning this incident as per guidance in FSIS Notice 44-16 dated 6/27/2016. The last time a live bird was removed from one of the 2 plant the kill lines immediately before that bird entered the first scald tank during a GCP station 1 check performed by IPP at Est M5842 was on 7/25/2016 and is documented on Poultry Good Commercial Practices MOI NPF0007071526I.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M5842	Tyson Foods, Inc.	04C05	NPF19100 73514G	2017-07-14	<p>GCP MOI Day, Date and Time of Meeting: Wednesday 7/5/2017 from approximately 0604 to 0608 Place Meeting Held: Est. M5842 Live Hang Room Persons Attending: FSIS Attendees – (b) (6). Tyson Foods Attendees – Joel Ferguson, APM; (b) (6) of shift 1. Author(s) of this Meeting Report: (b) (6) Date this Meeting Report was Written: Saturday 7/8/2017 &amp; Friday 7/14/2017. Subject: GCP Poultry Mistreatment MOI.</p> <p>Background: On Wednesday 7/5/2017 at approximately 0600 one of the CSIs on our in-plant inspection team told (b) (6) (b) (6) that the kill line 2 live hang belt or live in the plant live hang room had stopped due malfunction and as a result live young chickens were allowed to had pile up on this belt resulting in birds on the bottom of the belt dying by suffocation. (b) (6) then proceeded to the Live Hang room to perform the good commercial practices PHIS task for that shift from 0604 to 0608. Upon arrival in the Live Hang room (b) (6) observed plant personnel pushing dead young chickens on the surface of this kill line 2 live hang belt to the south end of the belt then onto a pile of dead young chickens located on the floor adjacent to the west end of this belt. This pile of smothered carcasses was approximately 7’ long, up to 5’ wide and up to 4’ high. The day shift APM and Live Hang supervisor were already on the scene when (b) (6) arrived in the live hang room. The Following was Discussed at the Subsequent Meeting Concerning this Issue: (b) (6) asked the plant APM what had occurred then asked the APM how many birds died of suffocation due to this belt malfunction and subsequent piling up of live birds one upon another. The APM told (b) (6) that plant personnel would count the number of birds that had died from suffocation then give him this information later. (b) (6) then told the APM that he would write a GCP MOI or NR to document this incident based on the advice of the DVS and left the live hang area at approximately 0610. Subsequently the plant told (b) (6) that approximately 200 live birds had suffocated during this incident. (b) (6) contacted the DVS about this incident and the DVS recommended that a GCP MOI be written. (b) (6)</p> <p>Assigned to Est. M5842 CC: (b) (6), Joel Ferguson, (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M5842	Tyson Foods, Inc.	04C05	NPF26110 80011G	2017-08-11	On Friday August 11th, 2017 while performing Operational Sanitation Inspection in the area of the rehangers for lines #1 and #2 at approximately 1105 hours, I observed a carcass being conveyed on the belt which appeared to be a cadaver. The carcass was not bled out at all, was bright red in color, and appeared to have died of other means than the normal slaughter process. Upon removing the carcass from the rehangar belt for evisceration line #1, I observed that the head was still attached and there was no cut present anywhere on the carcass that would have shown that it would have been killed by the normal slaughter process. This carcass was shown to (b) (6) at the time of the observation. The carcass was then presented to (b) (6) whom also confirmed that the carcass had been killed from other means than the normal slaughter process.
M5842	Tyson Foods, Inc.	04C05	NPF19080 95712G	2017-09-12	On Monday September 11th 2017, I was informed by the line inspector on evisceration line #1 station #3 that he had found a carcass with the head still attached and no cut in the neck or head. I observed the carcass on the inspectors PM evaluation hook for and observed that it was a carcass that had died from other means than the normal slaughter process. The carcass was also taken to (b) (6) who also verified this as a carcass that died from other means than the normal slaughter process. This carcass was shown to (b) (6) at the time of the observation who agreed with the determination by IPP.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M6137	Foster Farms	04C05	BXL210101 4510G	2017-01-10	<p>At establishment P-6137 on 01/09/2017, I (b) (6) and (b) (6) found the following: At approximately 0145 hours, while performing Poultry Good Commercial Practices Task, we were observing the birds after the stunner (line (b) (6)) for stunning effectiveness. Several birds were blinking their eyes and/or lifting their heads showing that they were not properly stunned before they entered the kill machine. This is an indication that the birds are still awake. (b) (6) showed up and (b) (6) informed him about the issue and instructed him to immediately stop hanging live birds on Line (b) (6). (b) (6) informed us that it was almost time for lunch break and the maintenance personnel was going to look into it and after this period the line will be ready for a recheck. At approximately 0241 hours, the line started and we observed six birds blinking their eyes and/or lifting their heads in less than 30 seconds. (b) (6) instructed (b) (6) to immediately stop hanging live birds. Maintenance worked on the Stunner again and at approximately 0305 hours the line resumed again and failed. At approximately 0315 hours and 0325 hours, I performed rechecks. Both of the rechecks failed, the first recheck had 15 birds that were not properly stunned and the second had 7 birds not properly stunned. This exceeds the limit of five birds that the Establishment allows on a five hundred bird sample. At approximately 0340 hours, after a passing recheck, the line was released. We informed (b) (6) that an MOI will be documented.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
M6137	Foster Farms	04C05	BXL541308 3730G	2017-08-30	<p>At Approximately 1025 Hours, while walking through the live hang area in plant 2, (b) (6) observed numerous dead and live birds on the floor around the area where establishment personnel are hanging birds on shackles on line (b) (6). He also observed a live bird become stuck under the end plate at the end of the conveyor at the last live hang station for line (b) (6). The chicken was stuck, and as the conveyor moved, additional birds continued to push the caught bird against the end plate, a process that was smothering the live bird. In addition, while observing the live hang area in line (b) (6), he observed a pile of mixed live and dead birds, and when one of the plant employees began moving live birds, another live bird was observed to be underneath the pile. In both cases, (b) (6) informed the lead person that was there at the live hang area about what he saw, and they took immediate corrective action. (b) (6) informed me about his observations and I immediately called (b) (6) and called him to discuss these observations at the USDA office in Plant 2. (b) (6) and myself reminded (b) (6) that live poultry need to be handled in a manner that is consistent with Good Commercial Practices (GCPs) and any incidences similar to the above will be grounds for USDA instituting a regulatory control action on the area. We reminded (b) (6) that the PPIA and Agency Regulations do require that live poultry be handles in a manner that is consistent with good commercial practices, and that they not die from other causes other than slaughter. Please review Federal Register Notice Vol. 70, No 187, published September 2005 (Docket No. 04-037N) for FSIS recommendations concerning treatment of live poultry before slaughter. (b) (6) was informed that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. (b) (6) USDA-FSIS Alameda Distcirt</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M737	House of Raeford - Wallace Div	04C05	DHA22030 20914G	2017-02-14	<p>P737 House of Raeford-Wallace Division, 2/14/17 at approximately 0300. In attendance: (b) (6). While performing a Good Commercial Practices task shortly before 0300, I observed a live bird in the DOA bin. This DOA bin is a forklift front end loader attachment, one flat end flush with the ground with a deeper opposite end. The DOA bin was half full and the bird was located near one of the deep corners. It was crouched down on top of dead birds with numerous dead birds around it and behind it at the low edge of the bin. The bird was very quiet, but alert and alive. It did not have any denaturant on it. Other nearby dead birds did have denaturant on them. Due to its location in the bin and amount of dead birds around it, the bird had not walked into the bin on its own. I did not see any other live birds in the DOA bin. (b) (6) was immediately notified. She observed the bird in the bin and then the bird was pulled out and was active while held, and stood quietly when placed on the ground. Given the bird's location in the DOA bin, the next barrel of DOAs from live hang would have been dumped on top of this live bird. The bird in question would then have suffocated and died by means other than slaughter. It is the establishment's responsibility to ensure that birds are slaughtered in accordance with 9 CFR 381.65(b). I informed (b) (6) that this finding of a live bird in the DOA bin was improper handling and would result in a MOI. The bird appeared healthy and with no presence of denaturant on the bird, I approved it to go on to slaughter. (b) (6) told me that the establishment employees would receive retraining on proper good commercial practices, and she would further investigate how this bird ended up in the DOA bin. This MOI will be forwarded to the District Office and the District Veterinary Medicine Specialist (DVMS) in case additional follow up is recommended. If you have any questions or concerns regarding this MOI, please feel free to contact myself or (b) (6). Respectfully, (b) (6).</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M7478	Tyson Foods, Inc.	04C05	LDB300809 0218G	2017-09-18	<p>On 9/14/17, at approximately 13:15 hours while performing a Good Commercial Practices check, I observed 2 birds with shallow cuts proceeding down line (b) (4) to enter the scalders. When I initially saw the first bird, I noticed that its eyes were wide open and it was trying to hold its head up while still hanging on the line. I did see a cut on the neck, however there was no active and steady bleeding coming from the area of the cut. I immediately notified (b) (6) of my findings and proceeded to the area of the scalders to see if the bird would expire prior to entering the scalders. There we observed the bird go through the head puller located just at the entrance to the scalders and the head was removed causing the bird to flap its wings and jerk its entire body excessively as it went into the scalders. We then returned to line (b) (4) to check to see if there were any more conscious and breathing birds and we observed another bird that was shallowly cut proceeding down the line. At this time, (b) (6) proceeded to remove the bird from the line and address the findings with the back-up cutter on that line. I then proceeded to check the conditions of the other two lines which appeared to be acceptable and returned to line (b) (4) to verify whether or not the conditions had improved and that was when I observed 2 alert and uncut birds with their eyes open going down the line. Both birds were removed from the line and I informed (b) (6) and (b) (6), of the noncompliance with 9CFR 381.65(b). Management removed the back-up cutter from the line and placed a new team member in that position and informed me that he was counseled on his job performance yesterday for a similar finding and that they would address this noncompliance with the team member accordingly. FSIS considers one source for Good Commercial Practices to be the National Chicken Council Guidelines. My observations are not consistent with guidance in the National Chicken Council Animal Welfare Guidelines: F. Processing Operations, section 13) Stunning &amp; Slaughter: "d) There must be backup personnel after the automatic knife to induce bleed-out in any birds not effectively killed by the equipment. Backup personnel must have sufficient room and lighting to ensure that the blood vessels are cut on 100% of the birds." A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M751	Norbest, LLC (Moroni)	04C05	MMK1315 033620G	2017-03-20	<p>Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Monday, March 20, 2017 at 1025 Attendees: USDA Establishment (b) (6)</p> <p>(b) (6)</p> <p>(b) (6) This meeting was necessitated by an observation made in the bird holding area while performing a Good Commercial Practices task on Saturday, March 18. On Saturday, the establishment held over birds on trailer #81 for slaughter this morning. After slaughter ended on Saturday afternoon, I verified the trailer was parked in the holding area, a roofed structure on site. The same trailer was observed on Sunday. This morning, the trailer was the first one emptied, and the birds entered the plant for slaughter. According to the flock processing schedule from Saturday, the birds arrived here Saturday morning at 0120. They were finally slaughtered this morning beginning at 0600. As a result of the hold over, the flock had remained on site in coops on the trailer for a period of 53 hours. After receiving instructions from agency leadership, I met with (b) (6), to notify him personally of my observations. (b) (6) will investigate the matter further. (b) (6)</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
M751	Norbest, LLC (Moroni)	04C05	MMK0409 040306G	2017-04-06	<p>Est. P1049, Norbest LLC. (Moroni ), April 5, 2017, 1015 hours. In attendance: (b) (6) and (b) (6)</p> <p>At approximately 1522 hours, on April 4, 2017, I, (b) (6), while performing the good commercial practices task, observed the following incident. I observed 5 turkeys that had escaped in the hanging bay. 2 went outside the bay, 2 moved a short distance from the trailer and 1 was under the trailer. When the driver moved the trailer forward so that the last few cages on the trailer could be unloaded the bird under the trailer was crushed to death. Death by crushing is not an acceptable GCP or a humane way to euthanize anything. I did not observe anyone monitoring the area so that this would not occur. I told (b) (6) and (b) (6) that the PPIA and Agency regulations require poultry be handled in a manner that is consistent with good commercial practices (GCP's) and that they not die from causes other than slaughter. I stressed to them the importance of adherence to the GCP's, especially because of the issues and possible repercussions if there is continued recurrence of this. I recommended management review the Federal Register on Treatment of Live Poultry Before Slaughter, published September 2005, for FSIS recommendations concerning treatment of live poultry before slaughter. I provided them a copy of this document. They were informed that this MOI would be forwarded to District Office (DDM, Dr. Robert Reeder) and the (b) (6) and (b) (6) in case additional follow-up is recommended. (b) (6) stated that he had plenty of help in the hanging bay area and that they would be instructed to observe and prevent escaped turkeys from being run over by the transport vehicle. Respectfully (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M751	Norbest, LLC (Moroni)	04C05	MMK3514 081102G	2017-08-02	<p>At approximately 1015 hours I was notified by (b) (6) that there were several birds (Toms) being noted with broken hocks. I immediately went out to the live hang bay to review Good Commercial Practices. I observed that the hangers were performing their duties as expected. I did not notice anything out of the ordinary except that the birds seemed more agitated than I normally notice them to be. I also noticed that about one in five birds were vomiting on the line. Typically I notice about one in twenty five vomiting. I alerted (b) (6) and (b) (6) to the items noted above. Considering that the lunch hour was 1100 to 1200 they agreed to look into it and review the procedures during production after lunch. Upon returning from lunch break, I returned to the live hang bay. I noted that they had closed the doors on one side of the hanging bay as well as the man door on the opposite side of the bay. (b) (6) received notification from (b) (6) that he had also taken the time to observe the hangers out in the hanging bay and had noted that the birds seemed more flighty than normal himself. He had asked for the doors to be closed (as had been noted) and agreed to continue to keep an eye on things. I also told him that I would be continuing to keep an eye on the situation and would report any further findings to him for action.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M7559	David Elliot Poultry Farm Inc.	04C05	SNA08070 61615G	2017-06-15	<p>On June 14, 2017 at 1100hrs, a meeting was held with management; (b) (6) and (b) (6). The purpose of this meeting was to discuss the large number of dead on arrival (DOA) chicken carcasses that occurred at this establishment on June 13, 2017. There were approximately 1,337 DOA carcasses out of the (b) (4) broiler chickens intended for slaughter on this day. During the meeting management discussed the factors they believed may have led to the large number of DOAs- including, but not limited to- the high temperature and humidity (weather) and the density to which the birds were loaded into the crates for transport. In light of this event, management intends to take additional planned corrective measures, including proactively coordinating with the hauler that transports the birds when warmer outside temperatures are anticipated, to decrease the density/number of birds placed in each crate and thereby increasing air flow/cooling. Management also discussed the possibility of changing the location of the trucks after they arrive at the establishment from the farm (inside vs. outside) prior to production starting the following day or changing the times the trucks are loaded. IPP reminded management of their responsibility to ensure that live poultry are handled in a manner consistent with good commercial practices (GCPs) and that they do not die from causes other than slaughter per Agency regulations and the Poultry Products Inspection Action (PPIA). Management was also advised that in accordance with FSIS Notice 44-16 and as previously discussed, lack of adherence to GCPs could potentially result in a noncompliance record (NR). Management was notified that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case any additional follow-up is recommended.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M7559	David Elliot Poultry Farm Inc.	04C05	SNA12110 94211G	2017-09-11	<p>A meeting was held at 1515hrs, on September 11, 2017, with establishment management; (b) (6) [REDACTED], and (b) (6) [REDACTED]. The purpose of the meeting was to further discuss the incident that occurred on Friday, September 8th involving live chickens in a barrel with other dead chickens. At approximately 9:45am in the corner of the kill floor/hanging area, adjacent to the crate washer, there were two, largely full barrels,-each containing an estimated 45-50 chicken carcasses of dead-on-arrival (DOA) chickens unloaded from the crates on the truck. Next to these barrels were approximately 3 to 4 crates, each containing 2-3 chickens each. Based on past observations, it is not uncommon for a few DOAs to be left in the loading crates that are emptied later into the barrel designated to hold dead chickens, or occasionally when there is a question as to whether or not a chicken is dead/DOA. While in the hanging area performing a Good Commercial Practices verification task, I observed a live chicken in one of these barrels, as evidenced by observable rhythmic respiratory effort and minimal movement. This particular bird did not receive any cut to bleed out. At that time, I notified Natan Fink, Plant Manager, and showed him the live bird in the full barrel of dead chicken carcasses. While then locating the Slaughter Foreman, several employees were witnessed removing the chickens from the crates adjacent to the dead barrels and placing these additional chickens into the barrels. Upon further examination, not all of these chickens removed from the crates and placed into the container designated for dead chickens, were actually dead. Several of these chickens were in a debilitated/weakened state- but still alive (as evidenced by observable rhythmic respiratory effort and movement), were placed on top of one another into the barrel containing dead chickens/chicken carcasses. (Note: The establishment was in the process of changing over from slaughtering broilers to cornish, and that is presumably the reason the establishment employees were trying to clear and empty the loading crates of broilers. ) After notifying the Slaughter Foreman, the birds were removed from the dead barrel, their throats were cut (per usual practice) and they bled out separately in the containers used for miscut birds to bleed out, before transferring them to the dead barrel. IPP reminded management of their responsibility to ensure that live</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>poultry are handled in a manner consistent with good commercial practices (GCPs), including handling poultry in a manner that prevents needless injury and suffering, per Agency regulations and the Poultry Products Inspection Action (PPIA). There should not be any instance where dead poultry carcasses are placed with/upon live poultry, or a live poultry put in container with other dead poultry- this includes the use of the "intermediate barrel" (a term used to designate an intermediate step, primarily for miscut birds- birds that are no longer considered Kosher and will be removed from the process and not presented for inspection- to verify that these birds are dead prior to placing them in the barrel with other dead chicken carcasses). Though several factors may have contributed to this occurrence- new employees (lack of training), the pandemonium surrounding the time in switching from broilers to corners- along with the general fast pace maintained in this area, IPP recommended establishment management put measures in place to prevent recurrence in keeping with adhering to good commercial practices. Several items for potential implementation were discussed, including increased oversight/monitoring of all containers holding chicken carcasses in the unloading/hanging area, additional employee training, and a standardized euthanasia program (cervical dislocation) for chickens that are not fit for Kosher standards (ex. injured, weak/debilitated, and/or immobile) and will not be ritually slaughtered and presented for inspection. IPP will follow up with the establishment on any plans or implemented practice changes regarding this issue. Management was notified that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case any additional follow-up is recommended.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M757	The Hillshire Brands Company	04C05	PYJ071209 3920G	2017-09-20	<p>While performing good commercial practices task at approximately 0650 on Wednesday, September 20, 2017, I observed a live bird flapping its wings, breathing, and trying to right itself along the last quarter of the serpentine belt before the birds enter the scalders. I notified (b) (6) [REDACTED], who stopped the line prior to the bird entering the scalders. The neck had been slit but the bird was still breathing. The backup neck splitter re-cut the neck, and approximately 15 seconds later the bird ceased breathing. The line was restarted. A supervisor stayed to monitor the birds going into the scalders. During observation for the next approximately 15 minutes, the line was stopped three more times to allow a conscious bird to fully bleed out and cease breathing. In conversation with (b) (6) [REDACTED] when the CO2 stunner has issues and birds need to be live hung, a supervisor is out monitoring live hang. He expressed that in this situation they would also need to station someone to make sure no live birds enter the scalders, and/or change line speeds to allow more time for the birds to fully bleed out. There had been issues with CO2 stunner fully stunning one section of the trucks, but maintenance informed me that they had fixed the issue at 0715, and birds were no longer being live hung. Observation after that showed no birds still breathing at the end of the serpentine. I saw no cadaver birds in the condemn barrels or listed on the sorter sheets in the evisceration department. I informed (b) (6) [REDACTED] of the situation and that it seemed to have been handled properly. He will inform the offsite animal welfare specialist of the situation in case adjustments to protocol need to be initiated.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
M9977	Tyson Foods Inc.	04C05	YBL460901 1014G	2017-01-14	The first lot slaughtered on 1st shift 1/13/17, Lot 21 (holdovers), had 742 DOAs out of (b) (4) head, or (b) (4) DOA's. It was heavily afflicted with air sacculitis. The house was begun the previous day, 1/12/17, on 2nd shift (Lot 1B) and the incidence of DOA's was only 0.18%. While the high mortality can be attributed to the severe air sacculitis pathology, holding these birds overnight greatly increased the mortality from 0.18% on Thursday night to 12.5% on Friday morning. For the entire 1st shift of 1/13/17, there were 1.46% DOAs, which still exceeds the norm. It is a good management practice to avoid holding sick birds overnight for slaughter the next day. The establishment should take these factors into consideration when managing its slaughter operations.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
M9977	Tyson Foods Inc.	04C05	YBL131604 4501G	2017-04-01	<p>On 3/30/17 at approximately 1351 hours, while conducting a routine Poultry Good Commercial Practice Task in live receiving, the following was observed. I was standing on the dumper stand next to the dumper-operator while he was actively operating the dumper. When the dumper-operator mechanically removed a cage away from the dumper to be taken away to the transportation trucks, I observed that one half of the cage doors (the entire left half of the cage doors when observing the cage with the cage doors facing the observer) had not opened at all and that this half of the cage was still full of live chickens. The dumper-operator mechanically opened the doors. He then mechanically moved the cage with the doors still open against the dumper, which did not align properly against the dumper. Immediately, the dumper-operator mechanically moved the cage away from the dumper again with the cage doors still open. I observed several live chickens standing at the edge of cage at the location of the hinge where the cage edge and door edge connect, as well as on the inside aspect of the cage doors. At this point, the dumper-operator closed the doors on the live chickens, resulting in several body parts of live chickens being stuck between the edge of the cage doors and the cage itself. I observed approximately two live chickens with their necks stuck between a door edge and the cage, approximately one live chicken with its neck and its wing stuck between a door edge and the cage, and approximately one live chicken with its wing stuck between a door edge and the cage. (b) (6) and (b) (6) were immediately notified of the situation. (b) (6) assumed control of operations, mechanically opened the cage doors, manually released the stuck chickens back into their cages, and dumped the cage onto the conveyer belt. I informed him that the District Office would be made aware of the situation. (b) (6) informed me that the dumper-operator should have gently pushed the live chickens completely back into the cage before closing the doors. He also informed me that the dumper-operator had been taken to Human Resources. Live bird body parts getting stuck in equipment from operator error is not consistent with good commercial practices. Under the Poultry Products Inspection Act (PPIA) and Agency requirements, live poultry must be handled in a manner that is consistent with good commercial</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					practices, which means they should be treated humanely. Please indicate what permanent preventive measures will be put into place to prevent this from reoccurring. Respectfully, (b) (6)
M9977	Tyson Foods Inc.	04C05	YBL001105 5618G	2017-05-18	<p>At approximately 1050 hours in the evisceration department of Est. P1325, I observed the Line (b) (6) line leader person holding two cadavers that had been removed from the line. One cadaver was a deep red color throughout the carcass and its neck was completely uncut with the head still attached and engorged with blood. The 2nd cadaver had the head removed but was uniformly red in color indicating it had not been bled out. The cadavers were shown and given to the (b) (6), (b) (6) by the line leader who took them back to the kill area to show the responsible person. The back-up kill person failed to manually cut the necks to permit the required bleed out. No other cadavers were observed at the time, indicating the process was still under control. Poultry are to be slaughtered in a manner that ensures that breathing has stopped before scalding, so that the birds do not drown, and that slaughter results in thorough bleeding of the poultry carcass (9 CFR 381.65(b)). Live poultry must be treated in a manner consistent with good commercial practices. At approximately, 1145 hours, (b) (6) retained a carcass for my examination. I confirmed it was a Dead On Arrival (D.O.A.) as it had a foul odor of decomposition with congested, friable viscera engorged with dark red blood, and large dark red patches in the breast muscle. I showed the D.O.A. to (b) (6) who took it back to the slaughter area to dispose of it, and when (b) (6) arrived I notified him as well. At 1300 hours, (b) (6) retained another bird that had the characteristic lesions of a D.O.A. as well. I showed it to (b) (6). DOA carcasses are to be condemned at ante-mortem inspection and should not be dressed or conveyed into any department of the official establishment where poultry products are prepared or held (9 CFR 381.71).</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
M9977	Tyson Foods Inc.	04C05	YBL061605 2826G	2017-05-26	<p>On 5/26/17 at approximately 1441 hours while performing a routine Good Commercial Practices Verification task, I was watching establishment employees shackling live poultry in the live hang area when I observed an establishment employee retrieve a live, loose chicken located in a metal offal bin positioned to the left of the end of the conveyer belt, outside of the fenced in area. I informed (b) (6) (b) (6) of my observation. Instances of live, loose chickens in the live hang area have been previously observed, discussed, and documented in Memorandum of Interviews (MOIs) from routine weekly meetings with establishment management: From MOI YBL0920055317G On 5/10/17 at approximately 1339 hours while conducting antemortem/GCP in the live hang area two live chickens fell from the conveyer belt onto the floor within one minute of each other. I informed (b) (6) (b) (6) that process control needed to be maintained at all times. On 5/12/17 at approximately 1351 hours in the live hang area I noticed two instances of live birds at the end of the conveyer belt, where the hanger controls the belt speed with a knee pedal, jump over the metal barrier and into the offal bin. (b) (6) and (b) (6) were informed. From MOI YBL2716054324G On 5/18/17 at approximately 1342 hours while performing antemortem and good commercial practices in the live hang area I noticed one live bird jump from the moving conveyer belt at the left most end in front of the conveyer belt operator/live hanger over the left metal barrier and land under the Dead Upon Arrival (DOA) table (where moribund birds and DOAs are placed before being humanely euthanized and placed in the DOA bin) OUTSIDE of the fenced in area. No management was present and the hanger buzzed. When (b) (6) arrived I informed him of the situation. Less than one minute later one live bird landed from the conveyer onto the floor within the fenced in area and was promptly retrieved. (b) (6) notified afterward. Loose live birds also noted within live hang area on 5/10/17 and 5/12/17. On 5/19/17 at approximately 1340 hours while performing a routine antemortem/GCP task in live hang I noticed one live bird jump from the conveyer belt onto the floor within the fenced in area and was promptly retrieved. (b) (6) notified. Loose live birds also noted in live hang area on 5/18/17, 5/12/17, and 5/10/17. To be documented in the next</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>weekly meeting with establishment management MOI: On 5/25/17 at approximately 1424 hours in live hang area during antemortem/good commercial practice inspection I observed (b) (6) pick up a live, loose bird outside of the fenced in area to the left of the left-most hanger. Loose live birds also noted in live hang area on 5/19/17, 5/18/17, 5/12/17, and 5/10/17. Brian Tietjens notified. Repeatedly allowing live chickens to fall and/or jump from the waist-level conveyer belt onto the floor and floor-level areas in the live hang area can result in injury to live chickens and is not consistent with good commercial practices. Previous corrective actions were either not implemented or ineffective at preventing recurrence. Under the Poultry Products Inspection Act (PPIA) and Agency requirements, live poultry must be handled in a manner that is consistent with good commercial practices, which means they should be treated humanely. Respectfully, (b) (6)</p> <p>[REDACTED]</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
M9977	Tyson Foods Inc.	04C05	YBL201208 3711G	2017-08-11	<p>On 8/10/17 and 8/11/17 during postmortem inspection, I observed approximately 10 severely bruised poultry carcasses. The first carcass on 8/10/17 had its entire left breast tissue affected with a severe red/purple bruise. (b) (6) and (b) (6) were shown the carcass. Two more severely bruised poultry carcasses were seen on 8/10/17. The first carcass had dark red/purple bruising across the entire left breast, corresponding shoulder joint, and ventral neck with blood pooled under the skin in all these locations. There was also a laceration approximately 2 inch in length located just to the left of the tip of the keel bone with the associated breast tissue infiltrated with blood. (b) (6) was shown the poultry carcass. The second poultry carcass had bruising centered in the right hip area which had spread to the corresponding breast and wing joint with blood pooled under the skin in all these locations. The hip joint was completely dislocated. Additionally, there were multiple caudal rib fractures present. (b) (6) was shown the poultry carcass. On 8/11/17, after giving inspector breaks on evisceration line #2, I showed (b) (6) two poultry carcasses with severe bruising. In both cases approximately one half of the entire breast and the corresponding wing joint was affected by a dark red/purple bruise. There was blood pooled under the skin of all these locations and the tissues were infiltrated with blood as well. There was a 1-2 inch long laceration in the breast muscle near the tip of the keel bone with bloody infiltrate. I showed (b) (6) approximately five more poultry carcasses which had red/purple bruising on the entire left breast muscle with blood pooled under the skin in this location and a 1-2 inch long laceration in the breast muscle near the tip of the keel bone. 9CFR 381.65(a) states: "Operations and procedures involving the processing, other handling, or storing of any poultry product must be strictly in accord with clean and sanitary practices and must be conducted in a manner that will result in sanitary processing, proper inspection, and the production of poultry and poultry products that are not adulterated." The lesions suggest that these chickens had significant force applied to the affected areas. Severe bruising is indicative of improper handling of live poultry. Under the</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					Poultry Products Inspection Act (PPIA) and Agency requirements, live poultry must be handled in a manner that is consistent with good commercial practices. Please provide a response which addresses this concern. Respectfully, (b) (6) (b) (6)

EstNbr	EstName	Task_Code	MOI#	Date	Description
M9977	Tyson Foods Inc.	04C05	YBL441909 4127G	2017-09-27	<p>MOI P-1325 Tyson Foods Inc. Meeting Date: September 28, 2017 Meeting Time: 17:00 Attendance: (b) (6); Brian Tietjens, Plant Manager of Production; (b) (6); and (b) (6). Approximately at 1430 hour on 9/27/17 (b) (6) rang the bell calling SPHV. I, (b) (6), went to station 1 - line 2 where I found 2 cadavers hung at the back of the station. I notified the (b) (6) and informed her that these 2 birds are cadavers and told her an MOI will be written. Approximately at 1525 hour (b) (6) rang the bell and I examined two birds with the same signs and I told the (b) (6) that these are also cadavers. The Plant Supervisor immediately condemned the carcasses. I requested a meeting and she said she will talk to plant management to hold a meeting tomorrow. Later Mr. Tietjens confirmed the meeting as on 9/28/17 at 5:00 PM. Recently the numbers of cadavers at night shift are increasing. Last week from Monday 9/18 -9/22/17 were 7, 8, 12, 4, and 2 respectively. On this week Monday 9/25 to Wednesday 9/27/17 were 3, 2, and 4 respectively. We discussed the issue of cadavers on 8/30/17 and 9/2/17 weekly meetings. On Thursday 9/28/17 at 5:00 pm I held a meeting with plant management. Attendees were: (b) (6); Brian Tietjens, General Manager of Production, (b) (6) and (b) (6). At the start of the meeting I described what happened yesterday and reiterated the trend we see concerning the number of cadavers. Mr. Tietjens explained that he talked to the management and especially the (b) (6). He showed me the robust animal welfare the plant is adopting. The QA will make checks (b) (4). The supervisor makes checks (b) (4), and the animal welfare specialist makes a check (b) (4) and the plant Manager (b) (4). The animal welfare specialist is not supervised by the local authority of the plant. In the meeting the Establishment stated they would arrange for more training to the backup kill personnels. The meeting was adjourned at 5:35 pm.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1009	Wayne Farms LLC	04C05	DSM57210 44603G	2017-04-03	At approximately 1500 hours while assisting (b) (6), with an annual GCP audit, a cadaver was noted exiting the last picking machine. The head was intact, engorged and red/purple in color, edematous, and no neck cut was present. I followed the carcass into the evisceration department. The head was removed by the head puller after the rehang table. I followed the carcass to inspection station 2 to ensure it was condemned. The inspector at station 2 condemned the carcass and instructed the trimmer to document it on the condemnation lot sheet as a cadaver at approximately 1508 hours. At approximately 1545 hours, (b) (6) informed plant management that an MOI would be issued. 9 CFR 381.65(b) states that "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding.
P1201	Pilgrims Pride Corporation	04C05	JAB011106 1310G	2017-06-10	At 1144 hours, while performing a GCP task on Saturday, I (b) (6) observed the plant employee make an attempt to retrieve a live bird from a cage rack. The employee was standing at the DOA observation station when I noticed him go with urgency to automatic loading area for the cage wash. He was unable to stop the cage from entering washer or retrieve the live bird. The live bird was retrieved from the cage after passing through the washer (water temperature unknown) and placed on the CO2 conveyer chamber for slaughter. I discussed this occurrence with plant personnel, (b) (6) and (b) (6) assured me the incident will be addressed. On Monday (6/12/2017) at 0605 hours, (b) (6) informed me of documentation the employee was retrained and how to proceed if a bird is observed in cage rack entering the washer. A copy of this MOI and your response will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1235	Wayne Farms LLC	04C05	GKN29140 31230G	2017-03-30	<p>On Wednesday, March 29, 2017 at approximately 1521 hour while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed several conditions concerning the treatment of poultry prior to slaughter in the live hang area. At the end of the live hang belt there was a large red “inedible” barrel that employees had put 12-15 live birds piled on top of each other in, the barrel was full to the very top. These are larger birds, putting them at a greater risk for crushing / suffocating the ones at the bottom and causing death by means other than slaughter. There were at least 30 loose birds running around in the live hang room as well, with many tucked under the belt and very difficult to visualize. The belt hangs low in this area and birds can easily become entrapped / snared. In addition there was a weak / minimally to non-responsive, laterally recumbent bird, that was unable to lift its head and had shallow respirations that was against a wall in the live hang room with a pile of three already deceased birds. At the end of the belt there was a pile of filth / feathers that was stacked approximately 2-2.5 feet high. Tucked under the belt among the pile of feathers was a live bird that was very difficult to visualize. Establishment employees had failed to notice this bird, and were not tending to the increasing size of the pile of filth / feathers at the end of the belt. In order to prevent this bird from almost certain suffocation I immediately notified the (b) (6), so he could get the bird and prevent it from dying by means other than slaughter. During this time I also discussed the other above concerns with (b) (6) and pointed out the recumbent bird next to the already deceased birds, at which time this bird was picked up and put back into production by (b) (6). The employees had already emptied the birds out of the “inedible” barrel and gathered all of the loose birds by the time (b) (6) arrived. (b) (6) had told me that they should not have that barrel back in live hang and he was unsure why they were putting the birds in there, this is not something that they do at this establishment. At the time of my inspection in the live hang area it appeared that control over that area had been lost. Establishment management was notified as well of the incident and informed of the resulting MOI. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, “Treatment of Live Poultry before Slaughter,” the Food Safety</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on March 29, 2017. (b) (6) Cc:</p> <p>DDM DVMS FLS'</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1235	Wayne Farms LLC	04C05	GKN16120 41507G	2017-04-07	<p>On April 7, 2017, at 0843, I (b) (6) observed less than Good Commercial Practices. While performing a routine Ante-Mortem Inspection and Good Commercial Practice check (GCP), I observed one live bird whose throat had not been cut about to enter scald number one. The bird had open, blinking eyes and was lifting its head in an attempt to right itself. I was standing at the west (entrance) end of scald number one where the establishment has installed a stop button for occurrences such as this. Therefore, I immediately stopped the picking line, per establishment's written permission, to prevent the bird from entering the scald vat. (b) (6) and (b) (6) arrived quickly and (b) (6) removed the bird from the line prior to restarting the picking line. I immediately performed an additional 1,000 bird check and did not observe any improperly slaughtered carcasses. I then proceeded to the kill room to verify the function of the stunner and kill machine. During my observation period all except 3 small birds were stunned and killed. The 3 small birds were then missed by the kill blade but were properly cut by the back up killer. The aforementioned bird had passed all plant intervention steps and the entrance into the scald was imminent when the line stopped. Hence, it is reasonable to conclude that without intervention and the utilization of the emergency stop button, the bird would have entered the scald alive. After removal of the live bird and examination of the kill process, the establishment determined that due to bird size variations the stunner needed to be raised. After adjusting equipment, verification checks performed by QA humane handling technician indicated that additional adjustments were needed. These adjustments were made and verification checks were found to be acceptable. At approximately 0900, I notified Plant Manager Heath Loyd that GCP MOI documentation would be forthcoming. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office. Respectfully, (b) (6) Cc: Dr. David Thompson, DDM, Jackson DO</p> <p>(b) (6) (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1235	Wayne Farms LLC	04C05	GKN51160 93712G	2017-09-12	<p>On September 12, 2017, at 1550, I, (b) (6) observed less than Good Commercial Practices while performing a routine Ante-Mortem Inspection and Good Commercial Practice verification check. While monitoring the cage dump operations, I observed the fork lift driver run over and kill a live bird. The driver was moving rapidly to the cage dump when a door on the cage opened and three birds fell onto the pavement. Before he could stop, one of the birds went under a tire on the forklift; the head was immediately crushed and severed from the body. The driver stopped and caught the remaining two birds replacing them into the cage and closing the door. He then retrieved the dead bird and took it to the DOA chute. (b) (6) and (b) (6) were called to the back dock and immediately notified. (b) (6) stated that the driver of the forklift was in training but had already been trained in animal welfare practices. She relieved him from this job for the remainder of the day, due to weather conditions and until time allowed for more training so that the driver did not feel the need to speed. The cage was pulled from rotation until repairs can be made. At approximately 1640, I notified Plant Manager Brad Trapp and (b) (6) that GCP MOI documentation would be forthcoming. As per Federal Register Docket NO. 04-037N, "Treatment of Live Poultry before Slaughter", the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices as described by industry guidelines. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office. Respectfully, (b) (6)</p> <p>Cc: Dr. David Thompson, DDM</p> <p>(b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1241	Tyson Foods, Inc.	04C05	MGJ54150 25809G	2017-02-09	At approximately 1540 hours while (b) (6) and (b) (6) were performing a Poultry Good Commercial Practices task, they observed a live chicken in the condemn barrel at the end of the transfer belt in the Live Hang Area. This condemn barrel is designated for dead chickens only, and no live chickens should be placed in this barrel. (b) (6) notified (b) (6) and (b) (6) of this finding, and he notified (b) (6) of the impending MOI.
P1241	Tyson Foods, Inc.	04C05	MGJ21180 72211G	2017-07-11	Establishment # 01241-P; Tyson Foods, Inc.; July 11, 2017; 1725 hours; (b) (6) and (b) (6) At approximately 1725 hours while performing a Good Commercial Practices task, I observed the following issues in the Live Hang area: 1. I found a live chicken in a condemn barrel that contained and was designated for dead chickens. 2. I found 3 live chickens that were partially covered by several dead chickens at the end of the live hang belt. I immediately notified (b) (6) of this finding and of the impending MOI. I also reminded (b) (6) of the importance of following good commercial practices when handling live poultry. (b) (6) removed the live chicken from the condemn barrel and euthanized it by cervical dislocation. The live chickens that were partially covered by the dead chickens were hung on the slaughter line prior to (b) (6) arrival to the site. (b) (6) then discussed the issue with (b) (6), (b) (6) of this department. (b) (6)
P1241	Tyson Foods, Inc.	04C05	MGJ52150 83014G	2017-08-14	Establishment #01241-P; Tyson Foods, Inc; August 14, 2017; 1550 hours; (b) (6), and (b) (6) At approximately 1550 hours while verifying Poultry Good Commercial Practices in the Live Hang area, I found a live chicken buried in a pile of approximately 30 dead chickens on the floor at the end of the live hang belt. A live hang employee removed the live chicken from the pile and placed the chicken onto the kill line. I immediately notified (b) (6) and (b) (6), of this finding and of the impending MOI. I also documented a similar finding in MOI# MGJ2018070311I dated 7/11/2017. (b) (6)

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1243	Perdue Foods, LLC.	04C05	XLB330708 2003G	2017-08-03	<p>This MOI is being issued to document the finding of a live bird in the DOA bin. On 08/03/2017, at approximately 0635 hours, while performing the Good Commercial Practices task, I observed a live bird travel down the conveyor that is used to remove dead on arrival birds from the live hang area. This bird fell to the floor when it reached the end of the conveyor. An establishment employee then picked up this bird and placed it in the DOA bin. (b) (6) was present and I showed him the live bird in the DOA bin. There was no denaturant applied to this bird at this time. (b) (6) removed this bird and it was placed back on the live hang table. If this bird had remained in the DOA bin, it likely would have died by asphyxiation due to being smothered by having dead birds placed on top of it. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices (GCP), and that they do not die from causes other than slaughter. I recommend that management review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. A copy of this MOI will be forwarded to the District Veterinary Medical Specialist (DVMS) in the event that an additional follow-up is recommended.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1249	George's Chicken, LLC	04C05	UVG13000 13925G	2017-01-25	<p>Poultry Good Commercial Practices Reg. 381.65(b) verified from 17:18 to 18:04 hours and from 20:50 to 20:58 hours. At approximately 17:18 hours, while performing the Poultry Good Commercial Practices Verification Task, I, (b) (6) observed two carcasses on Kill Line 2 which appeared to be cadavers. Immediately I followed these carcasses to the Evisceration Department, pulled them off the line at the rehang belt and confirmed that both were indeed cadavers; one had obviously not received a kill cut and both were a deep purple color due to not having bled out. I then showed the carcasses to (b) (6) who was in the area at the time. At approximately 17:32 hours while watching the kill process, I observed the backup employee miss one of the birds that had not received a cut by the kill blade. Immediately I stopped the line and notified the employee. I then observed him search for the missed bird, find it and make the necessary cut. Shortly thereafter, (b) (6) arrived and we both observed that several birds (4-6) in a row were not cut by the kill blade. Again I stopped the line (I was closer to the E stop than (b) (6).) and the backup employee was able to make the necessary cuts. Having made these observations and having been informed that the backup employee is new, my concern is that there may be an increased chance of birds not being slaughtered according to the Poultry GCP Regulation 381.65(b) when there is an increase in the number of birds missed by the kill blade. The observations noted above were discussed with (b) (6) and (b) (6). I also expressed the need for backup employees to feel comfortable stopping the line when necessary to ensure that all of the birds receive the proper kill cut. (b) (6) questioned whether or not there needed to be an adjustment of the line speed. (b) (6) stated that a reduction in line speed should not be needed in order to correct the problem. He further stated that the matter would be looked into and addressed.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1249	George's Chicken, LLC	04C05	UVG53230 20608G	2017-02-08	<p>Poultry Good Commercial Practices Reg. 381.65(b) verified from 16:52 to 17:02 hours, from 17:47 to 18:00 hours and from approximately 19:18 to 19:36 hours. GCP Findings: At 16:52 hours, I, (b) (6), observed 2 cadavers on line 2 in the picking room and I followed them to the Evisceration Department's Rehang Station. There I had these 2 cadavers pulled off of the line and then another cadaver was observed and pulled off by a rehang employee. Immediately I informed (b) (6) and showed him the cadavers. I then showed (b) (6) my findings and she notified (b) (6). The above finding were shown to and discussed with (b) (6) and USDA (b) (6). (b) (6) responded by saying that (b) (6) would be placed in the back up kill position and that maintenance would check the equipment. At 17:34 hours (b) (6) followed up on the initial meeting and stated the following: (b) (6) and (b) (6) [the usual back up employee] were now both working in the back up kill position.</p> <p>The line speed was slowed down by (b) (4) birds per minute. Maintenance checked the equipment and found no mechanical problems. The varied bird sizes may be the result of the birds being weaned off of gentamycin [a factor leading to the inability to set the kill blade at an appropriate level]. He will check with (b) (6).</p> <p>*Note - (b) (6) was not present at this meeting but was informed of my findings at a later time.</p> <p>*Note - My concerns stem not only from today's finding but also from findings noted in MOI UVG10000151251 dated 1/24/17 and NR UVG3021015730N/1 dated 1/27/17.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1249	George's Chicken, LLC	04C05	UVG06140 23827G	2017-02-27	<p>Poultry Good Commercial Practices Reg. 381.65(b) verified at 16:46 hours, from 16:54 to 17:00 hours, from 19:48 to 19:58 hours and from 21:25 to 21:41 hours. At 16:54, 16:55 and 17:00 hours, while performing the above mentioned task, I, (b) (6), observed a cadaver bird on Kill Line 2 in the picking room at each of the times listed for a total of 3 birds in a 6 minute time frame. The first 2 cadavers were pointed out to (b) (6) who had them removed from the kill line and disposed of. The third cadaver I pointed out to 2nd (b) (6) at 17:00 hours. These findings were discussed with (b) (6) and with (b) (6) at 17:05 hours. (b) (6) responded by saying that the current back-up kill cut employee was not consistently focused enough to remain in the position. She was therefore placing (b) (6) in this position until a capable employee could be trained to do the job.</p> <p>*Note: (b) (6) was not present at the meeting but was informed of these findings at a later time. **Note: I met with (b) (6) again at 20:07 hours to discuss observations made from 19:48 to 19:58 hours. During this time I observed another cadaver on Kill Line 2 and I also observed a rehang employee in the Evisceration Department tossing birds into the drain instead of into the inedible barrel where they could be accounted for. (b) (6) said that she would get with (b) (6) immediately regarding the cadaver and that she would also get with the Evisceration Department supervisors regarding the use of the inedible barrel for proper bird disposal. My subsequent findings during observations made from 21:25 to 21:41 hours were acceptable.</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P1249	George's Chicken, LLC	04C05	UVG5418073011G	2017-07-11	<p>An Establishment Awareness Meeting was held on 7/11/17 at approximately 2000 hours to discuss observations made in the Receiving/Live Hang Department. I, (b) (6) and (b) (6) were present at this meeting. The first issue addressed was the cadaver birds found between 1547 and 1557 hours. During this time, while in the picking room, I observed a cadaver bird on Line 1. Then after following the bird into the Evisceration Department, I observed 3 more cadavers in the Line 1 inedible barrel and 1 cadaver in the inedible barrel for Lines 2 &amp; 3. Immediately thereafter, I notified (b) (6) of my findings. After returning to the picking room I observed another cadaver on Line 1. (b) (6) responded by saying that the back up kill cutter had already been warned on two previous occasions about his job performance and that she and the line leaders would continue to monitor his performance on an (b) (4) basis. The second issue addressed was concerning a small bird found in the blood pit. At approximately 1607 hours, while observing the blood level in the pit, I noticed a bit of movement and discovered that a small bird was sitting in the pit. The bird was covered in blood and was in danger of drowning in blood if it remained in the pit much longer. Immediately I notified (b) (6) who then notified (b) (6) who responded by having the bird removed from the pit. (b) (6) also stated that they would keep an eye on the blood pit and that she would get with the Day Shift Senior Supervisor to make sure that the pit was being checked and pumped out before the shift change. The third issue addressed was the presence of birds on the floor in the Live Hang Area. When I walked into the Live Hang room I counted approximately 21 birds walking around or sitting on the floor. After I stood there for a few minutes, I then saw the line leaders begin to gather the birds and get them back on the belt for hanging. (b) (6) stated that I may have come into the area just before she did because shortly thereafter, she had spoken with the line leaders about the importance of keeping the floor clear of birds. The last issue addressed was the 2 loose birds found sitting between cages on trailer #148. While making observations in the receiving shed, I noticed a cage with an open door and then further observed that 2 birds were sitting between cages. Again I notified (b) (6) of my findings and</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>she instructed a line leader to remove the birds. (b) (6) also stated that they were working to ensure that all damaged cages were set aside for repair because with well maintained cages, they would be able to keep the birds from getting loose. This meeting was then adjourned. (b) (6)</p> <p>* Note - The first issue discussed was resolved with the termination of said employee on 7/12/17. Subsequent observations in this department on 7/12 &amp; 7/13 have shown a marked reduction in the number of cadavers.</p>
P1250	Fieldale Farms Corporation	04C05	OAA34090 42511G	2017-04-11	<p>124 birds were accidently suffocated on the hanging belt in the live hang room at P-1250 on the morning of April 10 between 0700 and 0800 hrs. due to a malfunction of the hanging belt causing the cogs to run but the belt to slip. Consequently birds from the dumping belt dropped on top of the birds on the hanging belt below and suffocated the birds on the hanging belt. I observed many of the dead birds while performing the Good Commercial Practices task. I met with (b) (6) and (b) (6) later the same morning at approximately 0945 hrs. They gave me the above explanation, also adding that the dumping belt automatically continues to operate as long as the cogs on the hanging belt are turning and cannot recognize when the hanging belt is slipping, i.e. the dumping belt keeps running. They said that when the malfunction was recognized by establishment personnel, no new cages of birds were dumped on the dumping belt. They didn't see how the incident could have been avoided and said that it doesn't happen very often.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1272	Pilgrim's Pride Corporation	04C05	CCA381201 1510G	2017-01-10	<p>Mark Dean, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Monday, January 9, 2017 at approximately 0553 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the pre-evisceration area. I observed one live bird enter the scald vat on line number one alive. The bird was observed alive and blinking its eyes. I immediately notified (b) (6) of the observation who retrieved the cadaver upon exit from the scald vats. (b) (6) and (b) (6) were both notified shortly thereafter. (b) (6) stated he would place a second backup killer on line one for the remainder of the shift. No other live birds were observed entering the scald vat alive. This issue will be discussed with management at the next USDA weekly meeting on January 11, 2017. There was no immediate response given by establishment management. Respectfully, (b) (6)</p>
P1272	Pilgrim's Pride Corporation	04C05	CCA330602 3115G	2017-02-15	<p>Mark Dean, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Monday, February 13, 2017 at approximately 0441 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the pre-evisceration area. I observed one deceased bird on the picking line exit scald vat number two and reenter scald vat number three on line number two that was bright red in color. Once removed by an employee, the bird was observed to be bright red with engorgement throughout the neck and head. There was no cut visible to the neck to indicate proper slaughter procedure. I immediately notified (b) (6) of the observation who retrieved the cadaver from the employee (b) (6) and (b) (6) were both notified shortly thereafter. (b) (6) stated he would replace the backup killer on line two for the remainder of the shift. This issue will be discussed with management at the next USDA weekly meeting on February 16, 2017 and documented in the weekly meeting MOI. Respectfully, (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1272	Pilgrim's Pride Corporation	04C05	CCA2207045425G	2017-04-25	<p>Mark Dean, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Monday, April 24, 2017 at approximately 0605 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the pre-evisceration area. I observed one live bird enter the scald vat on line number two alive. The bird was observed alive and blinking its eyes prior to entry into the scald vat. I immediately notified (b) (6). We both observed the cadaver upon exit from scald vat number 2 and scald vat number 3. (b) (6) stated he would replace the current backup killer on line two with another backup killer. No other live birds were observed entering the scald vat alive. This issue will be discussed with management at the next USDA weekly meeting on April 25, 2017. There was no immediate response given by establishment management. Respectfully, (b) (6)</p>
P1272	Pilgrim's Pride Corporation	04C05	CCA3403060014G	2017-06-14	<p>Mark Dean, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Friday, June 9, 2017 at approximately 0834 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the evisceration area. I observed and pulled from the line one cadaver bird during inspection on line number one at station number three. The cadaver was observed with an engorged head intact with the neck to which there was no cut visible. I immediately notified (b) (6) and (b) (6). I held the cadaver at the PHV hold rack at the station to show both supervisors. (b) (6) stated he would place a second person to assist the current backup killer on line one. During verification of this corrective action, it was later observed that (b) (6) instead switched backup killers instead of placing two people at this position. No other live birds were observed entering the scald vat alive. This issue will be discussed with management at the next USDA weekly meeting on June 15, 2017. There was no immediate response given by establishment management. Respectfully, (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1272	Pilgrim's Pride Corporation	04C05	CCA4206063216G	2017-06-16	<p>Mark Dean, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Wednesday, June 14, 2017 at approximately 0840 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the evisceration area. I observed and pulled from the processing line one cadaver bird on line number two at the rehang table. The cadaver was observed with an engorged head intact with the neck to which there was no cut visible. I immediately notified (b) (6), who observed the bird shortly after the occurrence. Plant Manager, Mark Dean was notified and observed the bird shortly thereafter. At approximately 0842 hours while still performing a Good Commercial Practices Task in the pre-evisceration area, I again observed a live bird enter the first scald vat on line number two. I immediately notified (b) (6). The bird was removed from the line after exiting scald vat number two. We both observed an engorged head and that there was no cut to the neck of the bird. (b) (6) and (b) (6) were also notified shortly thereafter. For both instances, (b) (6) stated that two employees will be placed at the position of backup killer on line two for the remainder of the shift. No other live birds were observed entering the scald vat alive. This issue will be discussed with management at the next USDA weekly meeting on June 15, 2017. There was no immediate response given by establishment management. Respectfully, (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1272	Pilgrim's Pride Corporation	04C05	CCA420606 4620G	2017-06-20	<p>Mark Dean, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Monday, June 19, 2017 at approximately 1042 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the pre-evisceration area. I observed one live bird enter the scald vat on line number two alive. The bird was observed alive and blinking its eyes prior to entry into the scald vat. I immediately notified (b) (6) and (b) (6). We all observed the cadaver upon exit from scald vat number two. (b) (6) removed the bird at this point before entering scald vat number three. The cadaver was observed with an engorged head intact with the neck to which there was no cut visible. (b) (6) stated he would add another backup killer on line two for the remainder of the shift. No other live birds were observed entering the scald vat alive. This is the fifth bird in approximately one week to be observed entering a scald vat alive at this establishment. Those corrective actions which have been stated and used thus far may not be sufficient to prevent reoccurrences of this nature. This issue will be discussed with management at the next USDA weekly meeting on June 20, 2017. There was no immediate response given by establishment management. Respectfully, (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1272	Pilgrim's Pride Corporation	04C05	CCA2206064320G	2017-06-20	<p>Mark Dean, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Friday, June 16, 2017 at approximately 1105 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the pre-evisceration area. I observed one live bird enter the scald vat on line number two alive. The bird was observed alive and blinking its eyes prior to entry into the scald vat. I immediately notified (b) (6). We both observed the cadaver upon exit from scald vat number two. (b) (6) removed the bird at this point before entering scald vat number three. The cadaver was observed with an engorged head intact with the neck to which there was no cut visible. First shift plant manager, Demaricus Green was notified and shown the cadaver shortly thereafter. Mr. Green stated he would replace the current backup killer on line two to allow for further re-training of the employee and if placed back in the position of backup killer there would always be a second person with him. No other live birds were observed entering the scald vat alive. This is the fourth bird in one week to be observed entering a scald vat alive at this establishment. Those corrective actions which have been stated and used thus far may not be sufficient to prevent reoccurrences of this nature. This issue will be discussed with management at the next USDA weekly meeting on June 20, 2017. There was no immediate response given by establishment management. Respectfully, (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1284	Pilgrim's	04C05	GDA37010 30002G	2017-03-02	<p>EST. P-1284, Pilgrim's, March 1, 2017, 0415 hours. In attendance: (b) (6)</p> <p>At approximately 0415 hours on 3/1/2017, I was observing conditions in the live room. As I was watching the picking line move through the electrostimulation unit, I observed a live chicken. I followed the line (no safe emergency stop within reach). I observed the live chicken enter the first scalding. At the exit of the final picker, I removed the cadaver that had no neck cut, red skin and a deep purple swollen neck and head. I immediately showed the cadaver to (b) (6) and (b) (6). I reminded plant management that the PPIA and agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Poultry are to be slaughtered in a manner that ensures that breathing has stopped before scalding, so that the birds do not drown, and that slaughter results in thorough bleeding of the poultry carcass. Poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned. Compliance with these requirements helps ensure that poultry are treated humanely. I recommended that the Federal Register on Treatment of Live Poultry before Slaughter, published September 2005, be reviewed for FSIS recommendations concerning treatment of live poultry before slaughter, and provided a copy of this document. A live chicken has been found on the picking line at this same location (GCP MOI dated 5/25/16) and the issue was discussed during the weekly MOI meeting (dated 5/26/16). This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in the event additional follow-up is recommended. Respectfully, (b) (6)</p> <p>P-1284</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1284	Pilgrim's	04C05	GDA10020 30520G	2017-03-20	<p>EST. P-1284, Pilgrim's, March 20, 2017, 0130 hours. In attendance: (b) (6)</p> <p>At approximately 2236 hours on 3/19/2017, I was observing conditions in the live room. As I was watching the picking line move through the electrostimulation unit, I observed a live chicken. I followed the line (no safe emergency stop within reach). I observed the live chicken enter the first scalding. At the exit of the final picker, I stopped the picking line and removed the cadaver that had no neck cut, bright red skin and a deep purple swollen neck and head. I immediately showed the cadaver to (b) (6) who was in the picking room at that time and observed me stop the picking line. I reminded plant management that the PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Poultry are to be slaughtered in a manner that ensures that breathing has stopped before scalding, so that the birds do not drown, and that slaughter results in thorough bleeding of the poultry carcass. Poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned. Compliance with these requirements helps ensure that poultry are treated humanely. I recommended that the Federal Register on Treatment of Live Poultry before Slaughter, published September 2005, be reviewed for FSIS recommendations concerning treatment of live poultry before slaughter, and a copy of this document was provided on 3/1/2017. A live chicken has been found on the picking line at this same location (GCP MOI dated 5/25/16) and the issue was discussed during the weekly MOI meeting (dated 5/26/16). In addition, an MOI was documented on 3/2/2017 for a similar occurrence. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in the event additional follow-up is recommended. Respectfully, (b) (6)</p> <p>P-1284</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1307	Mar-Jac Poultry-AL	04C05	KIL560602 3403G	2017-02-03	<p>On Friday, February 3, 2017 at approximately 1:12 am, I observed less than Good Commercial Practices. While performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed 5 birds piled up on the floor under shackles just prior to the kill machine. Four of these birds were deceased and the fifth bird in the pile was breathing, recumbent and very weak. The (b) (6), was immediately and verbally notified of the situation. At which time he had live hang personnel gather the birds and manually decapitate the live bird. (b) (6) was informed that this situation would result in an MOI for live birds co-mingling with dead birds and dying by means other than slaughter. This has been an on-going trend for the past three nights at this establishment, which was previously discussed with management, that if birds die by means other than slaughter, such as suffocation from live birds co-mingling with dead birds, an MOI for less than Good Commercial Practices could result. On February 1, at approximately 12:29 am, while performing an Ante Mortem inspection and Good Commercial Practice Check, I observed approximately 20 loose birds in the live hang area. There were also approximately 20 dead birds and a large amount of debris, such as feathers and filth at the end of each belt that the birds traverse to be shackled. I observed three smaller live birds fall off of the belt and land in and around the pile at this time, several other dead birds continued to fall onto the pile and on top of the live birds as well. Management, (b) (6), was immediately notified of the situation to prevent the birds from becoming crushed. At approximately 2:02 am the same night there was no change in the conditions in the live hang are, there were still approximately 15-20 loose birds, a pile of approximately 20 dead birds with filth at the ends of each belt and smaller live birds falling off the belt onto the pile of dead birds and one bird stuck under the belt. (b) (6) was again notified, at which time he informed me that he would have the live hang employees keep the ends of the belts clean. The following night, February 2, while performing an Ante Mortem inspection and Good Commercial Practice Check, there remained issues with smaller birds falling off the belts and comingling in the piles of dead birds. At this time it was thoroughly explained to (b) (6) that it is not in accordance with Good Commercial Practices for birds to die by means other</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>than slaughter. If these birds become crushed and suffocate in the pile of dead birds that is death by means other than slaughter and will result in an MOI for less than Good Commercial Practices. I was informed at that time by (b) (6) that two establishment employees would be kept back in the live hang area to keep the piles at the ends of the belts clean and monitor the birds to prevent this situation. These preventative measures failed to prevent recurrence. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on February 3, 2017</p> <p>(b) (6) Cc: DDM DVMS FLS</p>
P1307	Mar-Jac Poultry-AL	04C05	KIL531308 4102G	2017-08-02	<p>At approximately 10:10 on July 28, 2017, I observed less than Good Commercial Practices (GCP) while performing Antemortem/GCP/Mishandling verification at Mar-Jac Poultry in Jasper, AL. I observed one chicken in the DOA dumpster that was still breathing and fully alert. The chicken was one of approximately 10-15 chickens that had been dumped on top of the pile of denatured DOA's in the dumpster. All of the other chickens had been decapitated except the one live chicken. I notified (b) (6), who immediately retrieved the live chicken, and euthanized it by cervical dislocation and decapitation. Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Before Slaughter" states that under the Poultry Products Inspection Act (PPIA) and Agency Regulations, all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices. cc: (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1309	House of Raeford Farms Inc.	04C05	JLA1523054612G	2017-05-12	<p>At approximately 1135 hours, during the performance of a Good Commercial Practices task, I inspected the cages on truck #2837, which had been pulled from the truck sheds and was being prepared for unloading. I noted that one cage had three birds that appeared to be sitting on top of one another. Upon closer inspection, I observed that the top two floors of the cage were broken in one corner. This damage allowed a bird in the top section to fall through on top of two birds in the second section. These two birds had fallen partially through the floor of their section and were stuck between the second and third sections of the cage. One of these birds had a small amount of blood and an abrasion on the tail. I immediately notified (b) (6) of the damaged cage. I requested that the affected cage be removed from the truck, and the birds in the affected sections were removed by hand to prevent any further injury. The birds were then placed on the live hang conveyor belt for slaughter. The remaining birds in the cage were run through the cage dump, and (b) (6) tagged the cage for repair. (b) (6) also observed the damaged cage and indicated he would have the problem addressed. As I observed the unloading of other cages from truck #2837, I noted that some were missing one or more of their metal loading doors. The establishment most recently was notified of an issue with cage conditions by (b) (6) via MOI #JLA3712031830G issued on 03/30/2017. This MOI noted a number of cage issues, including broken cage bottoms, missing cage doors, and damaged metal parts and framing, during the week of March 27, 2017. A number of cages still appear to be in poor condition with the same issues noted above. The establishment has the responsibility to ensure the safe handling of all birds on its premises, which includes ensuring acceptable cage conditions, since significant cage damage may lead to injury or death of the birds.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1317	Wayne Farms LLC	04C05	QUI1110043118G	2017-04-18	<p>On Monday April 17, 2017 at approximately 0817 hour while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed a weak bird on its back under the dump cages in a puddle of water, with weak respirations, soaking wet and unable to right itself. In addition its right wing was contorted in an abnormal angle in the mid humeral region appearing fractured. I immediately went to ask the dump cage operator if he had a radio to call for a supervisor, he asked if it was for the loose bird, I replied yes. He told me that he did not and that I needed to go around front to the office to find someone. I went towards the front of the building, at which time I found a maintenance worker with a radio and asked him to call for a supervisor to meet me at the dump cages as quickly as possible. At approximately 0819 a supervisor came to the dump cages, got the bird and took it back into production. At 0822 a meeting was held with supervisors explaining that it is imperative that birds be handled/treated humanely prior to slaughter and do not die by means other than slaughter. This bird was in imminent danger of dying by drowning. At this time I was told that the bird had fallen out of a hole in the bottom of a cage to the area under the dump cages, which has a large amount of water at all times. The bird had not been retrieved in a timely manner allowing it to become injured and at risk of drowning. Management was informed of the resulting MOI from this incident. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, Treatment of Live Poultry before Slaughter, the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on April 17, 2017. (b) (6)</p> <p>Cc: DDM DVMS FLS</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1317	Wayne Farms LLC	04C05	QUI151104 0919G	2017-04-19	<p>On Wednesday April 19, 2017 at approximately 0647 hour while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed a weak, moribund bird on its back with shallow respirations on the ground in live hang at the end of the live hang belt under a pile of four other dead birds. This bird was in imminent danger of becoming crushed and dying by means other than slaughter. There was not a supervisor in the area, nor was one close by. No one was monitoring the birds at the end of the belt. I asked one of the live hang employees if anyone in the area had a radio to call a supervisor and was told no; that in order to get a supervisor I would have to go through the building and find the offices to locate someone. Due to the immediate risk of death/suffocation to the weak bird and the length of time it would take to get a supervisor, I first pulled the bird off to the side out from under the pile of already dead birds in order to prevent it from dying until I could locate a supervisor. An employee with a radio was found in the building. I asked her to please call a supervisor to meet me in live hang. Approximately 5 minutes from finding the bird, (b) (6) arrived and I showed her the bird and told her that it had been under the pile of the dead birds that were now beside it. She had gotten an employee to get the bird and put it back on the belt and into production and also instructed the employee to stay at the end of the belt to monitor the area. (b) (6) informed me that the supervisors had been in a meeting discussing the similar event that occurred yesterday and previous GCP MOI issued earlier this week. Yesterday, Tuesday April 18, 2017 at approximately 0827 while doing the Ante Mortem and Good Commercial Practice Check for that day, I observed a similar incident. In the live hang room at the end of the live hang belt on the ground there were a total of 8 birds, 7 of them were dead and one was live. The live bird was moribund and very weak. I asked an employee to get a supervisor and it took approximately 6 minutes for a supervisor to arrive. By the time the supervisor had gotten to the area the bird had expired. I asked for the supervisor to radio (b) (6), to discuss the incident. Good Commercial Practices were discussed in depth at that time and (b) (6) assured me that the situation would be rectified, as this had never been an issue at this establishment before and it</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>would be prevented from happening again in the future. I explained to him that this was very serious and the agency takes treatment of birds prior to slaughter very serious as well as birds dying by means other than slaughter. I also informed him that I would be doing additional GCP checks to verify that this did not occur again. Live birds should not comingle with the DOA birds as this puts them at risk for suffocation / becoming crushed. Once the incident occurred today (b) (6) was informed that an MOI would result from these issues. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, Treatment of Live Poultry before Slaughter, the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on April 19, 2017. (b) (6) Cc: Dr. David Thompson, DDM (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1317	Wayne Farms LLC	04C05	QUI0721083023G	2017-08-23	<p>TO: Mr. BRYAN ELROD, Plant Manager Wayne Farms LLC. 700 McDonald Ave. Albertville AL, 35950 FROM: (b) (6)</p> <p>Dear Mr. Elrod, On August 23, 2017 at approximately 20:50 hours, while performing an Ante-Mortem Inspection and Good Commercial Practices at P-01317, Wayne Farms Albertville AL, I observed a live bird in the DOA barrel. The bird was lying on the top of dead birds and being in eminent danger to be crushed and smothered by other birds when piling up on the top of each other. (b) (6)</p> <p>(b) (6), was notified about my observation. (b) (6) also observed the deficiency. I then notified (b) (6) (b) (6), of the observed deficiency, during a brief meeting held in USDA/FSIS office at approximately 21:10 hours. I also informed them that a GCP MOI documentation of our meeting and discussion of the observed deficiency would be forthcoming. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with Good Commercial Practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. Corrective and preventive measures addressing this incident are appropriate. I look forward to your response. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office. (b) (6) Dr. David Thompson, DDM (b) (6)</p> <p style="text-align: right;">Albertville AL, 35950</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P1317	Wayne Farms LLC	04C05	QUI141809 4718G	2017-09-18	<p>From: (b) (6) To: Mr. Bryan Ellrod Plant Manager Dear Mr. Ellrod, On Monday, September 18, 2017 at approximately 17:40 hours, I observed less than Good Commercial Practices. While performing an Ante Mortem and Good Commercial Practice verification inspection procedures I observed the fork lift driver ran over the bird which fell on the ground because the cage door was open. When he saw what happened, he stopped the fork lift and got out of it. I immediately asked him not to move a fork lift until I find the live hanging Supervisor or his assistant. Also I asked the live hanging personnel to stop hanging birds until I get immediately corrective action(s) from the (b) (6). A couple minutes after (b) (6) and the (b) (6) came to my office with their corrective action. (b) (6) stated that he will immediately replace the fork lift driver with another trained one. After his statement I told him that they can resume their production. Because of this egregious situation I informed (b) (6) that MOI is going to be issued to the plant manager. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office. (b) (6) Dr. David Thompson, DDM (b) (6) Respectfully submitted on September 18, 2017 (b) (6),</p> <p>(b) (6) Albertville AL, 35950</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1353	Pilgrims Pride Corporation	04C05	WUM0610 021502G	2017-02-02	<p>At approximately 0235 on 2-2-17, while performing a Poultry Good Commercial Practices task on 3rd shift, I observed a live bird in the far right corner of the dead bin. I asked the associate picking up the dead birds to tell (b) (6) I would like to see him. He, however, had seen the live bird, retrieved it and hung it on the line before he understood what I had asked. I walked down the line, found (b) (6) and asked to speak with him. I informed (b) (6) I had found a live bird in the dead bin but the associate had retrieved and hung it before I could show him. I informed (b) (6) I would be writing a Good Commercial Practices MOI. There were no other live birds found in the bin. The establishment's program failed to segregate a live bird from the dead birds. Without USDA-FSIS intervention, it is reasonable to conclude the bird would have been crushed or smothered and died by means other than slaughter. After discussing this matter with (b) (6), I then went on to finish my GCP task. My next step was to observe the birds entering the scalding. At 0241, I observed a live bird enter the scalding. The establishment's program failed to prevent a live bird from entering the scalding and, hence, failed to comply with 9 CFR 381.65(b). I informed (b) (6) of my findings and stated I would be including this incident in my Good Commercial Practices MOI. While (b) (6) went to discuss this with the backup head puller associate, I went to the bleeding room to observe the slaughter and bleeding of the birds. I observed the associate performing the backup slaughter and he did not appear to have to excessively back up the bleeding machine. These two incidents, found within minutes of each other, indicate the plant's program was not consistent in following Good Commercial Practices as required by 9 CFR 381.65 and as discussed in Federal Register Docket No. 04-037N titled "Treatment of Live Poultry Before Slaughter".</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1353	Pilgrims Pride Corporation	04C05	WUM4600 084815G	2017-08-15	<p>On 08/14/2017 at approximately 0058 hours, while performing a Good Commercial Practice Check at establishment 01353P, one young chicken out of a subset of 500 was observed with an uplifted head, pupillary reflexes, rhythmic breathing and no cut to the neck entering the scald tank. This incident was verified at the exit of the first picker. The carcass was brick red in appearance with a purple, uncut neck. The incident appeared to be isolated and no evidence of a system failure existed. To confirm, a second verification check of approximately 500 birds was conducted prior to the scald tanks and there were no live birds observed entering the scald tanks during this retest. (b) (6)</p> <p>(b) (6) and (b) (6) were notified. I explained my observations and informed them that a Memorandum of Interview (MOI) was going to be documented and a copy forwarded to the appropriate personnel in the Jackson District Office. Live bird(s) entering the scald system is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. Respectfully submitted,</p> <p>(b) (6) Cc: Dr. David Thompson, DDM; (b) (6)</p> <p>(b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1353	Pilgrims Pride Corporation	04C05	WUM5623 093818G	2017-09-18	<p>At approximately 2130 hours, (b) (6) came to the office to inform me that live hang was having issues with birds being dead on arrival. Upon entering the live hang area, I found that the establishment had already stopped hanging due to the significant number of DOAs. There were already 8 barrels filled with DOAs and a pile at the end of the belt approximately 3 feet high. No live birds were uncovered during the removal of the DOAs, but considering the pile up of birds, it is a logical assumption that if there were any live birds on the bottom of the pile they had died from asphyxiation. I spoke with (b) (6) and (b) (6) to see what had caused the high number of DOAs. I was informed that the particular lot was carried over from first shift and had arrived at 0657 hours that morning. The birds had been in the truck since that time. No issues were observed with the fans throughout the day. I was informed that the establishment would be investigating further to see if there was an additional cause to the high number of DOAs or if it was due to the significant amount of time the birds were held in the truck prior to slaughter. There were no significant findings on either antemortem or postmortem inspection for live birds found in that same lot. I informed both (b) (6) and (b) (6) that I would be writing an MOI for Good Commercial Practices for the incident. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to abide by the Good Commercial Practices (GCPs) as described by industry guidelines.</p> <p>Respectfully submitted, (b) (6) Cc: Dr. David Thompson, DDM; (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1353	Pilgrims Pride Corporation	04C05	WUM5203 092528G	2017-09-28	<p>While doing a Good Commercial Practices task on the morning of 9-27-17 on 3rd shift at Pilgrims of Chattanooga, I, (b) (6) observed 4 live birds enter the scalders. I informed (b) (6) that I had seen 3 live birds enter the scalders within a matter of minutes (the first at 0059 hours and two at 0106 hours) and would be writing a MOI. A fourth live bird entered the scalders a few minutes (0109 hours) after I had informed (b) (6) of the first three. I also informed him of this 4th bird. I continued to observe the carcasses entering the scalders for 10 more minutes. I did not observe any more live birds enter the scalders. These four incidents of live birds entering the scalders, found within minutes of each other, indicate the plant's program was not consistent in following good commercial practices as required by 9 CFR 381.65 and as discussed in Federal Register Docket No. 04-037N titled "Treatment of Live Poultry Before Slaughter." However, there were no other factors observed to support a process control failure and thus a regulatory control action. Respectfully, (b) (6)</p>
P1362	Tyson Foods, Inc.	04C05	LPC180902 5307G	2017-02-07	<p>Live chicken on ground below dumping unit. The bird was picked up by unloading personnel at my request. One cage on each of two trailers( #91083 and #91084; license #'s Oklahoma (b) (4) ) had large gaps in cages where vertical bars were broken and pushed inward. Both had holes large enough for birds to potentially escape. Also, the inward protrusion of the bars is a hazard to any birds inside the cages. Both cages had live birds in them.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1362	Tyson Foods, Inc.	04C05	LPC160906 2809G	2017-06-09	<p>On June 8, 2017, at approximately 09:20 hours, (b) (6), and (b) (6) met with (b) (6).</p> <p>The following is a synopsis of the events and discussion regarding GCP related issues. I began that while verifying that poultry was slaughtered in accordance with good commercial practice, I observed approximately 25 carcasses on the floor behind Line 1 live hang that were dead on arrival. I observed live hangers discarding several carcasses from the Line 1 live hang belt to the floor. I continued my GCP verification. While observing the poultry in the receiving shed, I observed several modules on several trailers in which the green plastic liner on the bottom layer of the module was displaced upwards limiting the space in which the birds could move freely. Some of these liners were displaced upwards in which there was only about 4 inches between the bottom of the next module and the liner of the lower module. I also observed a module in which there was a hole approximately 6-8 inches long and 4 inches tall in which birds could easily fall out or escape. Lastly, I observed a cage with a 4 inch piece of the module had been dislodged and was bent inside the cage where it could easily impale the bird. At approximately, 09:20 hours while returning from the receiving shed, I located (b) (6) and (b) (6) and informed them of his observations. I inquired about the cause of the large number of DOAs. (b) (6) informed me that these were due to holdovers from nightshift. I inquired about whether the establishment scheduled these holdovers to be slaughtered first. (b) (6) informed me that they did. I inquired about if the holdovers should be finished by this point and (b) (6) thought they were after consulting with (b) (6). It should be noted that NR number LPC1219064002N dated June 1st was issued due to DOA at the inspection station. Furthermore, DOAs presenting at inspection stations have been a developing trend discussed in the weekly meeting. In addition, cages being in disrepair were also most recently noted in the weekly meetings April 13th. There was no response by the establishment. MOI LPC1809025307G was issued on February 7th for similar instances of cages in disrepair. The meeting was adjourned at approximately 09:30 hours.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P1362	Tyson Foods, Inc.	04C05	LPC081407 0305G	2017-07-05	On July 5, 2017 at approximately 12:10 PM while performing the Good Commercial Practices task, I observed two live birds between cages on Trailer #091090 in Bay #7 of holding shed. I could not tell which cage they had come out of as all cage doors appeared to be closed. I notified (b) (6) and (b) (6) about this less than ideal situation. We have previously discussed problems with Live Haul concerning cages with holes in them and cages missing doors. Also, these afore mentioned problems predispose birds to getting loose and falling from trailers enroot to the establishment from the farm.
P1362	Tyson Foods, Inc.	04C05	LPC161809 2804G	2017-09-04	On September 4, 2017 at 18:01while doing a Good Commercial Practices task I observed a dead chicken that appeared to have been crushed between two cages. The chicken was on the roller chain that brings the cages up to the dump station. It was partially wedged under the front side of the next cage in line to be dumped on Line # 2. The chicken had only recently died. The person operating the dumping machine said he did not see the bird and said that neither of the forklift drivers notified him of any loose birds.This type of mistreatment of the birds, even if accidental, must not be allowed to happen again. Repeated incidents of this type could result in a violation of Good Commercial Practices. I notified the (b) (6) and (b) (6) of the situation and the subsequent MOI that I would be issuing.

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P146	Tyson Foods, Inc,	04C05	EJJ531004 3926G	2017-04-26	<p>P 146 Tyson Poultry On April 25, 2017 at approximately 0515 while performing ante-mortem and Good Commercial Practice I observed while walking through the live hang area there were a large number of dead chickens on the DOA belt. This seems to be a constant finding when there are chickens left over from the night shift that did not get slaughtered. In checking I found there were 17,680 chickens that were held over from the previous night. While continuing to perform ante-mortem and Good Commercial Practice on the live chickens on the trailers in the shed, I observed the chickens in the cages to be very depressed and cold looking. I could see there were some that had also died. These were also part of the numbers that were left from the previous night.I Inquired if there had been any equipment failure or a mechanical issue that caused this number of chickens not to be slaughtered and there was none. This seems to be a continual issue of too many chickens delivered to be slaughtered within the shift. The weather during the night was rainy and there was a cold damp air. The shed is open without any protection from the weather allowing these chickens to endure the elements of the weather. The chickens are held off feed prior to being caught and loaded into the cages on the trailers and have not had any water after they were loaded. Therefore these chickens had no food or water for approximately 12 to 24 hours.I have observed prior that when chickens are carried over from the previous day to bear the elements of the weather whether it is very cold or very hot there is an increase in the number of DOA's during my ante-mortem and GMP checks.</p> <p>Therefore my observation is that all this these chickens evidently died due by means other than the normal slaughter process.This issue had been discussed at the last weekly meeting and evidently no corrective measures have been taken to correct the issue.</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P165H	OK FoodsProcessing Plant	04C05	DAF05130 13225G	2017-01-25	<p>OK Foods, Inc. PO Box 158 1000 Old Pike Road Heavener, OK 74937 At approximately 0548 on 1/25/17, while performing a good commercial practice check, I observed a sensible bird (eyes open, head erect) proceeding down the line and into the line 1 scalders. I traveled down the line and observed a cadaver exit the pickers. I removed the carcass and observed no evidence of a neck cut. I motioned for a lead in the area and asked him to radio (b) (6). I showed (b) (6) the cadaver at which point he immediately left in the direction of the blood tunnels where the kill machine and back-up killers are located. Shortly thereafter, I performed a recheck and observed zero sensible carcasses prior to the scalders. I met with (b) (6) later in the morning and discussed this incident (b) (6) informed me that (b) (6) had replaced the back-up killer with another employee.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P165H	OK FoodsProcessing Plant	04C05	DAF29140 44417G	2017-04-17	<p>At approximately 1225 on 4/17/17 while performing a good commercial practice check in the back dock area, I observed the following poor live bird handling techniques. A live bird holding cage was resting on the concrete with all the doors open and approximately 300 live chickens huddled in the area. It appeared that the cage had fallen from a forklift and spilled the birds out. I observed the cage boomer correctly lifting birds, one at a time and placing them into the cage. As I monitored the situation, I observed two live hang employees come to the assistance of the boomer. However, one of these employees was scooping up multiple chickens (3) at a time, resulting in birds being carried by a wing or leg. These chickens were then crammed into the cage using more force than necessary. At this point, I walked to the cage and asked the live hang employee to stop catching birds. Both live hang employees immediately stopped catching birds and returned to the live hang room. I then began looking around the area for someone with a radio to contact plant management. I observed one of the live hang leads watching from under the cage dumping area and asked him to radio (b) (6). (b) (6) arrived a short time later. I immediately informed him of my observations. I stayed in the area until all the live birds were caught and returned to the cage using proper live bird handling techniques. (b) (6) commented that he would discuss my observations with the back dock lead in an attempt to determine who the live hang employee was. Later, (b) (6) reported that the live hang employee denied catching birds by the wing or leg. On the morning of 4/18/17, (b) (6) met with (b) (6) to further discuss this incident. (b) (6) asked what caused the cage to fall from the live haul truck and what steps the establishment was taking to prevent this from happening in the future. (b) (6) later explained that the forklift driver had not raised the top cage high enough prior to backing up the lift. The top cage caught on the lip of the cage below, pulling it off the forks of the lift, causing it to fall to the concrete. (b) (6) also commented that the establishment plans to retrain the forklift driver to prevent future incidents</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P165H	OK FoodsProcessing Plant	04C05	DAF13140 65203G	2017-06-03	<p>6-3-17 OK Foods, Inc. PO Box 158 1000 Old Pike Road Heavener, OK 74937 At approximately 0659 on 6/3/17, while observing cages being dumped as part of a good commercial practice task, I observed a chicken resting between the incoming track and the exit track of the cage dumper. The employee operating the cage dumper continued to dump chickens as the bird squatted between the tracks. Incoming cages passed the chicken on one side and outgoing cages passed the chicken on the other side. The chicken became excited as the doors of an exiting cage were closed and the chicken moved onto the track in front of the cage. The chicken was then pushed along in front of the cage until the point that it became crushed between the cage and the end stop plate at the exit end of the cage dumper track. I immediately notified (b) (6) of my observation and discussed the incident at approximately 0850 with (b) (6). Later in the shift I discussed the incident again with (b) (6). She informed me that the employee operating the cage dumper was unaware that a chicken was on the equipment because he was unable to see it from his vantage point. I explained that the establishment may need to consider placing a mirror on the cage dumper so the employee can visualize this area.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P165H	OK FoodsProcessing Plant	04C05	DAF22070 80704G	2017-08-04	<p>At approximately 0505 on Friday, August 04, 2017, while performing a good commercial practice check in the live hang room I observed the following. An employee hanging live chickens on line 2 was repeatedly using excessive force to place the birds in the metal shackles. The force being applied was such that I was easily able to hear the metal shackles banging loudly against the metal guide bar as the employee used a rapid downward motion to force the birds into the shackles. After observing this same forceful technique used several times, I immediately proceeded to the cage dumper and motioned for the operator to cease dumping cages of live birds onto the transfer conveyor. I then attached US reject tag B37528025 to the dumper and requested that a supervisor come to the area. Shortly thereafter, I met with (b) (6) and (b) (6) and notified them of my observation. (b) (6) explained that all of the night shift contract live hangers had received training on animal welfare. The live hanger who had been using excessive force had been removed from the live hang room and would not be allowed back on the premises ever again. The remaining contract hangers would all receive additional animal welfare training. At that point I released regulatory control of the cage dumper. A short time later I toured the live hang room again and observed all employees using the appropriate hanging techniques.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P165S	OK Foods, Inc.	04C05	LWA22190 64121G	2017-06-21	<p>On 6/21/2017 at about 1645 hours I had gone out to the hanging dock to complete a GCP task. I saw cages of birds on the line ready to go to the dumper. There were two cages in the hypobaric chamber and two cages sitting on the end of the line sitting in the sun. At about 1715 hours I noticed that birds were being dumped into the hopper ready to go into the live hang area. Two cages of birds were dumped into the hopper and another was ready to be dumped on top of those. The birds were stacked two deep in the hopper causing them to stand on top of each other. The misters were not on and the birds were noticeably in distress. I called (b) (6) up to the top of the stairs so that he could see what was happening. I told him that the birds were stacked two deep in the hopper and there were no misters on. He told me that he would get maintenance to get a hose and fix the misters. The birds were in the hopper five minutes before hanging started. When I went inside the hanging room I saw that there were several DOAs being thrown away from the birds that had been sitting in the hopper. I counted about 30 DOAs. I told (b) (6) about what I had seen before start up and informed him that the birds could not be piled so high in the hopper. He said that he would take care of the situation. I also told (b) (6) of my concerns about the birds in the cages sitting on the line in the sun during break. They do not have misters nor fans and the sun is shining directly on the cages. He said that from now on he would make sure the lines are clear when they go to break so that birds are not left in the sun. (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P165S	OK Foods, Inc.	04C05	LWA44160 85507G	2017-08-07	<p>At approximately 1512 on Monday August 7, 2017 I, (b) (6), was in the Live Hang Room performing a GCP Task. As I observed the hangers I noticed that live chickens were continuously getting to the bar at the end of the belt and crowding up against it. After I had been watching for a couple of minutes, I observed a healthy, alert chicken fall off of the end of the belt into a condemn barrel. There were 2 condemn barrels side by side under the end of the live hang belt. The employees ignored the chicken in the barrel. I asked the employee on floor duty to request either the Supervisor, or the Lead to come to the area for me. He nodded yes, but went directly to the 2 barrels at the end of the belt instead and looked in them. The employee pulled 1 live chicken out of the right barrel and placed it back up onto the belt, then pulled a dead chicken out, pulled the head off of it and placed it into another barrel on the side. Then he pulled 3 live chickens out of the left side barrel. The employee then went to get management. The Lead and the other employee that works in the office came downstairs. Immediately the Lead checked the condemn barrels at the overhead door that were full of dead chickens to see if any were moving while the other employee moved both barrels away from the end of the belt and checked in them. Only then did the Lead approach me. I told him the situation, then I returned to the USDA Office and notified (b) (6). (b) (6) then went and found (b) (6) and notified her of the happenings and that this MOI would be issued.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P170	Wayne Farms	04C05	IAA300909 2119G	2017-09-19	<p>While performing the Good Commercial Practices Verification Task on September 15, 2017, at approximately 0923 hours, I observed the following incident in the live hang/kill room areas: After observing the live hang floor person pick up several dead carcasses from the floor and place them on the offal conveyor belt, he then went to the suspect table where moribund or weak birds are placed, removed two live birds, and placed them on the offal conveyor belt. It was clear that these birds were alive as I had observed them moving on the table and when he picked them up by their legs, their wings began to flap. I immediately exclaimed that the birds were alive and began to look for a stop button for the conveyor belt. When I was unable to locate a stop button, I pulled both birds off the conveyor belt and placed them on the floor in the kill room while the floor person watched me through the opening between live hang and the kill room. When he came into the kill room, I pointed to the birds and told him again that they were alive and should not have been placed on the offal belt. Then I left the area to locate a supervisor. At approximately 0926 hours, I informed (b) (6), who then radioed (b) (6) to meet us in live hang. When I informed (b) (6) of the incident, he explained that the floor person was new and (b) (6) stated to (b) (6) that the floor person needs to be retrained. I then informed (b) (6) that the discussion would be documented in a Memorandum of Interview (MOI.) At approximately 1000 hours, after (b) (6) notified (b) (6) of the situation, I again discussed the matter with (b) (6) and (b) (6). At that time, (b) (6) stated that the floor person regularly works in Debone and occasionally helps out in live hang when staffing is short. He also stated that retraining would occur at the end of the lunch break. Per Docket No. 04-37N, FSIS reminds all poultry establishments that, under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices, and that they do not die from causes other than slaughter. This MOI will be forwarded to the District Office and the District Veterinary Specialist (DVMS) in case additional follow-up is recommended.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P170	Wayne Farms	04C05	IAA541309 1622G	2017-09-22	<p>September 15, 2017 To: Matthew Wooten, Plant Manager From: (b) (6) Re: MOI of Incident on 9/15/2017 On today, September 15, 2017 at approximately 5:25pm, I observed a large number of birds piled up on the belt entering into the plant approximately 2.0 ft high. It was later determined that during that time approximately 300 birds were smothered on the belt. I spoke with the (b) (6) approximately 6:15pm who informed me that the regular cage dumper was absent and the person filling in was trained but made a mistake with the controls and dumped 2 cages on the belt resulting in the pile up. The immediate corrective action was to stop operations and remove birds from the pile up as quickly as possible. I informed him that I would be documenting this incident in a Memorandum of Interview (MOI). I am aware of your staffing shortages which results in use of persons not completely familiar with the job they are performing. This does not negate you clearly understanding that live poultry MUST be treated in a manner consistent with good commercial practices at all times. FSIS's systemic approach to slaughter means the "establishments focus(es) on treating poultry in such a manner as to minimize excitement, discomfort, and accidental injury the entire time that live poultry is held in connection with slaughter". In this incident today, this was not observed. This is the 2nd MOI today; the first one IAA21120900151 given earlier in the 1st shift, documented by (b) (6). This MOI will be forwarded to the District Office and the District Veterinary Specialist (DVMS) in case additional follow-up is recommended. Repeated incidents could result in further enforcement action.</p>
P17340	Pilgrim's	04C05	UQB25030 52029G	2017-05-29	<p>At approximately 2:45am, on 5-28-2017, while performing the Poultry Good Commercial Practices task, I found one live bird in the DOA dumpster on the "old side". The bird was resting between birds that had been sprayed with denaturant but did not have denaturant on it. I notified (b) (6) retrieved the bird. I then informed (b) (6) the (b) (6). The establishment's program failed to segregate a live bird from the dead birds. Without USDA-FSIS intervention, the establishment's plan would have failed to prevent a bird from dying by means other than slaughter.</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P17340	Pilgrim's	04C05	UQB42140 64513G	2017-06-13	<p>On 06/12/2017 at approximately 1210 hours while performing a good commercial practices verification task, I observed a very large accumulation of comingled dead, moribund, and live birds at the convergence of the cage dump conveyor and live hang conveyor belts which had obstructed the latter, and accumulated to the point that the birds on the incline line were dragging across the accumulation of birds on the live hang conveyor belt as they advanced up the line. I also noted that despite the aforementioned obstruction that establishment personnel continued to hang live birds. I verbally notified (b) (6). (b) (6), of the aforementioned obstruction. (b) (6) subsequently attempted to address the aforementioned obstruction, whereby I observed live and moribund birds struggling to breathe, and suffocating underneath the carcasses of the dead. (b) (6), was also notified of the aforementioned issue. Several minutes later, I observed a very large accumulation of dead birds on the opposite side of the live hang conveyor belt which had been thrown off the conveyor and onto the floor by the live hangers. The aforementioned accumulation of birds was so substantial so as to impede my passage behind the live hangers on that side of the table. Upon closer inspection of the aforementioned accumulation of birds with a flashlight, I immediately observed two live birds partially entrapped within the accumulation of dead birds. Upon inspection of the fans on the west and east sides of the truck unloading dock (old side), 3/7 and 2/7 fans, respectively, were non-functional. (b) (6) and I noted that the birds were panting heavily. Upon observing the cage dumper platform (old side), I noted that the large fans suspended above the cage dumper and the cage dumper conveyor belt were nonfunctional. Upon further inspection of the live hang conveyor belt (at approximately 1400 hours), I observed a large, rigid white plastic divider in the middle of the live hang conveyor belt (oriented perpendicular to the belt) running throughout its length, which had effectively narrowed its width by half (plastic divider installed secondary to the current non-operational status of line 1). I also noted that additional, poorly secured white plastic divider components had been installed at an angle, at the origin of the live hang conveyor belt, to funnel birds onto the live hang conveyor belt. Hence, birds falling off the cage dump</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>conveyor belt and onto the live hang conveyor belt are being funneled into a narrow area (choke point) resulting in congestion and heaping of birds on the belt to the extent that birds on the incline line are dragging across the top of them. Upon further observation, (b) (6) and I also noted that the feet of birds were being caught between the divider and the live hang conveyor belt, and that one bird was entrapped in the aforementioned equipment by its wing. (b) (6) subsequently freed the bird from its entrapment. (b) (6) (b) (6), was verbally notified of the aforementioned. Federal Register Notice Docket No. #04-037N dated September 28, 2005, "Treatment of Live Poultry Before Slaughter," encourages those involved in the slaughter of poultry to abide by Good Commercial Practices. A copy of this MOI will be forwarded to the District Office and to the District Veterinary Medical Specialist in case additional follow-up is recommended. Respectfully, (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P17340	Pilgrim's	04C05	UQB07100 91809G	2017-09-09	<p>Est. P-17340, Pilgrim's, August 28, 2017, 1457 hours. Those in attendance: (b) (6)</p> <p>On 8/28/17 at approximately 2:57 PM while observing conditions in the old side live hang department, I observed multiple chickens with their toes trapped underneath the live hang conveyor belt divider. I did not observe any amputated toes, but the toes were entrapped to the point that live hang personnel had to pull some of the birds' feet out from underneath the divider. This divider was installed after evisceration line 1 operations ceased, and this divider's purpose is to direct birds to one side of the live hang conveyor belt. Upon observance of this mistreatment, I advised (b) (6) to stop the live hang conveyor belt. I discussed this mistreatment with (b) (6) and he advised maintenance personnel to remove the divider. At 3:02 PM after removal of the divider, I advised (b) (6) that the live hang conveyor belt could be re-started and operations resumed. Plant management decided to permanently remove the divider on 8/29/17 after divider modifications did not prevent further mistreatment. Poultry must be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering increases the likelihood of producing unadulterated product. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>Pilgrim's P-17340</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P17766	Southern Hens, Inc	04C05	SSN3413045311G	2017-04-11	<p>Good Commercial Practices MOI: On April 11, 2017 @ approximately 0905 hours, I observed a less than good commercial practice while performing Ante-mortem inspection and a Good Commercial Practices check at Establishment P-17766. While performing a 500 bird count, I saw a live, non-stunned and uncut bird enter the scalders. This was the result of two birds having been hung together in one shackle. The other bird in the shackle was dead from a proper cut to the neck before entering the scalders. (b) (6) and (b) (6) were immediately notified of this finding. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6)</p>
P17766	Southern Hens, Inc	04C05	SSN0813045524G	2017-04-24	<p>Good Commercial Practices MOI: On April 24, 2017 @ approximately 0838 hours, I observed a less than good commercial practice while performing Ante-mortem inspection and a Good Commercial Practices check at Establishment P-17766. While performing a 500 bird count, I saw a live, non-stunned bird enter the scalders. The bird was flapping and attempting to right itself. As it entered and traveled half the length of the first scalders, the bird jerked violently, while lifting itself until it was no longer in my immediate sight. (b) (6) was immediately notified of this finding. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P17766	Southern Hens, Inc	04C05	SSN061707 2624G	2017-07-24	<p>On July 24, 2017 at ~1640 hours, I observed a less than good commercial practice while performing and Ante-mortem and Good Commercial Practices (GCP) check at P-17766. While performing the GCP on the back dock, I noticed a bird pinned beneath the unloading conveyer and a coop. Only half of the bird was visible due to bobbing from the constant pulling and releasing action as the coops rolling over its body. I immediately alerted (b) (6), (b) (6) and (b) (6) of this unacceptable practice. Upon removal of the coop covering the bird, I noticed a slight movement. Examination revealed that there was golf-ball sized hole in the middle of its chest that extended deep enough to allow viewing of the internal organs. The bird was also blinking and attempting to lift his head. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6)</p>
P18414	MB Consultants LTD	04C05	JYI5211045 513G	2017-04-13	<p>On 4/11/2017 I observed in the area before the plucker 24 broken wings out of 500 total birds that passed by. On 4/12/2017 when I asked for the animal welfare guidelines they stated they didn't have one. I discussed with the plant that broken wings are considered mistreatment and are more likely to result in the birds being adulterated during processing, which is not following good commercial practices. Following animal welfare guidelines would be more likely to result in good commercial practices than not having any guidelines at all. Mishandling birds and creating 24 broken wings on 500 birds is not good commercial practice. Failure to follow good commercial practices could result in further regulatory action being taken</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P18557	Sanderson Farms, Inc.	04C05	QNA24100 41527G	2017-04-27	<p>On April 27, 2017 at approximately 0905, (b) (6) observed less than Good Commercial Practices while performing an Ante-Mortem Inspection and Good Commercial Practices check at 18557 P in Summit, MS. While observing the kill machine of each picking line for proper function, I did not observe any abnormality in the equipment's operation. I walked to the end of the blood trough to observe for any live birds entering the scalders. I observed a single, live bird at 0905 enter the scalders on picking line #1. The bird was hanging on the shackle with its eyes open, still breathing, and without a cut on its neck. This bird entered the scalders alive and still breathing. I did not take any regulatory action with this single-bird incident, since no evidence of a system failure existed. I notified (b) (6) (b) (6), of the observed nonconformance, during a brief meeting held in his office at approximately 0910. I presented the cadaver to him, explained my observation, informed him that a Memorandum of Information (MOI) was going to be documented, and relinquished the carcass into his control. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office.</p> <p>Respectfully, (b) (6) cc: (b) (6) (b) (6), and Mr. Don Coley, Jackson DDM.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P18557	Sanderson Farms, Inc.	04C05	QNA18110 53715G	2017-05-15	<p>On May 15, 2017 at approximately 1045, (b) (6) observed less than Good Commercial Practices while performing an Ante-Mortem Inspection and Good Commercial Practices check at 18557 P in Summit, MS. While observing the kill machine of each picking line for proper function, I did not observe any abnormality in the equipment's operation. I did observe that a new employee was backing the kill machine on line #2. I walked to the end of the blood trough to observe for any live birds entering the scalders. I observed a single, live bird at 1045 enter the scalders on picking line #2. The bird was hanging on the shackle with its eyes open, still breathing, and without a cut on its neck. This bird entered the scalders alive and still breathing. I did not take any regulatory action with this single-bird incident, since no evidence of a system failure existed. I notified (b) (6), of the observed nonconformance, during a brief meeting held in his office at approximately 1050. I presented the cadaver to him, explained my observation, informed him that a Memorandum of Information (MOI) was going to be documented, and relinquished the carcass into his control. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office. Respectfully, (b) (6) cc: (b) (6) and Mr. Don Coley, Jackson DDM.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P18557	Sanderson Farms, Inc.	04C05	QNA02110 64712G	2017-06-12	<p>On June 12, 2017 at approximately 1049 while performing a GCP task in the (b) (6) and (b) (6) observed less than Good Commercial Practices. A weak, moribund bird was observed lying in the vat of DOA birds located in the live receiving/cage dumper area. The bird had a very shallow and labored respiratory movement. Two employees were in the act of throwing more DOAs into the vat. This action would have certainly smothered the debilitated bird with the additional weight, since the bird could not right itself and escape. A new employee in the Management Trainee Program was informed of our observation. He removed the live bird, before any more DOAs were deposited into the vat, and replaced it on the hanging belt. We discussed the incident with (b) (6), at about 1055. He immediately communicated with (b) (6) in an effort to prevent future incidents. As per Federal Register Notice Docket No. 04-037N Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office. Respectfully, (b) (6) cc: (b) (6) and Mr. Don Coley, Jackson DDM</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P18557	Sanderson Farms, Inc.	04C05	QNA01120 61222G	2017-06-22	<p>On June 22, 2017 at approximately 1041 while performing a GCP task in the (b) (6) observed less than Good Commercial Practices. A weak, moribund bird was observed lying in the vat of DOA birds located in the live receiving/cage dumper area. The bird had a very shallow and labored respiratory movement. I immediately stopped the employee from throwing more DOAs into the vat. This action could have led to smothering the debilitated bird with the additional weight, since the bird could not right itself and escape. He removed the live bird, before any more DOAs were deposited into the vat, and replaced it on the hanging belt. I discussed the incident with (b) (6) at about 1056, in an effort to prevent future incidents. As per Federal Register Notice Docket No. 04-037N Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office.</p> <p>Respectfully, (b) (6) cc: (b) (6), and Mr. Don Coley, Jackson DDM</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P18557	Sanderson Farms, Inc.	04C05	QNA12120 75613G	2017-07-13	<p>On July 13, 2017 at approximately 1155 while performing a GCP task in the (b) (6) observed less than Good Commercial Practices. A weak, moribund bird was observed lying in the vat of DOA birds located in the live receiving/cage dumper area. The bird had a very shallow and labored respiratory movement. One bird was laying on top of this bird, further hindering its respiratory activity. No supervisor was immediately available to discuss this matter, so I removed the bird from the vat and returned it to the live receiving conveyor. Addition of more birds to the vat could have led to smothering the debilitated bird with the additional weight, since the bird could not right itself and escape. I discussed the incident with (b) (6), and (b) (6) at about 1202, in an effort to prevent future incidents. As per Federal Register Notice Docket No. 04-037N Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office.</p> <p>Respectfully, (b) (6) cc: (b) (6), and Mr. Don Coley, Jackson DDM</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P18557	Sanderson Farms, Inc.	04C05	QNA11110 73318G	2017-07-18	<p>On July 18, 2017 at approximately 1044 while performing a GCP task in the Live Receiving area, (b) (6) observed less than Good Commercial Practices. A weak, moribund bird was observed lying in the vat of DOA birds located in the live receiving/cage dumper area. The bird had a very shallow and labored respiratory movement. Several birds were laying on top of this bird, further hindering its respiratory activity. I notified (b) (6), about the observed nonconformance. He came to the DOA vat, removed several dead birds from the top of the vat, in order to find the live bird, and removed the live bird from the DOA vat, in order to return it to the live receiving conveyor. The addition of more birds to the vat could have led to smothering the debilitated bird with the additional weight, since the bird could not right itself and escape. I also discussed the incident with (b) (6) in an effort to prevent future incidents. As per Federal Register Notice Docket No. 04-037N Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office.</p> <p>Respectfully, (b) (6) cc: (b) (6) and Mr. Don Coley, Jackson DDM</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P18557	Sanderson Farms, Inc.	04C05	QNA32090 72025G	2017-07-25	<p>On July 24, 2017 at approximately 1043 while performing a GCP task in the Live Receiving area (b) (6) observed less than Good Commercial Practices. I observed a bird with a normal respiratory movement, eyes open and very alert, lying in the vat of DOA birds located in the live receiving/cage dumper area. I immediately had an employee to come to the DOA vat, remove the live bird, in order to return it to the live receiving conveyor belt. This action could have led to smothering the fully alert bird if additional weight would have been added to the DOA vat, since the bird could not right itself and escape. I discussed the incident with (b) (6) at about 1059, in an effort to prevent future incidents. As per Federal Register Notice Docket No. 04-037N Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office.</p> <p>Respectfully, (b) (6) cc: (b) (6), and Mr. Don Coley, Jackson DDM</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P18557	Sanderson Farms, Inc.	04C05	QNA14060 92806G	2017-09-06	<p>On September 6, 2017 at approximately 0532 while performing a GCP task in the Live Receiving area, (b) (6) observed less than Good Commercial Practices. A weak, moribund bird was observed lying in the vat of DOA birds located in the live receiving/cage dumper area. The bird had a very shallow and labored respiratory movement. Several birds were laying on top of this bird, further hindering its respiratory activity. I notified (b) (6), about the observed nonconformance. He came to the DOA vat, removed the live bird from the DOA vat, and returned it to the live receiving conveyor. The addition of more birds to the vat could have led to smothering the debilitated bird with the additional weight, since the bird could not right itself and escape. I also discussed the incident with (b) (6), in an effort to prevent future incidents. As per Federal Register Notice Docket No. 04-037N Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office. Respectfully, (b) (6)</p> <p>cc: (b) (6) and Mr. Don Coley, Jackson DDM</p>

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EstNbr	EstName	Task_Code	MOI#	Date	Description
P19112	Perdue Foods LLC	04C05	OXA34220 94913G	2017-09-13	<p>At 0031 on 9-13-17, while performing a Poultry GCP task, I observed the DOA Cage area. This area is in a room that is separate from the Live Hang room. There were approximately 4 or 5 live birds in the cage area. I noticed movement coming from under the pile of birds under the belt for Line 2. I went in the cage and removed a couple of live birds from the top and the periphery of this pile. I pulled one bird from under the pile. It was still breathing but unresponsive. As I was searching through the pile for more buried live birds, dead and live birds were dropping onto the pile. When 4 live birds dropped in succession, I left the DOA room in search of assistance. (b) (6)</p> <p>met me in the DOA room. I informed him that I had observed the pile under the belt moving or “jumping” and had pulled out some partially covered birds and one bird from below the others. I informed him the bird had been breathing but unresponsive and that several live birds had fallen off the belt while I was trying to sort through the dead ones. I stated that I would be documenting this with a MOI as there did not seem to be an adequate measure to keep the live birds out of the DOA cage and becoming covered by dead birds. It is reasonable to conclude that said covered birds would eventually be crushed or smothered by the falling birds and, as such, would die by means other than slaughter. (b) (6)</p> <p>proffered to retrieve the gates that go on the ends of the live hang belts and bolt them on as a preventative/corrective measure. He assured me they would remain on.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P19128	Case Farms of North Carolina, Inc.	04C05	FCA290603 4411G	2017-03-11	<p>At P19128, Case Farms of North Carolina, Inc. on 3/11/17: At approximately 0712, while performing a Good Commercial Practices verification I proceeded to the DOA dumpster located outside the live hang area to determine whether any live birds were present. Upon looking into the dumpster, which was about 1/2 full, I observed a live bird on it's back lying amongst the dead birds and noted the bird was experiencing respiratory difficulty. I then noticed a second bird that was partially under dead birds that was experiencing more respiratory difficulty than the first. Shortly after this observation (b) (6) was observed in the area so I obtained his attention and summoned him to the dumpster to demonstrate the live birds. (b) (6) retrieved both birds from the dumpster and I notified him that I would be documenting a MOI. (b) (6) protested and requested that I "give him a break" and not document the issue. I informed (b) (6) that I would be issuing the MOI as the live hang personnel should be able to properly identify a live bird by determining whether or not they are still breathing and at that point in the process, i.e. the DOA bin, this determination has failed. I then proceeded back to the inspection office and left a voice mail for (b) (6) regarding the incident. Shortly thereafter I notified Plant Manager Reuben Mayronne of the observation. Mr. Mayronne said he would go to live hang to talk with (b) (6). According to plant management personnel received disciplinary action and were re-trained on proper identification of live birds to ensure they do not go into the DOA bin.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P19128	Case Farms of North Carolina, Inc.	04C05	FCA0000075522G	2017-07-22	<p>At 22:00 while during an observation of the Live hang area, I observed an excessive amount of birds on the floor in the hanging room. Some were alive, however, most of them appeared to be DOAs. Two employees were picking up the birds and throwing them through an opening on the back wall of Live Hang area. This opening leads to the DOA bin. At 22:08 after observing the Live hang employees I decided to examine the DOA bin. I observed a live bird in the DOA Bin laying on its back with another bird on top of it. I immediately notified (b) (6) [REDACTED], of my findings. By the time I located the Supervisor and arrived back to the bin, denaturant had been applied on the birds, including the live bird. The live bird was removed from the DOA bin by the Live Hang Supervisor, killed by breaking the neck, and placed back into the DOA bin once it was dead. (b) (6) [REDACTED] apologized for the incident and stated that he was working with a short staff. He stated that numerous DOAs were dumped on the belt at one time and the employees had been working hard to sort through the birds. He ensured me that an incident of this sort would not happen again. (b) (6) [REDACTED] also stated that he would monitor the DOA bin, himself, for the rest of the night. This issue was also discussed with, Steve Ritchie, the Plant Manager on night shift. (b) (6) [REDACTED] informed me that plant employees will break the neck, i.e. utilize cervical dislocation, of moribund birds from now on. Once the bird dies, employees will also remove the heads before throwing the birds into the DOA bin.</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P19128	Case Farms of North Carolina, Inc.	04C05	FCA1408095515G	2017-09-15	<p>At approximately 0615 one of the line inspectors in 1st processing request for me to come their inspection station. The inspector showed me three DOA's they had just condemned while performing postmortem inspection. I went to live hang area to notify (b) (6) but at that particular time he wasn't available. I notified my supervisor (b) (6) of the situation and then return to evisceration to give inspector breaks at which time the inspector told me they had gotten three more DOA's. At this time Reuben Mayronne (plant manager) was coming through evisceration when he observed the three DOA's that had been hung back by the inspector and I told him of other DOA's that had been condemn. He immediately notified the live hang supervisor of the excessive amount of DOA's observed. During the time (b) (6) and I was giving breaks we each had observed approximately 6 or 7 more DOA's on the line. After (b) (6) and I finished giving breaks we went to the live hang dock. While I was standing behind the backup killer observing the process the backup killer pulled three DOA's off the line. While (b) (6) was observing in the live hang room, the hangers hung approximately 5 or 6 DOA's on the kill line. We observed approximately 20 + DOA's either being hung on the line in live hang or reaching the inspection stations in evisceration in a 30 to 40 minute time span. This MOI is a failure of the plant to follow their training procedure for handling live young chickens in processing plant, which states that DOA's should be identified and removed to the floor, which will be collected into barrels in a timely manner at the end of each lot or more frequently as required. At one point (b) (6) stopped the line for a couple of minutes to talk with his live hang employees about hanging DOA's on the line. The observance of DOA's was discussed in the weekly HACCP meeting and plant management said they would investigate the situation.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P192	Pilgrims Pride Corporation	04C05	OOB00180 10706G	2017-01-06	<p>Today 1/6/17 while performing a check for Good Commercial Practices at 1520 I found unacceptable conditions in live receiving. On the floor at the end of the Line 2 hanging belt there was a DOA pile of carcasses that was too large and not being managed in a timely manner. I notified (b) (6) and (b) (6) that the floor employees were not taking care of the DOA pile properly. I returned to live receiving with the Supervisor to watch as they picked up carcasses and performed manual decapitation and disposal in a condemn barrel. As they progressed through the pile, two birds were observed to move when picked up. One bird was barely alive. The second bird was very alert, eyes blinking. I informed (b) (6) that a GCP MOI would be issued for allowing live birds to be co-mingled with dead birds, and further putting them at risk of dying by way of smothering from the weight of birds on top of them in the DOA pile. We discussed today's weather conditions, which was extreme cold weather and chance of snow. The establishment had already noted an increase in DOA numbers related to the weather.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P192	Pilgrims Pride Corporation	04C05	OOB02140 10018G	2017-01-18	<p>On Wednesday, January 18, 2017 at approximately 0715 hour, I observed less than Good Commercial Practices. While performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed approximately 10 birds loose under the area where the cages are dumped onto the belts in the outside region to enter the building into live hang. The plant was leaving for break at this time while the birds were still loose. It took approximately four minutes to locate establishment personnel to inform of the loose birds. The birds were caught and placed in a pen on top of the belt on line two in the outdoor region that would enter into live hang. The employee that caught the birds put them in the pen and then returned to his break. I noticed one of the birds was dorsally recumbent with its feet outstretched in the air. I moved closer to examine the bird further. The bird appeared weak/unable to right itself, several other birds were sitting on its head, its breathing was very slow and shallow. I attempted to find establishment management to inform them of the bird's condition so it would not die via suffocation/means other than slaughter. It took approximately three minutes to locate establishment personnel. I asked him to come with me and showed him the bird. I informed him that this was not good and the bird was going to die by means other than slaughter if not attended to. He got a plant employee to come and turn the bird back over and then had the employee resume his break. He also stated that the employee that he had come out to "right" the bird knew how to properly put the birds in the pen and he would have him inform everyone else how to do so properly and that this should not happen. I informed him that the employee that he was referring to was the one that had placed the bird in the pen originally. He then stated that he knew better. The weak/moribund bird was then left in the pen with the remainder of the birds. The establishment was notified of the incident and informed of the resulting MOI. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on January 18, 2017 (b) (6) Cc: DDM DVMS FLS
P192	Pilgrims Pride Corporation	04C05	OOB07070 11130G	2017-01-30	On January 28, 2017, at approximately, 1200 I went into the live receiving area. There were over 100 dead on arrival (DOA) birds piled up on the floor in the live receiving area. Upon taking a closer look with a flashlight, I saw a bird that was in imminent danger of being crushed or smothered at the bottom of the pile still flapping its wings. There was only one plant employee handling the DOA birds. I immediately made this particular employee aware of the live bird and he proceeded to euthanize it by disarticulation of the neck. At 1100, (b) (6) (b) (6) had gone into the live receiving area and noted five employees handling the DOA birds. At 1150, (b) (6) informed plant management that the number of DOA birds on the floor was still significantly high and needed to be corrected. At 1230, (b) (6) checked on the condition of the live receiving area and noted that there were still over 100 DOA birds present and only one employee handling them. Federal Register 04-037N encourages those involved in the slaughter poultry to abide by Good Commercial Practices.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P192	Pilgrims Pride Corporation	04C05	OOB09160 75713G	2017-07-13	<p>On Thursday, July 13, 2017 at approximately 1511 hour, while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed one young chicken, with an uplifted head, pupillary reflexes, rhythmic breathing and no cut to the neck entering the scald tank that feeds evisceration line #2 (b) (6) was immediately notified.</p> <p>Live bird(s) entering the scald system is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. My observations are consistent with less than good commercial practices. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on July 13, 2017 (b) (6) Cc: Dr. David Thompson, DDM (b) (6) (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P192	Pilgrims Pride Corporation	04C05	OOB52210 72114G	2017-07-14	<p>On Friday, July 14, 2017 at approximately 1744 hour, while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed a live bird intermingled in a pile with six other dead birds at the bottom of the slide at the end of the belt in live hang that feeds evisceration line #1. Initially upon entering live hang I saw the pile of birds with movement towards the bottom of the pile and no establishment employees were attending to the pile. Once employees were aware of my presence they came to attend to the pile of birds. The dead birds were removed from the live bird at the bottom of the pile that was in imminent danger of becoming crushed/suffocating and dying by means other than slaughter. The bird was then put back into production. (b) (6)</p> <p>(b) (6) was immediately notified. The same Supervisor was spoken with yesterday as well over the concern for numerous loose birds in live hang and piles of dead birds that were not attended to until USDA entered the area. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. My observations are consistent with less than good commercial practices. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on July 14, 2017 (b) (6) Cc: Dr. David Thompson, DDM (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P192	Pilgrims Pride Corporation	04C05	OOB52140 73426G	2017-07-26	<p>On Tuesday, July 25, 2017 at approximately 1726, while performing a Good Commercial Practices task, I observed a truckload of birds directly in the sun with no misters or fans. Upon closer examination, I observed approximately half of the birds exhibit labored breathing. (b) (6) was immediately notified. These observations are consistent with less than Good Commercial Practices. It is the responsibility of the establishment to ensure that all birds on their premises are treated in a humane manner. Federal Register 04-037N encourages those involved in the slaughter of poultry to abide by Good Commercial Practices.</p>
P19514	Tyson Foods, Inc.	04C05	UMF01200 13206G	2017-01-06	<p>At approximately 19:45 hours I went to (b) (6) office to perform the weekly record keeping aspect of the GCP task. She could not find any data entry for second shift for the week. The week's production was not over yet, but it does cause one to wonder if I had not asked to see the data if any observations were going to be done for this week. I asked to see results from first shift; results were found for the yard and only one of the lines. The other line data was not in the system. The first shift plant observations were done on Tuesday of this week. The plant has had ample time since Tuesday to recognize that either the observation of line 2 was not done or that the data associated with the observation was not entered. This raises several questions: 1.) When does management look at the "Animal Welfare" data? 2.) Is the data collected just to have something to show an auditor that the establishment is "actively" doing something about good commercial practices? 3.) If the data collected during a week shows possible animal abuse and the data is not looked at for over a week's time, is that possible abuse allowed to continue during that time? 4.) In what time frame does the establishment react to the input? 5.) How can the establishment state that they are concerned about animal welfare and will react to abnormal findings when it has obviously not looked at the data for four days of production?</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P19514	Tyson Foods, Inc.	04C05	UMF06210 30202G	2017-03-02	<p>On 2/21/2017 at approximately 19:15 hours while performing a GCP task, I was on the live receiving platform observing the birds, the cage conditions and the cage dumping process. The operator dumped a cage and moved the cage on the transfer chains about 2/3s of the way and noticed that there were still two birds in the bottom right compartment of the cage. He reversed the travel of the cage several times to position it back at the dumping area. He proceeded to start tilting the cage when I noticed that one of the birds was trapped between the dumper slides, the door and the bottom of the cage. Approximately 1/3 of the bird was visible beneath the cage door. I alerted the operator, who lowered the cage and retrieved the carcass. A portion of the fresh looking intestines were dangling between the legs. I immediately notified (b) (6) of the situation. (b) (6) came to see what was going on and I told him we would talk in a quieter area. At 19:30 hours I met with (b) (6) and (b) (6) in the Evisceration MCC room. I explained to them what I witnessed and that I needed a plan from them on how to prevent this from happening again. I did not get a response that evening. On 2/22/2017 at approximately 19:44 hours I asked (b) (6) what their planned actions were and he said they were putting an end to the practice of moving the cage away from and then back to the tilting mechanism until guidelines could be established. It needs to be noted that (b) (6) witnessed a similar incident in November of 2015. She wrote a MOI (attached) covering that incident and the corrective actions (attached) did not prevent this most recent occurrence. It appears that the Establishment has not instituted protocols to prevent this type of action. As per Federal Register Notice docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the USDA Food Safety and Inspection Service (FSIS) strongly encourages all establishments in the slaughter of poultry to make every effort to treat poultry humanely and abide by good commercial practices (GCP) as described by industry guidelines. Thank you for your attention in this matter. A copy of this memorandum will be forwarded to the DVMS in the Jackson District Office.</p>
P19514	Tyson Foods, Inc.	04C05	UMF10230 71813G	2017-07-13	MOI rescinded per DVMS



EstNbr	EstName	Task_Code	MOI#	Date	Description
P19688	Sanderson Farms, Inc.	04C05	KJA250603 4413G	2017-03-13	<p>Date: March 9, 2017</p> <p>Meeting Start Time: 1245 hours Attendees: Sanderson Farms P19688: (b) (6)</p> <p>USDA: (b) (6) and (b) (6) GCP: On Thursday, March 9, at approximately 1227 hours while performing a Good Commercial Practices task in the Live Hang area, I observed the following: The drain cover over the end of the white drain immediately beneath the conveyor belt was not in place, revealing ~ 2 feet of the drain. A live bird was found within the drain. I immediately removed the bird and notified (b) (6). (b) (6) immediately replaced the drain cover. The presence of live, conscious birds within the drainage system is not consistent with good commercial practices. The establishment should implement measures to ensure that live birds received by the establishment do not die of causes other than slaughter.</p>
P19688	Sanderson Farms, Inc.	04C05	KJA011309 4209G	2017-09-09	<p>On Saturday September 9, 2017 at approximately 0840 hours while performing Poultry Good Commercial Practices task I observe the following: an establishment employee was picking up dead and live birds off the ground I observed him throwing live birds back onto the conveyor belt and dead birds into the drain. On one of these instances I have observed him pick up a live bird and throw the live bird into the drain. I also noticed a pile of approximately 30 dead and live birds behind the conveyor belt commingled on the floor. I notified (b) (6). (b) (6) At 1150 hours (b) (6) observed the similar conditions: 30 live birds on the floor, live birds falling off the conveyer belt and 8 dead birds on the floor with a live bird on top of the dead ones. The commingling of live birds and dead birds is not consistent with good commercial practices it's not acceptable to have piles of birds in the live hang room with live birds potentially located beneath dead birds. Measures to prevent the needless suffering, discomfort or accidental injury of poultry throughout the entire slaughter process failed to do so in this incident.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20245	Equity Group Kentucky Division, LLC	04C05	ISL071609 5428G	2017-09-28	<p>At approximately 1351 hours on September 28, 2017 while performing the Good Commercial Practices and Ante Mortem task, the following was observed in live hang. At the end of the belt under the shackles that feeds evisceration line #2 there was a pile of 21 DOA birds that continued to grow. I observed this pile for several minutes using a flashlight to determine if any live birds were present in the pile due to the rapid rate at which birds continued to accumulate in the pile. There was movement seen within the pile of birds under several DOAs. I could not locate a supervisor at the time to inform of my observations. At approximately 1354 establishment members began clearing the pile and a live bird was removed from about half way down the pile and placed back into production. (b) (6)</p> <p>was notified of the incident and informed that it would be documented in a MOI. It was also discussed that live birds should not be comingled with DOAs due to imminent danger of birds becoming crushing and dying by means other than slaughter. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than Good Commercial Practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on September 28, 2017</p> <p>(b) (6) Cc: Dr. David Thompson, DDM (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM01070 10804G	2017-01-04	<p>On Wednesday, January 4, 2017, I, USDA (b) (6), met with (b) (6) to discuss what was observed in the loafing shed earlier that day. At 0525 hours on January 4, 2017 while performing ante-mortem inspection in the loafing shed, I, (b) (6) (b) (6) observed a dead bird on trailer T69. The bird was located on the driver's side, first module on the bottom row, 4th level. There were four broken wires, approximately 1 inch apart, bent inwards and at an angle creating an approximately 6 x 5 inch opening on the outside module panel. The bird's head was stuck between two of the broken wires. The other ten chickens in this module were not injured. There was no mark on the module indicating that it was damaged. I notified the establishment's (b) (6) what I observed. The scale operators perform a Leg/Head Audit on each trailer that enters the loafing shed. Trailer T69 arrived at 0100 hours. The modules are inspected by establishment and marked if damaged. As of December 27, 2016, the percentage of damaged modules was 4.5% with the maximum limit being 5%. The marked modules are tracked or removed from service pending on the damage. The establishment will mark the module as damaged and have it repaired. Further investigation will be performed by the establishment to determine if any other actions need to be made. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry Before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>Respectfully (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM0715013213G	2017-01-13	<p>On January 12, 2017, I (b) (6) met with (b) (6) and (b) (6) (b) (6) to discuss observations I had made while performing a PHIS Good Commercial Practices verification task. On January 12, 2017 at approximately 0815, I observed (b) (6) holding a chicken that appeared sensible and was bleeding from the head. (b) (6) was standing next to the kill machine and took the chicken to the (b) (4) Room where she released the chicken back into the (b) (4) unit to be re-stunned. I approached (b) (6) and asked her where the chicken was cut. (b) (6) replied that the chicken had its beak cut off in the kill machine. As I continued the GCP verification task at approximately 0837 I observed loose birds on trailer # T922 in the southwest corner of the loafing shed. A bottom panel door on a lower level battery crate was open. One bird was roosting between two battery crates and three birds were perched with their heads sticking out of the cage and between the two stacks of battery. I notified (b) (6) of the loose chickens. (b) (6) told me he would place the chickens back into battery cages, and close the open panel. I then notified both my supervisor and (b) (6) and then arranged a meeting to discuss these findings. At the meeting, I asked (b) (6) if the establishment had a program for injured sensible birds, and specifically if there was a program for sensible birds that had passed through the slaughter machine and were injured by the machine. (b) (6) replied that the establishment's program for injured birds requires that the injured bird be taken immediately to the (b) (4) area to be placed in (b) (4). She also stated that management was aware that sometimes birds which passed through the slaughter machine received cuts other than on the neck, but that those birds were insensible. She emphasized that this bird was sensible, and was injured by the machine. She said that she was concerned about the situation, and was seeking guidance from an independent animal welfare organization. She was notified that this incident would be documented. Later in the afternoon she met with me and told me that she had been informed that their handling of the incident was considered acceptable by the organization. The observation of loose birds was acknowledged at this meeting, but was not discussed further at this time. The Poultry Products Inspection Act and Agency regulations (9 CFR</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>381.65(b)) require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>Est. P-20251 Tecumseh, NE</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM48140 12225G	2017-01-25	<p>On January 19, 2017, I (b) (6) met with (b) (6) and (b) (6) to discuss observations I had made while performing a PHIS Good Commercial Practices verification task. On January 18, 2017 at approximately 1140 hours, I observed loose birds on trailer # T922. A bottom panel door on a lower level battery crate was open. Two birds were roosting between two battery crates. As I continued I noticed another panel door opened on a different battery crate the chickens were all in the battery. I notified (b) (6) of the loose chickens. (b) (6) told me she would place the chickens back into battery cages, and close the open panels. I then notified both my supervisor and (b) (6) and then arranged a meeting to discuss these findings. At the meeting, I reviewed my observations. (b) (6) added that (b) (6) had observed loose birds earlier this week as well. In that instance, establishment employees were already present and in the process of catching a loose bird on the ground underneath the trailers when (b) (6) arrived at the loafing sheds (b) (6) and I both expressed concern about the battery cage doors popping open. I asked (b) (6) if the establishment had a program to fix or remove damaged battery crates. (b) (6) replied that the establishment does have a program. She further stated that this program requires that at least 95% modules are maintained in acceptable condition, and that the establishment is meeting that requirement. I followed up and verified that the Standard Operating Procedure requires ensuring that at least (b) (4) modules are maintained in a condition that prevents animal welfare issues. I asked (b) (6) if I could see the establishment's current reports on the condition of the battery cages. (b) (6) told me that she could not show them to me. When I asked why I could not see them, she replied, "Because we haven't been receiving them." She did not know why the reports were not being received and added that she would have to "look into that." The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6) [REDACTED] Est. P-20251 Tecumseh, NE

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM1907014827G	2017-01-27	<p>On January 24, 2017, I (b) (6) met with (b) (6) and (b) (6) to discuss observations I had made while performing a PHIS Good Commercial Practices (GCP) verification task. On January 23, 2017 at approximately 1230 hours, on trailer #T796 I observed two QA Tech's looking at what appeared to be a dead chicken between two crates. The body of the chicken was located next to a bottom panel door which had been damaged. The panel door bowed inward along the top and the corners were bent down in a dog-eared manner on both sides. This created an opening of sufficient size to allow a chicken to escape. This crate was previously marked with yellow tape to identify it as damaged and in need of repair to restore it to working condition according to (b) (6). I followed up later and watched as an establishment employee segregated the crate in question. During the GCP verification task I also observed one chicken with its leg protruding out of the crate between the floor of the battery and the bottom wire of the wire frame. The wire was bent in a way that the chicken was trapped and could not pull its leg back into the cage. The hock was abraded and bleeding and the chicken was struggling to get free. I notified the QA Tech and showed her my findings. The cage was not previously marked to indicate that it was damaged. An employee freed the chicken's leg. Continuing the GCP verification task, I observed two chickens on the floor near the kill machine. Both were alive and sensible. One appeared to be bleeding from its head, and on closer inspection I found that its lower beak and a portion of its face were cut off. I showed this finding to (b) (6), and asked if she would take care of this injured chicken. She carried it back to the entrance to the (b) (4) unit and placed it on the belt. Furthermore, on January 24, 2017, at 1212 hours, (b) (6) found a chicken with its head protruding from of a battery cage on trailer number T797, through wires that were bent to allow room for the chicken to stick its head out. The chicken was now deceased. (b) (6) notified (b) (6) and (b) (6) and showed them his findings. He notified (b) (6), who immediately informed management. During the discussion of the damaged battery cages, (b) (6) was adamant that the establishment was in compliance with its Animal Welfare program, which requires that at least (b) (4) of the battery cages be in acceptable</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>condition. (b) (6) assured (b) (6) that we did not question that the establishment was in compliance with the program. Nonetheless, compliance with the program may not be sufficient to prevent the creation of situations which result in the mistreatment of birds. During the discussion of the bird with the mutilated face, (b) (6) suggested that the establishment may wish to review how it responds to situations in which inadequate stunning occurs. It is also interesting to note that the injured bird was on the floor, and was not taken to (b) (4) until I requested it. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully submitted, (b) (6) Est. P20251 Tecumseh, NE</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM05150 40127G	2017-04-27	<p>Good Commercial Practice Mistreatment MOI at Est. 20251P (b) (6) and (b) (6) met with (b) (6) at 0815 hours on April 27, 2017 to discuss the mistreatment of young chickens described below:</p> <p>On April 26, 2017, at approximately 0520 hours, while performing ante-mortem inspection of birds on Organic trailer T-15, I, (b) (6), observed several dead and dying young chickens. The young chickens were wet and the outside temperature was 38 degrees Fahrenheit with an 18 mile per hour wind speed. I contacted the (b) (6) and requested more information on the trailer. Via E-mail, (b) (6) informed me that the trailer of birds was from Iowa. The trailer arrived to the establishment covered. There were 112 DOAs and there were birds from two different lots on the trailer. I explained to (b) (6) that allowing birds the die by other means than slaughter is not consistent with GCPs. (b) (6) will look into it and contact transportation about it. The meeting was adjourned at 0840 hours.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM3206055516G	2017-05-16	<p>On May 12, 2017 at 1215 hours, (b) (6) and (b) (6) met with Establishment P20251 (b) (6) and (b) (6) for a weekly meeting and to discuss Good Commercial Practice observed by (b) (6) stated below. On May 12, 2017 at 0532 hours while performing ante-mortem, I (b) (6) (b) (6), observed two live young chickens setting on Trailer T-796. The module adjacent from the birds had a broken door, open outwards and penned between the trailer support post and module, on the third level. There were approximately 20 live young chickens in the open compartment of the module. I notified the scale house personnel. The two loose birds were gently removed from the trailer and placed into another module. A wooden board was placed in front of the opening. Since the wooden board was not secured to the module, I asked the scale house personnel how is the module going to be handled when placed in the facility to keep the birds from falling out of the opening. He informed me that he would notify the unloading personnel of the broken module and they would monitor it at that time (b) (6) (b) (6) was notified via Email that an MOI would be documented and sent to District office for review. At the meeting, (b) (6) informed USDA that the module was unloaded first and no issues were reported. And (b) (6) will look into options for preventative measures.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM56120 65428G	2017-06-28	<p>On 27 June 2017 at 1315 hours, USDA FSIS (b) (6) met with VP Operations Mr. Erik Monson and (b) (6) upon request from the establishment. The establishment does not believe that the birds with red skin and red muscle being condemned are cadavers. They had a similar issue back in 2013. By meeting with the current USDA FSIS inspection team, they hope we can come to a consensus. The establishment used the description of a cadaver from the Compliance Guideline for Training Establishment Carcass Sorters in the New Poultry Inspection System (NPIS) Food Safety and Inspection Service U.S. Department of Agriculture, September 2014, which states: “A cadaver is a generalized condition that causes the carcass and viscera to be unwholesome and unfit for human food. Cadavers are any birds that did not bleed out properly due to a poor or missed cut of the neck veins before the bird entered the scalding. The heat of the scalding causes blood left in the carcass to expand into the skin blood vessels, giving the skin of the carcass and neck a cherry red to purple color. The blood also accumulates in the dependent (lower) regions, such as the necks, wings, and upper breast area. Some cadavers may appear red all over; others will appear red only in the lower regions of the carcass. The blood vessels in the viscera will appear enlarged and the liver may appear burgundy colored. The entire carcass and viscera of cadavers are unwholesome and must be disposed of properly to ensure that they are not used as human food.” It also states what the establishment sorter is to look for: “cherry red to purple color of whole carcass or the lower regions of the carcass; sometimes, just the neck will appear cherry red or purple color; may be no cut on the neck, or may be only partially cut; and blood vessels in the viscera may appear engorged (filled up with blood)” The establishment wanted to know if IPP are looking at the livers before condemning the birds as cadavers. Unfortunately by the time the carcasses arrive to the Carcass Inspection Station, there are no livers to examine and the IPP can only go by the skin, muscle and what they can see inside the cavity. But, I, (b) (6), was able to examine the lot at the Leukosis station and noticed that a large number of the birds have congested livers and ascites. Mr. Monson asked if the condition of the birds were due to their system. I replied: “No, but the condition of the birds and your</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					system can cause cadavers. This is why birds need to be placed on the line in a timely manner so they can go through the kill machine and bleed out.” The establishment doesn’t understand why IPP are looking at the breast muscle since they have no documentation on looking at the breast meat to disposition a carcass. They request to have some of the birds submitted for pathology. They will also share the documents they have from 2013 to the USDA FSIS. USDA FSIS agreed to submit pathology samples from carcasses that are condemned as cadavers and will review the documents the establishment has on the matter. Once all the information is review and pathology results received, the establishment and USDA FSIS will meet again on this matter. The meeting was adjourned.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM30170 61329G	2017-06-29	<p>On 28 June 2017 at approximately 0815 hours, I, (b) (6), meet with (b) (6) to discuss the Good Commercial Practice mistreatment observed earlier that morning. On 28 June 2017 at 0759 hours while performing ante-mortem inspection in the South loafing shed, trailer T325 had six loose young chickens on it. The top module at the second level from the top had a broken door which was hanging down and pinned between the trailer's support post and the module. The Scale House employee was notified. And, the birds were caught and placed into another module without harm or added stress. The employee informed me that a plastic door would be placed in front of the opening to prevent the remaining chickens from falling out and the trailer would be unloaded first for that lot. As I continued ante-mortem inspection on trailer T325, 529 and T796, I observed a large number of dripping wet young birds. During the time the trailers were being transported uncovered to the establishment, there were thunderstorms in the area. The small young chickens (under 3 pounds) were dead or very lethargic and pale in color. The young chickens were from Lot Number: 4308179, Total Head (b) (4), Total DOAs: 178 (24, 36 and 9 DOAs were on the three trailers). The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry Before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>Establishment P20251</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM4006070205G	2017-07-05	<p>On 5 July 2017 at 0937 hours, USDA FSIS (b) (6) met with (b) (6) to discuss the Good Commercial Practice Mistreatment of a young chicken. At approximately 0537 hours this morning while performing ante-mortem at the South Staging area, I, (b) (6), observed a dead young chicken with its head sticking out of the module with red substance (blood) splattered across the right side of its neck and wing and from its mouth down the module to the frame of the trailer. The bird was located in the middle of the organic trailer number 204 at the bottom level of the top module. Upon further investigation of the module, I observed that the bottom wire was broken creating an opening big enough for the bird to stick its head out of the module. The other young chickens (approximately 12) were unharmed. (b) (6) informed me that she will notify Live Op and the module will be fixed tonight. The establishment's average percentage for damaged modules is 3.46%. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>Est. P20251</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM2408082430G	2017-08-30	<p>On 29 August 2017 at 1420 hours, USDA FSIS (b) (6) met with (b) (6) to discuss the Good Commercial Practice Mistreatment of young chickens. At approximately 1412 hours on 8/29/2017, (b) (6) observed the (b) (4) belt stop but the dumper belt continued to run. The (b) (4) (b) (4) Operator continued to dump 3 (b) (4) (approximately (b) (4) live young chickens per coop) on to the belt which caused live young chickens to pile up on top of other live birds already waiting to enter the (b) (4) machine. (b) (6) called for (b) (6) in training, to come over to look at the issue. She went up on the dump stand and the (b) (4) (b) (4) Operator told her how to shut off the dump belt. At that time, (b) (6) came into the (b) (4) area and got the (b) (4) machine running. (b) (6) requested her to look at the birds entering the (b) (4) machine. She told him that both belts should shut off at the same time but weren't for some reason. At approximately 1420 hours, I, (b) (6) entered the (b) (4) area and observed (b) (6) on the Hatch Stand talking to (b) (6) came to me and informed me of the situation and that she will investigate to find out what exactly happened. (b) (6) and I went to the (b) (4) machine and I could see live young chickens piled on top of each other through the window. (b) (6) explained to me why there were live birds piled on top of each other inside the (b) (4) machine. I then went over to (b) (6) and asked her why the (b) (4) continued to dump birds on the belt while the (b) (4) machine was down. (b) (6) stated that the (b) (4) Operator was not aware of the (b) (4) belt not running. The dump belt and (b) (4) belt are set up to stop at the same time. I informed (b) (6) that an MOI will be documented. At approximately 1430 hours, I observed the pile of birds exit the (b) (4) machine. The establishment added extra personnel to monitor for conscious birds and control the amount of birds being placed on the carousel. There were only two birds that exited the (b) (4) machine still conscious and the carousel was not overloaded due to the increase number of birds exiting the (b) (4) machine. At approximately 1520 hours, (b) (6) called the USDA Office and informed me that the (b) (4) system was accidentally turned off instead of paused. When the system is on pause, the belt to the</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>dumper will stop. The person who shuts the system off has to communicate with the (b) (4) (b) (4) Operator to shut off the dumper belt. Since the personnel did not realize that the system was shut off, there was no communication to the (b) (4) (b) (4) Operator. I thanked (b) (6) (b) (6) for the information and that I will be documenting it in an MOI and forward it to the District Office. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry Before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. Respectfully, (b) (6) (b) (6) Est. P20251 Acting IIC 8/31/2017</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P20251	Tecumseh Poultry, LLC	04C05	PBM15100 92720G	2017-09-20	<p>On 9/20/2017, at approximately 0550 hours, I, (b) (6), met with (b) (6) to inform her of a Good Commercial Practice Mistreatment. At 0543 hours this morning with outside temperature of 73 degrees Fahrenheit, while performing ante-mortem in the loading sheds, I observed a Good Commercial Practice Mistreatment on Organic Trailer 204. I observed a module on the top row towards the back of the trailer with five (5) compartments all on the same side overloaded with live young chickens (approximately 125 birds involved). They were pressed up against the sides of the module and piled on top of each other panting (necks stretched out, open mouth breathing and tachypneic), vocalizing, and restless (shifting side to side or from laying to standing). One of the birds had its head and neck sticking outside of the module due to broken wires on the panel. No injuries were observed on the bird. (b) (6) took photos of the module and informed me that she will have Live Op move the module and find out the cause. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry Before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully,</p> <p>(b) (6) at Est. P20251 (b) (6) Denver District/ Lincoln Circuit 9/20/2017</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P206	Pilgrim's Pride Corporation	04C05	KCC182101 1905G	2017-01-05	<p>At approximately 1550 hours, while touring the facility with the (b) (6) was seen throwing birds by their neck from one end of the conveyor belt to the other. The birds were thrown approximately 3-5 feet, from the north end of the north conveyor belt hitting the bumper at the south end of the conveyor belt. At the time of this observation the conveyor belt was empty and the birds were starting to come in from the cage dumper. Regulatory control action was taken by stopping the picking lines and placing USDA Reject tags (B38482441 and B3848438) on the start/stop button of both the east and west picking lines. (b) (6) spoke to (b) (6) Tonya Byers (Plant Manager), and (b) (6) regarding the incident. The PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices and preventing mistreatment of poultry directly correlates with a decreased production of adulterated carcasses. (b) (6) and Tonya Byers immediately held a documented training with all live hang employees on 2nd shift before starting back up. Regulatory control action was relinquished by removing the Reject Tags from the start/stop button for both the east and west picking lines. This MOI will be forwarded to the Front Line Supervisor, District Office, and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. (b) (6)</p> <p>P206</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P206	Pilgrim's Pride Corporation	04C05	KCC551507 5920G	2017-07-20	<p>At approximately 2230 hours, while performing Good Commercial Practices, I observed two large piles of DOAs totaling approximately 200 birds in the live hang area. The DOAs were steadily being removed from the live hang conveyor belt. The picking lines were slow to accommodate the rate at which the DOAs were entering live receiving. The live hang foreman and additional live hang employees were in the process of removing the DOAs but they soon became overwhelmed and stopped killing on this line. At this time I went outside to observe the establishment dumping the cages. The cages from this farm, Lot 4 - (b) (4), were approximately 1/3 - 1/2 full of DOAs. At this time, no communication was made to USDA regarding any emergency that occurred during transport. When questioned, (b) (6) and (b) (6) were not aware of any issues that occurred with this trailer or farm. On the Poultry Lot Sheet (FSIS Form 6510-7) it shows that there were (b) (4) heads in the lot and there were 1490 DOAs. This is a (b) (4) DOA rate. I discussed this with (b) (6). He stated that they ran approximately 8 trucks from this farm and there was only 1 truck that had a large number of DOAs. This is indicative of an issue that arose during transport regarding this one truck. After consulting with (b) (6), (b) (6) I informed (b) (6), Tonya Byers (Plant Manager), and (b) (6) that they would be receiving a GCP MOI documenting the increased number of DOAs observed from this farm. On 07/19/2017 (b) (6) reached out to Pilgrims Corporate Management to identify if they were aware of the issue and informed them of the findings. USDA requested the establishment conduct an investigation into the issue. On 07/20/2017 she was informed that an issue had occurred at the farm concerning the catch equipment (in regards to the fans) and that there had been an issue with the driver of the truck in question. She also spoke with Plant Manager Tonya Byers and was told that the establishment had since implemented corrective actions to include hiring additional drivers and working with the Live Bird operation to decrease the number of birds loaded into the cages. She informed Plant Manager Byers that the information should be provided in response to the MOI being issued by</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>(b) (6). The establishment is reminded that they are encouraged to develop and implement systems that ensure poultry presented for slaughter are treated in a manner that minimizes accidental injury and/or death and that they die by a means consistent with Good Commercial Practices. This includes an assessment of areas where handling problems may occur, such as during transport. When issues are identified, the establishment is expected to take corrective actions immediately. Establishments should have, and implement as needed, an emergency plan or notification system that addresses animal welfare in the event an emergency or unusual circumstances during transport arises. This concern was discussed with the establishment in response to another transport related incident that occurred on 4/24/2017 in which a large number of birds were killed during a traffic incident and transported to the official establishment commingled with live birds. In regards to that incident, USDA was not notified of the issue before the truck arrived and the establishment delayed sorting of the birds. Noncompliance record KCC2016044525N/1 was issued. Copies of this Memorandum of Interview (MOI) will be distributed to the establishment, inspection file and District Veterinary Medical Specialist per FSIS Directive 6100.3. Documented by (b) (6)</p> <p>Establishment management response: Pilgrim's Pride is committed to the human treatment, handling, and processing of poultry in a manner that is consistent with Good Commercial Practices and has establishment a comprehensive animal welfare program to ensure that birds are handled with concern for animal welfare through all phases of grow out, transport, and slaughter. This letter is in response to the above mentioned LOC where our plant failed to prevent birds from dying by means other than proper slaughter. On July 18th, 2017 Plant Management was notified of a deficiency of good commercial practices. The conditions observed were as follows: excessive DOAs in the live hang area and on a cage trailer from (b) (4)</p> <p>Complex Management immediately conducted an investigation of the event and determined the findings were due to the following: The use of fans and misting at the farm to reduce the heat stress for the birds was not in affect at the time of loading. The root cause was determined to be that there were an insufficient number of fan truck drivers at the time of</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>loading. This created a shortage of fans/misters at the farm when the cage trailer was loaded. The Complex Management team met and discussed the findings. Measures have been implemented to ensure that the number of birds per load will be seasonally adjusted to reduce heat stress. We have hired additional fan truck drivers to ensure that a sufficient number of fan/mister systems are available during the loading of birds. We are hiring fan operators for correct fan operation and bird misting to reduce heat stress on the farms. Proper fan and mister operation, in conjunction with reduced stocking density in the cages will prevent further reoccurrence. Pilgrim's management personnel will also be available during catching operations to ensure best practices are used at all times. Complex management is confident that these preventative measures will correct any potential deficiencies going forward. All corrective actions have been implemented as of 7/24/17. After the implementation of the above measures, the Live Operations manager and Complex manager have monitored several farms at catch verifying that proper fan operation and misting procedures are being followed. We are confident that this issue has been permanently addressed and that there will be no further incidents of this type.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P208	George's Processing, Inc.	04C05	XIC461801 4621G	2017-01-21	<p>On January 21, 2017 at approximately 1825 hours I observed the stun/kill process for Kill Line #1. Over a period of 3 minutes I observed 12 birds on the line that had been hung by only one leg. I noted that because of the way these birds were hung on the kill line they did not pass through the stunning and kill machines properly. As a result the birds were not properly stunned. Additionally, I observed that the improper presentation of these birds through the kill machine resulted in cut wings/legs and no neck cut. Because these birds had not been rendered insensible by the stunning equipment these improper cuts resulted in excessive thrashing and wing flapping by the birds, which had to be manually killed by the backup kill employee. I immediately notified (b) (6) of my findings and we discussed the importance of all birds being hung on the kill line by two legs to help ensure proper stunning and slaughter. He immediately assigned a lead employee to the live hang area to ensure that birds were being hung properly. During several additional minutes of monitoring stun/kill operations I did not observe any more birds hung by one leg on the kill line. I discussed my findings with (b) (6) and reiterated to him the importance of all birds being hung by two legs on the kill lines to help ensure proper stunning and slaughter.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P208	George's Processing, Inc.	04C05	XIC331905 0322G	2017-05-22	<p>On 5-22-2017 at approximately 1910 hours while walking through the live hang and receiving areas I noted that the Kill Line #1 cage dumper was inoperable. As a result live hang employees were transferring live birds by hand from the Kill Line #2 hanging belt to the Kill Line #1 hanging belt, approximately 7 feet away, to be hung on shackles to allow both kill lines to be utilized for production. As I observed these activities in the live hang area I noted that a live hang employee was removing live birds from the Kill Line #2 hanging belt and throwing them through the air at a distance of approximately 5 feet to land on the Kill Line #1 hanging belt. On two occasions this employee tossed a live bird far enough to hit live birds that were hung on the Kill Line #1 shackles and then drop onto the hanging belt below. I immediately stopped production on Kill Line #1 and placed U.S. Reject tag #B35619004 on the live hang belt to denote it as rejected for use. I contacted N/S Plant Manager Paul Howell and informed him that the Kill Line #1 hanging belt was rejected for use due to improper handling of live birds by the live hang employee. After investigating the incident Mr. Howell and (b) (6) met with me to discuss corrective actions to prevent improper handling of live birds by live hang employees. Mr. Howell held an immediate meeting with the live hang employees to discuss proper bird handling. He also informed me that there would be a formal training session addressing good commercial practices and proper bird handling to be held with all live hang personnel at the end of the night's shift. He also directed that a supervisory employee be stationed in the live hang area to monitor live hang employees until the transfer of live birds between the two kill lines was discontinued for the night. At approximately 1926 hours I removed the U.S. Reject tag and released the Kill Line #1 live hang belt for use. The Kill Line #1 cage dumper became operational at approximately 2100 hours and normal operations for live hang on both kill lines resumed at that time.</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P208	George's Processing, Inc.	04C05	XIC511007 3019G	2017-07-19	<p>The following MOI documents my findings during a GCP task on 7/17/17 at P208 and the resulting discussions I had with establishment management: (b) (6), and (b) (6).</p> <p>At approximately 1110 I observed the following in the kill room. Line #1 had been stopped shortly after startup from break (1000). Birds had been removed from the line in live hang and stunned birds before the kill machine had their throats cut by the back-up killer. However, 2 birds were alive and aware at the entrance into the stunner before the stun plate and had been hanging this way since the line stopped for over an hour. These birds were breathing heavily and had some congestion of blood in their heads consistent with being upside down for an extended period of time. I was assured the line would be starting soon and the backup killer was addressing birds left in the stunner. In my discussion with plant management, they explained their reasoning for stopping the line with birds still in the stunner was to stop the birds at the front of the line from entering the scalders. I was told that in the future, they will account for the stunner when hanging birds before the line is stopped for an extended period of time. Continuing my observations, I proceeded to the picking room to observe birds for 1 minute (b) (4) birds) before they entered the scalders on line #2. I observed 1 bird blinking and breathing. The bird had a small nick high on its throat but no apparent blood loss. The bird was much shorter than the rest of the flock and also missed the head puller. I was unable to stop the line or safely remove the bird before it entered the scalders. After speaking with (b) (6), he had an employee raise the head puller to catch shorter birds due to variation in size within the flock. Birds left hanging on the line alive for extended periods of time can have altered physiology such as respiration and circulation, which can lead to death on the line or prevent appropriate bleeding out, which adulterates product. Additionally, killing chickens by means other than slaughter is not in keeping with good commercial practices. Good commercial practices are essential to producing wholesome, unadulterated product.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P208	George's Processing, Inc.	04C05	XIC231907 1928G	2017-07-28	<p>On July 28, 2017 at approximately 1900 hours, while monitoring bleed out operations for live birds on both kill lines at the end of the blood tunnel I observed two live birds on Kill Line #1. I was unable to retrieve the live birds but noted that both were without a neck cut and consequently did not undergo exsanguination. Both birds were alert and breathing prior to entering the scalders. I quickly walked to the stun/kill area and noted that stunning efficiency for Kill Line #1 was approximately 85-90%. I immediately notified (b) (6) of my findings. Adjustments were quickly made to the Kill Line #1 stunning machine. At 1910 hours I noted that the stunning efficiency for both kill lines was &gt;99%. During my discussion with (b) (6) it was determined that the water supply to the Kill Line #1 stunner had been turned off for the recent lunch break but had not been turned back on prior to resuming operations. Consequently stunning efficiency was reduced (which also adversely affected kill machine efficiency). (b) (6) informed me that the backup killer had access to an E-stop button for Kill Line #1 as well as a buzzer to notify plant management of stun/kill problems. The backup killer had become aware of stun/kill issues but had only stopped the line for a few seconds and had resumed operations without notifying plant management. (b) (6) counseled the backup killer on the importance of stopping the kill line and notifying management when stun/kill problems arise. Poultry not slaughtered in a manner that results in thorough bleeding of carcasses prior to entering the scalders reflects poor commercial practices and is noncompliant with 9 CFR 381.65(b).</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P208	George's Processing, Inc.	04C05	XIC4806083003G	2017-08-03	<p>The following MOI documents my findings during a GCP task on 8/2/17 at P208 and the resulting discussions I had with establishment management: (b) (6). At approximately 1030, while I was performing a GCP task, I observed 2 birds enter the scalders alive, 1 bird on each line. Both birds had their necks cut but were still breathing. Additionally, the bird on line 2, was still conscious—blinking and tucking his head up so that he missed both head pullers before the scalders, entering the scalders alive. The bird on line 1 was too small for the head pullers to be effective. I was unable to safely remove the birds from the line before they entered the scalders. I immediately proceeded to the killing area and observed both back up killers were present and performing their jobs satisfactorily. The stunners and kill blades on both lines were both effective. I informed (b) (6) of the issue and forthcoming GCP MOI. We discussed that the birds were shorter than the rest of the flock but still had cuts. (b) (6) proceeded to the killing area to observe the process and reported that the process appeared to be in control. He instructed the back-up killers to cut deeply on shorter birds, even when they appear to have a cut. Poultry slaughtered in a manner that results in failure of thorough bleeding of carcasses prior to entering the scalders reflects poor commercial practices, which are essential to producing wholesome, unadulterated product.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P208	George's Processing, Inc.	04C05	XIC021208 0411G	2017-08-11	<p>The following MOI documents my findings during a GCP task on 8/11/17 at P208 and the resulting discussions I had with establishment management (b) (6) and (b) (6). At approximately 1108, while I was performing a GCP task, I observed 1 bird enter the scalders alive. The bird had its neck cut but was still conscious, breathing and blinking. It tucked its head up so that it missed both head pullers before the scalders. I was unable to safely remove the bird from the line before it entered the scalders. I immediately proceeded to the killing area and observed the back up killer was present and performing his job satisfactorily but appeared overwhelmed because the stunner and kill blades were functioning slightly less than ideal. I informed (b) (6) of the issue and forthcoming GCP MOI. We discussed size variability within the flock and the decision was made to raise the stun plate to increase both stunning and kill machine effectiveness and decrease the work load of the back up killer. Poultry slaughtered in a manner that results in failure of thorough bleeding of carcasses prior to entering the scalders reflects poor commercial practices, which are essential to producing wholesome, unadulterated product.</p>
P208	George's Processing, Inc.	04C05	XIC151308 4730G	2017-08-30	<p>The following MOI documents a GCP issue I observed on 8/30/2017, while touring the slaughter and dressing process with a (b) (6), and the resulting discussions I had with establishment management: (b) (6) and (b) (6). At approximately 0720, while observing the scalding and picking process, we witnessed a live, conscious bird enter the scalders. The bird did not appear stunned and there was no evidence of a cut anywhere on the neck or head. The bird tucked its head so it missed both head pullers before the scalders. Due to the height and speed of the line, I was unable to safely remove the bird before it entered the scalders. After informing management, (b) (6) proceeded to the kill room and observed the kill process and the backup killer performing his job. He stated that the backup killer was not being overwhelmed by unstunned or miscut birds. He also performed a 3 minute check of birds on the line and saw no additional live birds entering the scalders. Poultry slaughtered in a manner that results in failure of thorough bleeding of carcasses prior to entering the scalders reflects poor commercial practices, which are essential to producing wholesome, unadulterated product.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P208	George's Processing, Inc.	04C05	XIC312208 0131G	2017-08-31	<p>On August 31, 2017 at 2210 hours while walking through the live hang area I observed a live chicken sitting among 7-8 dead chickens in the DOA hopper. This hopper feeds DOA carcasses into a stainless steel auger which macerates the carcasses allowing them to be delivered to offal through a pipe system. The auger was not operational at this time. I immediately notified (b) (6) who removed the live chicken from the hopper. I also notified (b) (6) of my finding. At 2225 I discussed the finding with (b) (6) who stated that to prevent future occurrences the employee responsible for the live bird in the DOA hopper was undergoing additional retraining/coaching on the proper disposition of live birds in the live hang area. (b) (6) also stated that the other employees in the live hang area had received previous training on the handling of live birds.</p>
P21234	Perdue Foods LLC	04C05	XGI591003 1702G	2017-03-02	<p>On Thursday, March 2nd, 2017, at 0737 Hour, while I was performing Poultry Good Commercial Practice Verification Task, I noticed that a number of birds were missing stunning on Line one, and went conscious through the neck cutting machine, some of them were still alive after passing the cutting machine, where the back-up nick cutter was cutting their necks while they were still conscious, I put my observation to (b) (6) who, and he told me that he has just started his position few days ago and he called the management immediately. I started counting the number of birds who missed stunning, there were (b) (4) on line 1, two small birds on line 2, and zero birds on line (b) (4) all for 5 minutes). The conscious birds were either small birds or hung on the top of the shackles, which I believe that it was the reason for missed stunning. The PPIA and Agency regulations do require that live birds be handled in a manner that is consistent with good commercial practices ( GCPs), This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist ( DVMS) in case additional follow up is recommended. /</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P244	Hain Pure Protein Corporation - Plainville Farms LLC	04C05	GCN21080 94615G	2017-09-15	<p>Plainville Farms, Inc. Hain Pure Protein, P244. From 9/11/17 to 9/14/17 the USDA and the establishment met and discussed 2 cadavers that were diagnosed on 9/11/17 and 9/13/17. On 9/11/17, at approximately 1500 (b) (6) retained a carcass for veterinary disposition. (b) (6) condemned the carcass as a cadaver. On 9.13.17 at approximately 0645 (b) (6) retained a carcass for veterinary disposition. (b) (6) condemned the carcass as a cadaver. Meetings were held with the establishment management on 9/12 through 9/14. The attendees included: Robert Terrell, Plant Manager, (b) (6) and (b) (6). We discussed what actions were taken, investigation into the cause of the deviation and what further actions will be taken. They are going to improve communications between evisceration supervisors and upper management. They checked the knife used by the back-up killer. They retrained the live hang employees on not hanging DOA's. They have been actively monitoring the line since the events. They have retrained their sorters on hanging back carcasses. The establishment is aware that preventing cadavers decreases production of adulterated carcasses.</p>
P2632	Pilgrims Pride Corporation	04C05	GAA56100 11805G	2017-01-05	

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P2632	Pilgrims Pride Corporation	04C05	GAA14120 61808G	2017-06-08	P-2632 Pilgrim's Pride, Regulation 381.65b. 1120 hours On Tuesday June 6, 2017 at 11:20 I, (b) (6), in the course of performing the daily Good Commercial Practices task, I observed the birds being transported from the Line 1 cage dump to the live hang area. On the right side of the cage dump conveyor belt, I observed two birds that had gotten their heads trapped between the belt and the metal guards that is designed to prevent this occurrence. At the time I observed this, both birds were dead and the other birds on the belt were traveling across the carcasses. I immediately requested that the conveyor be halted and contacted (b) (6). He has the two carcasses removed and made installed a temporary barrier to allow the process to continue until the end of 1st shift. At the end of the shift, permanent repairs were made and the problem appears to have been satisfactorily corrected. I consider this to be unacceptable since the birds appeared to have died in a manner other than slaughter and the fact that this potential point of birds becoming entrapped was brought to the establishment's attention during a weekly HACCP meeting on April 26, 2017. Maintenance had ample opportunity to make the alteration to prevent the incident I observed on June 6, 2017. Please respond in writing no later than Wednesday June 14, 2017.
P3	Mountaire Farms of Delaware, Inc.	04C05	OCG15090 10431G	2017-01-31	Time: 0845 hours Establishment: 00003-P Attendees: (b) (6), Mr. Daniel Rivera Plant Manager A meeting was held to discuss the following observation in live hang; while performing a good commercial practice task, at approximately 0835 hours, I observed one live bird in a dead on arrival barrel line 2 side. The bird was slowly breathing inside the DOA barrel. Establishment employee failed to recognize the live bird and began to pour denaturant on the bird. I immediately stopped the employee and notified (b) (6) and had bird removed from barrel and cervical dislocation performed. The bird was then properly condemned.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P320	Sanderson Farms, Inc.	04C05	MRA23150 23807G	2017-02-07	<p>On Tuesday, February 07, 2017 at approximately 1411 hour, I observed less than Good Commercial Practices. While performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed a live bird rhythmically breathing commingled in the dead on arrival bin under several dead birds. The bird was visualized in the bin from the live hang room, immediately I went to the bin to examine the bird closer. The bird was weak, laterally recumbent, rhythmically breathing and alive. The remainder of the birds in the bin had been manually decapitated, which is the establishment's protocol for dead on arrival birds before they go into the bin. This bird, however, was placed in the bin alive and had several birds on top of it, which would have led to dying by suffocation; death by means other than slaughter. The bin was approximately 2.5 feet deep with dead birds at this time. At approximately 1411 hour I asked an establishment employee to radio a supervisor to come to the area quickly. The supervisor arrived at 1417 and was made aware of the issue. Once the supervisor arrived he euthanized the bird. It was explained that live birds comingling with dead birds can lead to suffocation and death by means other than slaughter which is less than Good Commercial Practices. Establishment management was notified as well of the incident and informed of the resulting MOI. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on February 7, 2017 (b) (6) Cc:</p> <p>DDM DVMS FLS</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P320	Sanderson Farms, Inc.	04C05	MRA03220 22722G	2017-02-22	<p>(b) (6) Sanderson Farms, Inc. 2535 Sanderson (b) (6), MS. 39440 (b) (6), At approximately 2139 hours, while verifying Good Commercial Practices in Poultry (GCPIP) at P320, Sanderson Farms, Inc., the following less than GCPIP incident was observed on the back dock. One live bird was observed with rhythmic labored breathing on top of a bin full of DOAs in a plastic combo for collection of Dead on Arrival (DOAs). The head of the bird was buried underneath DOAs in the bin. The bird was then removed from the bin for further examination. The bird exhibited rhythmic, albeit labored, breathing, pupillary reflexes, and upward head movement. (b) (6) was requested to radio for the shift manager. The (b) (6) was notified of a live bird which had been placed in the DOA bin and observed the live bird prior to the bird being humanely euthanized by the (b) (6). Per establishment policy, all birds placed in the DOA bin are to have the head removed prior to being placed in the bin. Placing live birds in the DOA bin can lead to death by suffocation due to entrapment under other birds in the bin. This practice is not consistent with Good Commercial Practices. At approximately 2145 hours, a meeting was held in the USDA office with (b) (6) and (b) (6). The incident was discussed regarding placement of a live bird in the DOA bin and preventative measures for preventing future incidences. (b) (6) proposed placing an additional employee on the floor in the live hang area. This employee would pick up DOAs and remove the heads. All decapitated birds will be verified by (b) (6) before placement in the DOA bin for a period of 2 weeks. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial (GCPs) as described by industry guidelines. Respectfully, (b) (6) Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Perry Davis, DM Dr. David Thompson, DDM Dr. Larry Davis,</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					DDM Mr. Don Coley, DDM (b) (6) (b) (6)
P32182	Sanderson Farms, Inc.	04C05	DZL292001 3904G	2017-01-04	At approximately 2038 hours on 01/04/17, I (b) (6) while performing a Good Commercial Practices task along with (b) (6). I observed three live chickens in the outside drain near the cage dump next to Live Receiving. (b) (6) was notified. He started to retrieve birds out of drain. Two birds were retrieved alive from drain, one bird drowned. At 2049 I informed (b) (6) and (b) (6). At 2057 (b) (6) called (b) (6) to notify him of the incident.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P325	Tyson Foods, Inc.	04C05	YDM05230 12202G	2017-01-02	<p>On 12/31/16 at 3:30 pm, (b) (6) went to perform antemortem in live hang. Underneath the bed rollers, she observed four loose chickens on the ground. One of the chickens was sitting in a water trough and was soaked with water. It was 55 degrees outside at the time. On the edge of the bed rollers were three more chickens. (b) (6) demonstrated the birds to (b) (6) and instructed him to retrieve the chickens. (b) (6) stopped the mule driver to prevent him from putting more cages on the bed rollers and injuring the loose chickens. After the chickens were removed, (b) (6) allowed the mule driver to continue. The escaped birds did not appear to be injured. (b) (6) said that one of the cage doors probably popped open allowing the birds to escape. (b) (6) informed (b) (6) about the chickens and told him it was the plant's responsibility to prevent the chickens from escaping so that they do not become injured. (b) (6) said the plant has been steadily replacing the cages with new ones, and (b) (6) has observed the new cages. It is important to treat poultry in a way that minimizes accidental injury. Employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product. FSIS encourages establishments to develop and implement a systemic approach to ensuring poultry presented for slaughter are treated in a manner that minimizes excitement, discomfort, and accidental injury. The initial component of the approach is to assess the areas where problems may occur. The second component asks that establishments determine if their facilities are designed and maintained to prevent excitement, discomfort, and accidental injury to poultry the entire time that live poultry are held in connection with slaughter. The plant is asked to prevent future occurrences. Copies of this MOI will be distributed to the establishment, inspection file, and DVMS per FSIS Directive 6100.3.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P325	Tyson Foods, Inc.	04C05	YDM59160 11404G	2017-01-04	<p>On 1/4/17 at 3:20 pm, (b) (6) went to perform antemortem in live hang. She observed a loose chicken sitting in a water trough, and it was soaked with water. It was 45 degrees outside at the time. (b) (6) demonstrated the bird to (b) (6) and instructed him to retrieve the chicken. A plant employee picked up the wet chicken, which did not appear to be injured. On 12/31/16, (b) (6) observed seven loose chickens around the bed rollers, one of which was sitting in the water trough. Another MOI was written about those birds. During a meeting with Plant Manager Clint Holsomback, (b) (6), (b) (6), and (b) (6), the plant said they would put a shield on the dumper to prevent chickens from escaping off the dumper. It is important to treat poultry in a way that minimizes accidental injury. Employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product. FSIS encourages establishments to develop and implement a systemic approach to ensuring poultry presented for slaughter are treated in a manner that minimizes excitement, discomfort, and accidental injury. The initial component of the approach is to assess the areas where problems may occur. The second component asks that establishments determine if their facilities are designed and maintained to prevent excitement, discomfort, and accidental injury to poultry the entire time that live poultry are held in connection with slaughter. The plant is asked to prevent future occurrences. Copies of this MOI will be distributed to the establishment, inspection file, and DVMS per FSIS Directive 6100.3.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P341	Golden Rod Broilers	04C05	YDC191402 0424G	2017-02-24	February 24, 2017, while performing ante mortem and good commercial practices, I observed several cages on a truck that were removed from an accident earlier in the day. The cages appeared to be damaged, with dead and dying chickens pressed against the cage wire. Some had guts draped on them and all of the visible cages (three batteries high) had live chickens mixed with the dead chickens. In one cage, a chicken was pinned under and surrounded by dead and dying birds. After notifying the plant manager that an unacceptable situation had occurred and required immediate action, details of the situation came out. After monitoring the removal of the cages and the sorting of live chickens from dead and dying birds, the Deputy District Manager Larry Davis was contacted. He advised the discussion and documentation of a MOI during the weekly HACCP meeting, to get details of the resolution and how to avoid failure to notify FSIS of situations like this again.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P34308	Sanderson Farms, Inc.	04C05	PHY071501 5706G	2017-01-06	<p>On Tuesday January 3, 2017 while observing the establishment processes I (b) (6) observed the following.</p> <p>At approximately 1548 I was observing the backup cutter on kill line # 1, I observed him for 3 minutes and 10 seconds and in that time there were 17 mis-cuts and in that time and I also observed 1 uncut bird enter the scalding. This was no doubt because the backup cutter had to catch so many mis-cuts.</p> <p>(b) (6) was present and once the uncut bird was identified, it was removed from the line once it exited the first scalding and inspected for cut marks, there were no marks present. I informed QC of my observation and that it would be documented. I did a retest and the retest passed there were nine mis-cut birds. During the retest, I observed an uncut bird enter the scalding. (b) (6) and (b) (6) were present during this observation and removed the bird, after exiting the scalding and inspected the carcass for cut marks. The carcass had one cut mark behind the head and none along the neck. At 1627 I went back to live hang and observed the establishment process flow I also noticed that the backup cutter seemed to be having a hard time keeping up with the process and all the mis-cuts. Watching him did make me concerned. I evaluated the situation and there were 10 mis-cuts at 3 min and 10 seconds. I informed (b) (6) of my observation. I informed him that I would evaluate the condition a little later and if he would like to be present, I did not mind. At 2015, (b) (6) and I went to reassess the situation. I counted 20 mis-cut birds in 3 min and 10 seconds. During this observation I again witnessed another uncut bird enter the scalding. I informed the (b) (6) that this concern was brought to two of establishment management personnel yesterday, and the CSI informed them that they needed to get the issue addressed and under control. My concern is that the personnel are not able to handle to process flow, which is resulting in uncut birds entering the scalding. Which is failure to comply with 9 CFR 381.65(b) This MOI will be forwarded to the Front Line Supervisor, District Office, and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P34308	Sanderson Farms, Inc.	04C05	PHY372202 2828G	2017-02-28	On Tuesday February , 2017 while observing the establishment processes I (b) (6) observed the following. At approximately 2139 Hours and 2148 hours while performing a Humane Handling/Good Commercial Practices Task at the scalders, I observed the following noncompliance I observed an uncut bird on Line 1 and Line 2 go into the scalders. 9 CFR 381.65 (b) says that poultry must be slaughtered in accordance with Good Commercial Practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to Scalding. A breathing bird that enters the scalders dies by drowning. These are cadavers and unfit for human food. Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. (b) (6)
P34308	Sanderson Farms, Inc.	04C05	PHY372202 2828G	2017-02-28	On Tuesday February , 2017 while observing the establishment processes I (b) (6) observed the following. At approximately 2139 I was observing the backup cutter on kill line # 1, I observed 1 uncut bird enter the scalders. I notified (b) (6) and once the uncut bird was identified, it was removed from the line once it exited the first scalders and inspected for cut marks, there were no marks present. At approximately 2148 I was observing the backup cutter on kill line # 2, I observed 1 uncut bird enter the scalders. I notified (b) (6) and once the uncut bird was identified, it was removed from the line once it exited the first scalders and inspected for cut marks, there were no marks present (b) (6)

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P34308	Sanderson Farms, Inc.	04C05	PHY220603 2103G	2017-03-03	<p>On Friday March 3. , 2017 while observing the establishment processes I (b) (6) observed the following. At approximately 0606 I was observing the backup cutter on kill line # 2, I observed1 uncut bird enter the scalding. I notified (b) (6) and identified to him the shackle of the uncut bird, he attempted to remove the bird but was unable. He then lost the shackle of the bird as it moved further down the line. Birds that are incompletely bled out due to incomplete or missing cuts are considered adulterated and must be condemned. Regulation 9 CFR 381.65(b) requires that poultry must be thoroughly bled out to ensure that breathing has stopped before scalding, so that the birds do not drown. (b) (6)</p>
P34308	Sanderson Farms, Inc.	04C05	PHY211904 3712G	2017-04-12	<p>On this day, 4-12-17, at 1500, I found the following animal welfare concern. While going out back, where the live birds are dumped onto conveyer belt, I found where the employee dumping the birds, did not allow the previous cage of birds, get out of the way, before dumping another cage. I notified the employee to wait till the birds get out of the way before he dumps another cage. I notified (b) (6) of my finding.</p>
P34308	Sanderson Farms, Inc.	04C05	PHY211606 5309G	2017-06-09	<p>On May 9, 2017 I (b) (6) along with (b) (6) observed the following in Live hang. While performing a good commercial practice task I observed a live hang personnel attempt to hand off bird to the live hang supervisor. The supervisor was unaware of the employee, so the employee threw the bird to the supervisor and the bird landed on its head. The bird was alive and breathing rapidly. I informed the supervisor of the observation. I informed him and (b) (6) that the observation would be documented. As stated in 9 CFR 381.65(b) "the establishment is not following good commercial practices" under the PPIA and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices, which means they should be treated humanely. Although there is no specific federal humane handling and slaughter statute for poultry, under the PPIA, poultry products are more likely to be adulterated if they are produced from birds that have not been treated humanely, because such birds are more likely to be bruised or to die other than by slaughter. (b) (6)</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P34308	Sanderson Farms, Inc.	04C05	PHY342006 5912G	2017-06-12	On Monday June 12, 2017 I was walking to the live receiving holding area and I observed one bay staged with two trailers of chickens. I observed the first trailer to the right, it was closest to the fans and the mist. The chickens located in that trailer seem somewhat comfortable only a minor few were panting. Then I observed the trailer on the left and I observed numerous chickens panting, some were flapping there wings in an attempt to cool down. The trailer on the left was not able to benefit from the fans or the mist due to the trailer on the right blocking them. After leaving the area I observed the process at the kill line and I observed the backup cut employees removing an excessive amount of Dead on Arrival (DOA) birds from the line. I verbally notified (b) (6) and (b) (6). (b) (6) was informed that the observation would be documented. (b) (6)
P34668	Simply Essentials Poultry, LLC	04C05	000521105 2718G	2017-05-18	I understand that this lot was affected with Reo virus. This site has had a history of high death loss. The birds slaughtered were a clean-out of the barn. The number of DOA's and disposed carcasses was very high. The source barn is located within 25 miles of the plant and the weather was 84 degrees for a high temperature. The death loss occurred throughout the day even with the normal start early in the morning when it was cool. The holding barn has fans on the north and south sides and in between the trucks and is open on the east side. There are fans in the holding area of live hang. DOA losses for other sites on days before and after have been acceptable.

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description																								
P34668	Simply Essentials Poultry, LLC	04C05	000501106 4713G	2017-06-13	<p>6-12-17 Stressed birds/DOAs At approximately 7:00 on June 12 in the holding shed for Establishment P34668, I observed the following conditions: four of six outward exhaust fans on the side of the building were operating, and of the four “walls” of fans along the docks within the shed, one wall had four of twelve fans operating; the other 3 walls had zero fans operating. The fans on the opposite (airflow inward) side of the structure were also non-functional. The fans that were running were the only ones that were hooked up to a power source. No misters were installed. A maintenance man who was filling the generators powering the fans said that no birds were held overnight and the fans are turned on as soon as birds start showing up in the early morning hours. At 7:00 it was not too hot in the shed with all of the bay doors open, but there was a distinct temperature/airflow difference in the cages directly next to operating fans and those that had a wall of cages blocking the breeze. Additionally, at this time there was still an open bay – if the shed was full, the bay doors closed, or the temperatures higher (as they were predicted to be for much of the week), I anticipate that the shed could rapidly become dangerously hot. In the CO2 stunning area, there were three of five fans along the wall running, two bay doors open, and a large industrial fan opposite the room from the other fans to move air, but it was nonetheless very warm. When I was in the area at 10:45, many of the birds on the truck were panting, and by the time the last of the birds were being unloaded at approximately 13:00, nearly all of the birds were panting/visibly stressed. There were ten trucks from one lot presented today. The numbers of deads from each load are as follows, with the first trucks arriving earliest (first truck approximately 4:00 in stunning area, last truck approximately 13:00): Truck #</p> <table><tr><td>Deads</td><td>1</td><td>5</td><td>2</td><td>18</td><td>3</td><td>19</td><td>4</td><td>30</td><td>5</td><td>41</td><td>6</td></tr><tr><td></td><td>87</td><td>7</td><td>244</td><td>8</td><td>179</td><td>9</td><td>361</td><td>10</td><td>389</td><td></td><td></td></tr></table> <p>The issue of adverse environmental conditions resulting in DOAs has been raised in two previous MOIs and at the most recent weekly meeting. In fact, the establishment acknowledged in response to the 5-19-17 MOI that the non-functional fans were a contributing cause to a high mortality day; that response also stated that the fans would be hooked up promptly. It is unacceptable for birds to be held in stifling heat due to a longstanding lack of preparation for what are predictable</p>	Deads	1	5	2	18	3	19	4	30	5	41	6		87	7	244	8	179	9	361	10	389		
Deads	1	5	2	18	3	19	4	30	5	41	6																		
	87	7	244	8	179	9	361	10	389																				

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					weather conditions in this part of the country. (b) (6)
P34668	Simply Essentials Poultry, LLC	04C05	SFJ391109 3013G	2017-09-13	<p>At approximately 1045, I observed several chickens hanging over the bleed trough that had not had their necks cut to bleed out. These uncut birds extended from the entrance of the trough to the entrance of the scalding tank, and appeared to be effectively stunned/ unconscious. At the time of my observation, (b) (6) had the line stopped and the situation under control. Maintenance personnel were examining the killing machine (automated blade that cuts the necks to bleed out the birds). (b) (6) had employees beginning to cut chickens that were hanging above the trough. Once the killing machine was repaired, the line was started at a slow speed so that (b) (6) and another employee could cut chickens as they were exiting the trough before entering the scalding tank. I stood in a position to view chickens exiting Picker 2 before entering the wing scalding tank. I counted 98 cadavers from the time the line was restarted until I saw a consistency in normally bled-out carcasses (approximately five to 10 minutes). I expressed my concern to (b) (6) that uncut chickens filled the shackles between the scalding tank and the back-up killer, and that I counted approximately ninety cadavers coming out of the scalding tank. I informed him that although I think he had the situation under control and did a good job at ensuring no chickens entered the scalding tank alive, I was still going to share my observations with my supervisor. After discussing the situation with my supervisor, I informed (b) (6) that I would be documenting this situation in an MOI.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P34668	Simply Essentials Poultry, LLC	04C05	SFJ261009 4020G	2017-09-20	<p>At approximately 0900 hours on 9/19/17 while performing ante-mortem inspection in the live hang department, I observed a cage (on the trailer of the 7th trailer load of chickens in lot 1) with a floor from a subset cage holding chickens collapsed onto chickens in the subset cage below it. The cages have 5 levels with a division down the center which makes 10 subset cages to the 1 cage. Each subset has a metal door on one side of the cage. These doors are hinged at bottom of each subset and therefore open from the top. In this particular cage the first two (from the top) subset cages on one side of the center divider were each missing half of their floor. The floors are constructed of 2 plastic panels that snap in place on the framework of the cage. These first two subsets with the incomplete floors were not carrying chickens. The third subset was carrying chickens and its floor was collapsed down onto the chickens in the fourth subset cage. The collapse was located at the end adjacent to the door. The fourth subset door was open and resting on the adjacent cage, making approximately a 45 degree angle opening. There were approximately 4 chickens located between the collapsed floor and the door. They appeared to be alive. I could observe only 1 dead chicken under the collapsed floor at this time. There were more alive chickens inside the fourth subset cage, and all the chickens in the 3rd subset appeared to be alive. I tagged the cage with a USDA Rejection Tag # B41933978 and notified (b) (6) and (b) (6). When the establishment employees removed the cage from the trailer, they found 7 dead birds inside the fourth subset cage. Each subset holds approximately 25 chickens. At approximately 0920 hours I discussed the situation with Plant Manager Donnie Peters. He informed me that the cages are owned by the establishment itself, Simply Essentials. He also informed me that the field manager (of loading the birds at the farms) was on his way to the establishment to assess the situation. After further review and discussion, I removed my tag from the cage so the live birds could be slaughtered. At approximately 1500 hours, I met with (b) (6) to discuss how damaged cages were repaired. There is a facility (shop) in New Hampton, IA owned by Simply Essentials with Simply Essentials employees who provide maintenance on the trucks, trailers, and cages. Damaged cages are stored in an area on the establishment</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>premises until a full load of approximately 22 cages are available for repair. They get transferred to New Hampton and repaired there. There have been previous discussions with the establishment management about the conditions of the live bird cages. Yesterday I observed a cage with a door missing to one of the bottom subset cages, with chickens inside of it. I discussed with (b) (6) about my observation, and he informed me that he contacted the person responsible for loading chickens as soon as he had seen the cage, himself. This conversation was not recorded in an MOI. In prior weekly meeting discussions (MOI SFJ1006094605E and SFJ4714091807G), I was informed that cages in poor repair are marked or kept back to be repaired before being loaded back onto a truck. I observed a cage without a door (very likely the same cage from yesterday's discussion) loaded onto the very first truck from today's production lot 1. It did not have any distinctive markings to indicate it was in poor repair. I also observed the establishment load a cage with a door that shut poorly (in fact it would only shut if the floor was buckled) being loaded back onto Truck #1 this morning. This cage also did not have any distinctive markings on it to indicate it was in poor repair. In addition to today's and previous observations, Today I also observed another cage on the 7th trailer load from lot 1 that was missing a door to a subset cage containing chickens. Plant Manager Donnie Peters was informed an Good Commercial Practices MOI would be documented.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P34668	Simply Essentials Poultry, LLC	04C05	SFJ101309 0325G	2017-09-25	<p>At approximately 1240 hours while I was performing ante-mortem inspection in the Live Receiving Department, I observed a cage on the trailer of load twelve of the day's production with a missing door to a subset of the cage with chickens inside. All the chickens inside the cage appeared to be uninjured and in good health. I informed and showed (b) (6) of my findings. He summoned (b) (6). I showed (b) (6) the cage and informed him of my intent to document an MOI. I ensured the birds were removed from the subset cage and placed onto the conveyor belt that moves chickens from the cage dumper to the (b) (4) for stunning, before the cage was moved by forklift to the cage dumper. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with good commercial practices increase the likelihood of producing unadulterated product.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P39	Pine Manor Inc.	04C05	ULL421202 0807G	2017-02-07	<p>On February 6, 2017, at approximately 1350 hours, while I (b) (6) was showing (b) (6) around (b) (4) Poultry I observed one (1) live and stressed but sound young chicken buried under two (2) DOA carcasses in a DOA barrel. There were twelve (12) dead-on-arrival (DOA) chickens in this particular DOA barrel in the live hang room at the time of my observation. In addition, one (1) module holding birds was observed to be dumped on the dump conveyor. The establishment employee did not wait to dump the next cage before the conveyor was clear, and therefore birds were dumped on top of other birds which resulted in discomfort and excitement. I summoned (b) (6) and (b) (6) to notify them of this finding. (b) (6) immediately went through the DOA barrel and the live bird was immediately removed from the DOA barrel, hung, stunned and slaughtered and put back into production due to its healthy and good state. Moreover, the plant's employee was instructed to wait to dump the next cage after the conveyor is clear so that birds are not dumped on top of live birds. I reminded (b) (6) and (b) (6) that the PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices, and that they not die from causes other than slaughter. I recommended that the plant review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter, and provided (b) (6) a copy of this document. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>P39 Miller Poultry.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P39	Pine Manor Inc.	04C05	ULL351402 3008G	2017-02-08	On Wednesday February 8, 2017, at approximately 1358 hours while performing a poultry good commercial practices task, I, (b) (6), observed one (1) sound bright alert and responsive bird in the condemn barrel with an estimated eight (8) DOA birds. (b) (6) was observing me perform my observations and he put the live bird back into production. I explained that I will document an MOI because it is not in accordance with good commercial practices, in that birds should not die from causes other than slaughter. I also discussed my finding with (b) (6) who explained he will monitor the barrels more closely. I provided a copy of the MOI to (b) (6) and explained that a copy of the MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.
P40183	Sanderson Farms, Inc.	04C05	PEH100603 4009G	2017-03-09	Establishment P40183, Sanderson Farms, March 8, 2017, 1115 hours. In attendance: (b) (6), (b) (6) and (b) (6). This Memorandum of Interview (MOI) is issued for the following bird mistreatment in Picking Department; on March 8, 2017 at approximately 1105 hours while performing Poultry Good Commercial Practices Task in the live hang room, I observed one establishment employee picking a live bird from the floor and throwing it into the drain, I immediately told the employee to remove the bird from the drain, he removed the green cat walk and grabbed the bird and hung it on the killing line. I went to First Processing Manager Office and notified my findings and discuss the bird mistreatment to (b) (6), he called (b) (6) and I also notified my findings to him. The establishment was not following the Animal Welfare Program. Also, the Poultry Product Inspection Act (PPIA) and this agency regulation do require that the live poultry be handling in a manner that is consistent with Good Commercial Practices (GCP's), and that they not die from causes other than slaughter.



EstNbr	EstName	Task_Code	MOI#	Date	Description
P40183	Sanderson Farms, Inc.	04C05	PEH131604 3120G	2017-04-20	<p>On 4/20/17 at 1549 while doing a GCP check, I was standing near the entrance of the scalding tanks. On line 1 I saw a live bird with no obvious neck cut, and holding its head back, coming to the corner about to enter the scalding tank. At approximately the same time, the back-up killer stopped the line and removed the bird, and restarted the line. At 1550, while observing line 2, I saw another live bird, in the same condition as the previously mentioned bird, several birds away from entering the scalding tank. I was not able to get the back-up killer's attention quick enough, and the bird entered the scalding tank. At that time I notified (b) (6) of the above issues and we observed birds coming out of the scalding tank on line 2. The cadaver did appear, and it had very typical appearance with bright red skin and no neck cut, and was removed from the line by (b) (6). According to 9 CFR 381.65(b) Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. If this becomes a persistent finding due to loss of control of the process, a GCP noncompliance may be issued and further regulatory actions may result. At approximately 4:30 (b) (6) came to the USDA office and informed me that he will be monitoring the back up killer for the rest of the day, he had informed (b) (6) of the occurrence, and that he would have the appropriate documentation available in the QC office for verification by USDA. A copy of this MOI will be provided to the District DVMS in case further follow up is needed. Respectfully, (b) (6) 2nd shift</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P40183	Sanderson Farms, Inc.	04C05	PEH291206 2805G	2017-06-05	<p>Establishment P40183, Sanderson Farms, June 2, 2017, 0855 hours. In attendance: (b) (6) and (b) (6). This Memorandum of Interview (MOI) is issued for the following potential mistreatment of a live bird in Live Haul; on June 2, 2017 at approximately 0845 hours while performing Poultry Good Commercial Practices Task accompanied by (b) (6) between the offall and the truck yard, we observed one live bird inside the USDA Condemned yellow barrel; a Mighty Foam tag was attached to the handle of the USDA barrel. (b) (6) stayed with the bird while I went to Evisceration Office to notify and discuss the issue with (b) (6) notified (b) (6) of the issue and we all met at the offall. We discussed the issue and (b) (6) asked (b) (6) how this bird got inside the USDA Condemned barrel, why is sanitation using USDA Condemned barrel to clean up, and what are you going to do with the bird? He stated that he will find out how the bird got inside the USDA barrel and he is going to asked sanitation about why are they using USDA barrel for cleaning purposes. After the discussion with management they decided to sacrifice the bird, at approximately 0900 hours (b) (6) disarticulated the chicken's neck in presence of USDA and once all movement ceased the establishment elected to condemn the bird.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P40183	Sanderson Farms, Inc.	04C05	PEH520706 3521G	2017-06-21	<p>Establishment P40183, Sanderson Farms, June 16, 2017, 0930 hours. In attendance (b) (6) and (b) (6)</p> <p>This Memorandum of Interview (MOI) is issued for the following potential mistreatment of live birds in Live Haul; on June 16, 2017 at approximately 0556 hours while performing Poultry Good Commercial Practices Task inside the offall building, I observed two live birds inside the USDA Condemned yellow barrel. I notified and discussed the issue with (b) (6). After the discussion with (b) (6) he decided to sacrifice both birds, at approximately 0615 hours (b) (6) cut the chicken necks with a knife in presence of USDA and once all movement ceased the establishment elected to condemn the birds. At approximately 0930 hours, (b) (6) discussed the issue with (b) (6) since is not the first time that this happened. (b) (6) stated that he will get with sanitation to ask them, where exactly these birds are being found to try and pin point where the birds are being left. (b) (6) also stated that he would get with sanitation to discuss what they are going to do with the chickens when found during sanitation.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P40183	Sanderson Farms, Inc.	04C05	PEH022109 1712G	2017-09-12	<p>On 9/12/2016, at approximately 2145 hours, while conducting a GCP task in the Live Hang area I made the following observations: I observed numerous DOA carcasses on the floor in the Live Hang area. They were piled into two separate piles. The first pile, near the end of the conveyor belt contained approximately 20 birds. After further inspection, I observed the pile moving. I moved several birds on the top of the pile and noticed that there was a live bird present on the bottom the pile. The second pile of birds was located between the wall and conveyor leading to the main exit. It contained about 25 birds. Because a live bird was found in the first pile, I inspected the second pile and also found a live bird buried underneath the dead birds. This bird was alert when retrieved from the pile of DOAs. (b) (6) and (b) (6) was notified of my observations and concerns. If the live birds were allowed to remain in the condition they were found without human intervention, they likely would have died by asphyxiation due to being smothered by the dead birds lying on top of them. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices (GCP), and that they do not die from causes other than slaughter. I recommend that management review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. A copy of this document can be provided on request. Please provide an explanation for these incidences. A copy of this MOI and your response will be forwarded to the Raleigh District Office and the District Veterinary Medical Specialist (DVMS) in the event that an additional follow-up is recommended.</p>
P419	Case Farms Processing, Inc.	04C05	VDB05010 11618G	2017-01-18	<p>At approximately 2219 hours on 1/17/2017 while performing Poultry GCP's, I observed a live chicken and a dead chicken on the floor in Live Hang. A plant employee came over and picked them up and put them both in the DOA barrel. I notified (b) (6), of this and pointed out that the live bird should not be in the DOA barrel. The employee came back over and removed the live bird. The bird had not been harmed. At approximately 2240 hours, (b) (6) was notified of this with (b) (6) present.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P419	Case Farms Processing, Inc.	04C05	VDB53120 40005G	2017-04-05	<p>Establishment: 00419P Case Farms 121 Rand St. Morganton, NC 28655 Establishment Attendee: (b) (6)</p> <p>USDA Attendee: (b) (6) (6)</p> <p>At approximately 12:25 on 04/05/17, the inspector on Line 1, Station 3 identified a chicken with the head intact without neck cuts indicating the chicken had died other than by humane slaughter. I, (b) (6), confirmed the chicken had not received any neck cuts. The carcass was condemned. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices, and that they not die from causes other than slaughter. I recommend management review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. A copy of this federal register notice can be provided on request. A copy of this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>
P419	Case Farms Processing, Inc.	04C05	VDB28000 51716G	2017-05-16	<p>Est. P419, Case Farms, 5/15/2017, approximately 2050 hrs. Present: (b) (6), Mr. Robertson, Assistant Plant Manager and (b) (6) On 5/15/2017, at approximately 2042 hours at start up, I observed a number of red birds on the transfer belt. Upon closer examination, one of these birds had its head still attached to its neck and there were no cuts on the neck, indicating that the bird had died by means other than slaughter. I and (b) (6) confirmed that there were no neck cuts present on this bird. This bird and the other red birds were rejected by the plant. (b) (6) went to the stunning/killing area and observed that all birds he saw were being stunned and cut properly. I brought this to the attention of (b) (6) and I requested the presence of Mr. Robertson, Assistant Plant Manager. I pointed out our findings and Mr. Robertson said that the stunner had not been functioning properly but the situation had been addressed and corrected by the establishment. Our observations concurred with this. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist in case additional follow-up is recommended. A copy of Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] was provided.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P419	Case Farms Processing, Inc.	04C05	VDB05020 63922G	2017-06-22	<p>Est. P419, Case Farms, 6/22/2017, approximately 0119 hrs. Present: Mr. Robertson, Assistant Plant Manager, (b) (6)</p> <p>(b) (6) nd (b) (6) At approximately 0115 hrs after administering relief breaks, (b) (6) and (b) (6) observed on the transfer belt a red bird with its head still attached. Upon closer examination, there was no cut mark on the neck indicating that the bird died by means other than slaughter. This was brought to the attention of (b) (6) who called (b) (6). (b) (6) entered in to the discussion between the establishment and USDA. The back-up killer was replaced with another back-up killer. No other cadavers were observed on the line, indicating this was an isolated incident and the situation was under control. A similar incident occurred around 5/16/2017. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist in case additional follow-up is recommended. A copy of Federal Register Notice Vol. 70, No.187, published September 2005 [Docket No. 04-037N] was provided.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P419	Case Farms Processing, Inc.	04C05	VDB53210 70928G	2017-07-28	<p>Est. P-419, Case Farms, July 28, 2100 hrs. (b) (6) and (b) (6) At approximately 2050 hrs while performing GCP's I observed the tractor hooking up to the trailer loaded with chickens in Bay 12. As it drove past me, I noticed one of the cage doors was open and a chicken appeared about to jump out. I then observed what appeared to be a dead chicken in the bay just vacated and left it for further examination. I followed the trailer to live hang where the open cage door and bird were attended to. (b) (6) was notified of my observations. I went back to the bay and examined the dead chicken. There were wet tire marks before and after the carcass. It appeared popped open. It appeared to have just been run over. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices (GCP's), and that they not die from causes other than slaughter. I recommend review of the Federal Register on Treatment of Live Poultry Before Slaughter (attached) for FSIS recommendations concerning treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and DVMS in case additional follow-up is recommended. Respectfully, (b) (6) P-419 Case Farms.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P419	Case Farms Processing, Inc.	04C05	VDB3105084919G	2017-08-19	<p>Establishment: 00419P Case Farms 121 Rand St. Morganton, NC 28655 The purpose of this memorandum is documentation of a Good Commercial Practice (GCP) incident involving live chickens entering the scald tanks. At approximately 09:30 on Friday, 08/18/17, inspectors on Line 1 reported an unusually large number of cadavers. The count for the line was 14 since the shift had started at 06:00. Matthew Martin, Plant Manager was asked to accompany me, (b) (6), to observe the scald tank entry point. During our observation of approximately 10 minutes two chickens were noted that had not been slaughtered; one entered the tank and one was removed from the line just before entering the scald tank. The establishment had two backup killers in place. They found the backup killers were working right next to each other so they separated them by several feet. The problem cleared. A similar event occurred on 6/16 during a Good Commercial Practice verification visit and is documented in MOI number VDB2605082819G. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices, and that they not die from causes other than slaughter. I recommend management review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. A copy of this federal register notice can be provided on request. A copy of this MOI and your response will be forwarded to the District Office and the District Veterinary Medical Specialist for follow-up recommendations. Cc Jon Strange, General Manager/VP of Operations</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P419	Case Farms Processing, Inc.	04C05	VDB27050 82819G	2017-08-19	<p>Establishment: 00419P Case Farms 121 Rand St. Morganton, NC 28655 The purpose of this memorandum is documentation of a Good Commercial Practice incident involving live chickens entering the scald tanks. At approximately 13:45 on Wednesday, 08/16/17, during a Good Commercial Practice verification visit, (b) (6) observed 5 chickens enter the scald tank alive over a period of approximately 5 minutes. The incident occurred on Line 1. A regulatory control was taken by stopping the line. The establishment adjusted the stunner and placed another backup killer for the line. The line was released at approximately 14:15. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices, and that they not die from causes other than slaughter. I recommend management review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. A copy of this federal register notice can be provided on request. A copy of this MOI and your response will be forwarded to the District Office and the District Veterinary Medical Specialist in case additional follow-up is recommended. Cc Jon Strange, General Manager/VP of Operations</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P425	Northern Pride, Inc.	04C05	MYG0810050003G	2017-05-03	<p>P425 Northern Pride, Inc 06:35 hours: Plant Manager Warren Leighton, (b) (6) On Monday May 1, 2017 at approximately 06:25 hours while performing Good Commercial Practices Verification, I observed a bird that I suspected was still breathing on the line. The bird had passed through the blood tunnel, and from the point of observation the bird had approximately 52 seconds of travel time on the line prior to entering the scalders. I observed the bird did have a cut on the neck. As the bird turned the corner and passed out of view I proceeded to the post picking area. Approximately 4 minutes later a well fleshed bird with diffusely red skin exited the picker. This bird was also observed by an establishment employee who approached the line to remove the bird. I removed the bird off the line for further examination. I observed the cut on the neck was superficial and did not fully sever the carotid arteries and jugular veins for adequate exsanguination. I determined the bird died from means other than slaughter. I placed US Retain Tag B35188428 on the carcass. At approximately 06:35 hours I discussed the findings with Plant Manager Warren Leighton. I showed him the carcass and the superficial neck cut. Manager Leighton mentioned the establishment has a humane handling protocol and undergoes multiple audits a year which include humane handling. Manager Leighton stated that he will discuss this finding with the sticking employee and document the conversation. We discussed the importance of humane treatment of all birds, which Manager Leighton agreed was important. I advised Manager Leighton that an MOI would be written and forwarded to the District Office for the (b) (6) (b) (6) and (b) (6) to review, should additional follow-up be needed. Respectfully, (b) (6) OFO FSIS</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P425	Northern Pride, Inc.	04C05	MYG40050 51809G	2017-05-09	<p>P425 Northern Pride, Inc 13:37 hours: Plant Manager Warren Leighton, (b) (6) (b) (6) On Monday May 7, 2017 at approximately 13:35 hours while performing Good Commercial Practices Verification, I observed a bird on the line that had passed the blood tunnel and was headed to the scalders. The bird was rhythmically breathing and blinking. It had an arched neck and was moving its head dorsally, and then laterally. I stopped the picking line, and Plant Manager Warren Leighton removed the conscious bird from the line. At this time it was observed that the bird did have a cut on the neck, but the cut was superficial and did not sever the carotid artery and jugular vein for adequate exsanguination. (b) (6)</p> <p>(b) (6) took the bird to the hanging area where he rehung the bird for subsequent re-stunning and re-sticking. At approximately 13:45 hours I discussed the findings with Plant Manager Warren Leighton. We discussed that this incident was the second in two weeks. (On May 1, 2017 a cadaver was observed on the line after the observation of a possibly breathing bird was made prior to the scalders). Manager Leighton stated there are two sticking employees, they are both experienced. Each sticking employee has now been on sticking duty when a bird was observed by USDA IPP to not be adequately cut. Manager Leighton stated he would meet with both sticking employees after slaughter was completed for the day to discuss sticking. He noted that the first week of production there were problems with heads becoming detached in the picking machine, and the sticking employees were warned about this. Manager Leighton agreed he would rather have a detached head in the picking machine than a live bird going through the scalders, and he reiterated he would discuss the importance of this with the sticking employees. I advised Manager Leighton that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6), to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6), OFO FSIS</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P425	Northern Pride, Inc.	04C05	MYG08060 61627G	2017-06-27	<p>P425 Northern Pride, Inc 13:10 hours: Plant Manager Warren Leighton, (b) (6) On Monday June 26, 2017 at approximately 13:04 hours while performing Good Commercial Practices Verification, I observed a bird on the line that had passed the blood tunnel and was headed to the scalders. The bird was rhythmically breathing. The bird's eyes were closed and the bird was not moving its head or neck. I stopped the picking line, and (b) (6) removed the breathing, unconscious bird from the line. At this time it was observed that the bird did have a cut on the neck, and there was a large blood clot that had formed cranially to the sticking laceration. (b) (6) took the bird to the sticking area where the bird's jugular vein was cut a second time. The bird continued to breathe from the time of removal on the line past the time of the second stick, which was estimated to be a total of approximately 60 seconds. The bird expired approximately 3-4 seconds after the second stick was administered. At approximately 13:10 hours I discussed the above observations with Plant Manager Warren Leighton. I expressed concern that the bird, although unconscious, was breathing rhythmically for quite a length of time after removal from the line. From the location where birds are observed for signs of consciousness and rhythmic breathing to entering the scalders is approximately 50 seconds. It is quite possible that this bird, if gone unnoticed, would have died by drowning in the scalders. I advised Manager Leighton that an MOI would be written and forwarded to the District Office for the (b) (6), (b) (6) and (b) (6), to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6), OFO FSIS</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P425	Northern Pride, Inc.	04C05	MYG30070 71108G	2017-07-08	<p>P425 Northern Pride, Inc 7/8/17 at 06:20 hours: Plant Manager Warren Leighton, (b) (6) On Friday July 7, 2017 at approximately 11:04 hours while performing Good Commercial Practices Verification, I observed a bird on the line that had passed the blood tunnel and was headed to the scalders. The bird had an arched neck and was moving its head back and forth while rhythmically breathing and blinking. I stopped the picking line, and Manager Warren Leighton removed the conscious bird from the line. The bird was observed to have a superficial cut on the neck that had incised the epidermis and subcutaneous tissues only. At approximately 11:10 hours on 7/7/17 I discussed the above observations with Plant Manager Warren Leighton. I expressed concern regarding the trend of breathing unconscious birds and conscious birds observed on the line thus far this season (one bird observed on each of the following days: 5/1/17, 5/7/17, 6/26/17). Manager Leighton agreed and stated he would be discussing the issue with the establishment management team and the sticking employees. I stated that I would follow up with him regarding corrective actions after these meetings were held. At approximately 06:20 hours on 7/8/17 Manager Leighton informed me that he had spoken to the sticking employees after the end of shift on 7/7/17. Manager Leighton stated that the sticking employees have been the same two individuals for multiple years. Establishment records show that three cadavers have been identified thus far this year by establishment employees, and all the cadavers were identified during the month of May. Manager Leighton stated that to date under his management this is the most birds identified as being conscious or breathing on the line in one season. It was discussed that there has been no change to line speed in the sticking area this year, and that plant management has ensured the sticking employees are supplied with well-maintained knives. Due to concern for adequate lighting in the sticking area, plant management will be installing an additional "spot light" type light source to illuminate the sticking area without adding significant additional light to the area to cause excitement to the birds. In addition, (b) (6) will alternate with (b) (6) in monitoring (b) (4) birds per hour on the line for signs of breathing and consciousness. This will double the number of birds per hour monitored by the</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					establishment. The establishment will continue to not maintain written records of the GCPs at this time. I advised Manager Leighton that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6) to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6), FSIS OFO

EstNbr	EstName	Task_Code	MOI#	Date	Description
P44826	Case Farms Processing, Inc	04C05	000300005 1422G	2017-05-22	<p>On 5/22/2017 at approximately 12:55 AM, while conducting a routine walkthrough of the Evisceration department, (b) (6) did make the following good commercial practices observation. While standing at the evisceration rehang table, multiple (6-7), cherry-red cadaver birds with no neck cuts began appearing on the kill line. The evisceration rehang table employee's removed these birds from the kill line. (b) (6) proceeded back to the kill room to make further observations. It was noted that the kill machine had numerous heads in the blade and that several of the birds appeared to be too active after the stunner, including some birds that were noted to apparently be vocalizing after the stunner. The evisceration line lead was notified of these problems and the increased amount of cadavers being seen at the evisceration rehang table. While I proceeded back out to the evisceration rehang table, I observed several more cadavers on the kill line after the pickers. Once back out at the Evisceration rehang table (b) (6) and (b) (6) were overseeing the removal of the remaining cadavers from the evisceration line and I notified them of my observations regarding the kill machine and birds. (b) (6) notified me that maintenance was addressing the issue and followed me back to the kill room to check on the kill machine and stunner. Upon further discussion with maintenance, it was noted that while there had been a stoppage on the kill line due to a fire alarm, a breaker on the new stunner had tripped and this caused the birds to be insufficiently stunned prior to entering the kill machine, resulting in the large amount of cadavers noted. Maintenance had switched over the stunning machine to the back-up breaker and this resolved the issue. A follow-up GCP check of 1000 birds at 1:10 AM revealed the process was under control, with the birds appropriately docile after the stunner and no birds entering the scald tank breathing. Upon checking the condemn barrel at the evisceration rehang table after the issues were resolved, I noted approximately 30 cherry red cadaver birds with no neck cuts. The observations described above are not compatible with the establishment's policies for good commercial practices for poultry slaughter.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P45910	SANDERSON FARMS, INC	04C05	000511001 0219G	2017-01-19	<p>MOI for Sanderson Farms, Inc., P45910, St. Pauls, NC, 1215 hours. In attendance at the meeting were Mr. Paul Smith, Plant Manager, and (b) (6). At approximately 9:30 am, (b) (6) was observing conditions in the live hang area during a scheduled visit to observe good commercial practices at the establishment. She noticed that there was a live bird in the dead on arrival (DOA) barrel. She notified (b) (6) of her findings. (b) (6) had the bird removed from the barrel and hung on the kill line. I notified (b) (6) of these findings. I reminded him that it is important that birds be handled in a manner consistent with good commercial practices. Preventing mistreatment of poultry decreases the production of adulterated carcasses. I also notified him that an MOI would be documented and sent to District Office. On Thursday, January 19, 2017, upon further discussion with (b) (6) and (b) (6), I was informed that 2 establishment personnel involved in this incident had been terminated. Planned actions include lowering the lights to enable better visualization of the birds, and increasing the training for personnel in the live hang area.</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P45910	SANDERSON FARMS, INC	04C05	000341605 4910G	2017-05-10	<p>While I was conducting Poultry Good Commercial Practice Task at around 4:00pm, I observed a bird on the live hang belt on it's back struggling to breathe. During this time plant employees had gone on their break, thus leaving the birds in live hang unattended. I explained during my weekly meeting with the establishment management, 5/10/2017, that birds on their backs can not properly ventilate, which would eventually lead to suffocation. As I continued to walk down the line, I noticed a bird with a mutilated left rear leg. The bird was panting, had pale wattles and comb, and it's eye were closed and neck extended. The left leg had no feathers or paw remaining and the skin had been de-gloved (removed). Lying adjacent to this bird was another leg from a different bird that had been completely amputated, with the same presentation (no skin, feathers, or paw). I was not able to identify which bird this leg had come from, but addressed my findings with (b) (6).</p> <p>(b) (6) He informed me that there was an issue with the cage dumper belt and the live hang belt and he will take care of this situation promptly. NOTE* There was an error uploading establishment's response, so it will be copied and pasted below; Sanderson Farms, Inc. 2076 NC Hwy 20 • St. Pauls, North Carolina 28384 Telephone (910) 674-4777 • Facsimile (910) 802-4686 June 26, 2006 Memorandum Subject: Response to MOI on Good Commercial Practices from 5/10/2017 Date: 5/11/2017 To: (b) (6) The management team met on the issues addressed in the MOI to discuss a further plan of action and assess the corrective actions implemented on 5-10-17. The root cause of the incident was a gap in the divider causing birds to get caught or pinched in between the divider and the belt. Maintenance lowered the divider down to eliminate the gap in between the divider and belt. Also, maintenance added removable stabilizers to ensure the divider is properly adjusted before the next production run. We will also have personnel monitoring the live hang belt during all breaks for the next 30 days to ensure the problem has been eliminated.</p> <p>Respectfully, (b) (6) . (b) (6)  (b) (6) Sanderson Farms, Inc. 2076 NC Hwy 20 St. Pauls, NC 28384 P-45910</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P45910	SANDERSON FARMS, INC	04C05	000082105 2110G	2017-05-10	<p>On May 10, 2017 at 1830 hours while performing a Good Commercial Practice task, I observed the following condition at the live hang belt: At the very beginning of lunch break and as the live hang employees were leaving the belt area for their 30 minute break, I observed a live hanger toss one of five remaining birds that was not hung in a shackle back onto the belt with the bird landing onto his back and remaining in that position (birds that remain on their back can not properly ventilate which would eventually lead to suffocation). The employee then turned to leave for break. (b) (6)</p> <p>stopped the employee and explained to him about leaving birds on their backs. Also while looking at the live hang belt, I observed approximately 2 to 3 poultry legs that were wedged by their feet in a approximately 1-1/2 inch gap that had developed between the belt and the Teflon partition. The legs were completely severed at the junction of the Tibia and Femur with the muscle, skin and feathers still attached. I then took regulatory control of the live hang belt by applying USDA Rejected tag # B37028513 and then showing (b) (6)</p> <p>, and (b) (6)</p> <p>the noncompliance. at 1833 hours. The live hang belt was released after being repaired by maintenance and re-inspected by USDA at 1926 hours. There was previous discussion concerning Good Commercial Practices concerning the same issues in a plant meeting on May 10, 2017 at 1630 hours.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P45910	SANDERSON FARMS, INC	04C05	0000605053111G	2017-05-11	<p>Establishment P 45910, Sanderson Farms, Inc. May 8, 2017, 0615 hours. In attendance: (b) (6) and (b) (6). At approximately 6:15 am on May 8, 2017, I went to live hang and observed Good Commercial Practices. I saw that the birds were piled up at the end of the live hang table. The live hangers was having difficulty getting the birds out of the pile up, having to tug on the birds to dislodge them. Also while observing this pile up, there were 3 birds with their legs stuck underneath the end panel where the birds were piled up. Live hang workers cleared the pile up and removed the birds that had their legs under the panel. I notified (b) (6) of my concerns that the birds must not be mishandled; he stated that he would address the issues. Later in the shift, I also notified (b) (6), of these same observations. A copy of this MOI will be submitted to the District Veterinary Medical Specialist in the Raleigh District Office.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P45910	SANDERSON FARMS, INC	04C05	000572005 4018G	2017-05-18	<p>On May 18, 2017 at 1815, the following condition was observed in the Live Hang room: At the end of the shift, a live hang employee was observed picking several birds off the floor, two of which were very much alive, flapping and kicking vigorously and placing them into a stainless steel Dead on Arrival (DOA) bin. The birds did not appear to have received cervical dislocation. Seeing that USDA personnel (b) (6) and (b) (6), was observing the employee as he was walking up to the DOA bin with the live birds, (b) (6), started yelling for the employee to stop and not put the birds into the container. The employee apparently, not hearing, continued to place the birds into the container (b) (6) immediately ran over to the employee and had him remove the birds from the container and place them on the floor. USDA, (b) (6) performed further ante-mortem inspection confirming the live condition of the birds. He assessed consciousness, by performing palpebral reflex on both of the suspected birds. Palpebral reflex is assessed by gently tapping along the inner edges of the eyelids with a fingertip. A positive response is indicated by the animal blinking. The birds had a positive response to palpebral reflex by blinking their eyes and even opening their eyes immediately afterwards. Another indication that the birds were alive was miotic (constricted) pupils. A properly euthanized bird will have mydriatic (dilated) and fixed pupils. According to the animal welfare plan from the establishment, DOA birds will have cervical dislocation performed by trained personnel, prior to being placed into the DOA bin. (b) (6) explained to (b) (6) that the birds had not been properly euthanized and were still alive. (b) (6) arrived shortly after the incident and (b) (6) explained his findings and informed him that this would be documented in an MOI.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P45910	SANDERSON FARMS, INC	04C05	000271006 3412G	2017-06-12	This MOI is to document the meeting held on June 12, 2017, at 11:00 am, between Mr. Dane Beall, Plant Manager at Sanderson Farms, Inc. (P 45910) and (b) (6), USDA FSIS. The meeting was held to discuss the concern that there have been four recent incidents of mistreatment of live birds at the establishment. At the times of occurrence, these incidents were brought to management's attention and documented in MOI's. Per the establishment, there have been issues with the conveyor belts and also with employee training. Raleigh District Office is aware of these mishandling incidents and is monitoring the situation. It is important that the management of Sanderson Farms, Inc. be proactive in ensuring that Good Commercial Practices are followed when handling live poultry. Continued incidents of mistreatment could lead to the issuance of a Letter of Concern.
P45910	SANDERSON FARMS, INC	04C05	000231407 1214G	2017-07-14	This MOI is to document what was observed while conducting a Poultry Good Commercial Practices on 07/13/2017. At approximately 1800 hours I entered the Live Hang area and observed approximately 1500 dead birds in the area. I approached (b) (6) and questioned him about the amount of DOA's. He stated that he had multiple cages of mainly dead birds. Upon further investigation at the trailer staging area I observed in the 1st bay one fan not operating. The next 4 bays, the trailers loaded with birds were approximately 10-12' away from the fans and misters and in the final bay a empty trailer with no birds parked beside the fans with a loaded trailer with birds parked beside that. The empty trailer was blocking the air flow from the fans and misters. I alerted (b) (6) of my findings. (b) (6) immediately notified Live Haul supervisors and trailers were rearranged so that all loaded trailer were parked in front of fans and misters. This has been a on going issue and addressed in several USDA and establishment meetings.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P45910	SANDERSON FARMS, INC	04C05	000060708 1915G	2017-08-15	<p>This MOI is to document the discussion between Mr. Dane Beall, Plant Manager, Sanderson Farms, Inc. (P45910), and (b) (6), on August 15, 2017 at 7:00 am. Last Tuesday, following a power outage on second shift, the establishment carried over approximately 6 1/2 trailers of birds to be slaughtered on first shift. Of the (b) (4) birds in the flock, 3768 were DOA's (dead on arrival birds). This information was discovered by (b) (6) while he was reviewing establishment paperwork. The establishment failed to notify USDA of this failure of Good Commercial Practices. Through discussions with establishment management last week and this week, I was informed that the (b) (4) DOA rate was attributed to the birds being held overnight. I was also informed that there was no plan in place to account for birds being held overnight on the trailers. Establishment management could not be determine whether the fans and misters, used to help keep the birds cool, were off or on. Going forward, (b) (6) stated that when birds were held overnight, both second shift and third shift offal personnel would monitor that the misters and fans were on during hot weather. I advised (b) (6) of the importance of handling the birds consistent with Good Commercial Practices, as is required by Agency regulations and the PPIA. I also informed him that a copy of this MOI would be submitted to the District Veterinary Medical Specialist in Raleigh District Office.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P46091	Ozark Mountain Poultry, Inc.	04C05	000350205 5709G	2017-05-09	<p>On calendar date 5/9/17, at 0026 and 0031 hours respectively, I (b) (6) while performing a routine Good Commercial Practice (GCP) task observed the following deviations. AT 0026 hours, line #2 in the pinning room department had 28 miss-cuts from the automatic knife cutter (kill machine). The establishment lead person in that department had previously performed routine maintenance to re-set the machine due to a change in lots of young poultry carcasses and released said machine as acceptable to flow of slaughter. At 0031 hours, line #1 had 8 miss-cuts from the automatic knife cutter (kill machine), 6 of which appeared to be a result of miss-hung (hung by only one leg) young poultry carcasses. Establishment 46091P has incorporated a process control check into their prerequisite program, stating that the automatic knife cutter will be timed in accordance to 500 birds, approximately 4 minutes, at the line speed of (b) (4) birds per minute. No more than 5 birds can be missed to be in process limits. This is the same guidelines followed by IPP while performing GCP's. I immediately informed supervisor in training, (b) (6) (b) (6), and (b) (6) of my finding and the forthcoming MOI report, and the possibility of coming noncompliance record. At this time, (b) (6) took control of the situation by having the automatic knife cutter readjusted. Good Commercial Practice were periodically monitored, kill machine in particular, throughout the remainder of the production shift.</p>
P46091	Ozark Mountain Poultry, Inc.	04C05	FAA222309 5928G	2017-09-28	<p>On calendar date 9/28/17, while performing a routine Good Commercial Practice (GCP) task I, (b) (6), observed two obvious cadavers on kill/pinning line # 2. At 2030 hours, I positioned myself at a point in the process line between the final picker, and before the pre-sorter station. At 2032 hours I observed, simultaneously, two young poultry carcasses that were obvious cadavers. Neither carcass had been cut, both still had their heads, and each were the bright red color indicative of a cadaver. The pre-sorter on line # 2 promptly removed said carcasses from the process line as required. FSIS rules are very clear in 9CFR, that breathing must be stopped prior to scalding to prevent death by means other than slaughter. I informed (b) (6), of my findings and of the forthcoming MOI. I also informed (b) (6) that any further findings may result in a possible noncompliance record.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P468	Peco Foods, Inc.	04C05	JVD321705 0106G	2017-05-06	<p>Est P468, Peco Foods, May 6th 2017, 17:13 hours. In attendance: (b) (6) and (b) (6)</p> <p>(b) (6) At approximately 17:13 hours, while observing conditions in the 1st processing room, just prior to the scalding on line 2, I observed a single bird still breathing before entering the scalding. I immediately reported my findings to (b) (6), who then slowed the line to (b) (4) bpm. I verified again that no birds were entering the scalding breathing. At approximately 17:58 hours (b) (6) requested the line speed be increased to (b) (4) bpm with the replacement of the current back up killer; I had approved of his request. I reminded (b) (6) that the PPIA and the agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices (GCP's), and that they not die from causes other than slaughter. I provided (b) (6) a copy of the Treatment of Live Poultry Before Slaughter, published September 2005, and recommended he review it. I notified (b) (6) that this MOI will be forwarded to my front line supervisor as well as the districts District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6) P468 Peco Foods.</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P46826	SHENANDOAH VALLEY ORGANIC	04C05	BOK50140 92021G	2017-09-21	<p>On 9/21/2017 at approximately 1:30 pm, I, (b) (6), and the plant manager Bob Bahr, while inspected the cutting knife in the live hang area, discovered approximately 80 loose birds on the upper catwalk in the hangers' area, and approximately 100 loose birds under the cat walk. I immediately told the live hang supervisor to stop hanging birds and collect all of the loose birds. Upon closer inspection, three recently dead birds were discovered. The birds were warm to the touch and blood had not coagulated or dried on the birds. Two of the three dead birds were found on the lower level of the live hang area. One of these birds was decapitated, the other died of trauma to its chest cavity. The other recently dead bird was found on the upper level, under the beginning portion of the bird crate conveyer. This bird was dismembered, but again recently dead due to the uncoagulated blood, and warm body condition. I notified the plant manager, Bob Bahr of my intension of writing an MOI. I also explained that I would be contacting (b) (6), of the incident. (b) (6) was at P46826 yesterday performing a routine Good Commercial Practices assessment. These findings are not consistent with Poultry Good Commercial Practices. Measures should always be taken to ensure that poultry are handled and kept in conditions that will not result in death or injury unnecessarily. In addition, "employing humane methods of handling and slaughter that are consistent with good commercial practices increases the likelihood of producing unadulterated product". Establishment P46826 is hereby advised to address the above observations and take preventative measures to reduce the likelihood of occurrence. (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P46897	IHSAN FARMS, IIC	04C05	000580806 3727G	2017-06-27	An observation was made of the live hang employees were grabbing and lifting the birds by their wings to transport them from a conveyor belt into cones (a distance of approx. 3 feet). I immediately intervened to prevent the chickens from being handled in this manner and establishment management instructed the employees on how to properly pick up and move the chickens. During the time of observation, the employees began using proper handling techniques to move the live chickens after using a translator to help them understand. I had never seen the birds handled in this manner prior to this date, I found the two employees were new and once they were instructed they began to do the job properly. During this observation even though the handling was questionable no birds resulted in dying by means other than slaughter or that the handling prevented the birds from being properly bled out before entering the scalding. These employees behavior was discussed.. It was found that all birds were appropriately cut and appeared to have been properly bled out by the time they reached the scald tank. Also observed was that no birds were breathing when they entered the scalding.
P46897	IHSAN FARMS, IIC	04C05	000150508 0416G	2017-08-16	At approximately 1305 while on the line at the USDA inspection station giving a break, I observed a bird on the line with the head still attached and no kill cut. I immediately notified (b) (6). (b) (6) of the concern. Due to the fact that birds are manually slaughtered on a cone line and then removed by hand to the scalding line, it is clear that human error was the cause in this case. Poultry good commercial practices require that all birds be slaughtered, fully bled out, and no longer breathing prior to entering the scalding.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P481	Tyson Foods, Inc.	04C05	VHF3003073511G	2017-07-11	<p>On 7/10/17 at approximately 0252 hours the (b) (6) observed the following good commercial practice failure. The cull basket affixed to the end of the livehang belt was piled up with numerous small birds. The chickens in the basket were primarily small and or sick birds that were piled two deep. The basket was filled with culled birds and the mesh at the bottom was not visible. During observation multiple gasping birds were seen pressed to the bottom of the pile. I notified (b) (6), of the issue and plant management was then notified. (b) (6) immediately started culling the birds via the cervical dislocation and placing their carcasses in the condemn barrels located at the end of the line, as is normal for this establishment. (b) (6), approached at this point and assisted him in the culling of the birds, expediting the process. I observed multiple dyspneic birds, but none that appeared to have died by suffocation. FSIS observation continued until all the birds were euthanized and placed in condemn barrels. I then left the live hang area and spoke with (b) (6). I explained the condition I observed and the corrective actions taken by (b) (6). It was explained to me that this area of the plant had been understaffed at the time of the incident and those that were present were new employees. (b) (6) had instructed an employee to stand by the cull basket and euthanize birds as needed, but the instruction has been misunderstood. Instead the employee had culled the birds that were currently in the basket and returned to his duties on the line hanging birds. These factors coupled with the high numbers of culled, small birds that night lead to the incident listed above. It is not within the standards of good commercial practice to let birds asphyxiate, as was the potential outcome of this incident, and as such is concerning to the USDA. This is the third occurrence of birds piling up at the cull basket this year. The previous incidents occurred during day shift on 8/25/16 as outlined in MOI VHF1907082509G and during night shift on 11/11/16 as outlined in MOI VHF0105110811G. Repeated incidences such as these are an issue and can result in further action being taken by FSIS personnel.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P481	Tyson Foods, Inc.	04C05	VHF42040 83321G	2017-08-21	<p>On 8/21/17 at approximately 0249 hours while conducting a routine Good Commercial Practice verification task the (b) (6) observed the following GCP failure. While monitoring empty trailers in the holding shed (b) (6) noted one small bird in the 8th cage back from the windbreak on the top level of trailer 186. The cages on this trailer were all secured indicating the trailer was ready to be taken to another farm and loaded with more birds. Based on this information it was determined that this bird had been left on the trailer as an oversight by plant personnel. (b) (6) immediately alerted (b) (6), of this issue and accompanied both (b) (6) and (b) (6) to the receiving shed. (b) (6) and (b) (6) confirmed that there was a bird in the otherwise empty trailer. This trailer was returned to the unloading area, the affected cage was unloaded, and the bird was removed from said cage to be reintroduced into the slaughter process. (b) (6) stated that due to staffing shortages that night the both the dumper and backup dumper were unavailable and as such the plant employee dumping the cages was relatively inexperienced. The employee was retrained and it was emphasized that cages are to be checked after dumping to insure no birds are overlooked and reloaded onto the trailers. It is not in good commercial practice to cause a bird undo stress through transportation only to forgo slaughter or euthanasia. Repeated shipping coupled with food and water withholding are a great cause of stress and as such should be avoided. It should also be noted that comingling birds from different growers could potentially lead to disease transmission between farms. No other similar MOIs have been issued for birds being left on outgoing cages within the last year.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P510	House Of Raeford Farms	04C05	RHB28100 31713G	2017-03-13	<p>On 03/09/2017 at approximately 0730 hours I was conducting part of the good commercial practice verification task in the evisceration department. I was observing the birds going by on the line from the bleed out area before they entered the scalders.</p> <p>I noticed that one bird going by had his head up and was looking around. So I stopped the line before the bird reached the scalders. I then notified (b) (6), and (b) (6), of my findings.</p> <p>Per 9 CFR 381.65 (b) Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. (b) (6) used a knife to decapitate the bird. (b) (6) stationed a second back up killer at a point on the line prior to the scalders. He discussed that he was having the kill machine blade adjusted to assist with the issue. The line was restarted. I monitored the line at multiple times during the day and did not see any live birds enter the scalders. A copy of this MOI will be forwarded to the (b) (6) and to the circuit (b) (6). If you have any questions you can contact me or the (b) (6).</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P51179	Sanderson Farms, Inc.	04C05	0001019015509G	2017-01-09	<p>On January 6, 2017 at approximately 1544 hours I informed (b) (6) of an increase in cadavers being presented to inspectors since the start of the shift (2 hours prior). (b) (6) said he would follow up with (b) (6). At approximately 1549 hours while performing a Good Commercial Practices task at the scalding entrance on line 1, a live bird was observed to enter the scalding tank. The bird had an un-cut neck and was still breathing as it was conveyed into the scalding tank. When the bird exited the scalding tank I confirmed the neck was not cut. (b) (6) and (b) (6) both observed the cadaver. I discussed with (b) (6) that I had seen an increased incidence of cadavers over the previous 2 hours, especially on line 1. As immediate corrective actions to prevent more bird suffering (b) (6) said he would investigate the cause and counsel the employee working as the backup cutter on line 1. It is important to treat poultry in a way that ensures they are not breathing and are properly bled out when they enter the scalding tank. Employing humane methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce an unadulterated product. A similar incident was observed on October 25, 2016 and documented on MOI #0005913101026G (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P51179	Sanderson Farms, Inc.	04C05	0002014012310G	2017-01-10	<p>On January 9, 2017 at approximately 1800 hours while performing a Good Commercial Practices task at the scalding entrance on line 2, a live bird was observed to enter the scalding tank. The bird had an un-cut neck and was still breathing as it was conveyed into the scalding tank. When the bird exited the scalding tank I confirmed the neck was not cut. (b) (6) observed the cadaver. As immediate corrective actions (b) (6) said he would discipline the employee responsible. At approximately 1810 hours I discussed my findings with plant manager Mr. Larry Gatewood. I informed Mr. Gatewood of the live bird entering the scalding tank and that a similar incident was observed the previous working day, Friday January 6, 2017. It is important to treat poultry in a way that ensures they are not breathing and are properly bled out when they enter the scalding tank. Employing humane methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce an unadulterated product. The similar incident on January 6, 2017 was documented on MOI #0001019015509G (b) (6) )</p>
P51179	Sanderson Farms, Inc.	04C05	0003515014431G	2017-01-31	<p>On January 30, 2017 at approximately 2048 hours while performing a Good Commercial Practices task at the scalding entrance on line 1, a live bird was observed to enter the scalding tank. The bird had an un-cut neck and was still breathing as it was conveyed into the scalding tank. When the bird exited the scalding tank I confirmed the neck was not cut. (b) (6) and (b) (6) both observed the cadaver. As corrective actions (b) (6) stated that he counselled the employee stationed at the back up cutter. It is important to treat poultry in a way that ensures they are not breathing and are properly bled out when they enter the scalding tank. Employing humane methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce an unadulterated product. A similar incident was documented on January 9, 2017 and documented on MOI #0002014012310G (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P51179	Sanderson Farms, Inc.	04C05	000291503 4901G	2017-03-01	<p>On February 28, 2017 at approximately 1757 hours while performing a Good Commercial Practices task at the scalding entrance on line 2, a live bird was observed to enter the scalding tank. The bird had an un-cut neck and was still breathing as it was conveyed into the scalding tank. When the bird exited the scalding tank I confirmed the neck was not cut. (b) (6) observed the cadaver. As immediate corrective actions (b) (6) said he would train the employee responsible. It is important to treat poultry in a way that ensures they are not breathing and are properly bled out when they enter the scalding tank. Employing humane methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce an unadulterated product. The similar incident on January 30, 2017 was documented on MOI #0003515014431G (b) (6)</p>
P51179	Sanderson Farms, Inc.	04C05	000021404 4524G	2017-04-24	<p>On April 21, 2017 at approximately 1909 hours while performing a Good Commercial Practices task at the scalding entrance on line 2, a live bird was observed to enter the scalding tank. The bird's neck was not cut; its head was up, and was still breathing as it was conveyed into the scalding tank. When the bird exited the scalding tank I confirmed the neck was not cut. (b) (6) observed the cadaver. As immediate corrective actions (b) (6) said he would counsel the responsible employee. He believed the employee was focusing too much on rehanging the birds that were hung by one leg and needed to focus more on ensuring all birds were slaughtered. It is important to treat poultry in a way that ensures they are not breathing and are properly bled out when they enter the scalding tank. Employing humane methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce an unadulterated product. (b) (6)</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P51179	Sanderson Farms, Inc.	04C05	000341905 4911G	2017-05-11	<p>On Wednesday May 10, 2016 at approximately 2135 hours while performing a GCP task in the live hang room a chicken was observed crushed underneath a belt at the end of the live hang belt. The chicken was crushed between the belt and the roller at the end of the live hang belt and was obviously dead. The carcass was shown to the (b) (6).</p> <p>When (b) (6) attempted to remove the carcass it ripped apart. I asked (b) (6) what he was going to do to prevent further bird suffering and he said he would increase monitoring of the area. On Thursday May 11, 2017 (b) (6) was informed that an MOI about the incident would be documented. Processing equipment must be maintained in a manner that will not cause bird injury and suffering. It is important to treat poultry in a way that ensures they do not die by means other than slaughter. Employing methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce and unadulterated product. (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P51179	Sanderson Farms, Inc.	04C05	000171505 4731G	2017-05-31	<p>On Tuesday May 30, 2017 at approximately 2003 hours while performing a GCP task in the live hang room a weak bird was sorted off the live hang belt by an employee and placed onto the floor. (b) (6) picked up the bird by its head and tossed it onto a small pile of dead birds on the floor at the end of the belt. The bird was obviously still alive and breathing. (b) (6) was asked why he picked up the bird by its head and tossed it. He said he did not know that the bird was alive. When I asked (b) (6) what he was going to do with the bird he responded that he was going to wait for it to die. (b) (6) was informed that it is unacceptable to pick up live birds by the head and toss them onto the floor. The bird was collected by another supervisor and placed onto the kill line. The incident was discussed with the shift manager Mr. Larry Gatewood later in the evening. On Wednesday May 31, 2017 the incident was also discussed with (b) (6) and Plant Manager Mr. John Stedman at the weekly establishment exit meeting. (b) (6) and Mr. Stedman were informed that a GCP MOI would be documented. (b) (6) stated that he would provide retraining to (b) (6) to prevent more bird suffering. Picking up live birds by the head and tossing them onto the floor is not consistent with Good Commercial Practices because it resulted in needless bird suffering. It is important to treat poultry in a way that ensures they do not die by means other than slaughter. Employing methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce and unadulterated product. (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P51179	Sanderson Farms, Inc.	04C05	000571406 0301G	2017-06-01	<p>On May 31, 2017 at approximately 1732 hours while performing a Good Commercial Practices task at the scalding entrance on line 1, a live bird was observed to enter the scalding tank. The bird's neck was not cut; its head was up, and was still breathing as it was conveyed into the scalding tank. When the bird exited the scalding tank I confirmed the neck was not cut. (b) (6)</p> <p>(b) (6) observed the cadaver. As immediate corrective actions to prevent ongoing bird suffering (b) (6) said he would discipline the responsible employee. It is important to treat poultry in a way that ensures they are not breathing and are properly bled out when they enter the scalding tank. Employing humane methods of handling consistent with Good Commercial Practices and 9 CFR 381.65(b) can help produce an unadulterated product. (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO06000 21527G	2017-02-27	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 2300 hours on February 26, 2017, while verifying Good Commercial Practices (GCIPI) at P517, Mar-Jac Poultry, MS, the following less than GCIPI incident was observed on the back dock in the live hang area. One live bird was observed with rhythmic breathing in a pile of 4 Dead on Arrival (DOAs) at the end of the conveyor for the South picking line. The bird was removed from the pile for further examination. The bird, albeit weak, assumed a sternal posture, exhibited pupillary reflexes, and uplifted head. (b) (6) was notified. The bird was humanely euthanized by rapid cervical disarticulation. (b) (6) and (b) (6) were also notified.</p> <p>Comingling live bird(s) with DOAs can lead to suffocation and death. This practice is not consistent with Good Commercial Practices. At approximately 2345 hours, a meeting was in the USDA office with (b) (6) and (b) (6). The incident was discussed regarding placement of a live bird in a pile of DOAs and preventative measures for preventing future incidences. (b) (6) placed an employee on the floor to pick up DOAs and live birds which may drop onto the floor. (b) (6) indicated this is standard practice prior to this incident. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial (GCPs) as described by industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Perry Davis, DM Dr. David Thompson, DDM Dr. Larry Davis, DDM Mr. Don Coley, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO0100033801G	2017-03-01	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 2345 hours, while performing the Good Commercial Practices in Poultry (GCIPI) verification task at P519, Mar-Jac Poultry, MS on February 28, 2017, the following less than GCIPI incident was observed. One (1) live young chicken with rhythmic breathing, pupillary reflexes, and uplifted head entered the scald tank on the South picking line. (b) (6)</p> <p>(b) (6) was notified of the incident. Birds entering the scald tank while still breathing results in adulterated product and is not in accordance with Good Commercial Practices. Birds must be handled in manner which is humane and does not cause unnecessary suffering prior to slaughter. A second verification of approximately 500 birds prior to the scald tank had no live birds entering the scald tank. This incident was determined to be an isolated incident and not a loss of process control. A meeting was held with (b) (6) and (b) (6) at (b) (6) office at approximately 2400 hours. The incident was discussed and (b) (6) stated the stunning and kill equipment would be checked prior to starting up after the regularly scheduled lunch break as a preventative measure. As Per Federal Register Notice Docket No. 04-037N, "Treatment of Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Perry Davis, DM Dr. David Thompson, DDM Dr. Larry Davis, DDM Mr. Don Coley, DDM (b) (6)</p> <p>(b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO08210 43003G	2017-04-03	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS, LLC 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 2347 hours on April 2, 2017 while verifying the PHIS Good Commercial Practices (GCPIP) verification task, the following less than GCPIP incidences were observed at P519, Hattiesburg, MS. One young chicken, from an approximate 500 bird random sample subgroup, with uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck entered the scald tank on the north picking line which feeds evisceration line #2. (b) (6) and (b) (6) were notified. A second verification from an approximate 500 bird random sample subgroup had one live young chicken with uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck entering the scald tank on the north picking line at approximately 0025 hours on April 3, 2017. (b) (6) and (b) (6) were notified of the 2nd incident. A third verification from an approximate 500 bird random sample subgroup did not have any live bird(s) entering the scald tank at approximately 0040 hours on April 3, 2017. The first two incidences were determined to be isolated events and not repetitive or multiple demonstrating a trend or loss of process control. Live bird(s) entering the scald system live is a less than GCPIP and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. A meeting was held at (b) (6) office at approximately 0005 hours on April 3, 2017. (b) (6) and (b) (6) were present. The incidences and measures to correct the less than GCPIP incidents were discussed. (b) (6) said he would be in communication with (b) (6) and the maintenance department. A brief meeting was held at (b) (6) office with (b) (6) and (b) (6) after the 2nd incident. (b) (6) was present during the 3rd verification and notified by (b) (6) that the establishment was slaughtering birds in accordance with GCPIP. As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6)</p> <p>Relief, Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Perry Davis, DM Mr. Don Coley, DDM Dr. David Thompson, DDM Dr. Larry Davis, DDM (b) (6)</p>
P517	Mar-Jac Poultry-MS	04C05	QOO15140 60615G	2017-06-15	<p>Good Commercial Practices MOI: On June 15, 2017 @ approximately 1034 hours, I observed a less than good commercial practice while performing an Ante-mortem and Good Commercial Practices (GCP) check at P-17766. While performing the GCP, I noticed that a trailer under the unloading shed had numerous birds that were breathing rapidly and gasping with outstretched necks (distressed). The outside temperature was 82°F. The fans surrounding the bird trailers were blowing at full speed, but no misters were installed throughout the unloading shed. (b) (6)</p> <p>(b) (6) stated that the misters are only located under the holding shed. A survey of the holding shed revealed that the misters were powered on; however, they had very little output. This could only be observed when the fans were not powered. In the on state, there was no mist observed or felt in any house. The holding shed was free of trailers for the remainder of the day since the last truck had been transported to the unloading shed. (b) (6) was also notified of this unacceptable practice. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6) (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO04020 74104G	2017-07-04	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry LLC, MS 1301 James St. Hattiesburg, MS 39401 Mr. Monroe,</p> <p>At approximately 2038 hours on July 3, 2017, while verifying Good Commercial Practices (GCIPI) at P 517, Mar-Jac Poultry LLC, MS, the following less than GCIPI incident was observed on the back dock in the live hang area. One live bird was observed with rhythmic breathing in a pile of 3 Dead on Arrival (DOAs), inside the DOA bin. The bird was removed from the pile for further examination. The bird, albeit weak, assumed a sternal posture, exhibited pupillary reflexes, and uplifted head.</p> <p>(b) (6) and (b) (6) were notified.</p> <p>The bird was humanely euthanized by rapid cervical disarticulation. Comingling live bird(s) with DOAs can lead to suffocation and death. This practice is not consistent with Good Commercial Practices. At approximately 2230 hours, a meeting was in the Evisceration Manager office with (b) (6) and (b) (6).</p> <p>The incident was discussed regarding placement of a live bird in a pile of DOAs and preventative measures for preventing future incidences. (b) (6) stated that the establishment would provide a designated employee on how to properly perform rapid cervical disarticulation. If the number of DOAs was higher than normal they would add an additional employee to prevent this from happening in the meantime. Jeff Delia also stated that they would get with upper management on a solution to this problem to prevent future reoccurrences. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good commercial Practices (GCOs) as described by industry guidelines Respectfully, (b) (6) CC: Mr. Don Coley, DM Dr. Larry Davis, DDM Dr. Don Thompson, DDM (b) (6)</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO2504070124G	2017-07-24	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS, LLC 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 0300 hours while verifying the PHIS GoodCommercial Practices (GCPIP) verification task, the following less than GCPIP incidences were observed at Mar-Jac Poultry, LLC, MS, P517, Hattiesburg, MS. One live young chicken, from an approximate 500 bird random sample subgroup, with uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck entered the scald tank on the north picking line which feeds evisceration line #1. A bird consistent with a cadaver exhibiting pooling of blood in the lower breast, neck, and head was verified after the first picker. (b) (6) requested the hanger on evisceration line#1 to remove the bird from the line at approximately 0305 hours. (b) (6) was called to the evisceration department and notified at approximately 0308 hours of a bird entering the scald tank while still breathing. A second verification from an approximate 500 bird random sample subgroup on the north picking line at approximately 0309 hours had one live young chicken with uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck entering the scald tank at approximately 0312 hours. A bird consistent with a cadaver exited the 1st picker at approximately 0316 hours. (b) (6) requested the hanger on evisceration line #1 to remove the bird from the line at approximately 0317 hours. (b) (6) was called to the evisceration department and notified of a second bird entering the scald tank on the north picking at approximately 0320 hours. A third verification from an approximate 500 bird random sample subgroup on the north picking line did not have any live bird(s) entering the scald tank at approximately 0322 hours. The first two incidences were determined to be isolated events and not repetitive or multiple events demonstrating a trend or loss of process control. Live bird(s) entering the scald system live is a less than GCPIP and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. A meeting was held in the USDA IIC office with (b) (6) and (b) (6). The incidences and measures to correct the less</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>than GCPIP incidents were discussed. (b) (6) said he would be in communication with the back up cutters regarding the uncut birds entering the scalders. (b) (6) also stated the equipment was checked by maintenance, the stunning equipment and the killing machine were working within normal tolerances, and birds were being slaughtered in accordance with GCPIP. (b) (6) advised (b) (6) a Memorandum of Information would be documented and issued to plant management pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Don Coley acting DM Dr. David Thompson, DDM Dr. Larry Davis, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO26030 84409G	2017-08-09	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS, LLC 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 0513 hours on August 8, 2017 while verifying the PHIS Good Commercial Practices (GCPIP) verification task, the following less than GCPIP incidences were observed at Mar-Jac Poultry, LLC, MS, P517, Hattiesburg, MS. One live young chicken, from an approximate 500 bird random sample subgroup, with uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck entered the scald tank on the north picking line which feeds evisceration line #1. A bird consistent with a cadaver exhibiting pooling of blood in the lower breast, neck, and head was verified after the first picker. (b) (6) was present in the picking room and observed the cadaver as the bird exited the first picker. A second verification from an approximate 500 bird random sample subgroup on the north picking line had one live young chicken with uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck entering the scald tank at approximately 529 hours. A bird consistent with a cadaver exited the 1st picker at approximately 533 hours. (b) (6) was notified at approximately 0536 hours. A third verification from an approximate 500 bird random sample subgroup on the north picking line had no live bird(s) entering the scald tank at approximately 0539 hours. The first two incidences were determined to be isolated events and not repetitive or multiple events demonstrating a trend or loss of process control. Live bird (s) entering the scald system live is a less than GCPIP and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. A meeting was held in the USDA IIC office with (b) (6) and (b) (6) at approximately 0330 hours on August 9, 2017. The incidences and measures to correct the less than GCPIP incidents were discussed. (b) (6) said he would be in communication with the back up cutters supervisor regarding the uncut birds entering the scalders. (b) (6) advised (b) (6) a Memorandum of Information would be documented and issued to plant management pending review by (b) (6),</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>District Veterinary Medical Specialist. As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. David Thompson, acting DM Mr. Don Coley, DDM Dr. Larry Davis, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO37080 82709G	2017-08-09	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 0703 hours on August 9, 2017, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed in the live hang pen at Mar-Jac Poultry, LLC, MS, Hattiesburg, MS. Dead on Arrival (DOAs) were piled up on the crossover conveyor and at the end of the South picking line. On further observation, (b) (6) removed 2 live birds from the crossover conveyor and returned the birds to the picking line. (b) (6) then removed a live bird from the pile of DOAs at the end of the South picking line and returned the bird to the picking line. The live birds were comingled with the DOAs and could not be identified until removed from the piles. (b) (6) was notified of the less than GCPIP at the time of the incident. (b) (6) was notified at approximately 0707 hours. Mr. Jeff Monroe Plant Manager was requested at approximately 0707 hours. Comingling live birds with DOAs can cause suffocation and death by means other than slaughter resulting in adulterated product. The establishment must ensure that birds under their control on the official premises are treated in a manner that will minimize excitement, discomfort, injury and or death by means other than slaughter. A meeting was held in the USDA IIC office at approximately 0715 hours (b) (6) and Mr. Monroe were present. The less than GCPIP incident was discussed along with findings related to the establishment's sorting practices of DOAs and preventative measures including the head puller prior to the DOA bin which had been put in place, but not fully implemented. Mr. Monroe was advised that a GCPIP Memorandum of Information (MOI) would be issued to plant management pending review by (b) (6)</p> <p>As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. David Thompson, acting DM Mr. Don Coley, DDM</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					Dr. Larry Davis, DDM (b) (6) [REDACTED]

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO27040 81316G	2017-08-16	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 0234 hours on August 16, 2017, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at the transfer belt on the north picking line at Mar-Jac Poultry, LLC, MS, Hattiesburg, MS.</p> <p>Approximately 250-300 birds were piled up on the transfer belt approximately 8 feet along the belt and 3-4 birds deep causing birds to be trapped underneath other birds on the belt. (b) (6) was notified of the less than GCPIP. After the belt was cleared, one bird was observed trapped between the dumper belt and the side of the dumper. The bird had an abrasion to the left side of the breast. A plant maintenance employee removed the injured bird from the entrapment and placed the bird on the transfer belt. Piling on of birds can cause discomfort, injury, and suffocation resulting in death by means other than slaughter and adulterated product. The establishment must ensure that birds under their control on the official premises are treated in a manner that will minimize discomfort, injury and or death by means other than slaughter. A meeting was held in the Quality Assurance office at approximately 0245 hours. (b) (6) and (b) (6) were present. The establishment's handling practices of live birds was discussed along with repetitive findings of overcrowding of birds on the dumper belts. (b) (6) and (b) (6) were advised that a GCPIP Memorandum of Information (MOI) would be issued to plant management pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6) Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. David Thompson, acting DM Mr. Don Coley, DDM Dr. Larry Davis, DDM (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO1506081324G	2017-08-24	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 Mr. Monroe, At approximately 0526 hours on August 24, 2017, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed in the live hang pen at Mar-Jac Poultry, LLC, MS, Hattiesburg, MS. Approximately 12 Dead on Arrival (DOAs) were piled up on the crossover conveyor and approximately 8 DOAs at the end of the south picking line conveyor. (b) (6) then removed 3 DOAs from under the end of the north picking line conveyor and 1 live bird. The live bird was comingled with the DOAs and could not be identified until removed from the pile. The bird had a deep bruise to the right wing and abrasions with feathers missing on the left side of the body. The bird was hung on the picking line and returned to production. (b) (6) was notified of the less than GCPIP at the time of the incident. (b) (6) was notified at approximately 0531 hours. Mr. Jeff Monroe Plant Manager and (b) (6) were notified at approximately 0544 hours. Comingling live birds with DOAs can cause suffocation and death by means other than slaughter resulting in adulterated product. The establishment must ensure that birds under their control on the official premises are treated in a manner that will minimize discomfort, injury and or death by means other than slaughter. A meeting was held in the Plant Manager's office at approximately 1000 hours. (b) (6), (b) (6), Mr. Monroe, (b) (6), and Mr. Joel Williams Vice President, Mar-Jac Poultry, MS were present. The less than GCPIP incident was discussed along with findings related to the establishment's sorting practices of DOAs and the placement of an employee to pickup the DOAs in a timely manner and properly dispose of the carcasses. Mr. Monroe stated that an employee would be designated to pickup DOAs. Comingling of DOAs is a repetitive finding as documented in GCPIP MOI Q0002704081316G dated 08/16/2017. Mr. Monroe was advised that a GCPIP Memorandum of Information (MOI) would be issued to plant management pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines.</p> <p>Respectfully, (b) (6), Canton, MS 9024  1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM  Mr. Don Coley, DDM Dr. David Thompson, DDM  (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO08120 82130G	2017-08-30	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 Mr. Monroe, At approximately 1058 hours on August 30, 2017, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at P517 Mar-Jac Poultry, MS, Hattiesburg, MS. One (1) live young chicken with uplifted head, rhythmic breathing, pupillary reflexes, and no cut to the neck from an approximate 500 bird random subgroup sample entered the scald tank on the north picking line which feeds evisceration line #1. A carcass with head attached consistent with a cadaver exhibiting ventral pooling of blood to the neck and head and a reddish hue exited the 1st picker on the north picking line at approximately 1102 hours. The bird was removed from the evisceration line at approximately 1104 hours by a plant employee and retrieved by (b) (6) as notified at approximately 1106 hours and given an opportunity to examine the cadaver. (b) (6) was notified at approximately 1108 hours, and Mr. Jeff Monroe Plant Manager, (b) (6), and (b) (6) were notified at approximately 1110 hours. A second verification check of an approximate 500 birds random subgroup sample on the north picking line at approximately 1134 hours did not have any live bird(s) entering the scald tank. This incident was determined to be an isolated event and not a loss of process control or systemic event. Allowing bird(s) to enter the scald tank while still breathing is a less than GCPIP and causes needless suffering and death and resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control on the official premises are treated in a humane manner, subjected to minimal excitement, and not subjected to discomfort, injury, or death by means other than slaughter. A meeting was held in the USDA IIC office to discuss the less than GCPIP at approximately 1145 hours. (b) (6) and Mr. Monroe were present. The incident and planned action to prevent recurrence were discussed. Mr. Monroe stated he would be in contact with the contract firm that provides ritual slaughter for the establishment regarding the uncut bird entering the scald tank. Mr. Monroe was advised a GCPIP Memorandum of Interview would be issued to management</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>pending review by (b) (6) As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM Dr. David Thompson, DDM Mr. Don Coley, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO45100 93704G	2017-09-04	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 1007 hours on September 4, 2017, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed in the live hang pen at P517 Mar-Jac Poultry, LLC, MS, Hattiesburg, MS. Approximately 8-10 Dead on Arrival (DOAs) were piled up at the end of the south picking line conveyor. One bird, comingled in the pile of DOAs was observed with the head buried and the body visible, breathing albeit labored A plant employee was requested by (b) (6) to remove the bird from the pile. The bird was hung on the picking line and returned to production. (b) (6) was notified at approximately 1012 hours. Comingling live birds with DOAs can cause suffocation and death by means other than slaughter resulting in adulterated product. The establishment must ensure that birds under their control on the official premises are treated in a manner that will minimize discomfort, injury and or death by means other than slaughter. A meeting was held in the USDA IIC office at approximately 1030 hours. (b) (6) and Mr. Jeff Monroe Plant Manager were present. The less than GCPIP incident was discussed along with findings related to the establishment's sorting practices of DOAs and preventative measures including the head puller prior to the DOA bin which had been put in place, but not fully implemented. Mr. Monroe stated that the live hang supervisor had been instructed to place an employee on the floor to pick up DOAs and live birds which has fallen to the floor at the start of the shift. Mr. Monroe was advised that a GCPIP Memorandum of Information (MOI) would be issued to plant management pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6) Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM Mr. Don Coley, DDM Dr. David</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					Thompson, DDM (b) (6)

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO50070 93505G	2017-09-05	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 Mr. Monroe, At approximately 0533 hours on September 5, 2017, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at Mar-Jac Poultry, MS, Hattiesburg, MS. One (1) live young chicken with uplifted head, rhythmic breathing, pupillary reflexes, and no cut to the neck from an approximate 500 bird random subgroup sample entered the scald tank on the north picking line which feeds evisceration line #1. A carcass with head attached, consistent with a cadaver, exhibiting ventral pooling of blood to the neck and head ,and a reddish hue exited the 1st picker on the north picking line at approximately 0537 hours. The bird was removed from the evisceration line at approximately 0539 hours by a plant employee and retrieved by (b) (6). (b) (6) was notified at approximately 0542 hours and given an opportunity to examine the cadaver. A second verification check of an approximate 500 birds random subgroup sample on the north picking line at approximately 0547 hours did not have any live bird(s) entering the scald tank. This incident was determined to be an isolated event and not a loss of process control or systemic event. Allowing bird(s) to enter the scald tank while still breathing is a less than GCPIP and causes needless suffering and death and resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control on the official premises are treated in a humane manner, subjected to minimal excitement, discomfort, and injury, or death by means other than slaughter. A meeting was held in the Plant Manager's office to discuss the less than GCPIP at approximately 0800 hours. (b) (6) and Mr. Jeff Monroe Plant Manager were present. The incident and planned actions to prevent recurrence of this event were discussed. Mr. Monroe stated he would be in contact with the (b) (6) to ensure equipment was properly setup and functioning and personnel were present in the kill room at the beginning of the shift. Mr. Monroe was advised a GCPIP Memorandum of Interview would be issued to management pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>Slaughter”, the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6)</p> <p>██████████ Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046</p> <p>cc: Dr. Larry Davis, DM Dr. David Thompson, DDM Mr. Don Coley, DDM (b) (6) ██████████ ██████████</p> <p>██████████</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P517	Mar-Jac Poultry-MS	04C05	QOO54090 95207G	2017-09-07	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James St. Hattiesburg, MS 39401 Mr. Monroe, At approximately 0656 hours on September 7, 2017, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed in the live hang pen at P517 Mar-Jac Poultry, LLC, MS, Hattiesburg, MS. Approximately 4-5 Dead on Arrival (DOAs) were piled up at the end of the south picking line conveyor. One bird, comingled in the pile of DOAs was observed with the head buried and the body visible, breathing albeit labored A plant employee removed the bird from the pile and returned the bird to production. (b) (6)</p> <p>(b) (6) was notified at approximately 0657 hours, and (b) (6) was notified at approximately 0700 hours. Comingling live birds with DOAs can cause suffocation and death by means other than slaughter resulting in adulterated product. The establishment must ensure that birds under their control on the official premises are treated in a manner that will minimize discomfort, injury and or death by means other than slaughter. A meeting was held in the USDA IIC office at approximately 0715 hours. (b) (6) and Mr. Jeff Monroe Plant Manager were present. The less than GCPIP incident was discussed along with findings related to the establishment's sorting practices of DOAs and preventative measures, which were not fully implemented or ineffective. This is a repeated incident similar to the incident documented in GCP Memorandum of Interview (MOI) Q0044100094701 dated September 4, 2017. Mr. Monroe had stated previously the live hang supervisor had been instructed to place an employee on the floor to pick up DOAs and live birds form the floor at the start of the shift. Mr. Monroe was advised that a GCPIP Memorandum of Information (MOI) would be issued to plant management pending review by (b) (6)</p> <p>(b) (6) As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6)</p> <p>(b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
					39046 cc: Dr. Larry Davis, DDM Mr. Don Coley, DDM Dr. David Thompson, DDM (b) (6) [REDACTED]
P517	Mar-Jac Poultry-MS	04C05	QOO59040 93814G	2017-09-14	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, LLC, MS 1301 James St. Hattiesburg, MS, 39401 Mr. Monroe, At approximately 0232 hours on September 14, 2017, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed in the live hang pen at Mar-Jac Poultry, LLC, MS, Hattiesburg, MS. Approximately 15 Dead on Arrival (DOAs) were piled up on the crossover conveyor. One live bird with rhythmic breathing and the head covered was comingled with the DOAs. The bird was removed from the conveyor, hung on the picking line and returned to production. (b) (6) was notified at approximately 0529 hours. Comingling live birds with DOAs can cause suffocation and death by means other than slaughter resulting in adulterated product. The establishment must ensure that birds under their control on the official premises are treated in a manner that will minimize discomfort, injury and or death by means other than slaughter. A meeting was held in the Plant Manager's office at approximately 0700 hours. (b) (6) and Mr. Monroe Plant Manager were present. The less than GCPIP incident was discussed and the importance of removing live birds from the floor of the live hang pen in a timely manner. This is a repetitive finding similar to findings In the GCPIP documented on September 7, 2017. Mr. Monroe was advised that a GCPIP Memorandum of Information (MOI) would be issued to plant management pending review by (b) (6).</p> <p>As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DDM Mr. Don Coley, DDM Dr. David Thompson, DDM (b) (6) (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P519	Wayne Farms LLC	04C05	KMH59230 21326G	2017-02-26	<p>(b) (6) Wayne Farms, LLC 525 Wayne Drive Laurel, MS 39440 (b) (6), At approximately 2139 hours, while verifying Good Commercial Practices in Poultry (GCIPL), the following less than GCIPL incident was observed at the live receiving area. A young chicken was entrapped in a hole in the floor of the cage on the top right hand compartment. The cage was located on the 5th row, bottom cage on a company transport trailer. The leg of the chicken was bloody, and the chicken was not able to extricate itself from the floor of the cage. (b) (6) was notified and was requested to remove the cage from the trailer. The cage was removed, set to the side, and the bird was removed from the hole in the floor of the compartment. The bird had bloody abrasions to the right leg above the hock. The bird was placed into production. (b) (6) was also notified of the incident. Allowing birds to become entrapped in damaged equipment can cause injury and/or death and is not consistent with Good Commercial Practices. The establishment must ensure birds on the official premises be treated humanely while under the establishment's control. A meeting was held in the Evisceration Superintendent's office at approximately 0230 hours on February 27, 2017. (b) (6), and (b) (6) were present. The incident and preventative measures to prevent future equipment failure and entrapment of birds were discussed. (b) (6) stated damaged cages are routinely set aside for repair when identified. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described by industry guidelines. Respectfully, (b) (6) Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Perry Davis Dr. David Thompson, DDM Dr. Larry Davis, DDM Mr. Don Coley, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P519	Wayne Farms LLC	04C05	KMH49200 51901G	2017-05-01	<p>(b) (6) Wayne Farms, LLC, P519 525 Wayne Dr. Laurel, MS 39401 (b) (6), At approximately 0327 hours on April 28, 2017 while performing the PHIS Good Commercial Practice in Poultry (GCPiP) verification task, the following less than GCPiP incident was observed in the live hang are of P519, Wayne Farms, LLC, Laurel, MS. A young chicken was observed at the end of the live hang conveyor belt in a red container, with chicken manure and feathers which had collected from the belt. Only the back of the bird was visible. When the manure and feathers were removed, the bird raised its head. The bird was viable but had its head buried under the manure and feathers. Six live young chickens were observed at the end of the belt on the floor of the live hang area. The bird was removed from the red container by a plant employee and placed back into production along with the six other live birds. (b) (6) and (b) (6) and back dock supervisor were notified. Allowing birds to become entrapped under debris can cause suffocation and death by means other than slaughter. The establishment has a responsibility to ensure that all birds on the official premises be treated in a humane manner to prevent unnecessary suffering, injury, or death by means other than slaughter while under their control. A meeting was held briefly with (b) (6) and (b) (6) at the time of notification. A meeting was held with (b) (6) and (b) (6) at approximately 2300 hours on April 30, 2017. (b) (6) was unavailable at the time of the incident on April 28, 2017. (b) (6) stated any forthcoming response to the GCPiP Memorandum of Information would be addressed by (b) (6) (b) (6), Wayne Farms, LLC, Laurel, MS. As per Federal Register Docket Notice 04-037N, dated September 28,2015, "Treatment of Live Poultry Before Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely prior to slaughter and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6) (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Perry Davis, DM Mr. Don Coley,</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					DDM Dr. Larry Davis, DDM Dr. David Thompson, DDM (b) (6)

EstNbr	EstName	Task_Code	MOI#	Date	Description
P519	Wayne Farms LLC	04C05	KMH4504054402G	2017-05-02	<p>(b) (6) Wayne Farms, LLC, P519 525 Wayne Dr. Laurel, MS 39401 At approximately 0411 hours on May 2, 2017, while verifying the PHIS Good Commercial Practices in Poultry (GCIPI) verification task at P519, Wayne Farms, LLC, Laurel, MS, the following less than GCIPI incident was observed. One live young hen chicken from an approximately 500 bird sample subgroup entered the first scald tank exhibiting rhythmic breathing, pupillary reflexes, uplifted head and no cut to the neck. Verification was made at the exit of the last picker at approximately 0416 hours. The carcass was bright red in appearance, with pooling of blood in the head, neck, and upper breast consistent with a cadaver. (b) (6) requested the cadaver be removed at rehang by a plant employee. (b) (6) and (b) (6) were notified and observed the cadaver removed from the evisceration line. A second verification prior to the first scald of an approximate 500 bird subgroup had no bird(s) entering the scald at approximately 0422 hours. A visual check of the kill room evidenced the birds were being stunned properly with an occasional bird bypassing the kill machine. Bird(s) entering the scald while still breathing is not consistent with GCIPI and results in adulterated product. Establishments are responsible for birds entering the official premises and must employ GCIPI to prevent unnecessary suffering, injury and death. A meeting was held in the office of (b) (6) at approximately 0500 hours. (b) (6) and (b) (6) were present. (b) (6) discussed the incident and additional findings with (b) (6) and (b) (6). (b) (6) was advised a GCIPI Memorandum of Information (MOI) would be issued to the plant. (b) (6) stated any forthcoming response would be made by (b) (6).</p> <p>As per Federal Register Notice Docket 04-037N, dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6) Canton, MS 39046 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Perry Davis, DM Mr. Don Coley, DDM Dr. Larry Davis, DDM Dr. David</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					Thompson, DDM (b) (6) (b) (6)

EstNbr	EstName	Task_Code	MOI#	Date	Description
P519	Wayne Farms LLC	04C05	KMH2022051703G	2017-05-03	<p>(b) (6) Wayne Farms, LLC, P519 525 Wayne Drive Laurel, MS 39401 (b) (6), At approximately 2047 hours while verifying the PHIS Good Commercial Practices in Poultry (GCPIP) verification task at Wayne Farms, LLC, Laurel, MS, P519, 3rd shift, the following less than GCPIP incident occurred. (b) (6) and (b) (6) observed a live bird with labored breathing and with the head covered in a pile of Dead on Arrivals (DOAs) outside the live hang pen. The DOA bin was not in place and the live birds and DOAs had been piled on the sidewalk. (b) (6) requested a plant employee to summon a supervisor. Per (b) (6) request, a plant employee removed the birds from the one by one from the pile. The DOAs were decapitated and placed in the DOA bin. While the plant employee was removing the birds from the pile, another bird with labored breathing was removed from the pile of DOAs. The moribund birds were euthanized by rapid cervical disarticulation. (b) (6) and (b) (6) were notified. Birds entrapped in a pile of DOAs are subject to die by suffocation or means other than slaughter. The establishment has a responsibility to handle birds in their care on the official premises in a humane manner that will prevent unnecessary suffering, injury, or death by means other than slaughter. A meeting was held in the USDA office at approximately 2115 hours. (b) (6), and (b) (6) were present. The less than GCPIP incident and the contributing factors leading up to the incident, including the DOA bin not being in place and comingling live birds with DOAs, were discussed. (b) (6) and (b) (6) were advised a GCPIP MOI would be issued documenting the incident. As per Federal Register Docket Notice 04-037N, dated September 28,2005, "Treatment of Live Poultry Before Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely prior to slaughter and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					cc: Mr. Perry Davis, DM      Mr. Don Coley, DDM      Dr. Larry Davis, DDM      Dr. David Thompson, DDM      (b) (6) [REDACTED]      [REDACTED]



EstNbr	EstName	Task_Code	MOI#	Date	Description
P519	Wayne Farms LLC	04C05	KMH47040 63805G	2017-06-05	<p>(b) (6) Wayne Farms, LLC Complex Manager 525 Wayne Drive Laurel, MS 39440 (b) (6) At approximately 2227 hours on June 4, 2017, while verifying the PHIS Good Commercial Practices in Poultry (GCPIP) verification task at P519, Wayne Farms, LLC, Laurel, MS, the following less than GCPIP incident was observed. One live young hen chicken from an approximately 500 bird sample subgroup entered the first scald tank exhibiting rhythmic breathing, pupillary reflexes, uplifted head and no cut to the neck. Verification was made at the exit of the last picker at approximately 2230 hours. The carcass was bright red in appearance, with pooling of blood in the head, neck, and upper breast consistent with a cadaver. (b) (6) (b) (6) requested the cadaver be removed at rehang by a plant employee. (b) (6) (b) (6) was notified and observed the cadaver removed from the evisceration line. A second verification prior to the first scald of an approximate 500 bird sample subgroup had no bird(s) entering the scald at approximately 2237 hours. A visual check of the kill room evidenced the birds were being stunned properly with an occasional bird bypassing the kill machine. This was determined to be an isolated incident and not a loss of process control. Bird(s) entering the scald while still breathing is not consistent with GCPIP and results in adulterated product. Establishments are responsible for birds entering the official premises and must employ GCPIP to prevent unnecessary suffering, injury and death. A meeting was held in the office of (b) (6) at approximately 0430 hours on June 5, 2017. (b) (6), and (b) (6) were present. (b) (6) discussed the incident and further findings with (b) (6) was advised a GCPIP Memorandum of Information (MOI) would be issued to the plant. (b) (6) stated any forthcoming response would be made by (b) (6). As per Federal Register Notice Docket 04-037N, dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully (b) (6), Canton, MS 39046 1039 W. Fulton St. Canton, MS 39046 Cc: Mr. Perry Davis, DM Mr. Don Coley, DDM Dr.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					Larry Davis, DDM Dr. David Thompson, DDM Dr. Harvey Kermit, DDM (b) (6)

EstNbr	EstName	Task_Code	MOI#	Date	Description
P519	Wayne Farms LLC	04C05	KMH01050 64129G	2017-06-29	<p>(b) (6) Wayne Farms, LLC Complex Manager 525 Wayne Drive Laurel, MS 39440 (b) (6), At approximately 2356 hours on June 28, 2017, while verifying the PHIS Good Commercial Practices in Poultry (GCIPI) verification task at P519, Wayne Farms, LLC, Laurel, MS, the following less than GCIPI incident was observed. One live young chicken from an approximately 500 bird sample subgroup entered the first scald tank exhibiting rhythmic breathing, pupillary reflexes, uplifted head and no cut to the neck. Verification was made at the exit of the last picker at approximately 0101 hours. The carcass was bright red in appearance, with pooling of blood in the head, neck, and upper breast consistent with a cadaver. (b) (6) requested the cadaver be removed at rehang by a plant employee. (b) (6) was notified at approximately 0104 hours and observed the cadaver removed from the evisceration line. A second verification prior to the first scalding of an approximate 500 bird subgroup had no bird(s) entering the scalding at approximately 0106 hours. A visual check of the kill room at approximately 0110 hours evidenced the birds were being stunned properly and the automatic kill machine was operating properly. This was determined to be an isolated incident and not a systemic loss of process control. Bird(s) entering the scalding while still breathing is not consistent with GCIPI and results in adulterated product. Establishments are responsible for birds entering the official premises and must employ GCIPI to prevent unnecessary suffering, injury and death. A meeting was held in the office of (b) (6) at approximately 0130 hours on June 28, 2017. (b) (6), and (b) (6) were present. (b) (6) discussed the incident and further findings with (b) (6). (b) (6) stated that a check of the stunner and kill machine by (b) (6) was within normal operating parameters. (b) (6) was advised a GCIPI Memorandum of Information (MOI) would be issued to the plant. (b) (6) stated any forthcoming response would be made by (b) (6). As per Federal Register Notice Docket 04-037N, dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to abide by</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6)</p> <p>Canton, MS 39046 1039 W. Fulton St. Canton, MS 39046 cc; Dr. Larry Davis, acting DM Mr. Don Coley, DDM Dr. David Thompson, DDM (b) (6)</p>
P519	Wayne Farms LLC	04C05	KMH07080 84729G	2017-08-29	<p>Mr. Craig Ballentine Complex Manger Wayne Farms, LLC 525 Wayne (b) (6), MS 39440 (b) (6), At approximately 0450 hours on August 29, 2017, the following less than Good Commercial Practices in Poultry incident occurred at P519 Wayne Farms, LLC, Laurel, MS. One (1) live bird in dorsal recumbency with labored breathing was observed on top of a pile of Dead on the Arrivals (DOAs) in the DOA bin. (b) (6) and (b) (6) were notified. Comingling live bird(s) with DOAs can cause the bird(s) to suffocate. Establishments must ensure that birds under their control on the official premises are treated in a manner to prevent excitement, discomfort, injury, and death by means other than slaughter. A meeting was held In the Night Shift Manager's Office at approximately 0500 hours on August 29, 2017 (b) (6) and (b) (6) were present. The less than GCPIP incident was discussed. (b) (6) stated the head puller prior to the DOA bin was damaged shortly after the start of the shift at approximately 2100 hours on August 28th. (b) (6) stated he had contacted maintenance regarding the repair of the head puller. (b) (6) was advised a GCPIP Memorandum of Information would be issued to the establishment pending review by (b) (6) (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6)</p> <p>Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM Dr. David Thompson, DDM Mr. Don Coley, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P519	Wayne Farms LLC	04C05	KMH25070 94327G	2017-09-27	<p>On September 25, 2017 at approximately 1250 hours, I observed less than Good Commercial Practices while performing an Ante-Mortem Inspection and Good Commercial Practices check at P-519. I observed 3 live birds entering the scald tank. The birds were not cut and were breathing with the eyes open and blinking. I was being shadowed by (b) (6) who also observed the live birds entering the scald tank. (b) (6) was in the area during my inspection and took immediate action by adding a second back up killer and called a maintenance employee to adjust the kill machine. (b) (6) was informed while in the picking room at approximately 1300 that a GCP MOI documentation of our meeting and discussion of the observed deficiency would be forthcoming. In addition, these findings were observed on Sunday night, September 24, 2017 on 3rd shift. At approximately 2300 hours, (b) (6) notified (b) (6) that she had identified 6 cadavers, with 5 of them in rapid succession at station #4. A total of 9 cadavers had been identified by IPP by break time of 2311. (b) (6) and (b) (6) proceeded to the kill room and scalders and found no evidence of live birds entering the scalders or concurrent loss of process control. (b) (6) was notified of the issue and he immediately assigned a back-up neck cutter to the line. Several checks throughout the remainder of the shift at the scalders revealed no live birds entering the scalders. However, by the end of the shift, a total of 32 cadavers, some of which were DOAs, had been identified by IPP. (b) (6) was informed at a meeting in the USDA office at approximately 0525 with (b) (6) and (b) (6) that a GCP MOI documentation of our meeting and discussion of the observed deficiencies would be forthcoming. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office. Thank you, (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P522	Sanderson Farms, Inc. (Processing Div)	04C05	IKB291902 2802G	2017-02-02	<p>Today, February 2nd, 2017, at approximately 1908 hours, while conducting a Good Commercial Practices task, the following was observed in the live hang area. There was an accumulation of approximately 35 carcasses at the end of the live hang belt and on the adjacent metal table. The carcasses were piled 3 birds high. There were approximately 5 carcasses on the floor, lying in a puddle, and there was one carcass hanging by one leg off the side of the belt. As I observed, two more carcasses fell to the floor. I observed the carcasses on the table carefully and observed 2 birds within the pile that were breathing, as evidenced by rhythmic movements of the chest. I alerted an area employee and asked him to get a supervisor. I continued to observe as the employee began sorting, disarticulating the neck, and decapitating the carcasses. (b) (6)</p> <p>appeared and began participating in the process. After the carcasses had been disposed of, I verbally notified (b) (6), of my findings which would be documented in a Good Commercial Practices MOI. I expressed concerns about carcasses piling up in live hang during the weekly meetings on January 20, 2017 and February 2, 2017. I also informally discussed this issue with (b) (6) and (b) (6) last night, February 1st, 2017. Poor process control in live hang may result in the pile up of Dead On Arrival (DOA) carcasses. Weak or injured birds may become trapped under DOAs and may be smothered, resulting in suffering and death by means other than slaughter. The establishment is encouraged to review Federal Register Notice Vol. 70, No. 187, Published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. Respectfully, (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P522	Sanderson Farms, Inc. (Processing Div)	04C05	IKB510804 2706G	2017-04-06	<p>(b) (6) P-522 On April 6, 2017 at approximately 0515 while performing a GCP task in the Picking Room, I observed less than Good Commercial Practices. I observed a live bird lying on its back in a drain pan located under the picking line which runs prior to the kill machine. The bird could not right itself. Water from other birds hung on the picking line which had just exited the stunner cabinet and passing over the top of this bird was observed pouring down onto the front of this bird's head and body. The bird was lying in water collected by the drain pan. (b) (6) with me at the time of this observation removed the bird from the drain pan. The bird was breathing with open eyes and appeared lethargic and/or fatigued as there was very little movement from the bird when picked up. The Picking Room Supervisor placed the bird back on the picking line at a point in the process that caused the bird to re-enter the slaughter process for a second time. I discussed my observation with Kevin Montgomery, Plant Manager, and (b) (6). I reminded management this was now the third occurrence of finding birds displaced from the picking line. Two previous findings were discussed in weekly meetings with plant management of finding birds located at the stunner exit (one live and one dead bird). Discussions with plant management were documented in the weekly meeting minutes on 3-24-17 and 3-31-17. Additionally, I had a separate discussion with (b) (6) of my concern of allowing the bird to go through the entire slaughter process a second time. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. Respectively, (b) (6) Cc Mr. Don Coley, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P522	Sanderson Farms, Inc. (Processing Div)	04C05	IKB180704 5511G	2017-04-11	<p>(b) (6): On April 10, 2017 at approximately 0556 hours while performing a GCP task in the Live Hang Room, I observed less than Good Commercial Practices. When I walked into the room I noted a pile up of birds (these birds were not decapitated) on the slatted decapitation table that sits at the end of the live hang belt. No one was addressing the pile up of birds when I entered the room. I observed one breathing bird lying on this table located at a point where the moving live hang belt was repeatedly striking the bird. (b) (6), walked up to the table. He began removing the birds from the table and placing the birds on the floor. Twenty one (21) birds were removed from the table. As the birds were removed, I observed one breathing bird located at the bottom of the pile, lying on its back. The bird's head had falling down between the slatted bars of the decapitation table. I showed these birds to (b) (6). I notified (b) (6), Mr. Kevin Montgomery, First Shift Plant Manger, and (b) (6) of the forthcoming MOI. This issue has been discussed with plant management on multiple occasions. 1. As documented in the weekly meeting dated 1-27-17, I discussed with (b) (6), and (b) (6) on 1-23-17 at approximately 0535 hours, the issue of allowing birds to pile up on the slatted decapitation table next to the moving live hang belt. 2. As documented in the weekly meeting dated 2-17-17, at approximately 0550 hours, I discussed with Mr. Gary Delancey, First Shift Plant Manager the observation at 0541 hours by (b) (6) of a pile of birds at the end of the live hang table next to the metal grate. (b) (6) observed one bird lying on its back trying to right itself as birds were piling on top of this bird. She immediately notified (b) (6), and (b) (6) lifted the bird upright. 3. As documented in the weekly meeting dated 2-24-17, on 2-23-17 at approximately 0539 hours, I had a meeting with (b) (6) and Mr. Gary Delancey, First Shift Plant Manger, concerning birds piling up at the end of the live</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>hang belt. Two live birds were observed on their backs unable to right themselves as other birds were beginning to pile up on these birds at the end of the moving live hang belt. 4. On 2-28-17, at 0707 hours I discussed with (b) (6) and Mr. Kevin Montgomery, First Shift Plant Manger, birds piled up on the table at the end of the rehang belt with one bird lying on its back. Mr. Montgomery stated a meeting on animal welfare would be conducted at the end of the day and promised this issue would be corrected. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. Respectively, (b) (6) Cc Mr. Don Coley, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P522	Sanderson Farms, Inc. (Processing Div)	04C05	IKB581805 5025G	2017-05-25	<p>The following less than good commercial practices were observed yesterday at P-522, Sanderson Farms, Collins, Mississippi: I was informed by my CSIs that the picking line was down, so I proceeded to the live hang area to observe the condition of the live birds. Upon entering the live hang area at approximately 1412 hours, I observed that the outside line was not moving and there were no birds in the shackles on that line in live hang. There were approximately 15 dead birds on the metal table at the end of the line. Within the pile of dead birds I observed a live bird: The head of the bird was buried beneath dead birds, but the vent area of the bird was clearly moving in and out in a rhythmic manner as the bird breathed. (b) (6)</p> <p>(b) (6), was notified of this finding and informed that live birds buried beneath dead birds may suffocate, dying from means other than slaughter. This issue was discussed at second-shift weekly meetings with the establishment on 1/20/17, 2/2/17, 2/10/17, 4/7/17, 4/21/17, and 5/4/17. Additionally, Good Commercial Practice MOI's have been issued for this same problem on 4/11/17 (First Shift) and 2/2/17 (Second Shift). I proceeded to the platform adjacent to the dumper, where I observed that most of the shackles were empty. However, there were still live birds hanging in the shackles in three locations (at the time of my observation the birds had been hanging on the line for approximately 10 minutes): There were two live birds (one of which was hanging by one leg only) suspended in the shackles beneath the push-down bar. I asked area employees why these birds had not been removed from the line and they stated that the birds could not be removed from the line because the metal bar was in the way. There were 2 live birds suspended in the shackles near where the line makes the first a 90-degree turn as it exits live hang and proceeds towards the stunner. I asked the employees why these birds had not been removed since there was nothing obvious obstructing access to these birds. Area employees stated that the birds were stuck and could not be removed from the shackles. There were 10-15 live birds suspended in the shackles above the catwalk, located just prior to the entrance to the stunner. I immediately notified Mr. Barry Sparks, Plant Manager, and (b) (6), of my findings. I proceeded to the front office and informed (b) (6), of my findings, and asked if the</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>establishment's animal welfare program includes a protocol for dealing with live birds in the shackles in the event of a line stoppage. (b) (6) stated that live birds were to be removed from the line in the event of a line stoppage. This issue was previously discussed at the weekly meeting 3/2/17, at which time (b) (6) stated that birds are to be removed from the line in the event of a breakdown lasting more than 3-4 minutes. I subsequently reviewed the establishment's written animal welfare protocol titled, "Animal Welfare Plan for Disruption of Processing" and confirmed that removal of live birds from the line prior to the stunner is included in the protocol, although a time frame is not specified. The treatment of live birds before slaughter is an important animal welfare concern. Live birds buried beneath dead birds may suffer and/or suffocate, dying by means other than slaughter. Live birds left suspended upside down in the shackles for a prolonged period of time in the event of a line stoppage may suffer and/or die; this is especially true of birds improperly hung in the shackles or birds that are already in a compromised state due to disease or injury. Establishment management is encouraged to review Federal Register Notice Docket No. 04-037N (dated September 28, 2005) for FSIS recommendations concerning treatment of live poultry before slaughter. Establishments are strongly encouraged to abide by Good Commercial Practices. The aforementioned observations were discussed today with (b) (6)</p> <p>(b) (6) Respectfully, (b) (6) CC:</p> <p>(b) (6)</p> <p>Mr. Don Coley, Deputy District Manager (b) (6)</p> <p>(b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P522	Sanderson Farms, Inc. (Processing Div)	04C05	IKB341405 1526G	2017-05-26	<p>Yesterday, May 25th, 2017, at approximately 2143 hours, I observed the following at P-522, Sanderson Farms, in Collins, Mississippi: The backup cutter on the outside line (the line closest to the exit door) appeared to miss a live bird that had itself been missed by the neck cutting machine. I exited the area and went to the scalding entrance. I observed one live bird enter the scalding on the outside line. Prior to entering the scalding the bird was craning its neck, flapping its wings, and appeared to be bright and alert. There was no evidence of blood or a cut on the bird's neck. I proceeded to the hot rehang area of the evisceration department and observed a cadaver on Line One at approximately 2154 hours. The bird was removed from the line by an area employee and I inspected the carcass: It was brick red and the head was swollen and fully attached. There was no evidence of a cut on the neck. I immediately informed Barry Sparks, Plant Manager, of my findings. Birds that enter the scalding alive die by drowning rather than by slaughter. Establishment management is encouraged to review Federal Register Notice Docket No. 04-037N (dated September 28, 2005) for FSIS recommendations concerning treatment of live poultry before slaughter. Establishments are strongly encouraged to abide by Good Commercial Practices. Today, May 26th, I discussed my findings with (b) (6)</p> <p>Respectfully, (b) (6) CC: (b) (6) Mr. Don Coley, Deputy District Manager (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P522	Sanderson Farms, Inc. (Processing Div)	04C05	IKB521906 0430G	2017-06-30	<p>The following less than good commercial practices were observed today at P-522, Sanderson Farms, Collins, Mississippi: Upon entering the live hang area at approximately 1925 hours, I observed that there were 15 carcasses on the metal table at the end of the line. Within the pile of dead birds I observed one live bird: The head of the bird was buried beneath dead birds, but the side/breast area of the bird was clearly moving in and out in a rhythmic manner as the bird breathed. (b) (6)</p> <p>(b) (6) was notified of this finding and informed that live birds buried beneath dead birds may suffocate, dying from means other than slaughter. (b) (6) extracted the live bird from the pile and hung it on the line. The bird was clearly alive as its eyes were open and it had normal muscle tone and head movement. This issue was discussed at second-shift weekly meetings with the establishment on 1/20/17, 2/2/17, 2/10/17, 4/7/17, 4/21/17, and 5/4/17. Additionally, Good Commercial Practice MOI's have been issued for this same problem on 5/25/17 (Second Shift), 4/11/17 (First Shift) and 2/2/17 (Second Shift). The treatment of live birds before slaughter is an important animal welfare concern. Live birds buried beneath dead birds may suffer and/or suffocate, dying by means other than slaughter. Establishment management is encouraged to review Federal Register Notice Docket No. 04-037N (dated September 28, 2005) for FSIS recommendations concerning treatment of live poultry before slaughter. Establishments are strongly encouraged to abide by Good Commercial Practices. The aforementioned observations were discussed today with Mr. Barry Sparks, Plant Manager. Respectfully, (b) (6)</p> <p>(b) (6) CC: (b) (6)</p> <p>(b) (6) Mr. Don Coley, DDM</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P529	Pilgrim's Pride Corporation	04C05	ODE26110 62906G	2017-06-06	<p>At approximately 1:10pm on June 5, 2017, while conducting a Good Commercial Practices Task I, (b) (6), was looking in the DOA bin. I noticed that the belt that conveys everything that falls out of the drawers was not operating. I informed (b) (6). He stated that he had maintenance look at the belt approximately an hour before and they decided they would repair it after the end of production. I got a flashlight and looked into the area where the drawers were emptying out on the belt. I looked at it from the front where the belt empties into the DOA bin and from the top where the drawers emptied out. I noted a pile of feces and feather and soil with a live, immobile chicken on top of the pile. I asked (b) (6) how he would address live birds falling into that area and possibly getting trapped. (b) (6) responded that he did not know how he would address that issue. (b) (6) called maintenance to fix the belt after removing and humanely euthanizing the live bird at approximately 1:13pm. Maintenance got the belt running again at approximately 1:25pm. A pile approximately twelve inches deep of feces and feathers and soil fell out onto the floor. Buried within that pile of debris was approximately 6-8 chickens. All the chickens were dead when they came out of the pile. I could not determine if they were dead or alive when they dropped onto the pile.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P529	Pilgrim's Pride Corporation	04C05	ODE25120 63529G	2017-06-29	<p>At approximately 1320 on June 28, 2017, while performing a Good Commercial Practices Task I noticed 17 cadavers were marked on the lot tally sheets. There were 49,017 birds scheduled to be slaughtered in that lot. At approximately 1325 I discussed the number of cadavers with (b) (6). I asked him why there were so many cadavers and what he was going to do to ensure fewer cadavers. He stated that while he was working as the back-up cutter he noticed that the lot had a large variation in bird size causing the kill machine to miss a larger than usual amount of birds. He said when he was done working as the back-up cutter he raised the kill machine up to try and compensate for the large variation. He further stated that he would discuss a long-term plan with his manager and discuss it with me later. At approximately 1350 (b) (6) (b) (6) met with me in the USDA office to discuss his further plan. He stated that (b) (6) would send an e-mail to the live side operations to request that the "runt" birds be culled by the live side before being shipped to the plant. He also stated that when he notices a large variation in bird size, and staffing is available, he will station two back-up cutters after the kill machine. A similar situation with increased cadavers on two days was discussed during the USDA weekly meeting on June 6, 2017. This discussion was documented in the MOI for that meeting. The cause was attributed to lack of employee training for these two days.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P529	Pilgrim's Pride Corporation	04C05	ODE17100 74213G	2017-07-13	<p>At approximately 6:35am on July 13, 2017, I was alerted by an on-line USDA food inspector that they had condemned four cadavers in approximately the last 20 minutes. I looked in the condemn barrels and saw many bright red birds with no evidence of a cut on their neck. I reviewed the other lot tally sheets at each inspection station and found that there had been 13 cadavers condemned during the day shift. Day shift starts inspection at 5:45am. I then went out to the live hang area to investigate further. I noted that the stunning and cutting machinery appeared to be working properly and the back-up cutter did not appear to be overworked. At approximately 6:50am I met with the establishment (b) (6) and (b) (6). I informed them of my observations, asked them what happened and how they were going to correct the situation. (b) (6) stated he was putting salt in the line two stunner and he noticed his back-up cutter was working more than usual. In response he raised both the stunner and the automatic neck cutter. During this time (b) (6) noticed that the water was off supplying the line one stunner. This caused the water level in the stunner to decrease to the point where it was no longer effective. Once the water was turned back on, the stunner operated correctly. I asked what caused the water to be turned off supplying the stunner and what they would do to ensure the water is on during production in the future. (b) (6) answered that he was not sure how the water got turned off but he suspected night shift could have turned it off or the valve was bumped. He informed me in the future he will check the valves during shift change to ensure proper operation. Finally, I asked if the back-up cutter alerted them to the problem or stopped the line in response to the problem. (b) (6) said that the back-up cutter did not notify them or stop the line. He said he would have a conversation with them to remind them to stop the line when they cannot keep up with the amount of birds they have to cut.</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P533	Hain Pure Protein Corporation - FreeBird East	04C05	AKB5004023514G	2017-02-14	<p>On February 13, 2017 at approximately 10am a trailer of poultry on the way to slaughter at establishment Hain Pure Protein 533P overturned. The trailer arrived to the establishment at approximately 2pm. At approximately 2:15pm I went to live receiving to observe the unloading and sorting of poultry. In the live hang room the lights were on to assist with the sorting. There was a large pile of approximately 50 dead birds on the floor next to the belt. As the hangers were sorting the birds I noted one of the birds that was put in the dead pile was alive. I alerted the hanger who picked the bird back up and hung it on the kill line. I saw another live bird in the dead pile. I notified (b) (6), of the situation. I stopped the sorting until the dead pile was cleaned up and all birds were verified to be dead. In total there were 5 live birds placed in the dead pile. Once the pile was cleared, sorting and hanging resumed. (b) (6) performed the rest of the sorting and controlled the belt speed. I observed the rest of the sorting and hanging. No other live birds were placed in the dead pile on the floor. I discussed with (b) (6) that it is unacceptable to place live birds in the dead pile. Live poultry must be handled in a manner that is consistent with good commercial practices (GCPs), and that they not die from causes other than slaughter (b) (6) stated in response: In regards to the incident on Monday in live receiving with having to deal with the accident and having to process those birds. Should something unusual as this occur again we will slow the process down as much as necessary to keep ensure no live birds are going to the floor to be mixed with the dead. I will make it clear to the lead in live receiving that this must happen to abide by our GMP's. During a GCP Verification visit on 12/13/2016, (b) (6) observed a live bird on the floor with its head under the wing of a dead bird and (b) (6) discussed her concerns about the situation with establishment management at the time. (b) (6) also spoke with (b) (6) who stated the establishment was hoping on installing a table for dead/dying birds by the end of January 2017. At this time there is no table.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P544	Jennie-O Turkey Store Sales	04C05	KXJ310403 5023G	2017-03-23	<p>At approximately 1:35 AM I was down stairs by where the birds enter the scalding monitoring the plant's Commercial Practices in the stun and kill department. I observed a bird going into the scalding alive. (I knew that it was alive because I could see it holding its head up.) I then went over to the point where the birds exit the last picker, just prior to where they enter the hock cutter. During the time that I was there I did not see a cadaver come out of the pickers. However, I then moved to the live hang area and noticed two birds in the ante mortem condemn barrel that had their feathers removed and were cadavers. I then went upstairs to look for (b) (6) so that I might show him the cadavers in the condemned barrel. While upstairs I heard an inspector ring the bell to summon me and found that (b) (6) had retained a bird for my disposition. It was a cadaver, and I condemned it as such. I encountered both (b) (6) and (b) (6), showed them the cadaver behind (b) (6), and asked them to accompany me back downstairs. While downstairs, I showed them the cadavers in the ante mortem condemned barrel. (b) (6) and (b) (6) both began an investigation as to how two cadavers ended up in the ante mortem condemned barrel. (b) (6) explained that he had seen these two cadavers and brought them back to the blood tunnel to alert his back up kill person that there were birds going through scalding alive. He explained further that once he had his back up kill person's attention, he found that the handiest condemned barrel to dispose of the two cadavers in was this ante mortem condemned barrel. The lot or flock being slaughtered at the time had been started about one hour prior to the 12:30 AM lunch break. Counting the two carcasses that were found in the ante mortem condemned barrel and six carcasses recorded as cadavers on the inspectors' lot tally sheets, by 2:00 AM there were a total of eight cadavers produced by the plant. This is considerably more cadavers than normal, and I said to (b) (6) and (b) (6) that it looks like there is something going on that is resulting in cadavers. They said to me that they were two people short in live hang and, therefore, they only had one backup kill person in the blood tunnel. (b) (6) said that, although one backup kill person should be able to handle it, they would prefer to have two backup kill persons. They said</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					they instructed (b) (6) to adjust the kill blade of the auto kill machine, in hopes that there would be fewer missed cuts that the lone backup killer would have to act on.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P544	Jennie-O Turkey Store Sales	04C05	KXJ310004 4906G	2017-04-06	<p>P544-Jennie-O Turkey Store, Melrose, MN 4th April-03:00am: (b) (6), (b) (6) 5th April-22:45pm: (b) (6), (b) (6) (b) (6) Poultry Mistreatment</p> <p>Memorandum of Interview (MOI): The following is a documentation of observations and discussions with 00544P/Jennie-O Turkey Store, Melrose, MN establishment personnel regarding the observations of two instances where live birds were run over by trailers in the live haul area during two nights of production, the 3rd and 4th of April 2017. During the 1st shift on the 3rd of April 2017 at approximately 03:00am while performing a Good Commercial Practice (GCP) verification in the live haul rehang area, a trailer had just exited the live haul area when the live haul foreman was observed to pick-up the crushed carcass of a single turkey. The carcass was placed in a condemned barrel and denatured. I spoke with the live haul foreman, as the area supervisor was not available, that live birds need to be handled consistent with good commercial practices. During the 1st shift on the 4th of April 2017 at approximately 02:45am while performing a GCP verification in the live haul rehang area, I observed truck pulling trailer 1301M exit the rehang area. Approximately 2 feet from the outside overhead door, there was a single turkey with head lifted, wings flapping, vocalizing, and the back end was crushed. The live haul foreman performed a cervical dislocation of the affected bird and placed the carcass in the condemned barrel and denatured the contents. I located (b) (6) and (b) (6) outside of the evis department at 03:00 and spoke with them regarding the observations tonight and the previous night as not being consistent with good commercial practices, as the birds had died by means other than slaughter. (b) (6) and (b) (6) left to speak with the live haul foreman and crew. On the 5th of April 2017, (b) (6) was observed to be speaking to the live haul foreman and monitoring the live haul area at 1st shift start-up 20:00. Discussion that day during the 22:45pm weekly meeting (MOI KXJ2800040806I), (b) (6) reported preventative measures including advising the live haul crew hangers to be notifying the area leads if birds fall. The leads are</p>

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EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>to be monitoring areas, watching for fallen birds, and assisting the foreman when fallen birds are identified. Birds are to be retrieved at the time of identification. The live haul foreman is to be illuminating the areas with flashlight and assisting the leads with retrieving birds before the trucks move. I notified (b) (6) and (b) (6) that this MOI would be forwarded to the District Office and to the (b) (6) and (b) (6) should the need for follow-up be recommended. Respectfully, (b) (6)</p> <p>P544-Jennie-O Turkey Store</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description																				
P544	Jennie-O Turkey Store Sales	04C05	KXJ590605 2502G	2017-05-02	<p>United States Department of Agriculture Food Safety and Inspection Service (b) (6) 123 S. 5th. Av. E. Melrose, MN. 56352 320-256-3311</p> <p>Date: 5/1/2017 TO: (b) (6) and (b) (6) FROM: (b) (6)</p> <p>SUBJECT: MOI-Good Commercial Practice</p> <p>At 0745 hours I was on the north side of the Hang and Kill bay observing Good Commercial Practices. There were three trailers staged to enter Hang and Kill. The trailer numbers were 9821, 1402 and 0706. All three trailers belonged to flock, Buysee Plainview, which is 125 miles from the Jennie-O-Turkey Store, Melrose facility. The outside temperature was 32 degrees and a heavy mist, at the time of my Good Commercial Practices observations. I observed the back of the three staged trailers and noted that the back trailer axels and frame work was packed with snow. The back coops were wet. The turkeys in the back cages were wet, listless and shivering . The bottom 2 cages that I could observe well had 1-3 DOAs per cage. There was no panel protection on the back of the trailers. I observed the sides of the three trailers which had staggered side panels in place. The turkeys in the side cages were dry and the cages were drier then the cages in the back of the trailer. I did not observe any turkeys shivering in the cages on the trailer’s side. The back of the trailers did not have any panels. It appears that during the 125 mile haul from the farm to the Melrose facility that the snow, mist swirled up behind the trailer and made the back cages and turkeys wet and some of the turkeys were hypothermic. I demonstrated the three (b) (4) trailers to (b) (6) and (b) (6) . The two gentlemen said a further investigation into the wet conditions of the back cages of the trailers would be performed. After I entered the establishment I reviewed the DOA numbers for the Buysee Plainview flock. The numbers were: Trailer DOAs</p> <table><tr><td>1304</td><td>19</td><td></td><td></td></tr><tr><td>1101</td><td>15</td><td>0706</td><td></td></tr><tr><td>38</td><td></td><td>1402</td><td>47 1406</td></tr><tr><td></td><td>20</td><td></td><td>0705</td></tr><tr><td>5 9821</td><td></td><td>13</td><td>The average number of DOAs per</td></tr></table>	1304	19			1101	15	0706		38		1402	47 1406		20		0705	5 9821		13	The average number of DOAs per
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EstNbr	EstName	Task_Code	MOI#	Date	Description
					load for (b) (4) was 22.4 carcasses. The next lot of turkeys processed was from (b) (4) which is 27 miles for the Jennie-O-Turkey, Melrose processing facility. The average number of DOAs per load for (b) (4) was 2.75. (b) (4) were similar size birds to (b) (4). Sincerely, (b) (6).
P544	Jennie-O Turkey Store Sales	04C05	KXJ450405 2405G	2017-05-05	At approximately 3:10 I was down in the live hang area observing Good Commercial Practices. I saw the plant trying to retrieve a live bird off the hoist before trying to pull an empty trailer out of the live hang bay. It took some time to get the bird out. When they got the bird out, the live hang lead person checked for birds on the hoist from the front end of the truck once more with the flashlight on the driver's side and once more with the flashlight on the passenger's side before pulling the truck out. When the truck was pulled out, however, there was a bird lying in the wheel tracks on the passenger's side at the rear end of the hoist. The bird was bloody and was convulsing, revealing that it had just been run over. I met with (b) (6) after the incident, and we initiated discussion about preventive measures, such as: Ways to prevent birds from getting down on the hoist where they can get run over, such as by decreasing the space between the live hang mezzanines and the live haul trailers. Ways to increase personnel awareness about birds that do end up down on the hoist so they can be retrieved without being run over, such as by checking with the flashlights from both ends of the truck.
P544	Jennie-O Turkey Store Sales	04C05	KXJ280405 2831G	2017-05-31	While down in the live hang area doing ante mortem on a new lot of birds, I observed a DOA carcass in the Condemned barrel exhibiting signs of abuse, such as the skin over the breast of the bird being torn open, fully exposing the breast meat. I discussed with (b) (6) that birds should not be coming off the trucks looking abused like that, and that that message should be relayed to the live hang and loading crew(s). Later I discussed the same with (b) (6). He said he had already heard about my conversation with (b) (6) and that they were in agreement that they don't want their birds being abused either. As of July 6, I have not seen any more carcasses exhibiting such injuries.

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P544	Jennie-O Turkey Store Sales	04C05	KXJ280307 3620G	2017-07-20	<p>At about 22:45 I began performing a Good Commercial Practices verification task, standing right by the entrance to the scalding, watching the birds go by on the last three feet of the kill line before their descent into the scalding. After nearly two full minutes of observation, I saw a live bird go into the scalding. It was holding its head up and its eyes were wide open just before it rounded the bend and went into the scalding. I immediately came up stairs and met with (b) (6). His immediate response was that he was going to remove the chairs in the blood tunnel that the back up neck cutters have been sitting on, and that he was going to have one of the manual back up neck cutters go back out to live hang and bring a more experienced back up neck cutter back into the blood tunnel. A subsequent review of the lot tally sheets on that lot of birds revealed that there had been one cadaver identified in the lot. During a later meeting with (b) (6), at about 01:15, we discussed that the plant may need to get the kill line running at a more steady speed. In other words, instead of the plant letting the transfer table get empty and running the kill line real fast to catch up with product flow, and then letting the transfer table get too full and running the kill line real slow to let the accumulated product clear out, the plant needs to observe product flow more closely and avoid the need for large swings in kill line speed. By running the kill line at a more steady, appropriate speed they would avoid running it at excessively high speeds. This would result in the live hangers being more able to hang the birds properly so that they would go through the kill machine in a better position to have their necks cut properly. Likewise, the manual back up killers would have less work load to keep up with at a more reasonable speed to keep up with it at. Hence, they would be more able to make effective neck cuts when needed. (b) (6) added that he will be bringing the lead floor person from day shift live hang onto night shift to act as the kill supervisor on the night shift until the incumbent kill supervisor reports back for duty. He was confident that that person's skill would even out the kill line speed a lot.</p>



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EstNbr	EstName	Task_Code	MOI#	Date	Description
P544	Jennie-O Turkey Store Sales	04C05	KXJ0504090805G	2017-09-05	<p>Shortly after 3:30 AM I began Good Commercial Practices verification activities in live hang. I was standing off the passenger's side and just in front of the truck that was nearly empty of its turkeys. Recognizing that the truck was almost empty and ready to be pulled out of the live hang bay to make room for another full load of turkeys, I waited and watched. No one came to the passenger side of the truck to check for loose birds on the floor on my side of the truck. At about 3:35 the truck pulled out of the live hang bay. Once the truck had pulled out, the bay remained void of any more trucks, because the trailing truck driver sat waiting for live hang floor personnel to walk out into the bay and pick up a bird that was laying in the path of the left wheels of trucks. I was able to see clearly that the bird had just been run over by the truck that had just left the live hang bay, because it was quivering, and its abdomen had ruptured and was laying open. I saw (b) (6) hurry out into the bay, pick up the bird, and bring it to and place it into the "USDA Condemned" barrel that was right next to me. He immediately removed the barrel to the offal room where it would be denatured and elevated onto the offal trailer. I began a search for (b) (6) and found him upstairs. When I began telling him what I had observed, he told me that (b) (6) had just called him and told him that they had run over a bird. I told him that I had been on that very side of the truck, watching for a few minutes before the truck pulled out, and that I had not seen anyone checking for birds under that side of the truck before the truck pulled out. During our ensuing discussion we talked about the panels that are stored underneath the trailers and how they obstruct the vision of those who check for birds. I questioned the need for even having those panels with the trucks this time of year, because their only purpose is to be put on the sides of the trucks to keep birds warm during the cold months of the year. Will's response was that they don't have anywhere else to store the panels for the time being (due to the construction project where they would normally be stored this time of year), and that in just a few more months they will be absolutely necessary to keep the birds warm any way. Will did agree that, panels or no panels under the trailers, plant personnel must check thoroughly enough for birds under the trailers that they don't run over any birds when they pull the trucks out of the live hang bay.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P544	Jennie-O Turkey Store Sales	04C05	KXJ5905093328G	2017-09-28	<p>At 05:03am on the 27th of September 2017 while performing a Good Commercial Practice (GCP) verification at the start-up of production, I observed the following in the lower evisceration department. After the scalders and pickers, I observed two carcasses-five carcasses apart, coming through the turn point to the hock cutter to rehang table. These two carcasses were uncut, dark red to purple in color from head through the body and legs. These two carcasses where from a "heavy hen" lot, toms, well-muscled with no visible skin damage (processing or scabs) and did not have any external evidence of disease. These carcasses demonstrated evidence of dying by means other than slaughter. I was observing the picking line with (b) (6) (b) (6) at the time of the event. I notified the live hang lead (b) (6) and observed the mechanical cutter and back-up establishment cutters, who manually cut four carcasses during the two-minute monitoring. At 05:10am, I notified plant manager Mr. Jason Reuss regarding the observations of the uncut cadavers. At 05:15am-05:30am, I was in the evisceration department monitoring production and arrival of the aforementioned carcasses. The two cadavers did not arrive at the USDA inspection stands during this time. Further discussion of the incident was held during the weekly meeting (27th September 2017: MOI KXJ5511091027G). Respectfully submitted by (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P550	Simmons Prepared Foods, Inc.	04C05	XWN29120 73617G	2017-07-17	<p>Today, July 17, 2017 at approximately 1050 hours, while performing a Good Commercial Practices check in the cooling shed area, I observed that two trailers full of chickens were not parked in the cooling shed but instead were sitting outside in the sun. I observed that the birds were panting and appeared to be distressed by the heat. The temperature was approximately 89 degrees F, with a heat index making it feel like 94 degrees. I notified (b) (6) of the situation and informed him that if there were no bays available for the chickens to be pulled into the cooling shed, the trucks needed to be driven around to keep the air moving through the cages until space could be found to pull them in. On Tuesday, July 18 2017 I also discussed this situation with (b) (6) and emphasized that in the extreme summer heat we are having at this time, leaving chickens sitting in the sun is not an acceptable Good Commercial Practice. A copy of this Memorandum of Interview will be provided to establishment management and a copy placed in the official USDA file. (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P559	Tyson Foods, Inc.	04C05	UWC42210 11624G	2017-01-24	<p>On Tuesday, January 24, 2017 at approximately 1500 hour, I observed less than Good Commercial Practices. While performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed several loose birds on the roadway in the truck unloading area, between the trailer currently being unloaded and where cages were being unloaded onto the dump belts. One of the birds was run over by the forklift driver and had its leg pinned under the rear wheel of the forklift. The driver stopped to get the loose birds with the one remaining pinned under the tire. The free birds were caught and placed back in the coop that was currently on the forklift. The forklift was reversed to allow the pinned bird to become free at which time the driver then got out to catch the bird which was vigorously flapping and trying to get away. This bird was also placed back in the cage on the fork lift. Just prior to this event a bird was observed stuck in one of the cages by its toe that had just been emptied. The dump cage operators proceeded to remove the bird from the cage and placed it on top of a full cage further down the belt. The bird remained on top of this cage loose for several minutes. It also remained on top of the cage as the cage was moved down the belt to be dumped, creating a hazard in which the bird could become crushed. The supervisor was immediately informed of these issues and concerns. Establishment management was notified as well of the incident and informed of the resulting MOI. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on January 24, 2017 (b) (6) Cc:</p> <p>DDM DVMS FLS</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P559	Tyson Foods, Inc.	04C05	UWC30200 64607G	2017-06-07	At approximately 18:40 hours while giving breaks to Food Inspectors on Evisceration Line 1, (b) (6) had a bird presented to him that had a rubber band around its body. The band was located just behind the wings and encircled the entire body. It was deeply embedded in the back and breast muscles. Its long term presence was demonstrated by a heavy band of fibrous scar tissue proximal and distal to the area where the band had grown into the tissues. There was also a large area of inflammatory tissue in the breast muscles proximal to the banded area. This bird was from the same flock of birds as one found on day shift with a rubber band similarly located around its body. Plant is able to identify flock/grower from which this bird originated. The bird was turned over to Plant Manager Tim Peters for his correlation with grow-out personnel. He stated that this grower had recently replaced nipple waterers in the house and the rubber bands probably dropped during their installation.

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P5787	Pilgrim's Pride Corporation	04C05	DEB051204 0805G	2017-04-05	<p>On April 4, 2017 at approximately 1223 while performing a Good Commercial Practices check in the live hang area, I observed a bird on (b) (4) line that had been hung in the shackle by both legs and its head. The plant employee immediately stopped the line and the bird was removed. The bird's neck was bleeding and it was dead. This bird had died by means other than slaughter. During this Good Commercial Practices check I also observed 2 birds had been hung by both legs in one shackle and another bird hung by one leg. When I located (b) (6), I informed him about the bird I had observed that was hung by its head/neck as well as by both feet resulting in the bird dying by means other than slaughter. Hanging any chicken by its head/neck is not appropriate and USDA takes the humane handling of the chickens very seriously. (b) (6) told me they were training about 4 new hires in the live hang area and would go back there to see that they were moved to a part of the line where more supervision would be given to their proper hanging of the birds. He assured me that he would make sure they all understood that hanging any of the birds by the head will not be tolerated. This is a reminder that any mistreatment of birds during processing is a major non-conformance. A copy of this MOI will be forwarded to (b) (6) and (b) (6) in the Dallas District Office and (b) (6). (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P5787	Pilgrim's Pride Corporation	04C05	DEB071406 4228G	2017-06-28	<p>On Wednesday June 28, 2017 at approximately 12:34 PM I was in the live receiving area performing a Good Commercial Practices task. I noted one of the cages had been set aside and several of the birds had blood on them. I asked the (b) (6) of the area, (b) (6), why the birds had fresh blood on them and pointed out birds to be removed so that I could determine which one was injured. The first bird had fresh blood on it but I ascertained it did not have any wounds. The second bird with blood on it had a severely bruised wing but again no site for the bleeding was found. However, the third bird they removed was actively bleeding from a large gaping wound on its left breast. The skin had been torn away and was a hanging flap of skin. The wound was approximately 4 x 4 inches in width/length. There were several plant employees including (b) (6) and (b) (6) present but no one was taking any steps to alleviate the pain and suffering of this injured bird. I then told them the injured bird needed to be immediately euthanized to alleviate any further pain, suffering and distress. The bird was still alive and not moribund. The plant then euthanized the bird. I later spoke with (b) (6) and (b) (6) about the importance of taking action when they observe birds with blood on them. Also, that they needed to be more vigilant in the future and take immediate action so that injured birds are not left to suffer in pain and distress. USDA expects all birds to be treated in a manner that causes the least amount of distress, discomfort and excitement. It is expected that all plant employees will use all due diligence to ensure birds are treated in the least stressful manner possible. Therefore, being proactive in identifying possible instances where harm and or distress/discomfort may be inflicted upon the birds should be followed. A copy of this MOI will be entered into PHIS, forwarded to the Front Line Supervisor and the Dallas District Veterinary Medical Specialist. (b) (6) P5787 Natchitoches, LA</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO551204 4725G	2017-04-25	<p>At approximately 0530 hours on April 20, 2017, I spoke with (b) (6) regarding information that (b) (6) told me. She told me that at approximately 0510 hours, she arrived in Live Hang to see live hang employees cutting the necks of birds coming out of the CO2 tunnel and putting them in the DOA bin. I asked (b) (6) how he ensured these birds were dead in the tank and he said he couldn't verify this information. I spoke with Plant Manager Jody Long that day and the following day (April 21, 2017 during the 1030 weekly meeting). Mr. Long looked into the issue and told me that he looked at the video of the area and birds whose necks were cut were obviously stiff and in rigor mortis. I looked at the video with Mr. Long and (b) (6) on April 25, 2017 at approximately 0940 hours. The birds who were obviously stiff and not moving were put in the DOA bin after a neck cut. A conscious bird came out of the conveyer who was sitting upright and occasionally flapping its wings. We saw an employee reach for it with his knife and withdraw his knife without cutting the bird. (b) (6) said that was when she entered the area. Mr. Long said that employees know not to cut conscious birds. The conscious bird was shackled and sent to the electric stunner, to be slaughtered as the birds usually are.</p>
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO001406 4507G	2017-06-07	<p>I spoke to (b) (6) at 0915 hours regarding three cadavers that were presented to USDA inspection between 0800 and 0915 hours. The birds had dark purple splotchy skin that extended up the neck and inadequate cuts to the neck. Two of the three birds had only a skin cut without a neck muscle cut and the third bird had a cut trachea without any neck muscle cut. (b) (6) was notified about the inadequate cuts and bleeding. (b) (6) told me at 0915 hours that the auto-killer was adjusted to make a deeper cut, employees would check the auto-killer at least (b) (4), and the issues will be addressed with the backup neck cutter.</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO490706 5613G	2017-06-13	While performing antemortem inspection this morning, I spoke with (b) (6) at approximately 0405 hours regarding a bird stuck in a truck cage door. This bird had his head, part of his neck, part of a wing, and part of a leg stuck outside the cage in a manner such that he could not pull these body parts back in the cage. No swelling, bleeding, or abnormal breathing patterns were observed. While this bird was loaded poorly, the truck had been parked in the shed for some time and had not been noticed by plant employees. (b) (6) and I discussed Good Commercial Practice procedures. Not only was this bird not secured in a manner that minimized discomfort, this bird could potentially have had breathing difficulties or severe bruising. USDA employees will continue to monitor the holding sheds.
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO191307 1620G	2017-07-20	I spoke to Plant Manager Jody Long at approximately 0850 hours while performing a Good Commercial Practice Verification task today. Out of approximately 150 birds I looked at in the blood tunnel, I observed one bird with a fresh, full-thickness skin wound approximately 3" * 4" in width and length. The visible muscle was moist. I showed Mr. Long the wound. Mr. Long said the establishment would be more vigilant in watching for these wounds on the truck and evaluating the live hang department for areas that potentially injure the birds. Mr. Long and I had recently talked about this in a weekly meeting on July 17, 2017 (MOI # UIO2811070119G). At that meeting, Mr. Long said that he would talk to the Live Haul Manager and I received no further updates.

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO470907 0325G	2017-07-25	<p>I spoke to (b) (6) at approximately 1015 hours regarding two cadavers presented to USDA inspection between 0730-0745 hours. (b) (6) had observed those cadavers at the inspection stands when they were presented. The two cadavers today bring the total of cadavers this week to four. One cadaver had a superficial cut in the neck, intact neck vessels, and wide, splotchy, purples patches all along the neck. The other cadaver had similar patches all along its neck, but the vessels could not be examined since the neck was ripped as the carcass was removed from the line. Approximately ½ cup of blood dripped out of the neck after it was removed from the line. When we spoke at 1015 hours, (b) (6) said that they are checking the auto killer hourly and there is an employee acting as a backup neck cutter to the auto-killer. He is not sure why this issue keeps happening and he plans to monitor neck cuts himself intermittently. We discussed issues of Good Commercial Practice and unacceptability of the cadaver trend. We have discussed this trend before (GCP MOI dated 6/7/2017 # UIO0014064507G and during the recent USDA meeting on 6/17/2017 # UIO1913071620G).</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO021308 2307G	2017-08-07	<p>At approximately 0605 hours, I was in the blood tunnel for a Good Commercial Verification check and I observed the carbon dioxide stunner was not functioning properly. Some birds were exiting the stunner conscious. The establishment was using an electric stunner, their backup stunning mechanism. I stood at a location and observed the production line that was located approximately 75 seconds from the scalding. While I stood there, an establishment employee removed approximately ten conscious birds in five minutes. At approximately 0610 hours, an inspector removed a carcass from the line that was suspected to be a cadaver. This carcass would have already been in the scalding at the time that I was in the blood tunnel. I examined the carcass and observed a shallow neck cut, intact neck arteries, and splotchy, red marks on the neck skin. The carcass was condemned as a cadaver. I spoke to (b) (6) and he said he would investigate. At approximately 0900 hours, I spoke to (b) (6) and he told me that the carbon dioxide filter was clogged and was changed. At that time, the carbon dioxide tunnel appeared to be functioning properly. I did not see any more cadavers or conscious birds on the line for the remainder of the shift. This has been an ongoing issue in this establishment. The trend of cadavers was discussed in a weekly meeting on June 11, 2017 (MOI UIO2811070119G) and documented in a GCP MOI on July 25, 2017 (UIO4509072125I).</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO360708 5310G	2017-08-10	<p>At approximately 0630 hours, a USDA food inspector hung back a carcass for me to review. I observed a carcass with a purple head and two skin cuts, with no knife cut into the underlying neck. I condemned the carcass as a cadaver and showed it to (b) (6) did not have an explanation as to how this miscut occurred, though we did discuss his efforts of checking equipment, monitoring employees, and observing neck cuts. Even with (b) (6)' corrective actions, the trend of cadavers has been an ongoing issue in this establishment. Yesterday, I condemned a carcass as a cadaver due to reddish-purple marks in the neck skin, a shallow neck cut, and intact jugular and carotid vessels. Like the cadaver today, (b) (6) did not have an explanation as to how this miscut occurred. The cadaver trend has been discussed with the establishment before, in a weekly meeting June 11, 2017 (Memorandum of Interview [MOI] #UIO2811070119G) and in Good Commercial Practice (GCP) MOIs on July 25, 2017 and August 8, 2017 (MOIs #UIO5412081607I and UIO4509072125I, respectively). Since June 7, 2017, 33 carcasses were condemned as cadavers for both of the two slaughter shifts. Some of those carcasses were DOA cadavers, but a large majority of the 33 carcasses were carcasses that were not slaughtered properly. Throughout this trend, plant management have informed me that they are taking actions, such as increased observations and employee discipline, though the establishment has not been able to ensure that birds are slaughtered according to good commercial practices</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO251309 4507G	2017-09-07	<p>At approximately 1030 hours, I spoke with Plant Manager Jody Long regarding five cadavers that were presented for USDA inspection at approximately 0745-0755 hours this morning. All had reddish-purple splotches in the neck skin extending from the head and mostly up the neck. Two of the carcasses had only a skin cut, and three of the carcasses had shallow neck cuts that did not sever carotid or jugular vessels. I let Mr. Long know that after the five carcasses were presented, I observed carcasses in the blood tunnel prior to the chiller and noted several shallow cuts. I observed no conscious birds at that time. Mr. Long and I discussed the difficulty in making a cut deep enough for slaughter but not so deep that presentation issues would arise. Mr. Long investigated to see if he could learn from other establishments, but reported to me that 579P is slaughtering carcasses similar to other establishments. He did identify a particular employee issue that may have played a role, and this will be addressed. The cadaver trend has been discussed with the establishment before, in a weekly meeting June 11, 2017 (Memorandum of Interview [MOI] #UIO2811070119G) and in Good Commercial Practice (GCP) MOIs on July 25, 2017, August 8, 2017, and August 10, 2017 (MOIs #UIO5412081607I, UIO4509072125I, and UIO3407085210I respectively). In all cases, the establishment reviewed slaughter practices, reviewed potential employee issues, and increased monitoring. However, this issue appears to recur.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO4014091918G	2017-09-18	<p>At approximately 1705 and 1815, two cadavers were presented to USDA inspection with shallow neck cuts over the mandibular area. The heads and necks of both birds were reddish/purple, splotchy, and the major vessels appeared intact. While on the evisceration floor viewing the second cadaver at approximately 1820 the issue with cadavers was discussed with the (b) (6) and he stated that the blade that cuts necks had been adjusted. The cadavers were also discussed with (b) (6) and it was discussed that he would re-train the back-up neck cutter employee.</p> <p>During my further observations in the live hang area immediately prior to where the carcasses enter the scalding, at several times throughout the night, neck cuts appeared adequate and no live birds were observed entering the scalding. This has been an ongoing issue at P579 as documented on 9/7/2017 in a Good Commercial Practices Memorandum of Interview (UIO5406093307I) for 5 cadavers presented on day shift as well as in several Good Commercial Practices MOIs documented on July 25th, August 7th, and August 10th (UIO4509072121I, UIO5412081607I, and UIO3407085210I).</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P579	Jennie-O Turkey Store Sales, Inc.	04C05	UIO211309 3325G	2017-09-25	<p>At approximately 0840 on September 21, 2017, I spoke with (b) (6) regarding a cadaver presented to the USDA station on September 20, 2017. This cadaver had a purple-red head and upper neck, and had only a skin cut. No cut was present in the underlying muscle or fascia of the neck. There has been a cadaver trend at 579P, and has been documented in MOIs and weekly discussions June 11, 2017/ MOI#UIO2811070119G, July 25, 2017/UIO5412081607I, August 8, 2017/ UIO4509072125I, and August 10, 2017/ UIO3407085210I, September 7, 2017/UIO5406093307I, and September 8, 2017/UIO4014091918G). (b) (6) shared my concern and let me know that they evaluated the situation, and saw that a wings were being caught in the automatic neck cutter, thus preventing the neck cutter from fully cutting the neck. The establishment installed a guide bar, which will hopefully prevent future cadavers. The cadaver in question was a small bird, and the guide bar will hopefully be helpful for small birds. We discussed that employee on duty verifying the automatic neck cuts is considered to be a very reliable employee. I shared my concern that that even with a reliable employee verifying, there was still a cadaver. Is there a system error in the backup monitoring? (b) (6) said he would follow up on this.</p>
P6164A	Foster Poultry Farms	04C05	OIJ580904 5305G	2017-04-05	<p>On April 4, 2017, at approximately 0925 hrs, I, (b) (6) of P6164A, while on a GCP inspection observed a fully-awake bird hanging in the shackles, having passed the automatic slitter and back-up slitter, passed the head puller, and progressing toward the scalding tank. Before entry into the tank, (b) (6), removed the bird from the line. Upon examination, I found the bird's throat was only superficially cut, insufficient for slaughter as the bird was fully alert and ambulatory. (b) (6) then returned the bird to the live-hang belt-trough for re-hang. In a meeting immediately thereafter with (b) (6), I described the event and my findings with (b) (6). (b) (6) proposed some corrective actions. I asked him to notify me of the establishment's final corrective actions, when they were complete. This event is associated with a similar awake and un-cut bird on shackles event on February 21, 2017, documented in the establishment meeting MOI of February 23, 2017.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P622	Tyson Foods	04C05	NLB201807 0517G	2017-07-17	<p>Present at meeting: USDA: (b) (6)  Tyson Management: (b) (6)  (b) (6)  P622 Tyson Foods Monroe NC. On 7/14/17 at approximately 2040 while performing a Good Commercial Practices task, I observed that at the end of the conveyor belt for line 1 there was a large pile of DOA birds, up to the level of the conveyor belt approximately 2.5-3 feet high and spread out over perhaps a 5 foot semicircle. There were also DOA birds about 1-3 birds deep on the concrete behind the live hang platform, all along the length of it and extending out perhaps 3 to 4 feet. There were a couple of employees trying to keep up by putting DOAs on racks and take them out to the DOA bins outside, but it was clearly an insufficient response to the level of problem. Management was contacted and I asked that the huge pile of birds at the end of the conveyor belt be immediately sorted out to be sure there were no live birds in that pile. We saw one bird clearly alive at the edge of the pile; it did not have any birds on it but was in a spot where DOAs certainly could have fallen on it. However, after approximately 10 birds or so were removed, a live bird was recovered which had been completely buried under dead birds. Both this bird and the bird that was seen at the edge of the pile were deemed healthy enough to go on to slaughter and were put on the line. Line 2 had numerous DOAs around it, but not nearly as many as Line 1 and all of these birds were single layer deep. There were two live birds that I saw in this group, but they were not in locations that it was likely that DOAs would fall on them. Due to the extreme heat, stopping the line entirely was not a humane thing to do and there were not many more cages to finish the shift. Management did bring in more employees and made sure all the DOA birds were single layer deep as they then collected them to take outside. I spoke to (b) (6) and (b) (6) about the situation and informed them that a GCP MOI would be written because of the live bird found buried under so many DOAs, and this bird could have could have suffocated and died by means other than slaughter. It is the establishment's responsibility to ensure that birds are slaughtered in accordance with 9 CFR 381.65(b). (b) (6),</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>(b) (6) who was present while the birds were sorted at live hang came by the USDA office about 30 minutes later and said the total count was 626 DOAs collected off the live hang floor. This MOI will be forwarded to the District Office and the District Veterinary Medicine Specialist (DVMS) in case additional follow up is recommended. If you have any questions or concerns regarding this MOI, please feel free to contact myself or (b) (6). Respectfully, (b) (6)</p>
P646	JCG Foods of Georgia, LLC	04C05	XAA01230 50130G	2017-05-30	<p>On May, 29, 2017 at approximately 1453 hours, (b) (6) while performing good commercial practice task in the live hang area observed team member pick up DOA from the floor and throw it in the red bin. The bin was full and the team member began to pull it to be dumped in the offal drain. As the team member started to dump the bin she asked him to stop so she could observe the birds in the bin. The team member began to hand pick up the birds one by one and throw them in the drain. Halfway down in the bin (b) (6) observed a live bird breathing hard, this bird had dead birds piled on top of it and would have been dumped in the drain alive. This establishment had a similar incident that occurred and had put in place that they would remove the heads of birds prior to placing them in the DOA bin, they failed to do this. Their failure to remove the heads prior to putting them in the DOA bin has been discussed with management as recently as 2 weeks ago when they were observed throwing them in the bin without removing their heads. The bird was removed from the red bin and hung on the line to be slaughtered. Management, specifically (b) (6) and (b) (6) was notified of their failure to comply with good commercial practices. They stated that they had a new employee in live hang performing this job. (b) (6) stated that training would be completed with the supervisor concerning putting new personnel on these duties. The PPIA, Agency Regulations, and Federal Register do require that live poultry be handled in a manner that is consistent with good commercial practices. I notified (b) (6) that this issue would be documented in a MOI and will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P646	JCG Foods of Georgia, LLC	04C05	XAA24190 71504G	2017-07-04	<p>On July 3, 2017 at approximately 1515 hours, I, (b) (6) while performing good commercial practice task in the boiler room where they condemn DOA's observed team member taking DOA's from the red condemn buggy and throwing them in the ditch that goes to offal. At this time I walked over to the red buggy and he observed that he had got to the bottom with a few birds left in the bottom. I observed a live bird sitting in the red condemn buggy. I also observed 2 more DOA's in the bin, one had the head on the other one the head had been removed. At this time I got the live bird out of the condemn buggy and he stated that he had seen it and he was returning it to live hang. I took the bird to the supervisor so he could observe that there was a live bird in the red condemn buggy, I also told him about the head on others not being removed. (b) (6) stated that he disciplined the employee and the employee stated that these birds had come from dayshift and had been left over. This establishment had a similar incident that occurred and they had put in place that they would remove the heads of birds prior to placing them in the DOA bin, they failed to do this. Their failure to remove the heads prior to putting them in the DOA bin has been discussed with management as recently as 2 weeks ago when they were observed throwing them in the bin without removing their heads. This issue was also documented on 5/29/2016 again where management were not removing the heads, on this issue they stated that they had a new employee in live hang performing this job. (b) (6) stated that training would be completed with the supervisor concerning putting new personnel on these duties. The PPIA, Agency Regulations, and Federal Register do require that live poultry be handled in a manner that is consistent with good commercial practices. I notified (b) (6) that this issue would be documented in a MOI and will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P646	JCG Foods of Georgia, LLC	04C05	XAA38020 93030G	2017-09-30	<p>On September 27, 2017 at approximately 1610 hours, I, (b) (6), observed a pile of DOAs in the floor that was 8 foot by 3 foot and piled 2 foot high, a live bird was observed in this pile of DOAs with other birds piled on top of it. I notified (b) (6) to stop hanging and address the DOAs. The establishment stated the DOAs had all come off of a trailer that had been arrived in early in the shift on dayshift. I went to the live shed and observed that there were birds that were sitting on trucks in the sun with no aeration at all, the shed was full and there were four loads that were not in the live shed. I also observed that there were no misters on for the birds in the live shed. The PPIA, Agency Regulations, and Federal Register do require that live poultry be handled in a manner that is consistent with good commercial practices. I notified (b) (6) that this issue would be documented in a MOI and will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6504	Peco Foods, Inc.	04C05	CHK33120 65809G	2017-06-09	<p>At 1215 hours on Friday 9 June 2017 during a routine antemortem check and GCP verification, the following issues were discovered during the course of inspection: 1.) The individual in charge of the dumper was dumping birds too early, leading to birds being dumped on top of birds on the transverse belt. This was the 3rd time I have witnessed this in 2 weeks. The establishment was warned about this behavior and was told that all birds had to be off of the transverse belt before dumping a fresh cage to minimize injury and violation of GCPs. Premature dumping can cause suffocation, broken wings, broken legs, and bruising, which, unrelated or not, has been seen in post-mortem inspection at an increased rate in the 3 weeks I have been detailed to this plant. 2.) There was 1 trailer remaining in the holding sheds. The fans were off because maintenance was replacing the water nozzles. It is close to the hottest part of the day with the ambient temperature being recorded by The Weather Channel at 80 degrees F. 3.) The individual running the bar in live hang that controls the advance of the belt allowed birds to back up at the end of the belt. One bird's head was stuck under the partition at the end of the belt and was trapped between the rolling belt and the partition while the belt was rolling and was left there for several minutes until I drew the individual's attention to this problem and he removed the bird. Further, the individual controlling the speed of the belt forcefully jerked the bird from under the partition even while the belt was still rolling. This could be construed as "egregious." The plant has been warned about birds piling up at the end of the belt and being pulled under and into the partition without being hung on the shackles in a timely manner by me last week (the week of 28 May 2017).</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6505	Norman W. Fries, Inc.	04C05	BBA310805 4111G	2017-05-11	<p>Est. P-6505, Norman W. Fries Inc., May 10, 2017, 1100 hours. In attendance: (b) (6)</p> <p>At approximately 1040 hours while performing A scheduled Poultry Good Commercial Practices procedure in the Cage Dump Area, I observed one live chicken with it's leg hung on the right side of the Cage Dump Belt. The other birds were rolling off this belt over this chicken. I also observed a dead chicken with it's leg hung on the left side of the of the same belt. This bird had been dead so long that it was stiff when removed from the belt. I notified (b) (6) and (b) (6) this finding. I reminded (b) (6) and (b) (6) that the PPIA and the Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices(GCPs), and that they do not die from causes other than slaughter</p>
P6505	Norman W. Fries, Inc.	04C05	BBA280805 5011G	2017-05-11	<p>Est. P6505, Norman W. Fries Inc., May 10, 2017, 1040 hours. In attendance: (b) (6)</p> <p>At approximately 1040 hours, while performing a routine Poultry Good Commercial Practices, (b) (6) and myself observed a chicken with it's leg hung on the right side of the Cage Dump Belt. This was causing the other chickens to travel over this chicken. I informed (b) (6) of this finding. I reminded (b) (6) that PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs), and that they not die from causes other than slaughter. I informed (b) (6) and (b) (6) that I would be documenting this incident on an MOI. (b) (6) At approximately 1300 hours, I was informed that repairs had been made to the Cage Dump Chute to prevent the chickens from getting their legs caught at the edge of the belt. (b) (6) also informed me that he had ordered two mirrors that will be hung to enable the operators to check the belt to ensure no birds were hung in the future.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6510	Peco Foods Inc	04C05	WED19170 33513G	2017-03-13	<p>Mr. Ronnie Tolbert Plant Manager Peco Foods, Bay Springs, MS 95 Commerce Drive Bay Springs, MS 39422 Mr. Tolbert, At approximately 1454 hours, while performing the Good Commercial Practices in Poultry (GCIPI( verification task at P6510, Peco Foods, Bay Springs, MS, the following less than GCIPI incident was observed. One (1) live young chicken from an approximate 500 bird random sample with uplifted head, rhythmic breathing, pupillary reflexes, and no visible cut to the neck entered the scald tanks while still breathing. The incident was verified at the exit of the 2nd picker. The carcass was red in appearance with ventral pooling of blood in the neck, head, and breast and no cut to the neck. (b) (6) was notified. A second verification check of an approximate 500 bird random sample prior to the scald tanks had no live birds entering the scald tank. This incident was determined to be an isolated event. Allowing bird(s) to enter the scald tank while still breathing is not consistent with GCIPI and results in adulterated product. Poultry must be handled and treated in a humane manner while under the establishment's control on the official premises. A meeting was held at approximately 1800 hours in the USDA office to discuss the less than GCIPI incident. (b) (6), and (b) (6) were in attendance. (b) (6) described the less than GCIPI incident (b) (6) stated the kill machine was adjusted and the voltage to the stunner was increased. (b) (6) also stated that in addition to the adjustments made to the equipment, a backup cutter would be placed after the kill machine on the 2nd shift for a period of 1 week. As per Federal Register Notice Docket No. 04-037N, dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to abide by Good Commercial Practices (GCPs) as described in industry guidelines.</p> <p>Respectfully, (b) (6) Canton, MS 1039 W. Fulton St. Canton, MS 39046 cc: Mr. Perry Davis, DM Mr. Don Coley, DDM Dr. Larry Davis, DDM Dr. David Thompson, DDM (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6510	Peco Foods Inc	04C05	WED25210 74031G	2017-07-31	<p>Today, July 31, 2017, at approximately 1855 hours, the following was observed at P-6510, Peco Foods, while conducting the Good Commercial Practices Task: There was a yellow 'USDA Condemn' can in the live hang room. Within this can there were approximately 11 poultry carcasses. One carcass on the top was positioned so that the head of the bird was within the DOAs underneath, and only the vent/tail area was visible. I observed that the vent/tail area was moving rhythmically. I pointed to the bird and an area employee removed it from the can. The bird was alive- it was blinking, moving it's head and wings, and had muscle tone that appeared to be normal. The area employee used one hand to lift the bird by it's tail as he showed it to me. He then placed the bird on the belt of live birds to be hung on the line. I informed (b) (6) [REDACTED], of my findings, and showed him the bird in question which was now on the belt. The treatment of live birds before slaughter is an important animal welfare concern. Live birds buried beneath dead birds may suffer and/or suffocate, dying by means other than slaughter. Establishment management is encouraged to review Federal Register Notice Docket No. 04-037N (dated September 28, 2005) for FSIS recommendations concerning treatment of live poultry before slaughter. Establishments are strongly encouraged to abide by Good Commercial Practices.</p> <p>Respectfully, (b) (6) [REDACTED]  CC: (b) (6) [REDACTED]  Mr. Don Coley, Deputy District Manager (b) (6) [REDACTED]  [REDACTED]</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6616	Peco Foods of Mississippi	04C05	IRE440902 0411G	2017-02-11	<p>On February 11, 2017 at 0922 hours while verifying the plant's Good Commercial Practices in Picking Room # 2 I, (b) (6) observed one of the five hundred birds observed for this task alive and conscious as it entered the scalders. The plant otherwise exercised good control of their slaughter process. I notified (b) (6) of this incident. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act and Agency regulations, live poultry must be handled in a manner consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner consistent with Good Commercial Practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury through processing. A copy of this memorandum of interview will be forwarded to appropriate personnel in the Jackson District Office. Thank You, (b) (6)</p> <p>CC: Mr. Don Coley, DDM (b) (6)</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6616	Peco Foods of Mississippi	04C05	IRE511204 4026G	2017-04-26	<p>On April 26, 2017 at approximately 1108hrs. , I, (b) (6) observed less than Good Commercial Practices while performing a Good Commercial Practices check at P-6616. I observed a live bird entering the scalding line#2 ; the bird had it's head up and was looking around ; there wasn't a cut on the neck and it did not go through the head-puller. I completed the check and did not see another live bird enter the scalding but did manage to pull the one bird off the line once it cleared the scalding for a closer examination. I concluded that the system was not out of control and this was an isolated incident. (b) (6)</p> <p>(b) (6) and (b) (6) were notified and made aware of my observation. They were then informed that a GCP MOI document would be generated from this incident. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter , states that under the Poultry Products Inspection Act (PPIA) and Agency regulations , live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office. Thank you (b) (6)</p> <p>CC: Mr. Don Coley , DDM (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6616	Peco Foods of Mississippi	04C05	IRE381309 4505G	2017-09-05	<p>On Sept. 5, 2017 at approximately 1114 hours, I, (b) (6) observed less than Good Commercial Practices' while performing a GCP check at P-6616. I observed a live bird enter the scalding line #2: the bird had its head up and was looking around. After pulling the bird off the line after the scalding tanks, I observed that there was not a cut or incision on neck of the bird in question and it did not go through the head puller. I completed the check for a total of five minutes and did not see another live bird enter the scalding. I observed the stunnings and saw no issues there, but the backup kill employee did not appear to be very attentive. I concluded that the system was not out of control, and this was an isolated incident. (b) (6)</p> <p>(b) (6), was in the picking room at the time and I notified him of my observation and handed him the bird I found. I then later notified (b) (6); I also informed them that a GCP MOI documentation of the observed deficiency would be forthcoming. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in a manner as to minimize excitement, discomfort, and accidental injury throughout processing. Thank you (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6651	Tyson Foods Inc.	04C05	MSO01180 54409G	2017-05-09	<p>On Tuesday May 9, 2017 at approximately 1423 hour while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed a large (approximately two foot) pile of feathers and filth densely packed at the end of the live hang belt leading to the dead on arrival transfer belt. Last night I spoke with a supervisor after finding a live bird in this pile and expressed my concern that this could lead to birds becoming crushed and dying by means other than slaughter which would result in a Good Commercial Practices MOI. This area needed to be kept free of debris to prevent birds from being trapped in debris and becoming crushed/suffocating. Today when I saw the pile of debris I again expressed my concerns to the live hang supervisor at which time I was told that it would be cleaned out at break time. I took my flash light and looked closer and saw a breathing bird buried in the feathers and filth that was in imminent danger of dying by suffocation. I notified the supervisor that there was a live bird in the pile and it needed to be cleaned immediately. The supervisor and an additional employee cleaned out about half of the pile and a second live bird was removed from deep in the debris. I checked the pile again and there was a third live/breathing bird towards the bottom of the pile that I asked them to get out as well. I had them remove the rest of the debris under the belt to verify there were no more live birds in the pile. I explained at this time that the USDA FSIS takes treatment of birds prior to slaughter very seriously. If the birds would have been allowed to remain in the pile of debris until it was cleaned out at break they would have died by means other than slaughter, which is unacceptable. This area needs to be cleaned and monitored for live birds at all times. Once the incident occurred today supervision was informed that an MOI would result from these issues. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, Treatment of Live Poultry before Slaughter, the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on May 9, 2017. (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
					(b) (6) Cc: Dr. David Thompson, DDM (b) (6)
P6651	Tyson Foods Inc.	04C05	MSO18210 62528G	2017-06-28	<p>On Wednesday June 28, 2017 at approximately 1931 hour while performing an Ante Mortem inspection and a Good Commercial Practice Check with (b) (6), I observed a live bird intermingled in a pile with six other dead birds at the end of the belt that exits the live hang area. An additional large dead bird exited the belt landing on top of the live bird pinning it in the pile of dead birds putting it in imminent danger of becoming crushed/suffocating and dying by means other than slaughter. The establishment employee that normally disposes of the dead birds and monitors for any live birds walked by the pile, glanced over and continued to walk into live hang with the door closing behind him. Shortly thereafter (b) (6) was walking by the area about to exit to the live dock area when I motioned for him and pointed out the live bird under the dead ones in the pile. He retrieved the live bird and put it back into production. A meeting was held with (b) (6) at that time discussing Good Commercial Practices in depth. I explained that live birds should not comingle with the DOA birds as this puts them at risk for suffocation / becoming crushed. Once the incident occurred (b) (6) was informed that an MOI would be issued. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, Treatment of Live Poultry before Slaughter, the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on June 28, 2017. (b) (6) Cc: Dr. Larry Davis, DDM Mr. Donald Coley, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6651	Tyson Foods Inc.	04C05	MSO38180 95502G	2017-09-02	<p>At approximately 2132 hours on September 1, 2017 while performing the Good Commercial Practices verification task, the following was observed at the entrance to the scald tank that feeds evisceration line two (B line). One young chicken was seen entering the scald tank with an uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck. The bird was removed from the line just prior to exiting the picking room and (b) (6) was notified of the incident and shown the cadaver. A second verification at the same scald tank entrance was started at 2138 and immediately one live young chicken with an uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck (there was a cut skinning the very top aspect of the chicken's head) entering the scald tank. This bird was removed and shown to (b) (6) in the same manner. A third verification from an approximate 500 bird random sample subgroup did not have any live bird(s) entering the scald tank at approximately 2148 hours. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on September 2, 2017 (b) (6) Cc: Mr. Donald Coley, DDM Dr. David Thompson, DDM (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6651	Tyson Foods Inc.	04C05	MSO19220 95119G	2017-09-19	<p>After removing several cadavers from line one (A line) while giving food inspector breaks an additional Good Commercial Practice check was done to determine the increase in cadavers appearing on the inspection line. At approximately 2106 hours on September 19, 2017 while performing the Good Commercial Practices verification task, the following was observed at the entrance to the scald tank that feeds evisceration line one (A line). One young chicken was seen entering the scald tank with an uplifted head, pupillary reflexes, rhythmic breathing, movements and a superficial cut to the left side of the neck that did not penetrate the vasculature. (b) (6)</p> <p>(b) (6) was notified of these findings and that a MOI would be issued. A second verification at the same scald tank entrance was started at 2111 of a 500 bird subgroup. The Shift Manager was present for this verification and manually decapitated any birds approaching the scald tank that were not previously decapitated. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on September 19, 2017 Dr. (b) (6) Cc: Mr. Donald Coley, DDM Dr. David Thompson, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6666	Koch Foods of Gadsden, LLC	04C05	GQH5612053631G	2017-05-31	<p>On Tuesday May 16, 2017 while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed several incidents of unacceptable bird handling/mistreatment. At approximately 0009 I entered the live hang area; (b) (6) had been present as well. There is a metal plate preset that dead on arrival birds roll under to become separated from the live birds that get hung on the shackles. Live birds were piling up at the end of the first belt that feeds evisceration lines one and two. The birds were continually rolling under the metal plate as well as over the top of the plate. On several instances legs, wings and heads would get hung under the plate. The belt operator continued to move the belt forward despite a pile of birds being present and pressed up against the plate. The Supervisor lowered the speed of the belt two different times. After each time the birds were still piling at the end of the belt. During these observations three completely flattened/crushed and blood soaked dead birds came in over an approximately ten minute period. After the third bird was seen and the birds were no longer piling at the end of the belt I went to observe the dump cage area to try to determine the cause of the crushed birds. The establishment employee that was operating this particular dump cage was the same one that was leaving birds in cages and soaking them with the water pressure hoses that in part resulted in the Good Commercial Practice Memorandum of Interview GQH0812054831 issued the previous night's shift. At approximately 0024, the first cage that was observed to be dumped, I observed a bird get crushed under the cage. Once the cage was automatically moved back away from the belt bringing birds into the establishment there was a bloody, badly injured bird that had been crushed under the cage. The operator went out to the bird, attempted to cervically dislocate the bird and threw it from the dump cage stage to a condemned barrel that was on the ground. I asked the operator to not dump any more cages and to please get his supervisor. (b) (6) came out to meet me and I informed him of the incident, explained to him this was again unacceptable treatment of birds and that I was going to apply a Tag not to let the employee operate any further and we needed to have a meeting in the USDA office. I applied U.S. rejected Tag B3802788 at approximately 0026. At 0028 I observed the bird that had been thrown into the condemned barrel and it was still breathing. I looked up to the</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>catwalk where the Supervisor was still present and informed him that the bird was still alive. The dump cage operator then stated that he had, "broke its neck." This was the only bird present in the barrel, I reached in the barrel, felt the bird's chest and then again notified the Supervisor that the bird is alive, it was breathing and had a heartbeat. I also asked if they could please humanely euthanize the bird. The employee then came down and manually decapitated the bird. A meeting was then held with (b) (6), establishment (b) (6) and (b) (6) at approximately 0037 hour. The incident, the gravity of the situation and that further documentation would occur were explained during the meeting. The proposed corrective actions were that the employee would be suspended, retrained on animal welfare issues prior to being allowed to return to work and a back-up operator would be utilized. Maintenance would also fabricate a slide to prevent birds from being able to climb back onto the stage where the cages are moved as the second dump cage stage has that could likely be started in the morning. I informed them that I would remove the Tag when a new employee was in place and observe operations. The Rejected Tag was removed at approximately 0052. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. (b) (6)</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P6666	Koch Foods of Gadsden, LLC	04C05	GQH0812054831G	2017-05-31	<p>On Sunday May 14, 2017 at approximately 2350 hour while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed a weak moribund dorsally recumbent bird with shallow respirations in an empty cage loaded onto a trailer that was full of other empty cages. Additionally the bird had deep lacerations to each of its digits on its right limb. The bird appeared to be suffering and in danger of dying by means other than slaughter due to its weak condition. At that time I asked (b) (6), who had been with me, to get a supervisor. (b) (6) came to the trailer where the bird was located. I explained at this time that this was unacceptable to leave a bird in a cage and for birds to die by means other than slaughter, I also pointed out the severe injury to the birds digits and let (b) (6) know that USDA FSIS takes mistreatment of birds very seriously. I also notified him that there had been three loose birds in the yard with fork lift drivers driving around and USDA had to search for an establishment employee to come catch the birds, this could lead to birds becoming crushed. There was also a fourth bird loose in the trailer holding shed. At approximately 0010 hours while observing the dump cages, an additional bird was seen that had been left in a cage on the dump cage platform. Once the cages are dumped they are then sprayed out with high pressure water to clean them prior to being automatically moved to the end of the platform where they are picked up by the forklift. The bird that had been left in the cage had been sprayed with the pressurized water and the doors to the cages had been closed; the cage was being moved to the end of the platform to be picked up by the forklift and none of the establishment employees had seen the bird. At that time USDA waved at the dump cage operator and asked him to stop what he was doing and notified him that a bird was still in the cage. The employee got the bird from the cage and returned it to production. (b) (6) again got (b) (6). I informed him of the incident and this was at this point was going to result in an MOI and potentially further action if bird mistreatment continued to occur. An additional GCP check was done at approximately 0135, at 0139 myself and (b) (6) were standing on the catwalk observing the same cage dump region, with the same operator working, where the previous incident occurred and again a bird was left in the cage, went unnoticed by both the</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>cage dump operator and the supervisor and was drenched with water by the pressure hose. I immediately told the supervisor and showed him the bird. He had the dump cage operator remove the bird and place it back into production. I asked the operator to stop dumping the cages while I filled out U.S. Rejected Tag B38027087, I had to walk down the stairs of the catwalk, around the outside of the cage dump stage and up another set of stairs to apply the tag; while doing this the operator dumped an additional cage after being informed to no longer do so in front of supervision. The tag was applied at 0144 and he was again told to no longer operate nor remove the tag. Supervision was told to meet with me in the USDA office when they had corrective actions to resume operations to prevent reoccurrence. A meeting was held with the following (b) (6) and (b) (6). I was told that an additional employee would be stationed to the side of the dump cages as a temporary corrective measure to monitor for birds left in cages until lights could be installed over the cages which could possibly be done in the morning. I told them that we could try these measures and see if they would work but this could not continue to happen and I would remove the Rejected Tag. The tag was removed at approximately 0210. After removing the tag, which occurred during lunch break I walked through live hang. Where the second belt from the far dump cage, there are two, enters the building the protective rubber flap that prevents the birds from getting into the belt gears was bent away there was a live bird tucked under the belt in between the gears that was at risk of being crushed when the belt was restarted. Additionally at the end of the belt there were 12 dead birds with two additional live birds in the pile at the very end of the belt. There were not any establishment employees or any supervisors in the area. I immediately went to the supervisor's office to find (b) (6) at approximately 0216 and asked him to accompany me to the area to show him these situations. I informed him that the protective cover to the belt/gears must be fixed prior to resuming production after lunch break. He had already been informed earlier in the evening that live birds could not intermingle with dead birds. At approximately 0309 (b) (6) informed me that the belts covers had been fixed, I observed the corrective actions. Metal plates had been put up</p>

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EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>in place of the previous rubber ones, production resumed at approximately 0310. (b) (6) was verbally informed that due to birds being repeatedly mistreated by establishment personnel, the incidents described above occurring in such a short period of time, Supervision not reacting and correcting the bird handling/mistreatment, the establishments equipment in disrepair that could have caused further injury to birds, as well as live birds comingling with dead birds that formal documentation would occur. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted, (b) (6)</p> <p>(b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6666	Koch Foods of Gadsden, LLC	04C05	GQH0003070531G	2017-07-31	<p>On Sunday July 30, 2017 at approximately 1158 hour while performing an Ante Mortem inspection and a Good Commercial Practice Check with (b) (6) shadowing, I observed a live bird intermingled in a pile under three other dead birds and two processed carcasses at the end of the belt in live hang that feeds evisceration line (b) (4). The bird had a leg trapped under a plastic guard plate at the end of the belt. There was not a supervisor in live hang at the time of the incident or anywhere in the immediate area. I asked the operator of the belt to please stop pushing the belt forward to prevent any further trauma to the bird as it was visibly struggling to attempt to get out from under the other birds and from being trapped under the plate. The operator said, "okay" but continued to move the belt forward. The bird was becoming visibly weaker, yet still breathing and alive. I asked a second time for him to stop and was again told okay as he continued to move the belt forward. At this time I asked (b) (6) to please find a supervisor while I stayed with the bird. While (b) (6) was attempting to locate a supervisor an establishment employee with a radio passed through live hang. I asked him to please call for a supervisor to come to live hang as soon as possible. (b) (6) arrived at 0002. I asked (b) (6) to please have the employee stop operating the belt. Once the belt was safely stopped I showed (b) (6) the bird and explained the above situation to him. He removed the bird and placed it back into production and asked if they could begin running the belt again. I told him they could and that a Good Commercial Practice MOI would result. I then went to check the other belt that feeds evisceration lines one and two at approximately 0006 hour. At the end of this belt there were three live birds intermingled with an additional four dead birds and wet feathers and filth on top of them that were being continually pressed against the plate at the end of the belt. The live birds were pointed out to (b) (6) and he put the birds back into production. In addition there were approximately 10 loose birds on the floor around/under the belt and among the live hangers feet. At that time I then asked him if he had any questions about Good Commercial Practices or live birds not comingling with dead birds since the last meetings that we had when the previous Good Commercial Practice MOIs were issued. He said he did not. As per Federal Register</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>Notice Docket No. 04-037N dated September 28, 2005, Treatment of Live Poultry before Slaughter, the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on July 31, 2017. (b) (6) Cc: Dr. David Thompson, DDM (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P6666	Koch Foods of Gadsden, LLC	04C05	GQH07220 80309G	2017-08-09	<p>On Wednesday, August 9, 2017 at approximately 2043 hour, while performing an Ante Mortem inspection and a Good Commercial Practice Check, I observed one young chicken, with an uplifted head, pupillary reflexes, rhythmic breathing and a superficial nick to the skin on the right side of the neck entering the middle scald tank that feeds evisceration line (b) (4) (b) (6) was immediately notified. Live bird(s) entering the scald system is less than Good Commercial Practices and results in adulterated product. At approximately 2347 hour during the same shift I entered live hang and maintenance was working on the belt under the shackles that feeds evisceration lines 1 and 2. There were numerous loose birds on the floor in live hang, the belt was not functioning and there was a pile of 200 or more live and dead birds intermingled at the proximal end of the belt where the birds enter from the outside dump belt. There was an establishment employee standing on the belt throwing live birds. Numerous birds had been suffocated/crushed. I immediately asked (b) (6) to please have the dump cage operator no longer dump any birds, as the process was completely out of control and I would have to document this in a MOI. His demeanor became very threatening and he began yelling at me and pacing. I attempted to gather additional information as to how the situation would be rectified and he continued to shout and walk away. At that time I proceeded to the dump cage region to hang U.S. rejected tag B28869058 on the dump cage area to ensure more birds did not continue to flow in and cause further harm/suffocation/death by means other than slaughter until the establishment could regain control of their process. As I was walking to the dump cage region (b) (6) yelled for me to stop. I asked for him to give me a moment and proceeded to go around the dump cage and up the stairs to hang the tag. (b) (6) had climbed through the bars of the catwalk and onto the dump cage region to reach the area prior to me arriving there. Upon my arrival at the top of the stairs (b) (6) stood in front of me and blocking me from hanging the U.S. rejected tag. I asked him to please step aside so I could hang the tag, then we could step down from the stairs where it would be safer and I would be happy to speak with him. He refused to move and told me that I could not walk out there for</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>safety reasons. I explained to (b) (6) that I was not going to walk out there or step on the region he was referring to; I just needed to place the tag. He still refused to move and yelled at me that he was not going to let me do that and that I was interfering with their process and he was not going to take it. I calmly stated that either he could hang the tag or step to the side and stay there while I hung the tag, but he was hindering inspection and yelling is unacceptable. (b) (6) then stepped aside and allowed me to place the tag at approximately 2350 hour. I then turned to walk down the stairs to speak with (b) (6) further. He shouted, "Don't you walk away from me". I turned back to (b) (6) and again told him we can talk further but I would like to go down the stairs where it is safer and we could but it would be in a calm manner. As we came down the stairs he said aggressively he was not going to tolerate me interfering with their process and was going to call (b) (6). The establishment has been observed consistently having birds stacked 3 layers deep on the belts in live receiving and this has been discussed in depth with numerous supervisors. It has been explained to them that this puts birds at increased risk of becoming crushed/suffocated as well as causing increased stress and could result in a GCP MOI if birds become crushed as a result. This has been further discussed and documented in the past two weekly HACCP meetings held on Tuesday nights at 2345 on August 1, 2017 and on August 8, 2017. Further an establishment employee was observed slinging a live bird against a plate at the end of the belt that feeds evisceration lines 1 and 2 on August 9, 2017 at approximately 0454 hour. (b) (6) was notified of these observations at this time and it was explained that birds cannot be handled in this manner. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. At approximately 0015 a meeting was held in the USDA office with (b) (6) and (b) (6). All of the above issues were discussed as well as workplace violence and hindering inspection duties, which is unacceptable by USDA FSIS. Corrective actions were verbally given by the plant in which they stated that a drive chain broke on the belt, they would clear the birds from the belt</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>and not resume production until repairs were made and control was regained. I then went with (b) (6) to verify the process was under control and the birds had been removed from the belt. The U.S. rejected tag was removed at approximately 0025. My observations are consistent with less than good commercial practices. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on August 10, 2017 (b) (6) Cc: Dr. David Thompson, DDM (b) (6) (b) (6)</p>
P6666	Koch Foods of Gadsden, LLC	04C05	GQH45100 84311G	2017-08-11	<p>At approximately 1230 today while monitoring the live hanging pen here at Koch Foods I observed in excess of 50 live birds on the floor around and underneath the hanging belts. I observed an obviously sick but still live bird at the end of the hanging belt. A Koch Foods team member retrieved the live bird and threw the live bird into a condemn can half full of dead birds. I shined my flashlight in the can and observed the bird still breathing and moving its wings. I discussed the issues with (b) (6) who asked for a break and said he would take care of it and it would not happen again. At approximately 1:30 PM I returned to the hanging pen and observed in excess of 35 birds on the floor around and under the hanging belts. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, Treatment of Live Poultry before Slaughter, the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than good commercial practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on _____, 2017.</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P667	Mountaire Farms Inc.	04C05	KYN23060 84824G	2017-08-24	<p>The purpose of this Memorandum of Interview is to document the events on August 18, 2017 related to the large quantity of dead-on-arrival (DOA) chickens discovered during a Poultry Good Commercial Task in the live hang operations. At approximately 1200 hours, I observed behind the live hang belt for kill line #2, four full condemn barrels of dead birds as well as a large pile of approximately 50-100 dead birds, with 5 to 6 live birds sitting on top of the pile of dead birds. I immediately notified (b) (6), of my observance. The live birds were retrieved and hung on kill line #2 and all of the dead birds were collected and condemned. At the time, (b) (6) said that the cause of the excessive amount of dead birds was that a belt broke causing the birds to be smothered. At 1330 hours a meeting was held between me, (b) (6) and (b) (6), to discuss this situation. (b) (6) reported that surveillance video showed that belts never stopped moving and that the birds that were observed to be dead in the live hang room were actually dead upon arrival and that they had not been smothered at the establishment. At approximately 1435 hours the Night Shift SPHV and I, requested to review the surveillance video to confirm the establishment's claim. After a discussion with the plant management of USDA's right to view the surveillance video, that the establishment was using as an adjunct to verify it's Good Commercial Practice compliance, it was determined by USDA that the video was inconclusive. It is expected that measures are taken during grow out operations and during transit to reduce the number of birds dying prior to approved methods of slaughter. In addition, transporting large amounts of DOA's on the highway should be avoided. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices and that they not die from causes other than slaughter. I recommend review of the Federal Register on Treatment of Live Poultry Before Slaughter for FSIS recommendations concerning treatment of live poultry before slaughter. A copy of this MOI will be forwarded to the District Veterinary Medical Specialist (DVMS) in the event additional follow-up is recommended.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P689	Liberty Free Range Poultry LLC	04C05	JEF481209 5414G	2017-09-14	<p>To: Plant Manager Phillip Paulk, At approximately 1200 hours, while performing ante mortem on Lot 3, I noticed that one of the coops was broken at the corner at the middle section that joined the top and bottom parts of the coop. This break in the coop left approximately a 2-3 inch opening with jagged edges. The opening was large enough that if a bird stuck its head and neck through the opening, they could potentially be injured. I also noticed an empty coop on a trailer that had approximately a 3-4 inch hole in the middle of the bottom part of the coop. This hole had exposed sharp edges and was large enough a bird could get a leg caught in the hole and injure itself. I did not see any Supervisor in the unloading dock area so I went to find one. I saw (b) (6) as she was exiting the building and informed her of what I had seen. She radioed for the 1st (b) (6) and the unloading dock (b) (6) to meet us at the unloading dock area. I then showed all of them the coops that were broken and had the potential of causing injury to a bird. I asked (b) (6), and (b) (6) if they had a program that addressed the reuse of broken coops. I was informed by management that they did not have a program in place at this time. On Thursday September 7th, I had noticed several coops that were damaged to the point that they could cause injury to a bird. Some of these coops were empty and some of them had live birds in them at the time of observation. I asked President Gerald Lessard if the plant had a program to ensure that these coops were removed from circulation so that they could be repaired before any injury came to a bird. Mr. Lessard assured me at that time that there was a program in place on the "live side" to make sure that broken coops were not reused until they were repaired. During the weekly exit meeting on 9-8-2017, I discussed the issue that I had seen the previous day with the establishment management team. I was informed by management that they did not have a program at this establishment to ensure that broken coops were not reused. (b) (6) stated that a program was being designed to address this issue. This is documented in MOI - JEF36060957091. USDA's concerns are that broken coops are continually being refilled with live chickens. The potential for injury to the chickens do exist. The establishment does not have any written program in place to ensure that these</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					damaged coops are removed from circulation even after a week from when the first observation took place and I spoke to Mr. Lessard. It also appears that the program on "live side" does not prevent the reuse of the broken coops either
P7085	Tyson Foods, Inc	04C05	HMO40030 11225G	2017-01-25	<p>During the week of January 15th, the USDA Food Inspectors on the lines were hanging back carcasses for further disposition from the SPHV. Many of these carcasses had broken backs or broken pelvis/thigh joints which resulted in the bird to bleed out into the abdominal/chest cavity. Each time I examined one of these carcasses, I showed GPM Trevor Wood the carcass. USDA's concerns are that the live chickens are being handled in such a manner that results in broken backs and dislocated joints which either severs or bursts the blood vessels, which then bleed into the abdominal/chest cavity. This type of handling is considered to be excessive or aggressive due to the injuries that are seen on postmortem examination. Tonight, January 24, 2017, there has been an excessive number (10-15) of these types of carcasses held back for further disposition from the SPHV. Once again I have correlated with Mr. Wood and showed him each one of the birds that bled internally. Some of the birds tonight were condemned as DOA's due to the fact that the bird bled out internally and died prior to slaughter. Those carcasses had broken backs and the down side of the carcass showed blood pooling. USDA is concerned that the aggressive mishandling of live chickens is still occurring. This mishandling is easily seen on postmortem examination of the carcass. This type of handling is reflective of failing to follow the National Chicken Councils Guidelines for Good Commercial Practices as well as Tyson's policies for properly handling of live chickens. (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7085	Tyson Foods, Inc	04C05	HMO53060 71903G	2017-07-03	<p>On July 02, 2017 at approximately 0258 am I entered the live hang room. I observed sixteen dead carcasses lying on top of thirteen live birds at the end of the conveyor belt on the floor. I observed five live birds under the conveyor next to the open drain. On the left side of the hanging table were six birds and on the left side were four live birds and one behind me all on the floor. I notified (b) (6) verbally and visually of the situation. Assistant Plant Manager Trevor Woods reviewed the video of the Live Hang room which confirmed the information that I gave him. APM Woods ensured (b) (6) and me, (b) (6) that he will hold the supervisors accountable and this incident should not ever occur again.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7091	Pilgrim's Pride Corporation	04C05	SBF2022035720G	2017-03-20	<p>On 03 20 2017 at approximately 1548 hours, (b) (6) while conducting a Poultry Good Commercial Practices task in the Live Haul holding sheds observed birds were also open mouth breathing and showing signs of heat stress in every trailer (those marked with an E for East plant as well as those marked with a W for west plant). There were several DOAs in the DOA hoppers outside of Live Hang (3 of the 4 hoppers were completely full) however, Live Hang has been kept in good orderly fashion with minimal DOA cadavers observed on the floor behind the hangers. The grower was (b) (4) for Lot 2, although, this task was started after the lot had switched from Lot 1 of (b) (4) to lot 2, therefore, not all of the DOA cadavers are from Lot 2. Last month (February), (b) (6) spoke with (b) (6) to let her know that he was going to talk with the growers and tell them to start lowering the numbers of chickens in the cases in preparations for the increased temperatures with Poultry Good Commercial Practice handling as top concern. In addition, (b) (6) has mentioned to (b) (6) about noticing airflow conditions in the Live Haul Holding Sheds last month on a high heat day. (b) (6) did have maintenance out and improve the conditions within the Live Haul Holding Sheds at that time (b) (6) spoke with (b) (6) again on 03 20 2017 at approximately 1658 hours about the Live Haul Holding Sheds and the possibility of misters like those that are in the back dock holding area, he said he will ask about it and let (b) (6) know. The establishment is reminded in addition to the regulations found in 9CFR 381.65(b). FSIS encourages establishments to develop and implement a systematic approach to ensuring poultry presented for slaughter are treated in a manner that minimizes excitement, discomfort, and accidental injury. The initial component of the approach is to assess the areas where handling problems may occur. Establishments should periodically evaluate their handling methods to ensure that their employees are treating animals in a manner that minimizes injury, excitement and discomfort prior to slaughter and that their methods ensure all poultry are slaughtered in accordance with 9 CFR381.65 (b). Copies of this Memorandum of Interview (MOI) will be distributed to the establishment,</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					inspection file and District Veterinary Medical Specialist per FSIS Directive 6100.3. Documented by (b) (6)

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7101	Tyson Foods, Inc.	04C05	LUC272208 3310G	2017-08-10	<p>At approximately 2220 hours on August 8, 2017, while verifying the effectiveness of the establishment's adherence to good commercial practice requirements, I observed the following: (b) (6). (b) (6) was also present and observed the below because he was performing an assessment of my verification of their adherence to the regulatory requirements) On trailer #17756, the back two cages of birds contained so many birds that the birds were two deep (one bird sitting on top of another bird because there was just no room on the bottom layer of the cage) for at least ¾ of each section of each of the two cages. The cages were so packed full of birds that it was impossible to get a good look at the majority of the birds in the cage on the trailer. On the lower three or so levels at the edges of the sections of the cage that could easily be seen, I observed at least 12 dead birds and several other birds with purple colored combs and waddles that were struggling to breath because they were pushed so tightly against the side of the cage or had another bird on top of them. I also observed several birds that had skin abrasions and were bleeding because they were pressed against the sides and side of the cage had rubbed the skin to make it bleed. The lower cage of the two had one of the sections where the door was open and birds were sitting on the door but none were observed falling out of the cage or any other injury relating to the door not being properly closed. (b) (6) with us and observed this also. (b) (6), and Ryan Roper, Assistant Plant Manager, came to the area and were also notified of this issue. The dumpers were cleared of the other cages, the trailer was moved to the unloading area, a skip was placed in the line, and these two cages were dumped, the only action that would try to prevent any further birds dying by suffocation. The rest of the trailer was examined and no other cages were observed in this condition of overcrowding and a dead bird was observed here or there throughout the rest of the trailer but nothing like what was in these last two cages. All of the dead birds were condemned. There were approximately 336 dead-on-arrival birds from the two cages identified by the establishment for trailer #17756. Based on establishment documentation, the trailer was weighed at 2141 hours and our observations were at approximately 2220 hours, so the trailer had been on the lot for approximately 39 minutes in this</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>condition. After the two cages were dumped onto the live hang line and the chickens that were alive were hung on the line, the establishment took its company break. During this time, the establishment notified FSIS personnel that all of the chickens had been caught for this shift, so no further action was taken at that time. I had to return to get ready to take the line after the company break, so (b) (6) observed the last trailers that came to the establishment and observed some of the sections of the cages were full on one layer, none were loaded so that piling up of chickens or suffocation was an issue. (b) (6) discussed with (b) (6) that he was not going to take action and stop the establishment's kill since this was a catching issue and all the chickens were caught for this shift. He discussed with (b) (6) that prior to him (b) (6) leaving for the night, the establishment would need to provide the actions it was taking to ensure that this issue did not reoccur. The actions provided included: "The Live Haul Manager, Live Production Manager, and Complex Manager were notified of the overcrowded cages observed on trailer #17756. Managers from the establishment will meet with the contracted catch crew to discuss this and ensure understanding of animal welfare expectations. Dead birds will not be loaded on the farm in the same cage with live birds. Catch crews will utilize head count per cage section to prevent overcrowding in the cages." (b) (6) discussed with (b) (6) that, while some of the dead birds could have been dead at the farm, based on the signs observed with the birds in the trailer and the way they were in the cages, the crowding of the cage sections/suffocation of chickens contributed to the number of dead carcasses observed in these two cages. Based on the above actions, no regulatory control actions were taken as a result of the observation of this issue. The next shift the same calendar day, the establishment provided (b) (6) information to demonstrate the actions were taken as provided the previous shift.</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P713	Gentry's Poultry Co., Inc.	04C05	HDA43120 11726G	2017-01-26	<p>GCP MOI Est. 00713 P; Gentry's Poultry; January 26, 2017. In attendance: (b) (6)</p> <p>(b) (6) Mr. Wayne Berry, Plant Manager. At approximately 1330, while performing a GCP Inspection, I saw 4 dead chickens under the cage dumper, 1 dead chicken caught in the rollers of the dumper, and 1 live chicken in between the rolling belts of the dumper. I showed both (b) (6) and (b) (6) the chickens that were falling through a hole in the dumper. (b) (6) said that it was supposed to have been fixed yesterday and that he would fix it as soon as possible. A plant employee removed the live chicken from the belt area. I again reminded (b) (6) and (b) (6) that the PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices, and that they not die from causes other than slaughter. I recommended that (b) (6) review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>(b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P713	Gentry's Poultry Co., Inc.	04C05	HDA32120 15826G	2017-01-26	<p>Good Commercial Practices MOI Est. 00713 P; Gentry's Poultry; January 25, 2017 In attendance: (b) (6)</p> <p>(b) (6) Mr. Wayne Berry, Plant Manager. At approximately 0635 on 01/25/2017, while performing a Pre-Operational Sanitation Inspection with (b) (6)</p> <p>(b) (6) I saw 4 live chickens huddled under the cage dumper and 2 dead chickens lying under the cage dumper. Since no cages had yet been placed on the dumper, these chickens were obviously left over from the previous days' production. (b) (6)</p> <p>(b) (6) said that the plant was having a problem with chickens falling out of the cage dumper. (b) (6) then captured the loose live chickens and placed them in a portable cage and placed the dead chickens in a condemned product barrel. Later, I reminded (b) (6) and (b) (6) that the PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices, and that they not die from causes other than slaughter. I recommended that (b) (6) review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P713	Gentry's Poultry Co., Inc.	04C05	HDA02120 82811G	2017-08-11	<p>On 08/09/2017, at approximately 0655, while conducting a Good Commercial Practices inspection in the cage unloading area, I observed the plant employee who was operating the cage dumper throwing live chickens backhanded into the hopper. I climbed the stairs and asked him to not throw the chickens, instead to carry and place them in the hopper if they did not fall out of the cage properly. A few minutes later, as I was watching the cages being unloaded, I saw that 1 live chicken was left in the presumably now emptied cage. The doors were shut, and it was moved to the end of the dock to be picked up by the forklift and placed back on the truck. After the forklift operator placed the cage back on the truck, I asked him to stop and to go find his supervisor and ask him to meet with me in the unloading area. (b) (6) came out and I showed him the live chicken left in the cage. He instructed the forklift operator to remove the cage and then had the cage dump operator remove the live chicken and carry it back to the hopper. The PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices, and that they not die from causes other than slaughter.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P727	Simmons Prepared Foods, Inc.	04C05	VCF321305 2902G	2017-05-02	<p>On May 2, 2017, at approximately 11:00 hours, (b) (6), met with (b) (6). The following is a synopsis of the discussion and events regarding not slaughtering in accordance with good commercial practices: At approximately 06:35 hours while attempting to find (b) (6) to determine the reason for early break, (b) (6) observed maintenance personnel in the hanging room. While looking for (b) (6) in the live hang area, I observed that birds and carcasses had been left on the line for Kill Line 2. As I observed the live birds/carcasses, I observed the establishment had performed kill cuts on carcasses between the end of the guide bar for the heads/necks and as far as they could reach toward the stunner (approximately 6 carcasses). I observed four carcasses that were in the neck/head guide bar. The carcasses appeared stunned with no kill cut across their neck. As I continued observing, I observed approximately 20 birds in the stunner. After waiting an appropriate amount of time in which the carcasses should have regained consciousness and observing no breathing, I requested (b) (6). After testing to determine if the carcass was responsive to stimuli, the carcasses were removed from the line. Three of the four carcasses were deceased with the fourth (which was in the widest part of the guide bar) resumed breathing and regained consciousness upon removal. Based on my professional experience, knowledge, and observations, the carcasses most likely asphyxiated from the neck/head guide bar. Then, I informed (b) (6) that allowing carcasses to asphyxiate is not consistent with being slaughtered in accordance with good commercial practices. (b) (6) informed me repeatedly that the line broke down and inquired about how they were supposed to prevent unanticipated equipment breakdowns. I informed (b) (6) that carcasses must be slaughtered in accordance with good commercial practices and although equipment breakdowns cannot be anticipated, we still cannot allow carcasses to die by asphyxiation or other methods inconsistent with good commercial practices. At approximately 07:05 hours, the establishment resumed production on Kill Line 1 as company break had ended. I observed that a large number of birds were fluttering as they approached the kill machine and after passing through the kill machine. The establishment had two back-up killers present which were struggling to perform kill</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>cuts on the carcasses. This indicated to me based on my professional knowledge and experience that the stunner had not been turned on. The establishment immediately corrected and was later confirmed by establishment management. Once the line was repaired (approximately 40 minutes after the malfunction of the kill line), the carcasses from the stunner were removed from the line and disposed of via condemn barrels. At approximately 11:00 hours, I met with (b) (6) and informed him that birds must be slaughtered in accordance with good commercial practices. My observations indicated that they had not and that I was issuing an MOI documenting our discussion. At this time, I also discussed my observations regarding the carcasses that appeared to enter the kill machine without being stunned. (b) (6) verbally informed me of plans to prevent recurrence and I requested those plans in writing. A verbal synopsis of the actions that will be taken when a Kill line malfunctions were: stunners turned off, birds removed to prevent drowning/persistent stunning, and kill cuts will be performed on birds within the head/neck guide bar to prevent asphyxiation. The meeting was adjourned at approximately 11:10 hours.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P727	Simmons Prepared Foods, Inc.	04C05	VCF240906 3529G	2017-06-29	<p>On June 26, 2017, at approximately 07:15 hours, (b) (6), and (b) (6), met with (b) (6).</p> <p>The following is a synopsis of the discussion regarding cervical dislocation and the establishment's animal welfare plan. (b) (6) reviewed the animal welfare plan for the procedure regarding cervical dislocation. The animal welfare plan states the thumb and index finger will be placed at the back of the skull and the legs are quickly pulled with the other hand. (b) (6) expressed concern about whether this was the method that the employees were utilizing. (b) (6) inquired about where the method was acquired from. (b) (6) was informed that procedure was adapted from live haul. (b) (6) informed (b) (6) and (b) (6) that they appear to pull more on the neck than the legs and sometimes will twist the neck resulting in decapitation of the bird. (b) (6) informed establishment management that two or three birds were decapitated while attempting to perform cervical dislocation. There were several others (approximately 5-6) that had severe fluttering of the body muscles for greater than 30 seconds as they traveled down the conveyor. The establishment informed me that they would perform retraining of personnel that perform cervical dislocation to ensure that the procedure is being implemented as written. The meeting was adjourned at approximately 07:35 hours.</p>
P7470	Mountaire Farms Inc. - NC Division	04C05	YRA241606 3414G	2017-06-14	<p>While observing the plants GCPs at 16:16 I observed a live bird in the dead on arrival bird bin half way buried. The bird looked distressed at the time. I informed (b) (6) of my findings. He immediately removed the live bird from the bin. The cause was determined to be that the dead on arrival belt monitor left his station for a moment and the line running (b) (6). (b) (6) added an additional monitor to the system to prevent any future occurrence.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7470	Mountaire Farms Inc. - NC Division	04C05	YRA1722081418G	2017-08-18	<p>This memorandum of interview (MOI) is being issued to document what was observed while performing a Poultry Good Commercial Practices verification task on 08/18/2017. At approximately 1750 hours, I observed an excessive number of DOAs coming down system 2 live hang belt. There was a large pile of DOAs, approximately 9 feet long by 2 feet high, pushed against the back wall behind live hang belt 2. I immediately requested for (b) (6) to radio for (b) (6) to inform the employees to stop hanging on Line 2 until the DOAs had been removed and disposed of properly. While observing the employees removing the DOAs from the area, I noticed a live bird amongst the pile of DOAs at the end of live hang belt 2 that moved once an employee stepped on its wing. When I questioned the cause of excessive DOAs, (b) (6) responded and said it was due to the heat. Regulatory control was relinquished at 1805 hours and hanging was allowed to resume once the DOAs had been disposed of properly. Establishment data showed Lots 2E and 8E reported DOA percentages of 2.12% and 2.17% respectively. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices and that they not die from causes other than slaughter. I recommend review of the Federal Register on Treatment of Live Poultry Before Slaughter for FSIS recommendations concerning treatment of live poultry before slaughter. A copy of this MOI will be forwarded to the District Veterinary Medical Specialist (DVMS) in the event additional follow-up is recommended.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7470	Mountaire Farms Inc. - NC Division	04C05	YRA0508094308G	2017-09-08	<p>On 09/082017, at approximately 7:30 am and while giving breaks, the Food Inspector on Line Station 2 ask for me to inspect a carcass that she had pulled out of production for condemnation. In the course of evaluating the carcass, I noted that the bird was small in size, had a markedly swollen head and the skin on the head and neck was a dark purple color. The viscera was noticeably erythematous and congested. When the neck was further evaluated there was no indication that a cut was present to allow the bird to bleed out properly. These signs are consistent with a bird dying from causes other than slaughter. The carcass was shown to (b) (6) and (b) (6) and were told that an MOI would be issued. The carcass was condemned. The PPIA (21 U.S.C. 453(g)(5)) as well as the Agency's regulations (9 CFR 381.90), provide that carcasses of poultry showing evidence of having died from causes other than slaughter are considered adulterated and thus must be condemned. It is also required that the poultry be slaughtered in accordance with good commercial practices, in a manner that results in thorough bleeding of the poultry carcass, thus ensuring that bleeding has stopped before reaching the scalding so that birds do not drown (9 CFR 381.65(b)). Compliance with these requirements ensure that poultry are not mistreated. A copy of this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist in the event additional follow up is recommended.</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7485	Wayne Farms LLC	04C05	QBM13170 90230G	2017-09-30	<p>On September 29, 2017, at approximately 2230 hours I observed Less than Good Commercial Practice at establishment P-7485 Wayne Farms in Jack, AL. While performing a Good Commercial Practice verification task, I observed one (1) live bird in the DOA (Dead on Arrival) dumpster by the cage dumper in the Live Receiving area of the establishment. The live bird was average in size, buried under feathers, fecal material and other DOA's. The top layers of debris and DOA's did not contain any denaturant. The bird's head, neck and a partial wing was visible. The bird was alert, responsive and appeared to be in good health. I motioned for an employee in the Live Receiving area that was assisting with cages being unloaded/loaded to call for management. After a few minutes, (b) (6) arrived and I informed him of my findings. I reminded (b) (6) that the PPIA and Agency guidelines require live poultry be handled in a manner consistent with Good Commercial Practices (GCPs) by making every effort to treat poultry humanely. (b) (6) immediately removed the bird from the dumpster and humanely euthanized the bird by means of rapid cervical disarticulation. I strongly encourage the establishment to review Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter" for recommendations concerning treatment of live poultry before slaughter. A copy of this Memorandum of Information (MOI) will be forwarded to the Jackson District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully submitted (b) (6) cc: (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7487	Koch Foods, LLC	04C05	SPG350703 3215G	2017-03-15	<p>On Friday, March 10, 2017, at approximately 1:00 am, while performing a GCP review, (b) (6), observed a live chicken caught on a grate in the dumping area. The bird was on top of the grate to the right of the dumping operator which covers the conveyor belt transporting chickens into the live hang area. The bird appeared calm, but had one leg trapped through a hole causing it to hang down above the birds on the belt. When she notified the plant dumping operator of the bird, she was told that he would retrieve it at the next break. When (b) (6) went back to the area at approximately 11:00 am, the bird was still trapped in the same hole and position as before, but was dead. Additionally, there was another live bird on top of the grate, sitting on top of the dead one. Both the live bird on the grate and the birds moving on the belt below were pecking at the carcass. Establishment management was notified of the findings and removed both birds from on top of the grate. The concern was discussed at a meeting with plant management which included Mr. Gary Tallent, Plant Manager, (b) (6), and (b) (6), as well as (b) (6) and (b) (6). Who is responsible for retrieving the birds if they were found on top of the dump cage, crates or on the floor under the cage dump system? Preventative measures to prevent recurrence. As per the Federal Register Notice Docket No. 04-37N dated September 28, 2005, "treatment of live poultry before slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in slaughter of poultry to make every effort to treat poultry humanely and abide by good commercial practices. Sincerely, (b) (6) (b) (6) P-7487, Koch Foods of Chattanooga. cc: (b) (6) (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7487	Koch Foods, LLC	04C05	SPG220803 1920G	2017-03-20	<p>On Thursday, March 16, 2017, at approximately 09:15 A.M., I (b) (6) performed good commercial practices check. While performing the good commercial practices check, I observed less than good commercial practices in the picking room. I observed a live chicken with arched neck, blinking eye at 280 picking line entered the scalding tank. I retrieved the chicken (carcass) at eviscerating line number two re-hang table after exited from the picking room. The finding was shown to (b) (6), and discussed the finding with (b) (6). The finding was not in compliance with poultry inspection regulation 9CFR 381.65 (b). As per the Federal Register notice Docket No 4-037N dated September 28, 2005, "Treatment of live poultry before slaughter." The food safety and inspection service strongly encourages all establishments engage the slaughter of poultry to make every effort to treat poultry humanely abide by good commercial practices. Sincerely, (b) (6), P-7487 Koch Foods of Chattanooga Cc: (b) (6), District Jackson (b) (6) Chattanooga, District Jackson</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7487	Koch Foods, LLC	04C05	SPG270608 1611G	2017-08-11	<p>On Wednesday August 9, 2017, at approximately 07:25 A.M., (EDT) the plant manager Mr. Gary tallent informed the inspection program personnel that a live trailer rolled over on the farm. At approximately 11:05 A.M., The trailer carrying 20 cages arrived at the Koch Foods P-7487 facility. I checked the trailer and didn't see any damage to the cages, but there were a lot of dead birds in the cages . At approximately 1:00 P.M., the management started segregating the live birds from the dead birds. They were denaturing the dead ones and transferring them into the offal trailer. At approximately 4:35 P.M., the management informed me that they will stop hanging the birds on the 280-line and they will euthanize (cervical disarticulation) all the live birds. I was in the live hanging area watching for proper cervical disarticulation. I observed two barrels had one improperly euthanized bird. I told the employees to remove the bird from the barrel and euthanized them properly. I left around 5:02 P.M., and (b) (6) who was on pack out took over. They finished around 5:35 P.M. As per the federal register notice Docket No 04—037N dated September 28, 2005, "treatment of live poultry before slaughter "The food safety inspection service strongly encourages all establishments engage the slaughter of poultry to make every effort to treat poultry humanely abide by good commercial practices as described by industry guidelines. Compliance with these requirements helps ensure that poultry treated humanely.</p> <p>Sincerely, (b) (6) P-7487. Koch Foods of Chattanooga, Jackson District cc:(b) (6) Jackson District (b) (6). Chattanooga, Jackson District</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7487	Koch Foods, LLC	04C05	SPG211109 1425G	2017-09-25	<p>On Friday, September 22, 2017, at approximately 09:00 A.M., trailer number 180 arrived at Koch Foods of Chttnooga slaughter facility. I observed the following. Most of the cages doors were opened. Birds were trapped in between the cages. Birds were pile up on the trailer bed between the cages. Birds were sitting on the top of the cages door, I saw three birds neck were trapped in-between the cages door, necks were hanging, were dead. The management started working on the cages, putting the birds back into cages. The management started moving the cages to the cage dump area. I noticed approximately 15 birds fell off the cages during moving process. The findings were shown to plant manager Mr. Gary Tallent, and (b) (6). As per Federal Register Notice docket No 04-037N, dated September 28, 2005, "Treatment of live poultry before slaughter" the USDA food safety inspection service strongly encourages all establishments engaged in slaughter of poultry to make every effort to treat poultry humanely abide by good commercial practices. Compliance with these requirements helps ensure that poultry treated humanely. Sincerely, (b) (6)</p> <p>(b) (6) P-7487 Koch Foods of Chattanooga. cc: (b) (6)</p> <p>(b) (6) Jackson District. (b) (6) Jackson District.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7487	Koch Foods, LLC	04C05	SPG211009 4826G	2017-09-26	<p>This morning, on September 26, 2017, at approximately 07:15 A.M., while performing the good commercial practices observed the following less than good commercial Practices check in the cage dump area. The trailer number 182 was parked in the cage dump area to dump the cages at the cage dump station. I observed small section of a bird's wing was trapped under the outer rear wheel of the trailer. The bird was struggling to free its entrapped wing. The finding was shown to live hanging supervisor. The driver moved the trailer and the supervisor removed the bird, put back into the cage. At approximately 09:15 A.M., I met with (b) (6) and notified about the above incident and told him that inspection will issue a GCP MOI. FSIS DOCKRT No.04-037N. Treatment of live poultry before slaughter, states that under the poultry production inspection act and the agency regulations live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that the poultry handled and slaughter in a manner consistent with good commercial practices. Poultry should be treated in a manner as to minimize excitement, discomfort and accidental injury throughout the processing. Sincerely, (b) (6)</p> <p>P-7487, Koch Foods of Chattanooga cc:(b) (6)</p> <p>(b) (6) Jackson District (b) (6), Jackson District</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P758	Tyson Foods, Inc	04C05	ILK332203 3817G	2017-03-17	<p>(b) (6) Tyson Foods, Carthage Complex 3865 Hwy. 35 N. Carthage, MS 39051 (b) (6), At approximately 2145 hours while performing the PHIS Good Commercial Practices (GCPIP) verification task, the following less than GCPIP incident was observed on the No. 2 picking line. A live young chicken, from a random subgroup sample of approximately 500 birds, with uplifted head, pupillary reflexes, rhythmic breathing and no cut to the neck entered the scald tank. A cadaver was verified at the exit of the last picker on the No. 2 picking line with a bright red appearance, ventral pooling of blood in the neck and head with no cut to the neck. The carcass was observed entering the evisceration department where (b) (6) requested (b) (6) to remove the bird from the line. (b) (6) took possession of the carcass and requested (b) (6) to radio for Mr. Frank Triplett, 2nd Shift Assistant Plant Manager, and (b) (6) responded to my request and was shown the cadaver which had entered the scald tank while still breathing. The bird was relinquished by (b) (6) and given to (b) (6) for condemnation. A second verification check of approximately 500 birds was performed on the No. 2 picking line with no live birds entering the scald tank. This was determined to be an isolated incident and not a loss of process control., Allowing birds to enter the scald tank while still breathing is not consistent with GCPIP and results in adulterated product. The establishment must ensure birds under their control on the official premises be treated in a manner that will not cause unnecessary suffering, injury, or death by means other than slaughter. A meeting was held in the USDA office at approximately 2230 hours to discuss the less than GCPIP. (b) (6) and (b) (6) were in attendance. (b) (6) detailed the events to (b) (6) which resulted in the less than GCPIP incident. (b) (6) was informed that a MOI would be issued in response to the incident. (b) (6) stated (b) (6) would have to offer any forthcoming response from the establishment. As per Federal Register Notice Docket 04-037N, "Treatment of Live Poultry Before Slaughter", the Food Safety Inspection Service (FSIS) strongly encourages all establishment's engaged in the slaughter of poultry to treat poultry humanely prior to slaughter and abide by Good Commercial Practices</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					(GCPs) as described in industry guidelines. Respectfully, (b) (6) [REDACTED], Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc; Mr. Perry Davis Mr. Don Coley Dr. David Thompson Dr. Larry Davis (b) (6) [REDACTED] [REDACTED]



EstNbr	EstName	Task_Code	MOI#	Date	Description
P7632	Zorro Leasing LLC	04C05	HYE300603 2015G	2017-03-15	<p>It was reported to me by (b) (6) to (b) (6) that there were birds with a lot of bruises. I inspected the birds that were hung back and saw areas of blood tinged fluid filled pockets between muscle and skin ranging in size. One was large enough to cover both breasts of the bird. I did a Good Commercial Practices Task to ensure proper handling of the birds. At the time of inspection, (b) (6) was actively denaturing DOA birds in the designated bin. The employees hanging birds were doing so in the appropriate manor not to cause harm to the birds. The employee at the Dumper station was checking to see if birds were distressed or stuck in coops while using caution not to dump birds on top of each other. The birds, once hung, were going through the stunner and past the blade consistently well and I did not see any sensitive bird go into the scalders. I then walked over to the shed where the Live Haul trucks are staged. The birds were quiet but the condition of multiple coops were in disrepair. Some areas had bent bars, broken bars and broken or warped floor panels. These areas that can potentially be harmful to birds. After inspecting several trucks, I saw one that had a bird with its leg sticking out of the bars, between the coops. There was frank blood present on the leg and although the bird was calm, when it tried to remove its leg it could not. The bird did not appear distressed and I did not see dripping blood from the leg. Due to the location, I could not see if this coop was in disrepair or not. Live Hang personnel had gone to break so I immediately called the office of (b) (6) from my personal cell phone. (b) (6) came to where I was right away and called (b) (6) to tend to the wellbeing of the bird and to see the condition of the coops. The coop was bent with pliers to allow the bird to be removed without harm and immediately hung on the shackles to be humanly slaughtered. I do not think the bruises that were reported were a result of the coops and I do not suspect mistreatment of animals at this establishment. The bruises could have possibly been inflicted during live catch at the farm. Please attend to the condition of the coops in addition to the methods used to handle birds at the farm and in transit to this establishment in an attempt to prevent the conditions that we have seen. Respectfully, (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P764	Perdue Foods, LLC	04C05	CUA5612031522G	2017-03-22	<p>At approximately 9:55 am, during my visit to the evisceration department following the establishment's first half-hour break, I observed numerous red/pink carcasses being conveyed on evisceration lines (b) (4) and (b) (4). I checked the four inspector's lot tally sheets to determine the number of cadavers that had been recorded on them. My initial estimations were just over one-hundred total. During this time, one of the inspectors indicated that she was getting a lot of cadavers and showed me two separate carcasses that were determined to be condemned under the cadaver category. The inspector indicated that (b) (6)</p> <p>(b) (6)</p> <p>of the excessive numbers of cadavers by another inspector and that he had headed in the direction of the kill/picking room.</p> <p>When (b) (6) returned to the area, he indicated that the kill machine was not properly set up and that adjustments had to be made to it to get it to perform at acceptable levels. I informed him of my intention to issue the establishment an MOI based on the numbers of cadavers marked on the lot tally sheets, now numbering one-hundred twenty-eight, and the length of time it took to make the necessary adjustments to the kill machine to achieve a proper slaughter cut. I have provided plant management with a copy of the Federal Register Notice 04-037N, "Treatment of Live Poultry before Slaughter." This information can assist the establishment in considering means of assessing and improving their handling and slaughter procedures, by adopting a systematic approach which focuses on treating poultry in a manner that minimizes excitement, discomfort, and accidental injury during the entire time that live poultry are held for slaughter. (b) (6) cc: Raleigh District Office District Veterinary Medical Specialist Office File</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P764	Perdue Foods, LLC	04C05	CUA40130 42910G	2017-04-10	<p>At 1057, while touring the picking room, I was observing birds enter the scalders and noticed a bird with its head flexed towards me. This is abnormal, as all of the other birds (that had been cut and bled out properly) had their heads and necks fully extended and dangling freely. There was no obvious neck cut; however, the cut would have been on the side furthest away from me and I cannot be absolutely certain there was no cut. I was able to briefly touch this bird's head and it looked at me consciously and applied some resistance to my touch before it then entered the scalders. I had no time to intervene. I immediately notified (b) (6) and (b) (6), who were nearby. At 1405, I had a meeting with (b) (6) and (b) (6). (b) (6) We discussed the above incident. They told me they will do retraining of the backup killers and other receiving team employees.</p>
P764	Perdue Foods, LLC	04C05	CUA17130 50211G	2017-05-11	<p>During a walk-through with the Raleigh District Office DVMS, both stunners (one on each kill line) were observed to be full of water with birds hanging above and heads/necks submerged in the electrified water. The twenty or so birds in each stunner were observed to be lifeless and got that way as a result of asphyxiation instead of proper slaughter. Upon recognizing that the situation existed, a plant employee opened the valve on the stunner to lower the water level. (b) (6) as informed in the receiving office at approximately 12:30 pm and indicated that appropriate disciplinary action would be taken for poor job performance. (b) (6) was later informed of the incident in the main hallway of the plant. He indicated that this condition was handled appropriately several other times during the day, but this time it was overlooked. I have provided plant management with a copy of the Federal Register Notice 04-037N, "Treatment of Live Poultry before Slaughter." This information can assist the establishment in considering means of assessing and improving their handling and slaughter procedures, by adopting a systematic approach which focuses on treating poultry in a manner that minimizes excitement, discomfort, and accidental injury during the entire time that live poultry are held for slaughter.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P764	Perdue Foods, LLC	04C05	CUA1807073824G	2017-07-24	At 0623, while performing the poultry Good Commercial Practices task, the following issue was observed: - After exiting the kill room on line 1 (in which I had observed a trade off of people in charge of backup killing), I stood at the location where the birds on kill line 1 enter the scalders. I was observing the birds to ensure they were not breathing prior to enter the scalders. I observed a single bird with its eyes open and no observable kill cut - I touched this bird and tried to find a kill cut, which I was unable to find. I signaled (b) (6), who was standing nearby, and tried to non-verbally communicate the problem (I am unsure he understood, so see below). I then visually followed the birds through the process and observed them exit the first bank of picker machines. There was one bird seen with a swollen and congested (red) head, without a kill cut. I continued to monitor the birds on kill line 1 and did not see any further missed kill cuts or cadavers. - I notified (b) (6) and (b) (6) of the problem in the receiving office at 0630.
P764	Perdue Foods, LLC	04C05	CUA1920080624G	2017-08-24	On 8/24/2017 at 1754, while performing the Poultry Good Commercial Practices task in the receiving area, I found one live bird inside the dead-on-arrivals (DOAs) container. The bird was partially buried under other dead birds, and was sprayed with blue dye a chemical denaturing substance. I notified a plant employee and he immediately removed the live bird from the DOAs tank. Then I discussed this incident with (b) (6) the (b) (6) and (b) (6), and I reminded him that live poultry must be treated in a manner consistent with good commercial practices. At 1922 (b) (6) informed me that he made contact with (b) (6) and (b) (6). The discussion involved doing a PW3, (Corrective Action) failure for Poultry Care Violation for a live bird in the DOA Bin, and a Disciplinary Record for a Poultry Welfare violation. (b) (6) will come in and do a retraining on all floor associates and Team Leads on the requirements for placing a dead bird in the DOA Bin. The documentation and training will be kept in the Poultry Care Training Log Book.

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7669	Turkey Valley Farms LLC	04C05	RZB451102 0420G	2017-02-20	<p>Est. 7669p, Turkey Valley Farms, February 20th, 2017, 0635 hours. At approximately 0620 hours one of the USDA online food inspectors notified me that he was condemning more cadavers than normal. At approximately 0627 hours, while performing a Good Commercial Practices verification task I observed 1 out of 100 carcasses with no cut present on the neck and showing signs of consciousness (blinking eyes, open mouth breathing, raised head, and wing movement) proceed into the scalding. This bird did not come into contact with the final stunner located prior to the scalding. I waited after the feather picking machines and prior to the hock cutter to verify that the carcass had no cut present on the neck. During this time, I also observed 3 out of 100 carcasses hanging by one leg. (b) (6) [REDACTED], was present throughout this task and was immediately notified of the findings. (b) (6) [REDACTED] and Les Goff, Plant Manager were also notified of the findings. The end of the lot was at approximately 0645 hours. No further issues or concerns were observed. Mr. Goff later notified me that disciplinary action was taken to counsel the employee at the back-up kill station. In the past 90 days one similar Good Commercial Practices Memorandum of Interview (MOI) was documented on 11/30/16; MOI RZB2208112530G, titled Poultry Good Commercial Practices / RZB1608115730I.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7669	Turkey Valley Farms LLC	04C05	RZB2505051723G	2017-05-23	<p>Est. 7669p, Turkey Valley Farms, May 25th, 2017. In attendance: (b) (6) and (b) (6). On Monday 5/15/17 I observed that the breeder hen lot from Missouri had 118 out of (b) (4) head Dead-On-Arrival (b) (4)). During the weekly meeting on 5/18/17 the establishment was notified of this finding and (b) (6) emailed me on Friday stating that there were storms in Missouri (as well as Marshall, MN) the evening that the birds we loaded and traveling. He stated that he firmly believes the high DOA rate on Monday can be attributed to the storms seeing that birds came from the same flock on Tuesday and Wednesday with no DOA issues. I reviewed the last 5 months of PHIS information (January 1, 2017- May 25, 2017). There were 14 lots with DOA counts exceeding 1% of which 9 instances were breeder hens from various growers in Missouri, 2 were from the same flock of light hens from Nebraska, and the remaining 3 flocks were from Minnesota. During weekly meeting discussions, (b) (6) informed USDA that the high counts were due to inclement weather. The following DOA counts were observed: 1/5/17: 5 out of (b) (4) breeder toms from Minnesota 1/9/17: 160 out of (b) (4) breeder hens from Missouri * 1/27/17: 177 out of (b) (4) breeder hens from Missouri 2/3/17: 449 out of (b) (4) light hens from Nebraska 2/8/17: 86 out of (b) (4) breeder hens from Minnesota 2/9/17: 639 out of (b) (4) light hens from Nebraska 3/9/17: 273 out of (b) (4) breeder hens from Missouri 3/14/17: 39 out of (b) (4) breeder toms from Minnesota 3/20/17: 111 out of (b) (4) breeder hens from Missouri * 3/27/17: 137 out of (b) (4) breeder hens from Missouri * 4/10/17: 223 out of (b) (4) breeder hens from Missouri * 4/26/17: 101 out of (b) (4) breeder hens from Missouri 5/15/17: 118 out of (b) (4) breeder hens from Missouri * 5/25/17: 106 out of (b) (4) breeder hens from Missouri On 5/25/17, a discussion with (b) (6) was held. I informed him of the above dates and DOA numbers. He notified me that he has observed that the majority of issues are from flocks slaughtered on a Monday, these have been marked with (*) on the list. We discussed updating the GCP paneling procedures and conducting training for semi-drivers. (b) (6) informed me</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					that he would look to modifying their scheduling due to time of loading and/or inclement weather forecast.
P7669	Turkey Valley Farms LLC	04C05	RZB270907 4125G	2017-07-25	<p>Est. 7669p Turkey Valley Farms, July 25th, 2017 At approximately 0820 hours, while performing a Good Commercial Practices verification task, I observed 1 out of 100 carcasses showing signs of consciousness (blinking eyes, open mouth breathing, raised head, and wing movement) proceed into the scalders. The final stunner located prior to the scalders was not operating. (b) (6) was present during this task and was immediately notified of my findings. At approximately 0900 hours (b) (6) notified me that the stunner was not working due to a wiring issue. At approximately 0905 hours an additional 100 bird check was performed and no further issues were observed. A similar Good Commercial Practices Memorandum of Interview (MOI) was documented on 7/21/17; MOI RZB5410072721G, titled Good Commercial Practices. At this time, the final stunner was not functioning properly. The corrective actions were either not effective or not implemented properly to prevent recurrence.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7903	Perdue Foods, LLC	04C05	UYN36080 93528G	2017-09-28	<p>At about 0955 on September 26, 2017, I was in the rehang area and observed a cadaver on the line 1 rehang conveyor belt. I demonstrated the cadaver to a supervisor. I continued to observe the area and saw more cadavers on line (b) (4). Before the birds go through the head puller on line (b) (4), I picked off the line (b) (4) cadavers with bloody heads and no neck cuts and a cadaver with a bloody head and a poor cut right below the jaw. The birds were demonstrated to (b) (6) and (b) (6). I went to the line (b) cutting blade and verified that a back up cutter was stationed there. I returned to the rehang area and pointed out two additional cadavers with bloody heads and poor neck cuts to (b) (6). (b) (6) informed me that he went to the line (b) cutting blade and replaced the back up cutter with another person. Since I observed the first cadaver on the line 1 conveyor belt and not on a shackle, it is possible that cadaver did not originate from line 1. That cadaver could have potentially come from line (b) (4). The plant utilizes large blue containers to temporarily store out of flow birds. When the plant employees have the opportunity to address the out of flow birds, they will throw them on any of the three rehang conveyor belts. The first cadaver could have been an out of flow bird from line (b) (4) that was temporarily placed in a blue container and then tossed on the line 1 rehang conveyor belt to be hung on line 1. At about 1330 at the change of shift, I performed a GCP task. In the DOA hopper, there was a pile of several DOAs and debris. I observed the head of a live chicken sticking out of the pile. There were a couple of DOAs on top of it. I tried to find a supervisor in the immediate area but could not locate one. I went to the truck area and called over one of the plant employees who works in the area, and I demonstrated the bird to him. He left to find a supervisor. I dug the bird out of the pile. (b) (6) came to the area. I showed him the bird and told him I found it in the pile of DOAs. At this plant, DOAs are placed on the DOA conveyor belts by the lines. These conveyor belts deposit the DOAs into the DOA hopper. A conveyor belt runs from the DOA hopper to a truck outside. These belts are turned on manually by a plant employee. They do not constantly run. A plant employee is supposed to check the DOA belts periodically and remove any live birds that mistakenly get on there. This is meant to prevent</p>



**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>live birds from reaching the DOA hopper. Before the DOAs in the hopper are transported to the truck, another person checks and counts the DOAs. It is not written in the plant's animal welfare program exactly how frequently a person checks the DOA belts and hopper for live birds. Since there was no way for me to be sure when the DOA hopper would be checked next, I do not know how long it would have been before someone found the bird.</p> <p>FSIS reminds the plant that it is their responsibility to ensure the birds are handled in a manner that minimizes excitement, discomfort, and accidental injury. FSIS encourages establishments to develop and implement a systematic approach to ensuring poultry presented for slaughter are treated in a humane manner. The initial component of the approach is to assess the areas where problems may occur. The second component asks that establishments determine if their facilities are designed and maintained to prevent excitement, discomfort, and accidental injury to poultry the entire time that live poultry are held in connection with slaughter. Finally, establishments should periodically evaluate their handling methods to ensure that their employees are treating animals in a manner that minimizes injury, excitement and discomfort prior to slaughter and that their methods ensure all poultry are slaughtered in accordance with 9 CFR 381.65(b). The establishment is reminded that NRs for noncompliance with 381.65(b) and MOIs for GCPs when finalized are posted for public review on the FSIS website and that the information associated with NRs and GCPs can be FOIA requested by individuals from the general public. The establishment is also reminded that establishments with PHIS access can respond to the MOIs and NRs in PHIS by using the response tab. Copies of this Memorandum of Interview (MOI) will be distributed to the establishment, inspection file and District Veterinary Medical Specialist per FSIS Directive 6100.3.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P7987	Amick Farms, LLC	04C05	QKA41220 10204G	2017-01-04	<p>During the morning of 1/4/17, shortly after 0500, I was observing the treatment of live birds in the live hang area. There were a large number of live and dead birds under the live hanging table and around the room. I observed a large pile of birds (50+) near the line where the establishment hangs dead birds before removing their heads and placing the birds in condemn barrels. I observed that a bird at the top of the pile was still weakly breathing. Given the unusually large number of birds in the pile and the presence of a live bird, I was concerned about the presence of more live birds in the pile. I went to the production office and asked (b) (6) to meet me in the live hang area. I showed him the large pile of birds and the live bird on top of the pile. He had establishment employees start to hang the birds on the condemn line. As he searched the pile, he pulled out a live bird that was being suffocated and returned it to the live hanging table. At that point, I explained to him the establishment has to ensure that live birds are not buried under a pile of dead birds. I also showed him a live bird on an enclosed table where dead birds were starting to pile on top of it. At the end of the live hanging line, there is a short belt that transports birds to a table. Live and dead birds can end up on the belt and table; however, establishment employees should check the table frequently enough to prevent live birds from getting buried. The establishment is reminded that poultry must be slaughtered in accordance with good commercial practices. Poultry that die from causes other than slaughter are considered adulterated and must be condemned. Employing humane methods of handling and slaughter reduces the likelihood of producing adulterated product.</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P8289	Reichardt Duck Farm, Inc.	04C05	XKC511709 2321G	2017-09-21	<p>At approximately 1010 hours on 9/20/2017 at Est. 8289 while performing the Good Commercial Practices task I observed that only one employee was livehanging ducks on shackles. On several occasions the employee attempted to shackle two ducks at a time causing ducks to be left hanging with only one leg in the shackle. I observed the ducks suspended by one leg flap their wings and attempt to right themselves. This practice could lead to broken, disjointed legs and unnecessary discomfort to the ducks. I immediately instructed the employee to cease livehanging and requested to speak with establishment management. (b) (6) arrived and I explained the situation to him and he spoke with the plant employee. Normal hanging of the ducks resumed at approximately 1015. It is the establishment's responsibility to handle ducks in a manner as to minimize excitement, discomfort, and accidental injury the entire time that live poultry is held in connection with slaughter and not mistreating birds or handling them in a way that will cause death, injury, prevent thorough bleeding or result in excessive bruising.</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P843	Pilgrims Pride	04C05	PZA551101 2231G	2017-01-31	<p>At approximately 0730 hours, while giving USDA breaks, I was presented a small chicken that was a cadaver. Upon closer observation, I noticed that although there was a cut on the side of the neck, the cut was very shallow. Only the skin was cut. The subcutaneous tissue and underlying blood vessel were not cut. I immediately informed (b) (6) of my findings. She immediately went back to the Kill Room to investigate. At 1145 hours, I held a meeting with (b) (6). I reminded him that we have had two other incidences of live chickens entering the scalders last week. No other cadavers were observed the rest of the shift. I also reminded him that this is in violation of 9CFR381.65(b). Below is a list Poultry Good Commercial Practices MOIs that have been written in the last year.</p> <p>4/28/2016 PZA5606041228G Live bird entering the scalders  4/29/2016 PZA2105045629G Live bird entering the scalders  7/19/2016 PZA2403074819G Live bird seen entering the scalders  8/8/2016 PZA3313080908 G Cadavers 9/7/2016  PZA5703090907G Live bird seen entering the scalders  10/26/2016 PZA4101100526G Three live birds approaching the scalders with no visible cuts to their neck. 12/20/2016  PZA4610120320G Cadavers No cut on necks 12/21/2016  PZA1416121021G Cadavers Bad cuts 1/18/2017  PZA1210015018G Live Bird entering the scalders 1/18/2017  PZA1507010418G Live Bird entering the scalders 1/25/2017  PZA5813012225G Live Bird entering the scalders 1/28/2017  PZA5813012225G for a breathing bird seen entering the scalders</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P843	Pilgrims Pride	04C05	PZA161302 0801G	2017-02-01	<p>On 01 February 2017 at 1345 hours, while performing a follow-up inspection of live birds entering the scalders. I observed 1 live bird on the kill line just before entering the scalding tanks. The eyes were open and bird was trying to right itself and vocalizing with no visible cut to the neck. The bird was removed from the line for observation by plant management. (b) (6) and (b) (6) were both notified. Plant management was also notified that the Poultry Product Inspection Act (PPIA) and Agency regulations require that live poultry be handled and slaughtered in a manner consistent with good commercial practices (GCPs), and that they not die from causes other than approved slaughter methods. Per the regulation 9CFR 381.65 (b), Poultry must be slaughtered in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. Further planned actions have been ineffective in preventing recurrence. This trend has been documented in recent months in the following Poultry Good Commercial Practices MOIs: PZA5511012231G on 1/31/2017 for a cadaver bird. PZA2410014531G on 1/31/2017 for a breathing bird seen entering the scalders. PZA5813012225G on 1/28/2017 for a breathing bird seen entering the scalders. PZA1210015018G on 1/18/2017 for a breathing bird seen entering the scalders. PZA1507010418G on 1/18/2017 for a breathing bird seen entering the scalders. PZA2403074819G on 7/19/2016 for a breathing bird seen entering the scalders. PZA5703090907G on 9/7/2016 for a breathing bird seen entering the scalders. PZA4101100526G on 10/26/2016 for three breathing birds approaching the scalders with no visible cuts to their neck.</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P843	Pilgrims Pride	04C05	PZA111303 4428G	2017-03-28	<p>On 28 March 2017 at 0745 hours, after finishing giving Inspector breaks. I observed one bird on the evisceration line with the head still on the bird and the throat was not cut indicating a live bird entering the scalding. At 0800 hrs. while observing birds entering the scalding I observed one bird entering the scalding the eyes were open and bird was trying to right itself and vocalizing with no visible cut to the neck. The bird was removed from the line for observation by plant management. (b) (6) and (b) (6) were both notified. Plant management was also notified that the Poultry Product Inspection Act (PPIA) and Agency regulations require that live poultry be handled and slaughtered in a manner consistent with good commercial practices (GCPs), and that they not die from causes other than approved slaughter methods. Per the regulation 9CFR 381.65 (b), Poultry must be slaughtered in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. Further planned actions have been ineffective in preventing recurrence. This trend has been documented in recent months in the following Poultry Good Commercial Practices MOI's: PZA1613020801G on 2/1/2017 for a cadaver and breathing bird entering scalding. PZA5511012231G on 1/31/2017 for a cadaver bird. PZA2410014531G on 1/31/2017 for a breathing bird seen entering the scalding. PZA5813012225G on 1/28/2017 for a breathing bird seen entering the scalding. PZA1210015018G on 1/18/2017 for a breathing bird seen entering the scalding. PZA1507010418G on 1/18/2017 for a breathing bird seen entering the scalding. PZA2403074819G on 7/19/2016 for a breathing bird seen entering the scalding. PZA5703090907G on 9/7/2016 for a breathing bird seen entering the scalding. PZA4101100526G on 10/26/2016 for three breathing birds approaching the scalding with no visible cuts to their neck</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P855	Pilgrim's Pride Corporation	04C05	FDA53230 43327G	2017-04-27	<p>Est. P855, Pilgrims Corporation, USDA Office, April 27, 2017, 10:47 PM. In attendance: (b) (6)</p> <p>(b) (6)</p> <p>On 4/27/17 at approximately 2:30 AM during the performance of a routine SPS task I (b) (6) observed a pile of commingled live and dead birds at the doorway to the live hang room on the L1 side, piled several birds high and approximately 6x6 feet in area. It did not appear the live birds were being smothered or suffocated, although they were unable to move around freely. (b) (6) was picking up and throwing away dead birds. I left and attempted to find (b) (6) to notify her of the situation. I was unable to locate her and decided to check the L2 side of the live hang room. At approximately 2:40, (b) (6) observed birds being piled too high in the dumper cages, to the extent that birds were nearly touching the top of the cages. She informed (b) (6) of this and at that time observed the pile of birds on the floor on live hang Line 1. She left to inform (b) (6) of this Good Commercial Practice violation. At approximately 2:41 AM I observed another much more extensive pile of commingled live and dead birds on the Line 2 side of the live hang area, several birds high and extending from the wall on the right all the way to the entrance to the door. I observed breathing live birds in the pile underneath dead birds. Their breathing appeared labored and difficult. While I did not observe suffocated cyanotic birds, the amount of dead birds in the pile was so excessive as to create the potential conditions that lend themselves to smothering and/or suffocation. There were no establishment employees picking up birds on this side. At 2:42 AM I took immediate regulatory control action and informed (b) (6) that they would need to stop hanging on Line 2 until the situation was corrected and the birds were picked up off of the floor. Hanging was stopped and live birds were sorted from dead birds, which were thrown away. I observed incidents in which two undersized birds were picked up from above, being grabbed over the wings and neck area with a single hand instead of by the leg and then tossed onto the belt. I informed (b) (6) of these incidents at this time. Once the birds were picked up off the floor and humane conditions restored I released the line at approximately 2:47 AM. Inspection stated that while (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>(b) (6) was in the process of picking up the dead birds, the fact that the birds were piled up to the point of commingling dead and live birds is an indicator that the process is out of control. Employing humane methods of handling consistent with Good Commercial Practice can help produce unadulterated product. Plant Response (b) (6) stated that while they want to keep the lines full, humane handling procedures and good commercial practices are a priority. He stated that there is usually a person assigned to pick dead birds off the floor but they have had issues with staffing. (b) (6) has been instructed that when shorthanded hangers should be pulled off of the line to pick up dead birds. The proposed corrective action is to add an additional responsibility to the SSOP for live hangers. Live hangers already rotate positions on the hanging line (b) (4), wherein the first hanger on the line rotates to the last position. The proposed modification for the SSOP would add a responsibility to pick up dead birds off of the floor during the rotation before returning to the line. This modification will require corporate approval to become formalized but the establishment has already implemented this procedure within the live hang department. With regard to the mishandling of the undersized birds, (b) (6) stated that he did not believe that the birds were being mishandled, as they were not grabbed by the wings or necks themselves. He made available the Pilgrims Corporation Animal Welfare Procedures Training, 2016 Revision.</p>



EstNbr	EstName	Task_Code	MOI#	Date	Description
P9197	Perdue Foods, LLC.	04C05	UAB59120 43612G	2017-04-12	<p>At approximately 0845 hours while performing Good Commercial Practices (GCPs) with (b) (6); in the live hang room we observed an establishment's associate throw one live bird from the floor onto the incoming conveyor belt. Unfortunately, I was unable to stop the employee from throwing the bird; however I discussed with the associate not to throw birds onto the conveyor belt. I was unable to determine if the bird suffered any ill effects. I notified (b) (6) and (b) (6) of the issue. (b) (6) counseled the employee on humanely handling birds according to the establishment's poultry welfare procedures. At approximately 1030 hours, (b) (6) performed a follow-up GCPs task and she observed an establishment's associate pick up ten live birds and properly placed them on the conveyor belt. A copy of this compliant has been sent to the (b) (6) and (b) (6).</p>
P935	Allen Harim Foods, LLC.	04C05	YXA081702 1120G	2017-02-20	<p>On February 20, 2017 at approximately 1705 hours while performing Good Commercial Practice (GCP) Verification I observed one live bird on top of the approximate 50 DOAs pile located on the stainless steel table at the end of the large bird live hang line. An establishment employee was removing the DOAs from the stainless steel table when a second live bird was uncovered at the bottom of the pile. Agency regulations require that live poultry be handled in a manner that is consistent with GCPs and that they not to die from causes other than slaughter. (b) (6) was notified of the possible suffocation of the live birds in the pile of DOAs and that this MOI would be forthcoming. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6) Allen Harim Foods, P-935 Harbeson, DE. 19951</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA551604 3613G	2017-04-13	<p>At approximately 1437 hours inspection personnel on line 1, station 2 and station 3 notified me that they held back 1 carcass each for final disposition. Upon examination I observed the skin and neck of both carcasses to be cherry red and petechiation of the breast muscles. The carcasses were condemned and documented as cadavers. (b) (6) was notified and observed the cadavers. (b) (6) had establishment personnel make adjustments to the kill blade. At approximately 1600 hours while traveling to line 1, to provide inspection breaks, the inspector at station 2 notified me of 2 carcasses and the inspector at station 3 notified me of 1 carcass being held for final disposition. Upon Examination I observed the skin and neck of the 3 carcasses to be cherry red and petechiation of the breast muscles. The carcasses were condemned and documented as cadavers. At approximately 1650 hours the inspectors on line 1, station 2 and station 3 notified me of 2 additional carcasses (1 at each station) being held for final disposition. Upon examination I observed the skin and neck to be cherry red and petechiation of the breast muscles of both carcasses. These carcasses were condemned and documented as cadavers. I then went to the kill line to investigate further. The establishment's back-up kill employee on the large bird line was having trouble keeping up with the number of birds that were missing the kill blade. I then traveled further down the kill line where an additional back-up kill employee is usually stationed however; there was no employee in place. As I was observing the birds moving down the line, I observed 1 bird with its head raised and eyes blinking, which had missed the kill blade and the back-up kill employee had also failed to exsanguinate the bird. (b) (6) appeared beside me and I showed him the live bird traveling toward the scalders. (b) (6) and I went to the entrance of the scalders. When the live bird appeared (b) (6) attempted to remove the bird but was unable to unseat its legs from the shackles. (b) (6) called over the radio for the line to be stopped however the live bird was partially submerged into the scalders as the line stopped. (b) (6) removed the bird from the line plus an additional live bird (head raised, eyes open and blinking and no cut to the neck) that had not entered the scalders. I notified (b) (6) and (b) (6)</p>

EstNbr	EstName	Task_Code	MOI#	Date	Description
					<p>(b) (6) of the cadavers observed at post mortem inspection and the observation of a live bird entering the scalders. In response, management replaced the back-up kill personnel and added an extra back-up kill employee to the large bird kill line. At approximately 1800 hours (start of lunch break), inspection personnel on line 1, station 2 and station 4 notified me that they held back 1 carcass each for final disposition. Upon Examination I observed the skin and neck of the station 2 carcass to be cherry red and the carcass at station 4 body, neck and head were cherry red with no cut to the neck. These 2 cadavers were identified during the time that establishment management was initiating corrective measure for the live bird entering the scalders. At approximately 1900 hours I returned to the kill line and verified that the corrective measure was in place. No live birds were observed entering the scalders. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>Allen Harim Foods, P-935 Harbeson, DE. 19951</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA181704 3114G	2017-04-14	<p>At approximately 2145 hours while performing Good Commercial Practice (GCP) verification I observed a live hang employee, on the small bird live hang line, pick a live bird up, hold the bird with one hand by the hips and throw it toward a shackle. The bird's right hock landed in the shackle while the left hock and leg remained dangling. (b) (6)</p> <p>(b) (6) was notified of the mistreatment of the live bird during shackling. The live hang employee was immediately removed from the live hang area. (b) (6) stated that the employee was disciplined and all live hang employees will be re-trained on humane handling. It is recommended that establishment management review the Federal Register (attached) on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>(b) (6) Allen Harim Foods, P-935 Harbeson, DE. 19951</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA501605 0119G	2017-05-19	<p>At approximately 1718 hours while performing Good Commercial Practice verification I observed that there was no denaturant on the birds in the DOA bin. I removed several birds off the top and noticed that there were a couple of layers of DOAs that did not have a denaturant. (b) (6)</p> <p>(b) (6) came over to the DOA bin and as we were moving DOAs around in the bin, a few of them were moving. Upon investigation, a live bird was found buried under approximately 4 DOA birds. I then traveled outside to the dumping station and observed a trailer of live birds stationed in the direct sunlight, with no fans or misters. The outside temperature was approximately 87 degrees Fahrenheit. (b) (6)</p> <p>(b) (6) and (b) (6) were notified of the possible suffocation of the live bird in the DOA bin and the mishandling of birds that could cause death prior to slaughter. Two “fire fans” were placed beside the trailer to cool the birds. It is recommended that the establishment management review the Federal Register (attached) on “Treatment of Live Poultry before Slaughter”, published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. I notified (b) (6)</p> <p>(b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>(b) (6) Allen Harim Foods, P-935 Harbeson, DE. 19951</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA581805 4323G	2017-05-23	<p>At approximately 1953 hours while verifying Good Commercial Practice in the cage dump area, I observed 3 live birds under the small bird dump station. I continued outside to perform antemortem inspection of the live birds in the trailers. Upon my return I observed an establishment employee gathering the loose live birds under the dumping station and tossing them over the stainless steel wall of the live hang belt and onto the belt that transfers the live birds into the facility. While catching the last bird the employee grabbed and carried the live bird by the head and neck then tossed the live bird over the stainless steel wall of the live hang belt and onto the belt that transfers the live birds into the facility. This stainless steel wall is approximately 7 to 8 feet off the ground. (b) (6)</p> <p>(b) (6) was notified of the mistreatment of birds and advises the establishment that preventing mistreatment of poultry decreases the production of adulterated carcasses. It is recommended that the establishment management review the Federal Register (attached) on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>Respectfully, (b) (6) Allen Harim Foods, P-935 Harbeson, DE. 19951</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA0710063923G	2017-06-23	<p>June 23, 2017 Subject: Memorandum of Interview</p> <p>Mistreatment of live poultry A meeting was held in USDA office at P-935 on Friday June 23, 2017 at 1210 hours with (b) (6) ) concerning the following Good Commercial Practices: On Friday June 23, 2017, one of the Inspectors on Evisceration Line 1 Station # 3 called me for Veterinary disposition. Upon examination of carcass, I observed that head of the carcass was intact with no cut on neck veins. The facial area was swollen; skin around the neck area was purple in color while rest of the carcass was bright red in color. The carcass was condemned and documented as cadaver. (b) (6) was immediately notified of the finding. The Poultry Products Inspection Act (PPIA) and the agency regulations do require that poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of carcasses and ensure that breathing has stopped prior to scalding so that birds do not drown or die other than slaughter. It is the Agency's expectations that all Good Commercial Practices be correctly and effectively implemented. (b) (6) told me that back up killers will get write up as per establishment policy and an additional back up killer was placed on Kill line 1. (b) (6) assured USDA that the matter would be resolved. A copy of this Memorandum of Interview will be forwarded to Front Line Supervisor (FLS) in case additional follow-up is recommended and a copy will be placed in the official USDA file. Please feel free to contact me with any questions or concerns. Sincerely, (b) (6)</p>

**Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.**

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA311807 1803G	2017-07-03	<p>On July 3, 2017 at approximately 1705 hours while performing Good Commercial Practice (GCP) Verification I observed approximate 36 DOAs piled on the stainless steel table at the end of the large bird live hang line. Upon further investigation I uncovered 3 live birds buried in the pile of DOAs. Agency regulations require that live poultry be handled in a manner that is consistent with GCPs and that they not die from causes other than slaughter. (b) (6) was notified of the possible suffocation of the live birds in the pile of DOAs and that this MOI would be forthcoming. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>Allen Harim Foods, P-935 Harbeson, DE. 19951</p>



Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA0809070126G	2017-07-26	<p>From: (b) (6) . Date: 07/26/2017 Subject: Poultry Good Commercial Practice/ Meeting Date: 07/26/2017 Meeting Time : 6.45 Am Establishment: P 935 – Allen Harim Foods, LLC Comments: To: Mr. Kevin Gordon, Plant Manager. CC: (b) (6) . This memorandum of interview serves as written notification of occurrence of one Cadaver found on USDA inspection station today July 26, 2017. At approximately 6.45am FI identified a cadaver on line station 4. She held that carcass for Veterinary disposition and notified me accordingly. Upon arriving at her station I observed that the head of the carcass is intact with no bleeding cut on the neck. The facial area was swollen; skin around the neck was purple in color while the rest of the body of the carcass was bright red in color. (b) (6) was immediately notified of my findings. He assured me to take proper measures to prevent recurrence. The Poultry Products Inspection act (PPIA) and the agency regulations do require that poultry must be slaughtered in accordance with good commercial practices in manner that will result in thorough bleeding of carcass and ensure that breathing was stopped prior to scalding, so that birds do not drown or die other than slaughter. It is the agency expectation that all Good Commercial Practices be correctly and effectively implemented. The copy of this Memorandum will be forwarded to Front Line Supervisor (FLS) in case additional follow up is recommended. A copy will be placed in the official USDA file. Please feel free to contact me with any question or concern. Sincerely. (b) (6) CC: (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA5513083429G	2017-08-29	<p>This memorandum of interview serves as written notification of occurrence of three Cadaver found on USDA inspection station today August 28, 2017. At approximately 8.35am FI identified a cadaver on line (b) (6) station 1. She held that carcass for Veterinary disposition and notified me accordingly. Upon arriving at her station I observed that the head of the carcass is intact with no bleeding cut on the neck. The facial area was swollen; skin around the neck was purple in color while the rest of the body of the carcass was bright red in color. (b) (6)</p> <p>(b) (6) was Present notified of my findings. He assured me to take proper measures to prevent recurrence. On the same line at about 11.00 two other birds were observed with the head intact, no bleeding cut on the neck, the facial area was swollen skin around the neck was purple in color and carcasses were bright in color. (b) (6)</p> <p>(b) (6) assured me to take action and fix the problem. The Poultry Products Inspection act (PPIA) and the agency regulations do require that poultry must be slaughtered in accordance with good commercial practices in manner that will result in thorough bleeding of carcass and ensure that breathing was stopped prior to scalding, so that birds do not drown or die other than slaughter. It is the agency expectation that all Good Commercial Practices be correctly and effectively implemented. The copy of this Memorandum will be forwarded to Front Line Supervisor (FLS) in case additional follow up is recommended. A copy will be placed in the official USDA file. Please feel free to contact me with any question or concern. Sincerely. (b) (6)</p> <p>(b) (6) CC: (b) (6)</p>

Table:Memorandums of Interview (MOIs) in response to FOIA 2018-00062.

EstNbr	EstName	Task_Code	MOI#	Date	Description
P935	Allen Harim Foods, LLC.	04C05	YXA061809 2121G	2017-09-21	<p>At approximately 1920 hours, while performing ante-mortem and Good Commercial Practice (GMP) verification on the carry over birds, in the holding shed and in the yard, I observed the following: One carcass on the ground in front of trailer #63 in the second bay of the holding shed. This carcass was flat and had a tire mark down the middle of the body. Agency regulations require that live poultry be handled in a manner that is consistent with GCPs and that they not die from causes other than slaughter. Upon further investigation I observed two (2) loose live birds on the ground and six (6) loose live birds on the floor of three (3) trailers, between the coops. These loose live birds were located in the cooling shed and the yard which is in a high traffic area where incoming and outgoing trucks travel thus creating the potential for birds to become injured or die from causes other than slaughter. (b) (6)</p> <p>(b) (6) was notified of the potential for birds to become injured or die from causes other than slaughter. All loose live birds were placed in coops and all doors were secured. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. (b) (6) was notified that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6) Allen Harim Foods, LLC. P-935 Harbeson, DE. 19951</p>

**Enforcement Actions for GCP from 01/01/2017-09/30/2017(source:09/11/2017)**

Date	Aer__	District	Establishment_Number	Establishment_ID
21-Jun-17	15-17-GCP074	15	M44932	32101
26-Apr-17	50-17-GCP062	50	P15724	20791
18-Apr-17	05-17-GCP061	05		284690
27-Apr-17	15-17-GCP060	15	M9230	25167
10-Mar-17	15-17-GCP053	15	P6058	25089
21-Jun-17	90-17-GCP069	90	P20322	23842
13-Apr-17	90-17-GCP055	90	P20245	20897
24-Feb-17	15-17-GCP052	15	P6164A	25095
24-May-17	50-17-GCP063	50	P34287	28079
7-Jun-17	90-17-GCP065	90	P509	23457
22-Jun-17	90-17-GCP070	90	P6529	23511
25-Jan-17	90-17-GCP051	90	P308	23384
27-Apr-17	90-17-GCP059	90	P1307	23479
31-Jul-17	90-17-GCP072	90	P40345	20395
24-Jan-17	90-17-GCP049	90	P6510	23416
31-Aug-17	90-17-GCP078	90	P6616	23417
29-Aug-17	90-17-GCP076	90	P890	23477
26-Apr-17	90-17-GCP058	90	P6504	23397
11-Apr-17	90-17-GCP054	90	P19112	20860
12-Sep-17	90-17-GCP080	90	P17340	20812
7-Jun-17	90-17-GCP067	90	P6638	23418
5-Jan-17	90-17-GCP042	90	P192	23401
3-Jan-17	90-17-GCP040	90	P17500	23438
7-Mar-17	50-17-GCP056	50	P39	21207
31-Jul-17	90-17-GCP073	90	P27427	28313
15-Sep-17	90-17-GCP083	90	P18557	23441
18-Jan-17	90-17-GCP046	90	P18557	23441
14-Sep-17	90-17-GCP082	90	P247	23472
19-Jan-17	90-17-GCP047	90	P247	23472
20-Jan-17	90-17-GCP048	90	P522	23391
13-Sep-17	90-17-GCP081	90	P522	23391
25-Jan-17	90-17-GCP050	90	P164	23453
26-Jul-17	90-17-GCP071	90	P6651	23400
28-Aug-17	90-17-GCP075	90	P758	23411
11-Sep-17	90-17-GCP079	90	P19514	20874
6-Jan-17	90-17-GCP043	90	P559	23392
9-Jan-17	90-17-GCP045	90	P6	23382
30-Aug-17	90-17-GCP077	90	P33833	27528
4-Jan-17	90-17-GCP041	90	P1235	23413
7-Jun-17	90-17-GCP066	90	P7485	23429
6-Jan-17	90-17-GCP044	90	P1317	23396

6-Jun-17	90-17-GCP064	90	P7342	23420
20-Jun-17	90-17-GCP068	90	P912	23394
15-Mar-17	50-17-GCP057	50	P1209	20590

PH_Establishment_ID	Establishment_Name	Size
123757	BelCampo Butchery	
2091	Case Farms of Ohio, Inc	S
	D Bar X Meats	
6112	Dayton Natural Meats, LLC	S
6025	Draper Valley Farms	S
4783	Equity Group Eufaula Div LLC	L
2197	Equity Group Kentucky Division, LLC	L
6036	Foster Poultry Farms	L
12731	Huisman's Poultry	V
4544	Koch Foods LLC	S
4595	Koch Foods of Alabama	L
4487	Koch Foods of Mississippi LLC	L
4567	Mar-Jac Poultry-AL	L
13933	Misty Lea Farm	V
4512	Peco Foods Inc	L
4513	Peco Foods of Mississippi	L
4562	Peco Foods, Inc Canton Division	L
4496	Peco Foods, Inc.	S
2160	Perdue Foods LLC -Cromwell Plant	L
2111	Pilgrim's	L
4514	Pilgrims Pride Corporation	L
4501	Pilgrims Pride Corporation	L
4526	Pilgrims's Pride Corporation	L
2477	Pine Manor Inc.	S
9450	SS Enterprises of Warren Co., Inc.	V
4530	Sanderson Farms, Inc.	L
4530	Sanderson Farms, Inc.	L
4554	Sanderson Farms, Inc. (Procesing Div)	L
4554	Sanderson Farms, Inc. (Procesing Div)	L
4490	Sanderson Farms, Inc. (Processing Div)	L
4490	Sanderson Farms, Inc. (Processing Div)	L
4538	Tyson Foods Inc	L
4499	Tyson Foods Inc.	L
4507	Tyson Foods, Inc	L
2173	Tyson Foods, Inc.	L
4491	Tyson Foods, Inc.	L
4485	Tyson Foods, Inc.	N
12540	Water Valley Poultry, LLC	S
4509	Wayne Farms LLC	L
4518	Wayne Farms LLC	L
4495	Wayne Farms LLC	L

4516 Wayne Farms LLC	L
4493 Wayne Farms, LLC	L
1914 Whitewater Processing Co.	S

Enforcement_Action_Type	comments	comments_type
Good Commercial Practice	Good Commercial Practices review	CIC
Good Commercial Practice	Routine GCP Visit	CIC
Good Commercial Practice	Custom Exempt Review	
Good Commercial Practice	Routine GCP review	CIC
Good Commercial Practice	Routine GCP visit	CIC
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit Report	
Good Commercial Practice	Routine GCP visit	CIC
Good Commercial Practice	Routine GCP Audit	CIC
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	CIC
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	CIC
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	CIC
Good Commercial Practice	Routine DVMS Verification Visit	CIC
Good Commercial Practice	Routine GCP Visit	CIC
Good Commercial Practice	Routine DVMS Verification Visit	
Good Commercial Practice	Routine DVMS Verification Visit	
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Good Commercial Practice  
Good Commercial Practice  
Good Commercial Practice

Routine DVMS Verification Visit  
Routine DVMS Verification Visit  
Routine GCP Visit

CIC

comments_text	Status_Code
	Closed
	Closed
	Open
	Closed
	Closed
	Open
	Open
	Closed
	Closed
	Open
	Open
Closing a "No Action" DVMS verification visit report	Closed
	Open
	Open
Closing "No Action" DVMS routine verification visit	Closed
	Open
	Open
	Open
	Open
	Open
	Open
Closing a "No Action" routine DVMS verification vis	Closed
Closing a No Action routine DVMS verification visit	Closed
	Closed
	Open
	Open
Closing a "No Action" routine DVMS Verification Vis	Closed
	Open
Closing a "No Action" DVMS verification Visit Repor	Closed
Closing a "No Action" DVMS routine verification vis	Closed
	Open
Closing a "No Action" DVMS routine verification vis	Closed
	Open
	Open
	Open
Closing a "No Action" routine verification visit repo	Closed
Closing a "No Action" routine DVMS verification vis	Closed
	Open
Closing a "No Action" routine DVMS verification vis	Closed
	Open
Closing a "No Action" routine DVMS verification vis	Closed

Open  
Open  
Closed