

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	M17250	Tyson Foods, Inc.	UQJ062201 4004G	04JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Friday, January 04, 2019 at approximately 2005 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 ^{(b) (4)} initially observed one average size bird, still breathing with no visible neck cuts, entering the scald vat. The bird was hanging normally with its head straight down blinking its eyes. I stopped the picking line as it reached the scalders because just as I spotted this bird there was another live bird approaching on the same line. I motioned for the backup killer to come and retrieve the birds that he missed and had a maintenance technician radio for the (b) (6)</p> <p>(b) (6) and (b) (6) arrived first and I shared my findings with them and later with (b) (6). After discussing my findings with management I performed an immediate retest at approximately 2011 hours; it passed. After management assessed the situation I had a brief discussion with (b) (6) about his assessment and his further planned actions. I informed him that I would be documenting a GCP MOI and forwarding it to the District Office and the District Veterinary Specialist in case additional follow-up is recommended. (b) (6) stated that he instructed his supervisors to increase their monitoring for the remainder of the shift. He also stated that he consulted with his (b) (6) about this occurrence. In addition he noted that there may be a lighting issue and that the team member will be disciplined for this occurrence. I returned to the same vantage point approximately 40 minutes later and observed line ^{(b) (4)} for 10 minutes; no deficiencies were noted. This incident appears to be isolated; no regulatory action was taken and a</p>

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								<p>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.</p> <p>Sincerely, (b) (6)</p> <p>cc (b) (6)</p> <p>Larry Davis, DVM - Jackson District Manager</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	M17250	Tyson Foods, Inc.	UQJ042101 3823G	23JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Wednesday, January 23, 2019 at approximately 1905 hours while performing a Good Commercial Practice verification after lunch break, I observed one live bird entering the scald tank on picking line ^{(b) (4)} the bird was of average size for birds slaughtered at this facility and was taking deep breaths rapidly while blinking its eyes. I took a regulatory control action and stopped picking line ^{(b) (4)} since this was a repetitive issue. Past similar issue occurred 2 weeks prior. I left my vantage point to find supervision and to notify them of this occurrence; Live receiving ^{(b) (6)} responded first. Upon her arrival I notified her of my findings and of this forthcoming MOI. A similar occurrence was documented on 1/4/2019 in MOI # UQJ2620010804I. After management assessed the situation I had a brief discussion with ^{(b) (6)} about his assessment and his further planned actions. I informed him that I would be documenting a GCP MOI and forwarding it to the District Office and the District Veterinary Specialist in case additional follow-up is recommended. ^{(b) (6)} stated that he instructed his supervisors to increase their monitoring for the remainder of the shift and the next 4 days. Past further planned actions were implemented but have proven to be ineffective. I performed a second verification for 10 more minutes at approximately 2110 hours; no deficiencies were noted. 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.</p>

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12:20 Thursday, March 28, 2019 4

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>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.</p> <p>Sincerely, (b) (6)</p> <p>[Redacted Signature]</p> <p>– Jackson District Manager</p>

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85	M17980	Pilgrim's Pride Corporation	ZBB541202 4706G	06FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0512 hours while observing operations in the Picking Room, I observed the following situation which resulted in mistreatment of poultry: There were two (2) cadaver birds coming down the Kill line. The birds were very red in color with the head and necks engorged with blood. As I observed the two birds coming down the line a plant employee removed the birds from the line after they had transferred at the auto rehanger from the Kill line to the Evisceration line. Those two birds were placed in the inedible barrel in the Picking Room. Less than a minute after that observation, there were three (3) more cadaver birds I observed coming down the Kill line and then transferred onto the Evisceration line. They were also very red in color with the heads and necks engorged with blood. Upon further examination of the birds, there was no cervical cut on the necks. After my observations, I immediately notified (b) (6) and showed her my findings. The birds were then placed in the USDA condemned containers. I then went and observed the Kill line for several minutes after to ensure birds were being properly cut to allow thorough bleeding and ensure breathing stopped prior to the birds entering the scalding tanks. According to regulatory requirement poultry are required to be slaughtered in a manner that is consistent with good commercial practices and in a manner that results in thorough bleeding to ensure that breathing has stopped prior to scalding. The establishment 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 (b) (6)</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M18866	Jennie-O Turkey Store Sales, LLC	WJL30180 32821G	21MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 11:15, while verifying good commercial practices in live hang, when trailer number 9905 was brought into the live hang bay I observed that there was one turkey with a hock and a wing pinched under the coop gate, second row down and first column forward, right behind the driver's side of the truck cab. As I looked closer, I also noted that the turkey was on its back. I noted that the turkey was still alive, as evidenced by intermittent struggling movements. The bird was unable to right itself, as the wing and hock were both firmly trapped under the coop gate, as if the loading personnel had closed the coop gate while the bird was on its back, with the two limbs still outside the coop. I notified (b) (6) [REDACTED] of my concern, and he said he would pass this concern on to the loading crew.</p>

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50	M2130	Cooper Farms Processing	HEF180201 3829G	29JAN2019	04C05	Poultry Good Commercial Practices	Finalized	On January 4th 2019 at approximately 3:40 AM, I, (b) (6), while performing antemortem inspection outside in the cooling sheds, observed a topmost rear trailer cage that was missing the door on the front of the cage, leaving an open space for turkeys to fall through. There were multiple live turkeys visible within the open cage. I also observed one live turkey that was loose directly beneath the open cage. There was a minor observable injury on the turkey's right claw (caudal digit) and a corresponding small amount of fresh blood on the concrete where the turkey had been standing. A live hang employee approached and caught the loose turkey, then placed the turkey in an intact cage on the trailer and covered the open cage by placing a board over the row of cages. The topmost trailer cages are not reachable without the aid of steps or a ladder and present a significant distance from these cages to the concrete floor of the cooling sheds. An incident similar to that documented above occurred one year prior on 1/02/2018 (see MOI #HEF3202013903I).
50	M2130	Cooper Farms Processing	HEF200201 5129G	29JAN2019	04C05	Poultry Good Commercial Practices	Finalized	At 3:15 AM on 1/16/2019 while returning from checking the trailers in the cooling shed, I, (b) (6), was passing through the live hang area where stunned turkeys are shackled on a conveyor belt (approximately 3-4 feet in height from the floor), and observed an employee push a stun failure (fully conscious turkey) off of the belt, causing the turkey to fall on the concrete floor on the opposite side of the belt from the employee, where another conscious turkey was also sitting on the floor. I spoke with (b) (6) about what I observed, and she said that she would speak with the employees in the live hang area. An SOP for proper handling of conscious birds was to have been newly implemented in December 2017.

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
05	M27389	Pitman Farms	NCO12140 14602G	02JAN2019	04C05	Poultry Good Commercial Practices	Open	<p>at 085hrs checked trailer at receiving area ---chickens at 0910hrs observation in live hang at approximately 1100hrs (b) (6) found trailer Lic.# 4LJ5260 had two damaged modules (PF-672 and PF-539). Upon closer inspection (b) (6) found what appeared to be chickens dead inside the modules and tagged the trailer with NO.B41202485. He informed (b) (6) of his findings. (b) (6) asked me to investigate this incident due to the fact I was performing the Poultry Good Commercial Practices task. I spoke with (b) (6) and requested that the two modules be set aside to allow closer inspection. After making my observations, I found two chickens with their heads smashed between the cage and the framework of the module. I found an additional dead carcass, but was unable to determine cause of death.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M32130	Dakota Provisions LLC	JEB060601 4608G	08JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. 32130, Dakota Provisions, 1/8/19, 0535 hours. Meeting Attendance: (b) (6) and (b) (6)</p> <p>On 1/8/19 at approximately 0515 hours while monitoring conditions in pick and hang, I noticed a bird on the line before the scalding that was arching his neck and trying to escape the shackles. I immediately stopped the line and informed plant personnel of the conscious bird about to enter the scalding. While I observed this bird on the line, he was able to arch his neck and blink his eyes. They grabbed a portable ladder and pulled the bird off the line. The bird had a superficial skin cut only. No major vessels were severed. The bird was then immediately relocated back on the line before the neck cutter to start the process over (b) (6) stated that the cages were not fully loaded so they might have been run too fast through the kill machine. He said they will place an employee before the neck cutter with the back up manual bolt stunner to effectively stun the birds that did not achieve unconsciousness from the kill machine. He said they will also have maintenance adjust the kill machine. The incident that took place is a concern due to the neck cut miss and its path straight to the scalding to drown, as it was still breathing and fully conscious. Employing humane methods of handling and slaughtering that are consistent with good commercial practices increase the likelihood of producing unadulterated product. Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcass and ensure that breathing has stopped prior to scalding. Stunning of poultry, when performed, is also expected to be done in a consistent and effective manner.</p>

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25	M32130	Dakota Provisions LLC	JEB081303 4004G	04MAR2019	04C05	Poultry Good Commercial Practices	Open	<p>Est. 32130, Dakota Provisions 3/4/19 1045 hours Meeting attendance: (b) (6) and (b) (6) At 0450 am while performing ante-mortem inspection, I observed trailer no. 26 that had just arrived and was missing a side panel. After a conversation with the driver, he stated that the cage had a bent bar which affected the installation of the panel. I also noted that trailer no. 14 and 24 were each missing panels. I notified (b) (6) manager, of my findings. Approximately 30 minutes later, (b) (6) and I went outside again to look at the trailers under the shed and noted the arrival of trailer No. 4. It was also missing a panel and the driver stated it was because the cage was in disrepair and one of the panel bars was missing completely. It was also noted at this time that trailer No. 11 was missing 2 panels. (b) (6) was again notified of the trailers not appropriately paneled for the current weather conditions. Two US Reject Tags were applied to the cages that needed maintenance on trailer #4 and #26. The ambient temperature was negative 4 degrees upon arrival to work. The establishment's written procedure for Good Commercial Practices state (b) (4) Trailers arriving with missing panels was previously discussed in a weekly meeting on Feb. 7th. At 10:45 am, a meeting was held with (b) (6) and (b) (6), of the items addressed above. The trailers I identified with panels missing were all from Lot 2. Lot 2 had 52 birds condemned at the inspection station as Cadavers. There were also 175 DOAs for Lot 2. Lot 2 had 11,206 birds total.</p>

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25	M322A	Pilgrim's Pride Corporation	CNC48110 23801G	01FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 1/29/19 I arrived in the live-hang area to perform routine ante-mortem inspection. All trailers were tarped to protect birds during transportation from wind and cold ambient temperatures. It was evident on ante-mortem inspection that there were several frozen birds on these trailers, as observed through lack of movement, as well as very cold, live birds. Large muscle portions like the breast musculature were frozen solid. Several birds had feet, feathers and wings frozen to the plastic drawers that hold the birds during transport in the mods. The establishment removed the mods from the truck trailer and opened the drawers in an effort to remove DOA birds to prevent their entrance into the facility. However, the concern is with the number of birds frozen upon arrival and at the time of slaughter. Inspection personnel perform observations in cold weather to identify birds frozen inside cages or to the cages themselves, to ensure birds are being handled in accordance with Good Commercial Practices. This issue was discussed with (b) (6) at 0700 when I noted the frozen birds. After reviewing the daily totals on this day, the establishment reported 1299 DOA birds out of a total count of 43966 birds (3%). The birds in the observed trailer above (#56) had arrived at the establishment at approximately 0123 hours but not enter the live hang area to be slaughtered until approximately 0700 hours. (b) (6) explained that unintended down time was the cause of the increased holding times. Subsequent production shifts were cancelled (the next two night shifts and two days shifts) due to the cold weather. The establishment is also looking into a redesign of the tarping system designed to protect the birds during transit. The trailers of birds are kept tarped in a non-temperature controlled building, which is enclosed on 3 sides while at the</p>

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								establishment prior to being presented for slaughter. The establishment does have a written program with regards to Good Commercial Practices, but does not have a copy of procedures to follow in the case of extreme cold weather. The temperature the night of transport of this trailer was -15 degrees Fahrenheit before wind chill was added.

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M322A	Pilgrim's Pride Corporation	CNC40030 35301G	01MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2330 hours on February 25, 2019, while observing conditions in the live hang and kill and pick areas, I observed a live chicken with its eyes open and head raised enter the scalding tank on line ^{(b) (4)} while still breathing. I informed ^{(b) (6)} of this finding. ^{(b) (6)} accompanied me back to the kill and pick room and we both observed a second live bird entering the scalding tank on line ^{(b) (4)} hile still breathing, with its head raised and looking at us with eyes open. ^{(b) (6)} attempted to remove the bird from the line before it entered the scalding tank, but could not get to it in time. There was only one backup killer stationed after the autoknife at this time. Prior to the incident, the CO2 stunner had not been working and there were awake birds being hung in live hang. The backup electrical stunner was raised and turned on, per protocol. ^{(b) (6)} said he would speak with the night shift live receiving supervisor about having a second backup killer stationed after the autoknife when the CO2 stunner was down. I reminded ^{(b) (6)} that the 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. Later in the shift, at approximately 0400 hours on February 26, 2019, there were again awake birds on line ^{(b) (4)} due to a problem with the CO2 stunner. I returned to the kill and pick room at that time and noted that ^{(b) (6)} was assisting the backup killer and two additional people were stationed prior to the autoknife on line ^{(b) (4)}. I also observed the entrance to the scalding tank for approximately 15 minutes, and did not note any conscious or breathing birds enter the scalding tank at that time. I notified ^{(b) (6)} that this MOI will be forwarded to the District Veterinary Medical Specialist (DVMS) in case</p>

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								additional follow-up is recommended. Sincerely, (b) (6) P322
60	M45134	Birdsboro Kosher Farms Corp.	FKJ440902 3921G	21FEB2019	04C05	Poultry Good Commercial Practices	Open	On Thursday 02/21/2019 at approximately 0710 hours while I was walking through killing Department with (b) (6), I opened one of the closets located at Rabbi's changing room and found two alive birds from previous day. (b) (6) was informed and placed the birds at a separate room and put water for them. Later they decided to condemn them by disarticulation (Break neck) The regulations, 9 CFR381.65(b), require that poultry must be slaughtered in accordance with Good Commercial Practices.. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	M45134	Birdsboro Kosher Farms Corp.	FKJ531402 2526G	26FEB2019	04C05	Poultry Good Commercial Practices	Open	<p>On February 26th while I and (b) (6) [REDACTED] Good Commercial Practice task, we observed a bird with non-Kosher bleeding cut to the neck was rejected by a plan employee in presence of a Rabbi. The rejected bird was put into an inedible barrel immediately while it was still alive. (b) (6) [REDACTED] was informed and immediately moved the bird to the individual bucket until stop breathing then moved it to condemn barrel. The regulations, 9 CFR 381.65(b), require that poultry be slaughtered in accordance with GCP and in a manner that ensures a thorough bleeding of the poultry carcass and that breathing has stopped before proceeding with the next step; the next step in this case was placement into an inedible barrel. Slaughter must result in thorough bleeding of the poultry carcass (9 CFR 381.65). Compliance with these requirements helps ensure that poultry are treated humanely. In general, poultry should be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Also, there was loose bird and was caught and put into cage immediately. Birdsboro Kosher must ensure that all poultry are slaughtered according to regulations, even if they are rejected as suitable as a Kosher product. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

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25	M4653A	Agri Star Meat and Poultry, LLC	HRJ330902 4101G	01FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Regarding GCPs for live turkey production on Wednesday, January 30, 1 (b) (6) made the following observations: -The temperature outside at the start of production was -28F with a wind chill of -50F (according to The Weather Channel and Weather Underground). The live dock where turkeys are unloaded is a three sided shed with no insulation. While the establishment placed several space heaters at the edges of the shed, these proved inadequate to increase the air temperature beyond a two foot radius (more and better heaters were added later in the day, improving general conditions). -Birds in trailers throughout the day were quiet, still, and huddled with heads down. Some birds were observed shivering. Mortality was slightly increased (13 vs. one or two normally) and birds were generally depressed. While rectal temperatures where not taken birds felt noticeably hypothermic. -Dumping mods are stored outside when not in use and several mods had accumulated several inches of snow and/or ice. This was not removed from the lower holes, and birds in mods were left standing on ice and snow for 30 minutes during the lunch break. Dumping was not witnessed so no observations were made as to whether birds were frozen to mods. (Management stated they would attend to this better in the future.) -While I spoke with management the previous day about the need to modify trailer movement to ensure live birds were not left sitting outside unprotected in trailers for extended periods, the rotation of the second and third trailers was done in a way that left a trailer of birds outside for about 10 minutes. The temperature at this time was -22F and wind chill was present. (Management stated this was due to one of the trucks freezing up, later rotations were changed to accommodate for this.) -In the kill room only the far line was being used, and a hole</p>

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								in the belt cover from the near line had not been covered over, resulting in birds standing up as the belt moved past and getting caught against the far side of the hole.
25	M4653A	Agri Star Meat and Poultry, LLC	HRJ400902 3513G	13FEB2019	04C05	Poultry Good Commercial Practices	Finalized	At approximately 1033 on 2/11/19 while walking through the poultry kill room I (b) (6) observed in the dead barrel at the far end of the room a live bird with dead birds on top of it. The bird was agonal and non-responsive, but still breathing. The lunch break had just started and no supervisor was in the immediate area. I showed the bird to (b) (6) and notified her of the issue. No other live birds in the dead barrel were observed that day.

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	M5842	Tyson Foods, Inc.	NPF41090 12410G	10JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>GCP Poultry Mistreatment MOI Day, Date and Time of Meeting: Wednesday 1/9/2019 from approximately 1055 to 1106 Place Meeting Held: Est. M5842 Live Haul Trailer Holding Area Persons Attending: FSIS Attendees -(b) (6) Tyson Foods Attendees -(b) (6)</p> <p>Author(s) of this Meeting Report: (b) (6) Date this Meeting Report was Written: Wednesday 1/9/2019 Subject: GCP Poultry Mistreatment MOI. Background concerning this Poultry Good Commercial Practice (GCP) Non-Regulatory Issue: On Wednesday 1/9/19 from 1030 to 1047 (CST) (b) (6) performed a station 5 Poultry Good Commercial Practices (GCP) PHIS task by observing live, large young chickens in cages on live haul trailers parked outside in the live haul trailer holding area at Est. M5842. At approximately 1034 during this check (b) (6) observed 1 live bird roosting in the space between adjacent stacks of trailer cage modules (there are usually 8 cages per module) on live haul trailer #91981. This young chicken appeared to be uninjured. (b) (6) looked for an open or damaged cage that this bird had egressed through. (b) (6) then observed 1 open cage door on the top row of cages, approximately 8' above bed/floor of this trailer, in this same space between the two adjacent stacked cage modules. He also observed 1 DOA carcass hanging out of this cage by its head, which appeared be trapped/caught at the inside bottom corner of this open cage door. (b) (6) surmised that this young chicken had got its head trapped/caught in the corner of this open cage before or as it egressed from this cage and eventually died hanging there. After observing this (b) (6) continued the station 5 check. This check was completed at 1047 with no more live</p>

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								<p>or dead young chickens observed out of the cages on the total of 7 live haul trailers observed during this station 5 check. Discussion notes for the meeting with Plant management on Wednesday 1/9/2019 from approximately 1055 to 1106 concerning this GCP poultry mistreatment incident: (b) (6) met with the establishment PM, QA Manager, HACCP Coordinator and shift 1 Evisceration GPM at live haul trailer #91981 from approximately 1055 to 1106 on Wednesday 1/9/2019 and showed them what he had observed at 1034 (above). In-plant IPP and plant management had already discussed the issue of open live haul cage doors observed in the live haul trailer holding area that had not resulted in apparent/observed injury to live birds on Saturday 1/5/19, Monday 1/7/19 and Tuesday 1/8/19. So, this issue of open live haul trailer cages had already been discussed with plant management and plant management was already addressing this issue with their live haul/grow out personnel when this incident occurred today. However, this was the first time in-plant IPP observed a live young chicken that appeared to have been harmed after or else while emerging from an unintentionally opened and/or damaged cage door on a live haul trailer at Est. M5842.</p>

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35	M5842	Tyson Foods, Inc.	NPF20170 21719G	19FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>GCP Poultry Mistreatment MOI Day, Date and Time of Meeting: Tuesday February 19, 2019, from approximately 1540 to 1547 (CST) Place Meeting Held: Est. M5842 APM Office Persons Attending: FSIS Attendees - (b) (6) . Tyson Foods Attendees - (b) (6)</p> <p>Author of this Meeting Report: (b) (6)</p> <p>Date this Meeting Report was Written: Tuesday 2/19/2019 Subject: GCP Poultry Mistreatment MOI. Background concerning this Poultry Good Commercial Practice (GCP) Non-Regulatory Issue: On Tuesday February 19, 2019, from 1430 to 1445hrs (CST) I performed a Poultry Good Commercial Practices (GCP) task by observing live chickens in cages on live haul trailers parked outside in the live haul trailer holding area at Est. P5842. At approximately 1442hrs during this check I observed 1 bird lying in the space between adjacent stacks of modules (there are usually 8 cages per module) on live haul trailer #91780. Upon closer inspection, this chicken was deceased. This check was completed at 1445hrs with no more live or dead young chickens observed out of the cages on the total of 6 live haul trailers observed during this GCP task. At this time, (b) (6) was brought to the trailer cooling shed and observed the bird described above. (b) (6) attempted to remove the bird, and the bird had had its head crushed under a module and had an open, dislocating cervical (neck) injury. It appeared that this chicken was loose on the trailer when the next module was loaded. Upon closer inspection, the module adjacent to the one next to this chicken had 1 cage with no door. In inspecting 4 previous trailers, each trailer had at least 2 cages missing doors completely, and I identified 2 cage doors that had severely bent corners and would</p>

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								<p>not close completely. Additionally, there was 1 cage on another trailer that the cage walls were severely damaged and potentially large enough for a chicken to get through. A similar incident occurred on January 9, 2019, when a chicken was found hanging by its neck from an open cage door. Discussion notes for the meeting with Plant management on Tuesday February 19, 2019 from approximately 1540 to 1547hrs concerning this GCP poultry mistreatment incident: I met with the establishment Plant Manager and shift 1 and 2 Assistant Plant Managers in the APM office from approximately 1540 to 1547hrs. The situation had already been explained to them by (b) (6). I explained my observations at 1442hrs (above). I explained that since our discussions on January 5-9, 2019 about open cage doors and module repair, that the situation has been greatly improved. Plant management intended to discuss this issue with their live haul/grow out personnel after this incident occurred today.</p>

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35	M7100	Tyson Foods, Inc.	ZHB442103 0618G	18MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. 07100P, Tyson Foods of Nashville, AR, March 18, 2019, 20:32 hours, In attendance: (b) (6)</p> <p>At approximately 20:25 hours, while walking around the unloading shed towards a trailer that was being unstrapped, to perform Ante Mortem on a trailer of Lot 4 birds, I observed (b) (6) establishment employee and terminal tractor driver, waving his arms and yelling at the forklift driver, who, I noticed, was lowering an empty cage onto a wildly flapping live bird. The cage was set down completely on the bird. As I ran toward the forklift, the forklift driver lifted the cage off of the now dead bird—it was not breathing or moving at that point. I summoned (b) (6) to notify him of this finding. I tagged the trailer US Rejected tag # B23639865 as I took a regulatory control action of preventing the forklift driver from removing the dead bird until (b) (6) arrived. I reminded (b) (6) and (b) (6), that the PPIA and Agency regulations 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 notified (b) (6) that this MOI will be forwarded to Springdale District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. (b) (6) stated that the forklift driver would be retrained in animal welfare. Respectfully (b) (6)</p> <p>07100P Tyson Foods of Nashville, AR</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M7345	Butterball, LLC	AGA11100 11628G	28JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Thursday, January 24, 2019, three truck loads of lay one breeder hens, flock "PT", were scheduled to be run as the last birds of the day (day shift hours are 0946-1816). Each truck contained 1040 hens. The trucks arrived at 1053, 1141, and 1242, respectively. I observed them at approximately 1400 and did not note any abnormalities. According to establishment paperwork provided, the hens went off feed on January 23, although they were still looking into what time. Due to mechanical issues with the chiller, the establishment was unable to run the hens that day (January 24) and elected to carry them over to the following day (January 25). Normally, when birds are carried over, they are run first thing on night shift (b) (4); however, night shift does not run breeder hens, so the establishment decided they would be run first on day shift on January 25 (see email from (b) (6), communicating this to me). While making GCP observations at 1420 on January 25, I observed that these three truck loads of hens were still on the yard and had not been run yet. I also observed an increased number of DOAs from the previous day and numerous hens with large, exposed wounds that the hens surrounding them were pecking into. Fresh blood was visible on the beaks of these birds and splashed onto surrounding feathers. In two cases, the hens had managed to peck open a wound and pull out intestines and were pecking at the intestines splayed out in the cage of two separate hens. The birds were seen aggressively pecking at each other and at the feces/eggs in the cages. At this point, the hens had been off feed for approximately two days and on the yard for 26-28 hours, and had not had access to feed or water during that time. According to Butterball's "Animal Care and Well-Being Program", (b) (4)</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>(b) (4)</p> <p>I immediately proceeded inside and found (b) (6). I expressed my concerns with the birds being held at the establishment for a greater length of time than normal and that it was communicated to me yesterday that these birds would be run first on day shift and still had not been run. He said there had been some miscommunication due to changes in management/staffing and that the decision was made to run the hens last on dayshift, with the new breeders that had come in today, based on ease of product flow through the establishment. I expressed my concerns to him that the birds were being held without access to food or water and bird welfare needed to be taken into consideration. The birds did not end up being run until starting at 1715, or 31 hours from their arrival at the establishment. According to paperwork submitted on January 28, there were 38 DOAs (1.2%). The "Animal Care and Well-Being Program" states (b) (4)</p> <p>A similar situation occurred in October 2016 following Hurricane Matthew where birds were off feed/water for 60 hours before being killed. It was documented at the time in a meeting MOI on October 27, 2016 that our recommendation was to look at different options if a similar situation arose and the establishment said that they would take each on a case-by-case basis.</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M737	House of Raeford - Wallace Div	DHA50100 24421G	21FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>During the DVMS GCP assessment on 02/20/2019, (b) (6) made the following observations: At the entrance to the scalders, (b) (6) observed birds that were not properly bled out and were still breathing just prior to entering the scalders. On Line 1, (b) (6) observed a bird as it approached the scalders. The bird was showing signs of being alive (breathing, eyes open, trying to lift itself up). An establishment employee who was accompanying the group also saw the bird and retrieved it from the line before it could enter the scald tank. Upon further examination, the bird was found to have no cut to its neck. On Line (b) (6) observed two (2) birds approaching the scalders. These birds appeared to be alive as evidenced by their breathing, having eyes open, and showing coordinated body movements. The establishment employee again was able to retrieve the birds from the line before they could enter the scald tank. Upon further examination, both birds were found to have cuts to their necks, but because they were still alive, the cuts were determined to be inadequate to facilitate proper bleeding. There was no other intervention procedure in place at the entrance to the scalders, so if the establishment employee had not been present to remove the birds from the line, these birds would have entered the scalders and would have died by means other than slaughter. During the Exit Meeting, (b) (6) reminded (b) (6) that the PPIA and Agency regulations 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. (b) (6) notified (b) (6) that his observations would be documented in a GCP MOI and this MOI will be retained to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M737	House of Raeford - Wallace Div	DHA39100 33720G	20MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Mr. Cowan Johnson, Plant Manager, P-737 House of Raeford Teachey, NC 28464: This MOI is being issued to document the observation of two live birds entering the scalding on 03/20/19. At approximately 0915 while performing a GCP, I observed two live birds entering the scalding. The birds at the time of my observation were side by side on the kill line, had normal rhythmic breathing, controlled head movement and eyes blinking. After further observations there was no evidence showing that the bird's neck had been cut after going through the stunner. I immediately stopped the line when the birds mentioned had reached the e-stop button which is located at the entrance of the scalding. At that time, a live hang employee came and removed the two live birds off the line and placed them in live hang to be rehung. At that time (b) (6) arrived and he was notified of my findings. (b) (6) was notified that the birds would have died by means other than slaughter therefore not-being in compliance 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". If you have any questions please review 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. Mr. Johnson this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist in case additional follow-up is recommended. If you have any questions or concerns regarding the above, please feel free to contact (b) (6), or (b) (6).</p> <p>Respectfully, (b) (6) P737</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M737	House of Raeford - Wallace Div	DHA13110 33228G	28MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>0818 - When going to performing a Good Commercial Practice check, I observed several cadavers in the red barrels with no cuts on the necks at the re-hangers on line (b) (4) t 0821 while performing the Good Commercial Practice task I, observed on Line (b) (4) a live bird with no cut on its neck as evidenced by their breathing, having eyes open, and showing coordinated body movements was about to enter the scalders. (b) (6) [REDACTED], who accompanied me when I did the task was able to retrieve the bird from the line before it could enter the scald tank. There was no other intervention procedure in place at the entrance to the scalders, so if the establishment employee had not been present to remove the birds from the line, the bird would have entered the scalders and would have died by means other than slaughter. (b) (6) [REDACTED], was notified of the MOI being issued. At 1145, (b) (6) [REDACTED] was performing a Good commercial Practice task on Line 1 and observed a one legger with no cut on its neck about to enter the scalders. The line was stopped to prevent the bird from drowning in the scalders and the bird was removed from the line by (b) (6) [REDACTED]. (b) (6) [REDACTED], was notified of the findings and of the MOI. There was no other intervention procedure in place at the entrance to the scalders, so if the establishment employee had not been present to remove the birds from the line, the bird would have entered the scalders and would have died by means other than slaughter. (b) (6) [REDACTED], was also notified of the findings. Agency Regulations require that live poultry should be slaughtered in a manner that is consistent with good commercial practices and that they should not die from means other than slaughter. Please refer to Federal Notice Volume 70, No. 187, published September 2005 [Docket</p>

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								No. 04-037N] for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6) [REDACTED], P-737 House of Raeford, Wallace Division
80	M7470	Mountaire Farms Inc. - NC Division	YRA232201 1610G	10JAN2019	04C05	Poultry Good Commercial Practices	Finalized	This memorandum of interview (MOI) is being issued to document what was observed and subsequently discussed with establishment management. At approximately 22:00 on 1-10-19 I witnessed an employee walk over to the DOA bin and use a red squeegee to move dead birds out the way so he could retrieve a live bird that was trapped under the dead birds in the DOA bin. After removing the live bird he then tossed the bird on the other side of the bin in an attempt to hide the bird from me. I then observed the bird and saw that it was alert and flapping its wings. I informed him of the violation then I went back to live hang and notified the (b) (6) [REDACTED] of my findings. His response was that he was going to go investigate. 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. A copy of this MOI will be forwarded to the district Veterinary Medical Specialist (DVMS) in the event additional follow-up is recommended. I certify this MOI contains a summary of all pertinent matters discussed.

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M751	Pitman Farms Inc. (Moroni Turkey Processing)	MMK0014 012710G	10JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Memorandum of Interview on Good Commercial Practices as Discussed in the weekly meeting on 1/10/19 Pitman Farms/Norbest Turkey / Est# P1049 Meeting Time: Thursday, January 10th, 2019 at 0900 Attendees: USDA</p> <p>(b) (6) [REDACTED] Establishment (b) (6) [REDACTED]</p> <p>This Memorandum of Interview is to document concerns with Good Commercial Practice Concerns as discussed during the weekly meeting with establishment management on January 10th, 2019. At the weekly meeting with establishment management I described my concerns about Good Commercial Practices because I had witnessed a live medium hen run over by a trailer on January 9th, 2019. This event occurred at approximately 9:45 am. The hen had gotten down between the two rows of rear tires on Trailer 82. There were about 4-5 other hens running around in the hanging bay at the same time and one employee who was trying to catch them. The hen was run over and killed by means other than humane slaughter when the trailer was pulled forward. At the weekly meeting I stated that one of my concerns is that I have noticed that there seem to be more loose birds running around in the hanging bay when they are slaughtering medium hens. (b) (6) [REDACTED] said that this has been addressed. I said that I recommend that the establishment train employees on how to perform cervical dislocation on the birds so that if they need to humanely kill a bird by means other than slaughter, they can. During the event described</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>on January 10th, the employee did not seem to know what to do or how to perform cervical dislocation. I performed cervical dislocation on the hen after she had been run over so that she wouldn't continue to suffer as she died. I stated that this isn't a federal requirement, but I would recommend considering training employees on how to humanely kill a bird if needed. (b) (6) should be able to help with this as part of a humane handling program. (b) (6) said that he plans to have both the security employees and the hangars trained in the event that they need to be able to humanely kill birds. (b) (6) also said that he will follow-up on this. This memorandum serves to document my findings on Good Commercial Practices and what was discussed. A copy of this Memorandum of Interview will be provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M751	Pitman Farms Inc. (Moroni Turkey Processing)	MMK3615 011117G	17JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Memorandum of Interview on Good Commercial Practices as Discussed in the weekly meeting on 1/17/19 Pitman Farms/Norbest Turkey / Est# P1049 Meeting Time: Thursday, January 17th, 2019 at 0900 Attendees: USDA</p> <p>(b) (6) Establishment (b) (6)</p> <p>This Memorandum of Interview is to document concerns with Good Commercial Practices as discussed during the weekly meeting with establishment management on January 17th, 2019. At the weekly meeting with establishment management I described my concerns about Good Commercial Practices. On two separate days I saw birds that had died after their heads were trapped between the side of the cage and the side of the cage door. On 1/11/19, I saw one hen in Trailer 79 who was dead with her head caught between the side of the cage and the side of the cage door. She had a freshly bleeding and torn wing, evidencing her struggle after the door was closed on her. Another hen in Trailer 81 had had the cage door closed on top of her head and one wing. She was also dead on ante-mortem exam. On this day there were 4 other birds with their legs or feet caught under cage doors. These legs and feet were bloody and bruised. On 1/14/19, I saw two hens in trailer 82 that had died after their heads were caught between the side of the cage and the side of the cage door. In trailer 74 there was a tom who was struggling to breath and not doing well who had his head caught and trapped under a cage door. In trailer 80 one hen had had her leg trapped between the side of the cage and the cage door. Three other birds on other trailers</p>

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								had had their legs caught and trapped under cage doors. These legs and feet were bloody and bruised. (b) (6) said that the establishment would discuss these issues and see what they could do to prevent them. This memorandum serves to document my findings on Good Commercial Practices and what was discussed. A copy of this Memorandum of Interview will be provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	M9977	Tyson Foods Inc.	YBL311901 4215G	15JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>MOI January 15, 2019 At approximately 1630 hours on January 15, 2019 I went to explore the alarm sound I heard coming from receiving area at the feather collection basin. I found the water level at the feather area is up triggering the sound alarm. There was the (b) (6) with a maintenance personnel working with the issue. When coming back I noticed that the back-up head puller is off and heads were dropping on the floor making a big pile. I also noticed that some of the heads attached to the carcasses past the puller. I showed this to (b) (6) and I saw him instructing the receiving Supervisor to address the issue. I went past the feathers basin to the door leading to the trucks receiving area. I found the door broken although we talked about this door in our weekly meeting January 8, 2019. I also noticed that the pipe-joint near the stunning area, and the dripping of the sink at the receiving door were not fixed although we mentioned that in the weekly meeting. Furthermore, when I returned back to the hanging area I saw the birds were piled up at the hanging belt and already 2 birds were loose on the floor. The cart at the end of belt was full with DOA and the DOA barrel was 75% full. The hanging associates were working feverishly to relieve the belt but the number was too large. I immediately ran to evisceration department to get hold of (b) (6) but I found (b) (6) and showed him the overcrowded belt and the dead carcasses. At that moment the receiving (b) (6) showed up and I asked him to stop the dumbing. (b) (6) told me that he had already stopped the dumbing and I pointed out that he should have stopped the dumbing earlier. The receiving area should have been monitored more closely because there was no shortage of hanging personnel and I counted 8 associates hanging birds. I will be monitoring the</p>

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								receiving area till these issues are addressed as quickly as possible. (b) (6)
50	P1209	Whitewater Processing Co.	FFG191201 1615G	15JAN2019	04C05	Poultry Good Commercial Practices	Finalized	Est. P1209 Whitewater Processing Co. At 1310 hours while observing birds entering the scald tank as part of a routine GCP task, (b) (6) observed the following. One old breeder turkey (b) (6) was observed to be breathing and raising it's head on the production line just before the scald tank. (b) (6) stopped the line and alerted Plant personnel of the finding, Plant personnel removed the birds from the line. An establishment employee, rehung the bird prior to the stunner. The line was then restarted. (b) (6) went immediately to the office and discussed the finding with (b) (6). I explained that this issue continues to occur. The last one occurred eighteen days ago (12/28/2018). I again explained that public perception of this could lead to problems for the plant and further corrective actions need to be implemented. She stated he would take immediate corrective measures which included reviewing findings with plant personnel. I again stressed that it is not a condition that the birds are not cut but that only one carotid is cut and the birds are regaining consciousness without bleeding out.

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1209	Whitewater Processing Co.	FFG090802 4414G	14FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. P1209 Whitewater Processing Co. At 0855 hours while observing birds entering the scald tank as part of a routine GCP task, (b) (6) observed the following. One old breeder turkey (Hen) was observed to be breathing and raising it's head on the production line just before the scald tank. (b) (6) stopped the line and alerted Plant personnel of the finding, Plant personnel removed the birds from the line. An establishment employee, rehung the bird prior to the stunner. The line was then restarted. (b) (6) went immediately to the office and discussed the finding with (b) (6) .. I explained that this issue continues to occur. The last one occurred Thirty days ago (01/15/2019), but not all these days were production days. I again explained that public perception of this could lead to problems for the plant and further corrective actions need to be implemented. He stated he would take immediate corrective measures which included reviewing findings with plant personnel. I again stressed that it is not a condition that the birds are not cut but that only one carotid is cut and the birds are regaining consciousness prior to bleeding out.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1209	Whitewater Processing Co.	FFG100802 1315G	15FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. P1209 Whitewater Processing Co. At 0855 hours while observing birds entering the scald tank as part of a routine GCP task, (b) (6) observed the following. Two young tom turkeys were observed to be breathing and raising their heads on the production line just before the scald tank. (b) (6) stopped the line, the first bird expired prior to plant personnel arriving so (b) (6) restarted the line. (b) (6) observed a second bird and stopped the line again, and alerted Plant personnel of the finding, Plant personnel removed the birds from the line. An establishment employee, rehung the bird prior to the stunner. The line was then restarted. (b) (6) went immediately to the office and discussed the finding with (b) (6) .. I explained that this issue continues to occur. The last one occurred yesterday (01/14/2019). I again explained that public perception of this could lead to problems for the plant and further corrective actions need to be implemented. He stated he would take immediate corrective measures which included reviewing findings with plant personnel. I again stressed that it is not a condition that the birds are not cut but that only one carotid is cut and the birds are regaining consciousness prior to bleeding out.</p>

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1209	Whitewater Processing Co.	FFG160802 1120G	20FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. P1209 Whitewater Processing Co. At 0855 hours while observing birds entering the scald tank as part of a routine GCP task, (b) (6) observed the following. Two old Breeder turkeys (Hens) were observed to be breathing and raising their heads on the production line just before the scald tank. (b) (6) stopped the line and alerted Plant personnel of the finding, Plant personnel removed the birds from the line. An establishment employee, rehung the birds prior to the stunner. The line was then restarted. (b) (6) went immediately to the office and discussed the finding with (b) (6) .. I explained that this issue continues to occur. The last one occurred last Friday (02/15/2019). I again explained that public perception of this could lead to problems for the plant and further corrective actions need to be implemented. He stated he would take immediate corrective measures which included reviewing findings with plant personnel. I again stressed that it is not a condition that the birds are not cut but that only one carotid is cut and the birds are regaining consciousness prior to bleeding out.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1209	Whitewater Processing Co.	FFG230802 0222G	22FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. P-1209 Whitewater Processing Co. At 0905 hours while observing birds entering the scald tank as part of a routine GCP task, (b) (6) observed the following. Two old Breeder turkeys (Hens) were observed to be breathing and raising their heads on the production line just before the scald tank. (b) (6) stopped the line in both cases and alerted Plant personnel of the finding, Plant personnel removed the birds from the line. An establishment employee, rehung the birds prior to the stunner. The line was then restarted. (b) (6) went immediately to the office and discussed the finding with (b) (6) .. I explained that this issue continues to occur. The last one occurred Wednesday (02/20/2019). I again explained that public perception of this could lead to problems for the plant and further corrective actions need to be implemented. She stated she would discuss this with management and they would take immediate corrective measures which included reviewing findings with plant personnel. I again stressed that it is not a condition that the birds are not cut but that only one carotid is cut and the birds are regaining consciousness prior to bleeding out.</p>

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1209	Whitewater Processing Co.	FFG150803 0307G	07MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. P-1209 Whitewater Processing Co. At 0855 hours while observing birds entering the scald tank as part of a routine GCP task, (b) (6) observed the following. Three old Breeder turkeys (Hens) in a row were observed to be breathing and raising their heads on the production line just before the scald tank. (b) (6) stopped the line and alerted Plant personnel of the finding, the birds had expired prior to the arrival of plant personnel. The line was then restarted. (b) (6) went immediately to the office and discussed the finding with (b) (6) .. I explained that this issue continues to occur. The last one occurred Friday (02/22/2019). I again explained that public perception of this could lead to problems for the plant and further corrective actions need to be implemented. He stated he would discuss this with management and they would take immediate corrective measures which included reviewing findings with plant personnel. I again stressed that it is not a condition that the birds are not cut but that only one carotid is cut and the birds are regaining consciousness prior to bleeding out.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1241	Tyson Foods, Inc.	MGJ07190 15114G	14JAN2019	04C05	Poultry Good Commercial Practices	Open	<p>Poultry Mistreatment MOI January 14, 2019 Establishment 1241-P, Tyson Foods, Inc, January 14, 2019, 6:15 pm. In attendance: (b) (6)</p> <p>(b) (6) Nathan Henry, Tyson Plant Manager, (b) (6) At approximately 4:08 pm while performing a Poultry Good Commercial Practices task at a point just before where the chickens enter the scalding tank, I observed a live chicken enter the scalding tank while still breathing. The chicken had no visible knife cut on its neck and was exhibiting voluntary movement of the head and neck as it entered the scalding tank. I immediately proceeded to the point on the kill line directly after the last picking machine and waited for the chicken carcass in question to pass by me. When the carcass appeared, I removed it from the kill line and examined it. The carcass was red in color and had a small, superficial cut on the back of the neck. This cut did not sever any major blood vessels and was insufficient to allow proper bleeding out of the carcass. I immediately showed the chicken carcass to (b) (6) (b) (6), and informed her of the impending MOI. Members of the maintenance team examined the stunner and kill machine and made the necessary adjustments. At approximately 6:15 pm, I met with (b) (6) (b) (6), Nathan Henry, Tyson Plant Manager, and (b) (6) to discuss my findings. 9CFR 381.65(b) requires 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. (b) (6) assured me that he and other members of management would thoroughly investigate the issue and take measures to prevent its reoccurrence. He also stated that he</p>

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								would provide written documentation of the corrective actions and preventive measures taken to address this issue. (b) (6) [REDACTED], Est. 1241-P Corydon, IN

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1241	Tyson Foods, Inc.	MGJ59200 21501G	01FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Establishment 1241-P, Tyson Foods, Inc, February 1, 2019, 7:30 pm. In attendance: (b) (6) and (b) (6)</p> <p>At approximately 5:08 pm while performing a Poultry Good Commercial Practices task at a point just before where the chickens enter the scalding tank, I observed a live chicken enter the scalding tank while still breathing. The chicken had no visible knife cut on its neck and was exhibiting voluntary movement of the head and neck as it entered the scalding tank. I immediately proceeded to the point on the kill line directly after the last picking machine and waited for the chicken carcass in question to pass by me. When the carcass appeared, I removed it from the kill line and examined it. The carcass was small, red in color, and had no knife cut on the neck. I immediately showed the chicken carcass to (b) (6) or, and informed him of the impending MOI. At approximately 7:30 pm, I met with (b) (6) to discuss my findings and his planned corrective actions. I informed (b) (6) that 9CFR 381.65(b) requires 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. (b) (6) informed me that he plans to have a meeting with all live hang employees to instruct them not to hang small cull birds that may miss the stunner water and the kill machine. (b) (6) also informed me that he plans to verbally counsel the employee who was working as the back-up killer at the time of this incident, stressing to him that no chickens should go past him that have not been properly cut. (b) (6), Est. 1241-P Corydon, IN</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P1243	Perdue Foods, LLC.	XLB151302 3005G	05FEB2019	04C05	Poultry Good Commercial Practices	Open	<p>On 02/05/2019, at approximately 0942 hours, while I was observing operations in evisceration prior to providing relief breaks to the USDA inspectors, the evisceration line #1 stopped running at the transfer station. After providing the USDA relief breaks, at approximately 1010 hours, I proceeded to observe the conditions at live hang, since line #1 still was not in operation. I observed birds in the stunner with their heads under the water and birds hanging on the line before reaching the stunner. Perdue has an animal welfare program that has included a procedure for this event. I asked (b) (6) [REDACTED], if they were following their procedure of removing the birds if the line was down for a certain amount of time. He stated no, they were not. The birds in the stunner were allowed to drown during this time, thus dying otherwise than by slaughter. About this time, the evisceration line was restarted so no actions were taken to follow the procedures at this time. I asked for the animal welfare program and was told they would provide it to me today. As of the writing of this report, I have not been provided with the procedure. I prepared this report on 02/05/2019 and I certify that this report has recorded in it a summary of all pertinent matters discussed.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	P1304	Farmers Pride Inc.	YVB4502010805G	05JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1230 while performing a routine Poultry Good Commercial Practices task I was observing live receiving at the point where the cages of chickens are loaded with the fork lift onto the conveyor belt to enter the CO2 chamber. While one of the cages was being placed on the conveyor belt one of the lower blue plastic crates was protruding out of the main cage structure on the side the plant employee was standing. The plant employee pushed the crate in to realign it, but it then protruded approximately 6-10inches out the other side of the cage structure. At that point the space crated allowed approximately 2-3 chickens to stick their heads out of the crate. All the chickens then retracted their heads back into the crate except for one that kept its head sticking out of the crate. The establishment employee then pulled the crate back into place without looking at the opposite side of the cage and the chicken with his head sticking out had its neck trapped between the blue plastic crate and the metal support of the cage structure. I informed the establishment employee immediately of what had happened, and he tried to free the chicken, but was not able to free the chicken before it moved further down the conveyor belt. This resulted in the chicken being suffocated, therefore dying by a means other than slaughter. This same chicken was identified by plant personnel at the live hang belt and was condemned before it entered any further into the plant. I immediately found (b) (6) and informed him what had occurred. He acted immediately to speak with the employee and give him verbal counseling. He also informed me that because the employee had not harmed the chicken with any malicious intent that the employee would be receiving documented retraining from plant management</p>

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								to prevent an occurrence like this from happening in the future.
90	P1307	Mar-Jac Poultry-AL	KIL011402 0712G	12FEB2019	04C05	Poultry Good Commercial Practices	Open	At approximately 13:05 on February 12, 2019, I observed less than Good Commercial Practices (GCP) while performing Antemortem/GCP/Mishandling verification at Mar-Jac Poultry in Jasper, AL. I observed five chickens in the DOA dumpster that were still breathing, and partially covered by chicken paws and chicken litter. None of the chickens had been decapitated. I immediately notified (b) (6) and (b) (6) of this finding. The chickens were euthanized by cervical dislocation and decapitation. cc: (b) (6) Dr. Greg Brookhouser, Deputy District Manager (b) (6)
90	P1307	Mar-Jac Poultry-AL	KIL340403 5221G	21MAR2019	04C05	Poultry Good Commercial Practices	Finalized	At approximately 0400 while near the cage dump area, I observed a forklift driver trying to remove one of the top cages containing live chickens from a live haul trailer. As the driver was removing the cage, one of the cage doors popped open and got caught on another cage which caused the entire cage of live chickens to plummet to the ground. The cage hit the ground with such force that the remainder of the cage doors opened and the chickens were scattered on the ground. I observed over 100 chickens grossly mangled and killed as a result of the fall. I notified (b) (6) of my observations. Respectfully submitted on March 21, 2019, (b) (6) Cc: Dr. Gregory Brookhouser, DDM (b) (6) (b) (6) (b) (6)

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80	P146	Tyson Foods, Inc,	EJJ451601 5517G	17JAN2019	04C05	Poultry Good Commercial Practices	Open	<p>The following MOI documents my concerns regarding the practices of P-146 associates in Antemortem: On January 16, 2018 at approximately 1718 when (b) (6) and I started a Poultry Good Commercial Practices task we observed a nonconformance. As we approached the area where birds are retrieved from the trucks and conveyed to the cage dumper we observed a bird fall out of a cage directly onto the ground. The driver was moving the birds rapidly and backed over the bird as we were yelling to him and waving our hands in the air trying to get his attention. He saw us as we got closer and stopped. I took Regulatory Control Action. The actions of the driver resulted in the breaking of one of the bird's legs and it was partially eviscerated. The bird died 10-15 seconds later. As I was verifying the bird had died, the jack driver tried to remove the carcass and I asked that he stop all actions until further notice. He replied, "What do you want to do play with it!" I responded, "I have stopped the process, leave the bird here, I need you to get your supervisor." When he left, (b) (6) and (b) (6) arrived to the area at about 1720. I described the sequence of events and that I had stopped the process due to the inhumane treatment of a bird having been killed by being run over. During this time the jack driver again made comments such as, "What does me picking up the bird have to do with anything? I can't pick it up?" Another driver made comments stating, "Birds are falling out of the cages all the time". This establishment and all Tyson Foods are committed to the proper handling of all animals used to produce meat and poultry according to their Animal Welfare Program. I did not see this mission expressed in the actions and comments of the associate moving the birds. I told all members of management and the driver that a bird should</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>not die by means other than slaughter and establishments are to handle and treat live birds humanely in the loading and live hang areas as dictated by FSIS Directive 6100.3, VII, A, (b). The establishment has a plan in place for handling animals from the time they enter the premises. On another note, Tyson's plan states that for Escaped birds, movement of trucks in the immediate area will be stopped to prevent injury to the escaped bird , contain it, recage or placed on the line or notify the Yard supervisor. The driver was speeding about moving too fast and not being vigilant enough to make this observation. Furthermore, I stopped production because the driver retrieved the bird from the ground and started carrying him to DOA bin prior to the bird dying. The bird did not die until I asked the driver to return it and get his supervisor. This person did not try to kill the bird prior to disposing of the carcass. He did not communicate what he was doing he just headed in the direction of the DOA bin. That bird would have needed to be humanely euthanized in my presence then placed in the DOA bin. (b) (6) went to get (b) (6) [REDACTED], who arrived around 1723. I explained the series of events and told him I would need a plan of action from the establishment to bring themselves back into compliance before they could start their process again. (b) (6) listed the following:</p> <ul style="list-style-type: none"> -Coaching the jack driver -Doing a retraining of all team members -A supervisor monitoring the yard hourly doing a visual inspection <p>It will be documented. -He also started to locate the damaged cage that had the bird I accepted preventative measures and released Regulatory Control Action at 1727. During the sequence of events (b) (6) [REDACTED], reiterated that the cages that have been damaged and removed from production</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								however current efforts to make cages safe for the transport of birds have been ineffective. On 1/17/19 I requested the Animal Welfare check of this establishment. It shows that a weekly Chicken Yard Audit was performed on 1/16/19, it completed at 1430 and inspection of the yard found no Loose birds/Escaped birds on the yard. MOIs regarding deviation from Good Commercial Practices have been written in the last 90 days on November 9, 2018 and December 27, 2018 citing that the establishment failed to slaughter poultry in accordance with Good commercial practices. Should an ongoing pattern develop where birds are not being slaughtered in a manner that results in thorough bleeding of the carcasses in accordance with FSIS Directive 6110.1, II, B an NR for noncompliance with 9 CFR 381.65(b) (failure to handle birds in accordance with GCP) will result.

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40	P165H	OK Foods, Inc.	DAF00230 22311G	11FEB2019	04C05	Poultry Good Commercial Practices	Finalized	At approximately 2041 hours on 2-10-2019, while performing Ante Mortem inspection on Lot 1 and Good Commercial Practices at the back-dock area, I observed the fork lift driver place a cage onto the cage dumper dock. I immediately noticed that one of the cage doors was wide open and 4 chickens were sitting on top of the door. The fork driver never looked to see if the cage was acceptable or not before leaving to get another cage. One of the chickens fell off the door and landed on the edge of the dumper dock. The employee operating the cage dumper moved the line forward which caused the open door of the cage to be forced back upward. This resulted in 3 birds being caught at mid body between the door and the cage. The employee on the fork lift returned with a full cage and was about to place the cage on the dock, when I stopped him from doing so. I motioned to the cage dump employee to stop the moving line. After he stopped the line, he walked around the equipment stand and saw the birds that were caught in the cage door. He quickly moved the cage backwards to release the pressure on the door so that he could free the 3 chickens. After he removed the caught chickens, he tried to shut the door and realized that the door was broken and would not stay shut. He had a nearby employee utilize a long rod to hold the cage door shut while he moved the cage up to the dumping station. He also flagged the cage so that it would be sent to the repair shop. USDA's concerns are that live chickens are being injured and caught in broken cage doors. The establishment has a program in place for the humane handling of the chickens. Each of the employees are given this training when they are hired and again when issues arise. The failure of the fork lift employee to notice that the cage door was open or noticed that it was open and failed to notify the cage dump employee indicates that the

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								establishment's program may not be effective in preventing injury to the live chickens. USDA has written several MOIs for open cage doors on trailers and/or broken cage doors. These MOIs were written on 11-14-18, 9-18-18, 7-31-18, 5-15-18, and 5-11-18. USDA strongly recommends that the establishment respond to this MOI and address this issue of concern.
35	P165S	OK Foods, Inc.	LWA55120 14223G	23JAN2019	04C05	Poultry Good Commercial Practices	Finalized	This MOI is to document my conversation with (b) (6). At 0531 hours, while performing a PHIS GCP task, I observed 2 live birds on Kill line #1 that would have entered the scalders alive, if I had not instructed the second back-up killer to stop the line. (b) (6) stated that he was calling the Maintenance department to check the kill machine on line #1. He was monitoring the line.

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P17766	Southern Hens, Inc	SSN081602 5112G	12FEB2019	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 1210 hours, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at P17766, Southern Hens Inc., Moselle, MS while performing the routine PHIS Poultry Good Commercial verification task. Two (2) live chickens were observed in the Dead on Arrival (DOA) bin along with 2 DOAs. The live birds were blinking, looking around, and were vocal. The transfer belt from the live hang to the DOA bin was operating unattended. (b) (6) was notified. Allowing live bird(s) to enter the DOA bin and comingle with DOAs can lead to entrapment, suffocation and death. Live birds may accidentally enter the offal chute and be carried by the flowing water into offal pit, through the augers, and into the offal trailers. This can cause needless suffering and death. 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. Ms Tia Horton Plant Manager and (b) (6) discussed briefly the less than GCPIP incident in the management office at approximately 1930 hours. No response to the less than GCPIP incident was given at this time. (b) (6) 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 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</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								industry guidelines. Respectfully, (b) (6) [REDACTED]

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P17766	Southern Hens, Inc	SSN071703 2426G	26MAR2019	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 1123 hours, the following less than Good Commercial Practices in Poultry (GCIPL) incident was observed at P17766, Southern Hens Inc., Moselle, MS while performing the routine PHIS Poultry Good Commercial verification task. Upon walking around to the back-dock area, (b) (6) observed approximately 8-9 employee workers unloading from two separate trailers parallel to the conveyer belt on either side. The employees were transferring bird cages from the unloading truck to the conveyer belt. Some were working in groups of two, and there were employees who were individually tossing crates from approximately six feet in a stacked position onto the conveyer belt. This action was observed from either trailer. As some of the crates were hitting the conveyer belt, with failed attempts, it would land on its side causing the birds to all tumble to one side of the crate stacking in an un-natural position onto one-another. The birds were vocal and this point and some even escaped to where they fell approximately five feet to the ground under the unloading truck to the concrete in watery feces. (b) (6) who was present at the time was informed of the GCP MOI. (b) (6) S, and (b) (6), discussed briefly the less than GCIPL incident in the management office at approximately 1310 hours. (b) (6) said that they would implement some form of training to the employees and emphasize that crates under no circumstances should be thrown. (b) (6) was advised a GCIPL Memorandum of Interview would be issued to management pending review by (b) (6). Respectfully, (b) (6)</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P192	Pilgrims Pride Corporation	OOB29170 20612G	12FEB2019	04C05	Poultry Good Commercial Practices	Finalized	On Friday, February 8, 2019 at 2120 while performing a good commercial practices task, I observed a pile of approximately seven DOA birds in the hanging pen. Upon closer examination, I observed a live bird partially covered by the pile of DOAs. The bird's chest was exposed and it was breathing heavily. I immediately notified the live receiving supervisor who then promptly removed the live bird from the pile. He then instructed an employee working the floor to pick up and decapitate the remaining DOAs. The establishment has failed to adhere to the Federal Register 04-037N, which encourages those involved in the slaughter of poultry to abide by Good Commercial Practices.
40	P19688	Sanderson Farms, Inc.	KJA540901 0708G	08JAN2019	04C05	Poultry Good Commercial Practices	Open	Tuesday Morning on 01/08/2019 I was performing a good commercial practice (GCP) task at approx. 0645 hrs. I was standing between the bleeding tunnel and the scalders for kill line 1. I observed a bird on the line that passed by and seemed not had been slaughtered. I immediately stopped the kill line 1 and asked the plant employee to remove the bird from the line. (b) (6) also came and I explained to him of my observations, we looked at the bird that had been just removed from the line only inches before it had entered the scalders. The bird was fully conscious with both eyes open and was breathing. There were no signs of any cut made to the neck of the bird, hence the establishment failed to prevent a live bird entering the scalders. The line was allowed to start back up immediately and (b) (6) was verbally informed of the upcoming MOI. I expanded my check but didn't notice any evidence of process control as this was just an isolated incident. The findings were later discussed with the (b) (6) and the plant Manager Allen Laughlin (b) (6)

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35	P208	George's Processing, Inc.	XIC191201 4015G	15JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Tuesday, January 15, 2019, at approximately 11:18 hours, (b) (6) met with (b) (6). The following is a synopsis of the events and discussion regarding a bird that appeared to have been damaged by a module. At 11:15 hours while performing Good Commercial Practices, I observed a module that was full of birds on the dumper for Kill Line 1 (It is important to note that the module had already been conveyed prior to my observation). The dumper operator lifted the cage tilt cradle to dump the birds onto the metal slide. At this point, I observed that a bird underneath the module which appeared to be aware and had intentional flapping motion of its wings. The bird's legs were also not visible and the dumper operator lowered the cage down onto the bird. The dumper operator lifted the cage tilt cradle again to dump any remaining birds. I observed the bird appeared to be aware and still had intentional flapping of its wings. The dumper operator lowered the cage down again onto the bird. The dumper operator attempted to convey the module from the dumper/tilt cradle section to the first outgoing conveyor but the module would not convey backwards. At this point, there was still a single bird in the module that had not been dumped from the initial two lifting and tilting of the modules and the dumper operator looked toward the mirror and appeared to observe the bird left in the module. Then, the dumper operator lifted the cage tilt cradle a third time. I observed the bird that had been trapped under the cage had fallen under the dumper section. The bird did not appear to be breathing, aware, or have any intentional movement. I immediately went to retrieve (b) (6). He was not in his office and so I proceeded to (b) (6) office and requested that (b) (6) meet me at the dumper</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								area to inform him of my observations. After informing (b) (6) of my observations, the carcass was retrieved by the establishment which demonstrated that approximately 2-3 inches of the skin over the breast had been avulsed. I also observed blood present on the head/neck. I informed (b) (6) that this is not consistent with good commercial practices. I also discussed that a similar MOI had been issued on December 28th (MOI number XIC3410125228G) for similar observations in which a bird was injured on the dumper section of Kill Line 1. (b) (6) informed me that actions to prevent future occurrence would include corrective training/disciplinary action on the employee. The meeting was adjourned at approximately 11:25 hours.

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P208	George's Processing, Inc.	XIC151301 1929G	29JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Monday, January 28, 2019, at approximately 11:35 hours, (b) (6), and (b) (6), met with (b) (6).</p> <p>The following is a synopsis of the events and discussion regarding dead birds in live hang. At approximately 11:30 hours, (b) (6) informed me, (b) (6), that the establishment was switching to Lot 3 on Line (b) (4) and that a leukosis check and antemortem had not been performed on that lot. I proceeded back to the receiving area to perform antemortem on Lot 3. Upon entering Live hang and looking toward the live hang belts and DOA auger, I observed two condemn barrels full of dead birds. In addition, I also observed a pile of dead birds approximately 4 feet wide by 8 feet long and approximately 1-3 layers deep on the floor. Based on my observation, I would estimate that there were at least 150-200 carcasses on the floor. I observed that (b) (6) was working on disposing of the carcasses via the DOA auger. I inquired about the reason for the increased number of dead birds. (b) (6) informed me that the hanging belt malfunctioned in which the live hang belt was not working but the dumper belt was. This resulted in carcasses piling up in the tunnel between the dumper and the first live hang personnel. I informed him that allowing birds to pile up and smother is not consistent with slaughtering birds in accordance with Good Commercial practice. (b) (6) requested that I discuss the issue with (b) (6) Smith who was observing the live hang personnel. I proceeded over to (b) (6) and informed him of my observations and that this practice was not consistent with the slaughtering of birds in accordance with Good Commercial Practices. The establishment was still considering the optimal method to prevent future recurrences at the time</p>

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								of the discussion. Therefore, no measure was to prevent recurrence was provided by the establishment. The meeting was adjourned at approximately 11:45 hours.
85	P211	Palmetto Pigeon Plant, Inc.	DJK140903 0711G	11MAR2019	04C05	Poultry Good Commercial Practices	Finalized	On March 7, 2019, at approximately 1000 hours while performing a Poultry Good Commercial Practices (GCP) task in the Kill Area, I made a few observations while slaughtering Poussin. There were approximately three (3) loose birds in the blood trough under the cones that are used for placement of the birds prior to the cut being applied. Some appeared to have shallow cuts and were still alive walking around. I also noticed that there were several cones missing and as I continued to watch the kill step in the process, I observed the cuts being applied but the birds were not being bled properly. After only about thirty seconds from applying the cut to the birds they were then moved from the cones and placed in a barrel. The birds appeared to still be breathing and exhibited body movement and wing movement. They were not thoroughly bled prior to being placed in the barrels. After my observations of this practice, I notified Ms. Sandy Benenhaley, Plant Supervisor and explained to her my observations and concerns. This MOI serves to remind the establishment that the PPIA (Poultry Products Inspection Act) and Agency regulation require that poultry are handled in a manner that is consistent with Good Commercial Practices. I notified Ms. Benenhaley that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
85	P21234	Perdue Foods LLC	XGI241202 0126G	26FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Perdue Farms P-21234 Date: 2/26/2019 Time: 1:21 PM On Tuesday, February 26, 2019, at approximately 12:11pm, I, (b) (6) observed the following: while performing Good Commercial Practices Verification, there were approximately 30 birds piled up on the DOA table. Mixed with these birds were 2 visibly live birds. The DOA birds were falling on top of the live birds, smothering them and causing them to have trouble breathing. I informed the cage dumper (b) (6) that when the floor attendant is on break, he is responsible for managing the DOA table. I told him that the live birds needed to be retrieved immediately and the DOA birds needed to be appropriately condemned. We cannot allow the DOA birds to pile up on top of live birds. It causes the birds to be significantly stressed. This is mistreatment and it is not consistent with good commercial practices. I informed (b) (6) of the mistreatment of the live birds I had observed, and told him that I would be documenting my findings in an MOI. This MOI will be forwarded to my (b) (6) and the (b) (6) in case additional follow-up is recommended. Respectfully, (b) (6)</p>

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40	P218	Pilgrim's Pride Corporation	WOD5622 030021G	21MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On March 20, 2019 at approximately 1940 hours while performing a PHIS Poultry Good Commercial Practices task USDA (b) (6) (b) (6) observed the following while outside at the establishment's dumping operations. There were five birds stuck, by their neck, between the conveyor belt and a newly installed Teflon board at the junction where the two belts meet on line (b) (4) Regulatory control was taken, and the dumper operator was instructed to stop dumping live birds onto the belt. (b) (6) (b) (6) was called to the area, shown the birds and notified maintenance and (b) (6) Further inspection of the birds and the belt showed that there was a gap between the belt and the new Teflon board that allowed the birds' neck to get caught up, trapping it between the belts. The birds were all dead and had matted dirty feathers with generalized bruising. The Teflon board was removed, the belt was inspected and dumping operations resumed at 2020 hours. Plant Management is asked to consider these USDA concerns of good handling practices particularly to the design/setup of the conveyor belt equipment as well as establish and implement effective preventive measures to avoid future occurrences. 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. 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 MOIs can be FOIA requested by individuals from the general public. Documented by (b) (6)</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P286	Perdue Foods LLC	MOB05100 11830G	30JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1040 hours on Wednesday, January 30, 2019, (b) (6) met with establishment (b) (6) and (b) (6), to discuss poultry good commercial practices during the upcoming cold weather. (b) (6) informed (b) (6) that the outside temperatures over the next couple of days are going to be extremely cold and their plans should be in place to make sure that the incoming turkeys are handled in a way that conforms to poultry good commercial practices. (b) (6) stated that they decreased the number of turkeys to be slaughtered on today, Wednesday, January 30, by 6000 birds which will result in a daily total of 28,962 turkeys will be slaughtered. (b) (6) stated all turkey cages have plywood barriers on sides and backs of cages. Plywood barriers should help keep the wind off of the turkeys while they are in transit or at the establishment shade and should also help keep the body heat of the turkeys inside the cages. The establishment shade has sturdy canvas curtains to prevent direct cold wind to the shades. (b) (6) also stated that the farms that are scheduled to be slaughtered on today are not too far from the establishment, which should also diminish the amount of environmental stress on turkeys. Also, there should not be long holding time for the turkey slaughter at the establishment till weather comes back to normal. (b) (6) informed (b) (6) that we will be closely monitoring handling of the turkeys from the time they enter the establishment premises until slaughtered to make sure that they are handled with poultry good commercial practices. Also, monitoring DOA counts for potential increased numbers from colder than normal ambient temperatures. (b) (6)</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								(b) (6) IIC Perdue Foods Inc., Est. 286P Washington, IN 47501

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P286	Perdue Foods LLC	MOB08160 33601G	01MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>February 28, 2019 FROM: (b) (6)</p> <p>(b) (6)</p> <p>(b) (6) SUBJECT: Good Commercial Practices (GCP) Memorandum of Interview (MOI), Perdue Foods, Inc., Establishment Number P286 As part of a routine GCP assessment, observations were being conducted at the live hang bay, the point on the process after which the crates of young turkeys had been subject to controlled atmosphere stunning. The stunned birds are manually removed from stacked poultry crates located on semi-trailers. The intent is the birds are irreversibly stunned at this stage, so the birds may be inverted easily, and the feet placed into the shackles on the moving line as it proceeds to the neck cutting area. Although not directly related to the establishments slaughter process, the establishment has allowed a company to harvest feathers at a point on the line prior to neck cutting. Occasionally, a live bird is observed on the line and the backup cutter employee is required to identify and cut the neck to ensure no live birds enter the scalders. However, it is also important that the employee of the feather harvesting company recognize an unstunned bird that remains conscious to avoid plucking feathers from a live bird. At approximately 1430 hours, a live turkey was observed on the line. As the bird was observed and followed through the process, the feather harvesting company employee was observed to disregard the state of consciousness of the bird and grab a fistful of feathers from the conscious bird hanging in the shackles. (b) (6)</p> <p>(b) (6) who was present in the area, was immediately notified of the observation and that it was inconsistent with Good Commercial Practices. (b) (6) immediately contacted the supervisor and relayed the observed incident. At approximately 1432, another unstunned bird was observed and</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>followed through the process to the point of the feather picking company employee. The employee was again observed to disregard the state of consciousness of the bird and grab a fistful of feathers from the live bird. (b) (6) was immediately notified of the second observations and the supervisor removed the feather picking company form the line at that time. (b) (6) was informed that a GCP MOI would be generated to document the observations and subsequent conversation regarding the obligation for implementation of Good Commercial Practices for all individuals handling live poultry on the official premises, to include those that may not be directly employed by the establishment.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
85	P32	Mar-Jac Poultry, Inc.	CAA44010 12525G	25JAN2019	04C05	Poultry Good Commercial Practices	Open	<p>The meeting was held in USDA office between plant management P32 and USDA IPP. In attendance: (b) (6); (b) (6); (b) (6)</p> <p>Mistreatment of Poultry: At approximately 0350 hrs on 1/24/19 (b) (6), CSI day shift inspector witnessed a live bird being mistreated. (b) (6) was parked in the USDA parking lot and saw out of his car window a fork lift driver carrying a dumpster. He saw the driver stop and step off the vehicle to retrieve a live bird that fell from the dumpster. The driver then stomped on the live bird's head and placed the carcass back inside the dumpster to resume toward the offal department. Based on the isolated finding, the establishment is mistreating a live bird else where other than slaughter operation. (b) (6) immediately reported the incident to (b) (6). (b) (6) discussed the mistreatment with the establishment in the upcoming meeting Friday morning 0200 hrs. Plant Management response: (b) (6) was concerned about the poultry mistreatment. He immediately went outside with (b) (6) soon after he heard of the mishandling of the live bird and investigated where the bird have died. It was raining outside during the time they were at the location. In the meeting between USDA and plant management, (b) (6) stated that he didn't see any evidence of blood or feathers on the ground at the location of the mistreatment but said he would look further into the matter with the fork lift driver.</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P325	Tyson Foods, Inc.	YDM23190 31913G	13MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On March 13, 2019 at approximately 1520 while conducting a GCP task (b) (6) observed the following conditions in the Live Hang department. Nine DOA birds were on the floor to the side of the metal DOA bin. The metal DOA bin at the end of the live hang belt was three birds deep and no one was removing the birds from the bin. (b) (6) asked the live hang supervisor to remove the birds from the bin. Upon closer inspection there were a total of three live birds mixed in with the DOAs in the bin. Those birds were underneath the other layer of dead birds. I notified GPM William Beck of the concern with live bird humane handling. GPM William Beck stated that the team member operating the dumper was dumping the cages too frequently and the birds became piled on top of each other causing the smothering of the birds and the increased number of DOA birds in the Live Hang department. He also stated that he had placed two team members to dispose of the DOA birds in the DOA bin, but when (b) (6) arrived there was no one removing the heads and disposing of carcasses in the condemn barrels. The mixing of live birds with dead birds in the DOA bin can suffocate the live, weak birds and is not consistent with the Agency expectations for handling of live poultry. Allowing the DOA bin to fill two three layers of birds deep with overflow onto the floor is indicative of a loss of process control and is not acceptable. The establishment is asked to ensure establishment employees handling live animals are aware of company policies regarding live bird handling. Employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product. Copies of this Memorandum of interview will be distributed to the establishment, inspection file and the District Veterinary Medical Specialist per</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								FSIS Directive 6100.3. The issue will also be discussed at the next weekly meeting.
40	P33900	Foster Poultry Farms, A California Corporation	NHH57090 12730G	30JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0820 hours while verifying poultry Good Commercial Practices requirements four live chickens were observed falling through two large holes in the bottom of a cage while the cage was in the process of being dumped. The cage was lowered onto the birds crushing one. (b) (6) and (b) (6) were notified of the issue and took control. At approximately 0830 hours, inspection met with Mr. Matt Ottinger, plant manager, and (b) (6). As a corrective measure (b) (6) elected to put extra personnel in place to make sure poultry were properly dumped and none were trapped under cages. Also, live receiving personnel would tag cages to make sure they were repaired prior to being returned to use.</p>
50	P34287	Huismann's Poultry	THU45060 35922G	22MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Establishment P- 34287 On 03/21/2019 at the end of slaughter operations (b) (6) noted that there were multiple coops containing young broiler chickens being held in the live receiving area. On 03/22/2019 while performing a Good Commercial Practices task (b) (6) noted that these same coops were still in the live receiving area meaning that these birds were being held in excess of 18 hours in the receiving area. I immediately went to the office and discussed this with (b) (6). I explained that according to good commercial practices that young broiler chickens should not be held in excess of 16 hour in coops or on trucks and these birds had clearly exceeded that. (b) (6) stated that she would discuss this with Plant Management.</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P34668	Simply Essentials Poultry, LLC	SFJ361102 4111G	11FEB2019	04C05	Poultry Good Commercial Practices	Finalized	On February 8, 2019 lot 2 was slaughtered at the plant. Each of the loads had a large number of dead on arrivals. The total number from the loads was 12815 head weighing 59619 pounds. The birds were cold and stiff. The dead birds were spread evenly among and throughout the trucks. All trucks were affected. Please investigate this incident and advise the inspection staff of the cause and any preventive measures.
40	P46374	Sanderson Farms, Inc. Tyler Processing Division	AQI210702 2418G	18FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Poultry Mistreatment Meeting at Est. P-46374, Sanderson Farms - Tyler in February 18, 2019 at 0545 hours. In attendance: (b) (6) and (b) (6)</p> <p>At approximately 0510 hours, while performing Poultry Good Commercial Practices (b) (6) observed pile up of birds in the conveyor belt at the live hang room. Approximately 200 dead or bewildered birds were pulled out. The confirmed dead birds were promptly rendered and few birds that recovered are hanged back. According to (b) (6), piling up of birds is due to inappropriate and untimely belt adjustment by the lead man. I recommended to (b) (6) to review the Federal Register Notice Vol. 70, No. 187, published September 2005 (Docket No. 04-037N). I also notified PM Harris that this Memorandum of Interview (MOI) will be written which 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) of Est. P46374 – Sanderson Farms at Tyler</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P509	Koch Foods LLC	IPG090502 5007G	07FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On February 5th, 2019 at approximately 3:40am, I observed less than Good Commercial Practices while performing an Ante-Mortem Inspection and Good Commercial Practices check at P-00509. When I entered the live hang room I observed a mixed pile of birds and waste at the end of the conveyor belt. The pile was about four feet wide at the base and approximately thirty inches tall. There was a mix of live birds, dead birds, and waste material in the pile. Live hanging was immediately suspended and (b) (6) was summoned to the area to observe the situation. Live hang personnel were then directed by the (b) (6), to begin (b) (6) removing the birds and waste. Some of the birds removed from the pile still were alive. These were separated from the dead birds and debris. The healthy birds were placed back into production and the dying birds were humanely killed. The (b) (6), was called and came to the live hang area to discuss the situation. (b) (6) was informed that an MOI documenting the GCP failure would be forthcoming.. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office. Thank you.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P510	House Of Raeford Farms	RHB44130 33204G	04MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Ms. Nicole Reynolds, Plant Manager, P-510 House of Raeford Rose Hill, NC 28458 Ms. Reynolds At approximately 1352 while performing the Good Commercial Practices Verification task, I observed a live bird about to enter the scalding. The bird at the time of my observation had normal rhythmic breathing, eyes open and blinking with the head elevated. I immediately pointed out the bird to (b) (6), who stopped the line before the bird could enter the scalding and removed the bird from the line. After removing the bird from the line, it was observed that there was no cut on the neck which would not have allowed the bird to bleed out properly. (b) (6) took the bird back to live hang to show it to (b) (6). (b) (6) placed the bird back onto the kill line to allow it to go back through the stunner and the kill blade to allow proper bleeding. (b) (6), instructed the backup cutter to pay more attention to the smaller birds going through. I discussed my finding with (b) (6) and (b) (6) and notified them of the pending MOI and the establishment's failure to comply with 9 CFR 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), was also notified my findings. (b) (6) this MOI will be forwarded to the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. If you have any questions or concerns regarding the above, please contact (b) (6).</p> <p>Respectfully, (b) (6) P510</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P510	House Of Raeford Farms	RHB05080 35828G	28MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Ms. Nicole Reynolds, Plant Manager Establishment P510 House of Raeford Farm, Inc. Rose Hill, NC 28458 Ms. Reynolds, On 03/28/2019, at approximately 0721 hours, while performing a Good Commercial Practices task in the Live Hang Room, I noted 5 live birds in the span of 1-2 minutes about to enter the scalding. At the time of my observations, each bird had normal rhythmic breathing, eyes open and blinking with the head elevated. A team member was in the area who stopped the line and removed each bird from the line before they could enter the scalding. On further observation of each bird, 3 did not have a cut on the neck to allow the birds to bleed out properly. The remaining birds had incomplete cuts on the neck which did not allow the birds to bleed out completely before entering the scalding. Each bird was placed back on the line to go through the proper slaughter process. (b) (6) was made aware of my findings and was notified that a GCP MOI would be written and sent to the DVMS as a result. He reported that a new back up killer is currently being trained. (b) (6) stated that the trainer was not paying attention and had stepped away from the platform. Following this incident, the trainer was instructed to pay more attention and to stay at the platform while the new team member is being trained. Following this conversation, I repeated my Good Commercial Practices task and verified that the trainer was present on the platform in a location closest to the automatic kill blade. A previous memorandum was written on 03/04/2019 for similar findings. In this memorandum (MOI# RHB1412035404I), a live bird was found at the scalding entrance without a cut on the neck. The incident was attributed to the back-up cutter not paying attention and the preventive measure cited was to instruct the back-up cutter to pay</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>more attention to the smaller birds as they pass the kill blade. The plant's preventative measures must be proactive and effective to ensure that birds entering the establishment do not die from causes other than slaughter. 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. It is the establishment's responsibility to ensure that birds are slaughtered in accordance with 9 CFR 381.65(b). 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. If you have any questions or concerns regarding this MOI, please feel free to contact myself or (b) (6).</p> <p>(b) (6). Respectfully, (b) (6)</p> <p>(b) (6) Tyson Foods, Inc., Monroe</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO36010 20009G	09FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6) Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401</p> <p>(b) (6) At approximately 2145 hours on February 8, 2019, the following less than Good Commercial Practices (GCP) incident was observed at Mar-Jac Poultry in Hattiesburg, MS. Two (2) live young chickens with uplifted heads, 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.</p> <p>(b) (6) was verbally notified of the incident at approximately 2200 hours. A second verification check of an approximate 500 bird random subgroup sample on the north picking line at approximately 2215 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 GCP and causes needless suffering and death and results 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.</p> <p>(b) (6) was advised a GCP Memorandum of Interview would be issued to management pending review by (b) (6).</p> <p>Respectfully, (b) (6), Hattiesburg, MS 39401 cc: (b) (6)</p> <p>(b) (6)</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO08030 23819G	19FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6) Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401</p> <p>(b) (6) At approximately 2030 hours on February 18, 2019, the following less than Good Commercial Practices (GCP) incident was observed at Mar-Jac Poultry in Hattiesburg, MS. (b) (6) observed five (5) live birds (bright, alert, and responsive) being pulled from a pile at the end of the line (b) (4) onveyer belt in live hang where they were comingled with DOA birds. Additionally, (b) (6) upon arrival to live hang at approximately 2035, observed an additional (1) bird (bright, alert, and responsive) pulled from the same pile where it had been comingled with dead birds. (b) (6) was verbally notified of the incident at approximately 2100 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. (b) (6) was advised a GCP Memorandum of Interview would be issued to management pending review by (b) (6)</p> <p>Respectfully, (b) (6)</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO28000 35305G	05MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6) Manager Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 (b) (6) At approximately 2045 hours on March 4, 2019, the following less than Good Commercial Practices (GCP) incident was observed at Mar-Jac Poultry in Hattiesburg, MS. (b) (6) observed a bird trapped in a hole in the flooring of an otherwise empty cage on a truck being prepared to leave the establishment. The hole in flooring was between the upper two chambers of the cage and measured approximately 15 cm by 15 cm. The bird was trapped in a position in which one leg and one wing were in the lower of the two chambers, one wing was in the upper chamber, and the other leg was wedged against the body in such a way that the foot was in the upper chamber and the hock was in the lower chamber. Additionally, the neck was in a distorted position and wedged against the body in such a way that the base of the neck was in the lower chamber and the head was in the upper chamber. (b) (6), was notified immediately of the incident, the cage was removed from the truck, and the welfare situation was corrected. (b) (6), was verbally notified of the incident at approximately 2250 hours. This is a predictable consequence of the state of repair of the cages used for transporting the live birds. The condition of the cages has been a consistent talking point at night shift weekly meetings for 11 months. Additionally, the establishment was specifically warned at the most recent night shift weekly meeting (0400 on 3/1/19) that the condition of the cages increased the likelihood of an animal welfare issue after a truck almost backed over a loose bird (only intervention by FSIS personnel prevented that occurrence). Birds trapped in such a way as this one are in obvious discomfort</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>and at increased risk of injury. Had the bird made the return trip to a chicken house, it would have seen additional exposure to the elements. 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. Respectfully, .</p> <p>(b) (6) Hattiesburg, MS 39401 cc: (b) (6)</p>
90	P522	Sanderson Farms, Inc. (Processing Div)	IKB070701 0303G	03JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 3, 2019 at approximately 0520 hours while conducting a Good Commercial Practice check with Dr. (b) (6), and (b) (6), in the Picking Room of establishment P-522, the following was observed. One live bird entered the scalders on the outside Picking Line. The bird was consciously alert, blinking its eyes, and looking around at its surroundings as it hung on the Picking Line. There was no blood or cut on the neck of the bird. (b) (6) was notified of the pending 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 Good Commercial Practices. Respectively, (b) (6)</p>

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90	P522	Sanderson Farms, Inc. (Processing Div)	IKB200703 1308G	08MAR2019	04C05	Poultry Good Commercial Practices	Finalized	On March 8, 2019 at approximately 0509 hours while conducting a Good Commercial Practice check in the Picking Room of establishment P-522, I observed the following: I observed one (1) live bird enter the scalding on the inside Picking Line. The bird was alert, blinking its eyes, and moved its head back and forth as it looked around. No blood or cut was observed on the neck of the bird. No additional live birds were observed entering the scalding system. (b) (6) was notified of the observation and pending MOI. Respectively, (b) (6)
60	P533	Hain Pure Protein Corporation - FreeBird East	AKB550301 4724G	24JAN2019	04C05	Poultry Good Commercial Practices	Finalized	At approximately 1110 hours while in Live Receiving I was observing birds as they exited the blood tunnel immediately before they enter the scalding. During my observation I witnessed a bird leave the blood tunnel that was still moving its head and beak and was also flapping its wings. I observed the bird enter the scalding water in this condition which resulted in the chicken being drowned, therefore dying by a means other than slaughter. I immediately found (b) (6), and informed him what had occurred. He informed me that he would act immediately to prevent it from happening again.

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	P533	Hain Pure Protein Corporation - FreeBird East	AKB081203 0326G	26MAR2019	04C05	Poultry Good Commercial Practices	Open	<p>On Tuesday 3/26/19 in the time frame of 0600 to 0620 I observed the following conditions in the picking area. Upon entering the department, I could see immediately the establishment employee positioned between the wash cabinet and the scalding hanging the dropped leg of birds back into the shackle. While I did not get an exact count, I estimate this to be between 4 to 6 birds. I observed the birds in the blood tunnel and during my observation of the birds at this time I observed between 7-10 additional birds hanging by one leg in the shackle. I went into the hanging area and watched the hangers for a few minutes. Their hanging didn't seem to be impeded or obstructed and the birds were being hung correctly in my presence. I returned to the blood tunnel and waited a few minutes. I observed 2-4 more birds hanging by one leg. Correct shackling is critical for proper stunning. Birds must be hung by both legs. Pre-shocks may result from parts other than the head coming in contact with the electrified water. This can lower stunning percentages as the birds flap their wings and lift their heads out of the bath. Flapping wings may also result in broken wings. Improper hanging also can result in improper cutting at the kill blade or by the backup which could result in incomplete bleed-out. I informed (b) (6) of what I had seen. The establishment brought some additional employees into the area to help prevent the birds being hung by one leg. I spoke with (b) (6) about ten minutes after this incident and he told me that the hanger responsible is going to be disciplined and possibly removed from the department. The issue was raised previously at the following weekly meetings: On 2/8/19 - 4 or 5 birds around 1145 yesterday went through kill blade hanging by one leg in the shackle. On 3/1/19 - Numerous live birds were seen hanging</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								by one leg on Monday and Tuesday(2/25-26.) I spoke with (b) (6) on the 26th and he stated there is one live hanger who they are working with to make sure he understands the legs of the bird must be fully hung into the shackle. On 3/15/19 - Continued observation of birds hanging on the kill line by one leg. Though the amount observed by USDA has decreased it is still an issue. (b) (6) stated they are actively training the hangers with the importance of hanging two legs firmly on the shackle.

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25	P544A	Jennie-O Turkey Store Sales	KXJ570701 5303G	03JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 20:45, after I had finished the TOC diagnostic test on the first lot of Turkeys, the food inspector at outside 2 summoned my attention and showed me a turkey carcass that was bruised in the hip and thigh. The femur was broken and there was frank blood between the skin and the muscle, indicating that the injury had occurred before death. The inspector brought it to my attention that two other inspectors had found similar carcasses at their station. Thus, it appeared that there was a cluster of three or four such carcasses within a short amount of time. I went looking for the evisceration room supervisor and found (b) (6). When I told him about it, he said that he had already taken photographs of all the birds and sent it to (b) (6), night superintendent. (b) (6) said he would get (b) (6) back to me with what he finds out. Later, I met with (b) (6) (day production superintendent). I explained to him that (b) (6), who has experience with loading crews, has explained to me how the loading crew operator(s) can, if not careful, operate the machinery in such a way that pinch points are created between the loading machine and the frame of the cage on the truck, resulting in injuries to the birds. (b) (6) said that he was going to have the loading crew manager look into it and see how this can be prevented in the future. I asked him to look into whether it could be the loader operator, not just the loader itself.</p>

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35	P550	Simmons Prepared Foods, Inc.	XWN44050 31006G	06MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>0745 hours I found 3 carcasses on Kill Line 1 at the dumper that were stuck on a piece of bent metal in the corner closes to the (b) (6) employee that was operating the dumper and was just above the belt than conveys the carcasses into live hang area. I inform the lead in RKP management about the carcasses and watch the lead stop the equipment to remove the carcasses. I observed the operation of the equipment for approximately 3-5 more minutes after management resumed processes and noticed another chicken got caught in the piece of bent metal by its foot. Although, the (b) (6) employee that was operating the dumper did stop the machine and removed the chicken again from the bent piece of metal it was going to be an issue during processing. I then Notified (b) (6) at approximately 0758 (b) (6) hours, about my issue that I had with the piece of bent metal catching birds and not properly being handle. I notified my (b) (6) and was informed to go discuss my issues and findings with the (b) (6) asked me to show him the exact area of the piece of bent metal that was causing the birds to be affected or mishandled.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P559	Tyson Foods, Inc.	UWC14150 14323G	23JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At 15:00 hours during the performance of a Good Commercial Practices task, I observed a pile of 15 - 20 birds at the DOA end of the rehang belt. There were three small, live birds on the periphery of the pile which I handed to one of the live hang personnel. As I removed more birds from the pile, I found two live birds at the bottom of the pile. This puts live birds in a position to be suffocated. I took a regulatory control action by directing the live hang personnel to stop hanging birds on the kill line. I found a QA technician with a radio to call the (b) (6) [REDACTED].</p> <p>[REDACTED] Before her arrival, I spoke with (b) (6) [REDACTED] and explained the problem. Once the GPM arrived, I explained the situation to her and told her I needed a corrective action from her before I would allow the operation to resume. Her immediate corrective action was to place a person at the end of the belt to watch for small birds coming off the belt through out the remained of the flock. Since there was only one flock scheduled for second shift, that person should be there for the rest of the shift. Down time was approximately 7 minutes. I have repeatedly stressed to management the need to prevent pile ups at the end of the belt in order to prevent such an occurrence.</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO230802 3211G	11FEB2019	04C05	Poultry Good Commercial Practices	Finalized	At approximately 9:25 am this morning, 02/09/19, I observed (1) live loose turkey on the south side upper walkway and (2) live loose turkeys on the north side upper unloading walk-way. These birds were allowed to roam freely as establishment employees continued to unload birds from the coops. Additionally, I observed live loose turkeys on the lower level walkways of the truck unloading bay/lift area, (2) birds on the north side and (2) on the south side of the truck. These birds had either been left unattended to roam on the upper walkway and then fall or had immediately fallen during the unloading process from the upper platform to the floor below. The (2) live birds on the north side of the lower walkway were both found on the walkway. On the south side of the truck unloading bay/lift area (near the driver's side door) there was (1) bird under the truck lift and (1) bird standing in an uncovered area of the feather trough. I also observed that the truck lift was continually being lowered without the birds being addressed by establishment personnel. I noted that there was a green plastic grate that had been pulled exposing the trough at the end of the feather trough (near the turn to the feather separator). A bird was observed standing in the open part of the trough. The observed bird was standing in approximately a ½ "of water and was not under stress. The establishment did have a red cone placed on the floor near the open trough/trench cautioning employees to be careful of the area, but, this didn't prevent access for the bird to the trough/trench. I went to notify a live hang employee/supervisor of the loose birds including the one under the lift and the one in the feather trough, but, was not able to find anyone at the time. When I turned around the bird that was observed in the trough was gone. I went to see where the bird had gone and when I got to

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>the area I observed that the trough was over (¾ full of fast flowing water and feathers) and there was no sign that the bird had removed itself or had been removed from the trough by an establishment employee because I only saw 1 of the 2 birds present in the area. I then suspected the bird must have gotten washed away by the increased volume of water and feathers and managed to get caught up in the feather separator, pulled up the conveyor and deposited in the feather tanker. I immediately went up on the walkway on top of and next to the feather tanker and noted (2) motionless intact birds in the tanker in addition to the feathers. (1), clearly had been cut at the neck and was not of concern the others injuries were not readily apparent, but, did look like the bird that I had observed in the trough. I immediately went to find a live hang employee with a radio to call (b) (6), so, that I could bring my observations and concerns to their attention. When they both arrived I explained the situation, my observations, and my conclusions to both (b) (6). All (3) of us then went on the walkway to look at the birds that I had observed earlier in the feather tanker. (b) (6) were able to pull the bird in question from the feather tanker, so, that we could inspect the bird. I was able to confirm that the injuries observed to this bird were consistent with injury due to being caught up by the feather separator. The bird was wet, intact, feathered and exhibited signs of acute trauma secondary to having being crushed by the separator. Additionally, I observed water exit the birds mouth (after it had been removed from the feather tanker) suggesting that it had taken on water and drowned as well. This is consistent with what would be expected if a bird had entered the feather separator after being swept away by fast flowing water and feathers from the trough.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>While speaking with (b) (6) in front of the truck I noted that there were 2-3 loose live birds on the north side upper walkway and 2 birds on the south side upper walkway. I did not see unloading employees addressing these birds which were allowed to roam the platform.</p> <p>(b) (6) and I then observed (1) of the birds on the south side upper walkway fall of the walkway onto the truck lift in front of the truck. Josue removed this bird from in front of the truck and Mustafa directed unloading employees to address the loose birds on the upper walkway, lower walkway, under the truck and on the floor. The bird that died by from causes other than slaughter was cut and condemned by establishment personnel at (b) (6) direction. USDA has concerns that establishment employees are not addressing loose birds, early, and are allowing them to roam freely increasing the risk that they could be injured or injure themselves. Establishment employees should not continue to unload birds with loose birds observed on upper platforms or allow those that had fallen to the floor to roam unattended longer than necessary. These birds are being put at risk of injury, unnecessarily, due to improper handling and monitoring by establishment personnel during the unloading process. I am documenting my observations and findings in this MOI dated 02/09/19. (b) (6)</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO552002 0921G	21FEB2019	04C05	Poultry Good Commercial Practices	Finalized	At approximately 19:51 hours on 2/20/2019, I observed an establishment employee removing a turkey from under the truck lift. I directed the employee to lay the bird in the light so I could inspect it. The bird was dead; it was disemboweled with a significant length of intestine prolapsed outside the body cavity. Given the condition and location, the turkey had mostly likely been crushed to death by the truck lift. I notified (b) (6), who said he would hold a meeting to discuss the incident.

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO501803 0322G	22MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 16:35 while observing operations in the live-hang area, I found a number of turkeys with extensive injuries. Four of the more severely injured turkeys are described here, and there were at least six more that I observed on the line with injuries. Turkey #1: extensive tissue damage over an approximately 12 x 18 inch area over the middle back to the base of the neck. Exposed muscle tissue was mutilated and hemorrhagic, and pieces of muscle tissue appeared to be missing. Feathers surrounding the wound were bloody. Turkey #2: an approximately 6 x 8 inch skin de-gloving injury over the lower back; the underlying tissue was moist but intact. In addition there was an approximately 4 x 6 inch skin de-gloving injury over the left thigh; the exposed thigh muscle was intact and dry. Turkey #3: massive tissue damage to the left drum; the muscles of the drum were pulled apart and the underlying bones were exposed. In addition, there was a compound fracture of the left humerus. Turkey #4: massive tissue damage to the neck; the skin was completely peeled off for most of the length of the neck, and the underlying vessels, trachea, esophagus and other tissues were destroyed. In addition, there was an approximately 6 x 8 inch hematoma over the left thigh and an approximately 4 x 4 inch skin de-gloving injury over the left elbow. I later spoke with (b) (6). (b) (6) reported that one of the conveyor belts in the CO2 stunning system had stopped moving, resulting in a clog of turkeys inside the enclosed system. The belt in question is located in the system upstream from the CO2 stunning chamber, so the turkeys involved in the clog would not yet have received a stunning dose of CO2 gas. The extensive and widespread injuries I observed are consistent with similar incidents have occurred in the past. A</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>new system installed in the last few months is supposed to shut down the entire system of conveyors if one malfunctions, so I asked (b) (6) to investigate why it appears that this did not work. I notified (b) (6) that I would be documenting this incident.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6504	Peco Foods, Inc.	CHK22000 12411G	11JAN2019	04C05	Poultry Good Commercial Practices	Open	<p>P-6504 Peco Foods, Inc. Tuscaloosa, AL Meeting Date: 6 Jan 2019 Mtg. Time: 0400 hours Meeting Participants: (b) (6)</p> <p>(b) (6)</p> <p>(b) (6)</p> <p>(b) (6)</p> <p>(b) (6) At approximately 0015 hours on 3 January 2019 I witnessed that most of the poultry in the trailers under the holding sheds (6 trailers total) out on the back lot were very wet from the rainfall that night and also witnessed that the cooling fans were on and functional. The temperature was approximately 50F and the birds were shivering, eyes closed, and all huddled together seemingly trying to keep warm. They were quiet or comatose due to these conditions. I met shortly thereafter with (b) (6), the evisceration superintendent, and told him about the conditions of the birds. He then contacted the (b) (6), and told him to turn the fans off. The fans, by company policy, are supposed to be turned off at 49F. However with the added moisture I believe it was making the chickens very cold and should be defined as mistreatment. A significant number of DOAs were observed in the trailers as well, more than the usual number. A record review of the DOAs for that night indicated that the percentages were high for this plant at approximately 0.5% per trailer. The Lot DOA (each grower is a separate lot) was nearly 0.5%. The series of events was discussed at the weekly meeting 6 Jan 2019.</p>

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12:20 Thursday, March 28, 2019 90

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6504	Peco Foods, Inc.	CHK42000 13611G	11JAN2019	04C05	Poultry Good Commercial Practices	Open	<p>P-6504 Peco Foods, Inc. Meeting Date: 9 Jan 2019 Meeting Time: 0400 hours Meeting Participants: (b) (6)</p> <p>[REDACTED]</p> <p>On 7 Jan 2019 at the live hang table on the back dock at P-6504 at approximately 0400 hours I witnessed (b) (6), one of the hangers, slamming chickens down into the shackles with force far in excess of what is needed to secure the birds into the shackle slots. (b) (6) was also there and witnessed the event. I told (b) (6) that this was unacceptable and he spoke with (b) (6). I then went directly to the evisceration office and spoke to (b) (6). I informed (b) (6) that I have complained about this individual for the past 12 months and nothing has been done. (b) (6) then made moves to terminate the employee. Apparently at a later time the management of P-6504 reviewed video footage and reversed the termination, turning into a short-term suspension. (b) (6) is now back at work in the same position performing the same duties. He has not been witnessed using excessive force as of yet.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
85	P6505	Norman W. Fries, Inc.	BBA330701 2325G	25JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>While observing conditions in the live hang area at 0650 hours, I observed approximately 10 birds that appeared to be all dead on the floor at the exit end of the live hang conveyor belt identified as "LIVE HANG CONVEYOR, SYSTEM #2". The 10 birds were commingled in a pile along with excrement and extraneous material making a mass approximately 2 foot by 1 1/2 foot by 10 inches in beveled height. As I watched operations in this area, I observed an employee remove a couple of birds from the top of this pile at this location and dispose of them into a condemn barrel. As the employee was removed the top carcasses, I observed three of the birds under these dead birds to still be alive. I observed the employee remove these live birds from the pile and hang two of them on the kill/pick line. I observed him pull the head off the other live bird and toss it on the floor beside the wall. I notified designated (b) (6) whom had just entered the area. Also, I notified (b) (6) of these observations. I reminded (b) (6) that the PMA 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 recommended that they 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 him a copy of this document. I notified these establishment contact personnel 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>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6638	Pilgrims Pride Corporation	UDG04230 13616G	16JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 16, 2019, at approximately 2239 hours; I observed Less than Good Commercial Practice at establishment P-6638 Pilgrim's in Enterprise, 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 dump in the Live Receiving Area of the establishment. The bird had its eyes closed but was taking agonal breaths. I notified (b) (6) because she was standing on the dock next to me at the time of observation to call for (b) (6). As we waited for (b) (6) also witness the bird take additional agonal breaths. The beak was open and closing each time for a total of 5 breaths prior to being removed from the dumpster. I then examined the bird after removal from the dumpster and the bird continued to take agonal breaths by opening and closing the beak. The bird was small in frame and cold to touch. The bird moved slightly when stimulated by touch. The bird had already been sprayed with red colored denaturant. Previous corrective actions for live birds previous found in the DOA dumpster consisted of removal of all heads prior to being placed in the dumpster. The establishment failed to implement this corrective action. I informed (b) (6) and (b) (6) of the documentation of this Memorandum of Information (MOI). 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. Respectfully Submitted, (b) (6) cc: (b) (6) (b) (6) cc: (b) (6)</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P7044	Tyson Foods, Inc.	GJJ242303 4329G	29MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2139 on March 29, 2019, (b) (6) was doing an ante-mortem and good commercial practices check. Upon entering the hanging pen there was approximately 16 live birds walking around the hanging pen and in adjacent rooms. There were at least nine DOAs that were on the floor adjacent to the belt in the hanging pen. (b) (6) stopped the line from hanging and then the team members picked up all the DOAs and live birds on the floor. As the GCP task was continued, there were two live birds under the stunner and in the corner adjacent to the backup cutter. Outside under the dumper there were three live birds walking around within and outside of the wire fencing under the dumper.</p> <p>(b) (6) was informed of the non-regulatory concerns and the forthcoming MOI. There was no supervisor or floor person working the area. Employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product. Plant Management is asked to prevent future occurrences. 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>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P727	Simmons Prepared Foods, Inc.	VCF340201 0816G	16JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 01/14/19 at 0325 hours, while performing a GCP task I, (b) (6) with (b) (6), observed 14 chickens inside the top row of a cage in the cage rebuild area. 10 of the chickens were dead, 2 of these had their heads stuck under the damaged door to the cage and 4 birds were alive. I also observed 1 dead chicken laying on the ground next to these cages. (b) (6) (b) (6), was present at the time of this finding. I also observed that several of the cages on the trailers in the dumping area were missing covers. We then proceeded to verify the birds on the trailers in the holding shed. There were 6 trailers in the holding shed and each trailer had multiple covers missing from the cages. The fans in bay 8 and 3 were blowing onto the uncovered cages. When (b) (6) was asked why the fans were on when the temperature was 30 degrees he stated the fans are automated. We then observed the DOA tank and observed a live bird partially buried with the DOA carcasses. The tank was approximately ½ full and no denaturant was visible. (b) (6), removed the live bird from the tank and returned it to the live hang area.</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P727	Simmons Prepared Foods, Inc.	VCF390201 2221G	21JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 01/15/19, at approximately 2127 hours, while verifying GCP/Ante mortem, I, (b) (6), observed trailer # 092399 staged in the live dock/dumper area with cages full of waiting birds. I noticed, behind this trailer sat a cage on the ground. I asked live hang supervisor, (b) (6), why the cage was on the ground. He stated that the cage was empty so the fork lift driver had removed it from the trailer so he could get to the full one below it. I looked inside the cage at this time and observed multiple dead carcasses on one of the shelves inside the cage. I showed the dead carcasses to (b) (6) and evisceration superintendent, (b) (6). I asked (b) (6) why there were dead carcasses in a cage sitting on the ground. (b) (6) spoke with the fork lift driver who was removing cages from the trailer. (b) (6) then came back and told me that the fork lift driver was going to take the cage to the dumper area so that it could be emptied. At this moment the driver picked up the cage and placed it back on the trailer with the dead carcasses still in it. I notified (b) (6) that the cage had been placed on the trailer not in the dumper area as he had stated they would do. (b) (6) and (b) (6) went to the driver and spoke with him. The cage was removed from the trailer and sent to the dumper area where I observed the establishment remove 57 dead carcasses from the cage and dispose of them in the DOA tank. At approximately 2349 hours, while verifying GCP/Ante mortem, I, (b) (6), while observing the empty trailer holding lot, I noticed a live chicken inside one of the cages. The chicken was on the bottom row of the cage located at the back of the trailer. I showed the live chicken to (b) (6). I noted to (b) (6) that the live chicken was located on the same trailer, #092399, as the one from earlier that night. (b) (6) had the trailer pulled</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								back to the live dock where plant personnel removed the chicken.
80	P764	Perdue Foods, LLC	CUA39200 30926G	26MAR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At 1857 hours while performing the Poultry Good Commercial Practices task in the kill room, I observed on kill line number two several birds with neck cut have intense body and wings motion entering the scalding. This might indicate that the bleeding equipment was not properly adjusted, and the neck cuts were inadequate to achieve thorough bleeding of the birds. Also, I was able to remove a live bird with no neck cut from the line before it enters the scalding.</p> <p>Immediately, I notified (b) (6) the poultry welfare officer and the (b) (6) shift leader of the incident, he inspected kill line number two and evaluated the bleeding equipment. Then 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 reminded (b) (6) that live poultry must be treated in a manner consistent with Good Commercial Practices. I notified him that this Memorandum of Interview would be forwarded to the District Veterinary Medical Specialist (DVMS).</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P768	Tyson Foods, Inc.	BFC080401 4328G	28JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Monday, 1-28-2019 morning, at approximately 2:45 AM, I, (b) (6) was notified by (b) (6) that she had just found a dead chicken in the holding shed that had been run over and crushed. It was located underneath the parked trailer and in front of the tires and appeared to have been accidentally backed over while the trailer was being parked. The carcass in question was in good flesh and portions of the viscera and bones were expelled and located adjacent to the carcass. There was no obvious dependent blood pooling or deterioration of the viscera as would be expected with a bird that is dead on arrival (DOA). This is an unacceptable finding that is not in accordance with Good Commercial Practices. Repeated incidents may indicate damaged caging that is allowing birds to escape, however, at the time of the finding there were no significantly damaged or opened cage banks observed. In addition, there were no other birds loose in the holding area or other GCP violations to indicate a loss of process control and warranting documentation of a noncompliance record. This is the first known incident of this type since my arrival in 2017, and I was unable to locate any documentation of any similar incidents from prior to my arrival. At approximately 2:50 AM, CSI Deaton and myself notified both (b) (6) the finding and explained that it would be documented under a Good Commercial Practices MOI. (b) (6) acknowledged and informed us that he would speak with the live haul crew as well as see to it that the carcass was condemned appropriately.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P7903	Perdue Foods, LLC	UYN06050 10914G	14JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0536 hours, two large piles of dead and live birds comingled together were observed on the belt at the end of the two live hang belts. The piles of birds were approximately three to four feet in width, spanned the width of the sorting belt, and approximately two feet high. (b) (6)</p> <p>(b) (6) was informed in the receiving office of these conditions and we went to the hanging room to see these conditions together. (b) (6) indicated that the person who normally takes care of this part of the process was not present at work today. I indicated that these conditions are not acceptable under any circumstance and that either the establishment personnel manage the area, or the operations would be halted. I informed (b) (6) that an MOI would be issued for the incident. Upon my arrival to the evisceration department, I informed (b) (6) of these conditions and he immediately went to the area to address the concern. When we arrived at the live hang room, (b) (6) was already there and we discussed these processes and conditions. (b) (6) immediately stopped both live hang belts and kept them off until the two piles of birds were sorted and handled appropriately. I informed (b) (6) and (b) (6) that an MOI for GCR (b) (6) issues would be issued. At approximately 0620 hours, a live bird was observed in the DOA truck parked outside the receiving area. In addition, there was no denaturant present on any of the carcasses in the truck, numbering approximately 75 – 100 carcasses. I informed (b) (6) that these conditions were not acceptable and to stop hanging live birds until the appropriate adjustments were made. I met (b) (6) and (b) (6) in the evisceration department and/or main hallway and notified them of these</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								findings. (b) (6) indicated that the conditions would be rectified immediately and that he would be spending more time in the receiving area to retrain employees and emphasize the importance of proper handling of the birds being processed. (b) (6) removed the live bird from the DOA truck and applied denaturant to the dead birds contained within. Operations were permitted to resume once these corrections were made and verified. All the aforementioned statements are true and correct to the best of my knowledge, as indicated by my electronic signature below.

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P843	Pilgrims Pride Corporation	PZA071202 0804G	04FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0914 hours, while performing a Good Commercial Practice (GCP) Task in Live Hang, I observed a pile of apparently dead carcasses on top of the far DOA table. On closer observation, I noted three live birds among a pile of 15 dead carcasses. One bird was resting at the top of multiple dead birds and a second bird was resting directly on the table at the periphery of the pile. A third bird was on its back, breathing with half closed eyes and was observed to be caught underneath two dead bird carcasses. At the time, there were no team members on the floor monitoring the situation and there was no supervisor in the area. I moved the two dead birds from the live bird on its back and the bird immediately moved to a normal resting position. I had the floor lead call Mr. Kevin (b) (6) [REDACTED]</p> <p>[REDACTED] r. Sydney Daigle, Plant Manager, called to the area to show him my observations. The live birds were deemed suitable for slaughter and were returned to the line. USDA had discussed similar concerns with Plant Management on previous occasions. These concerns were documented in a Weekly Establishment MOI on 12/18/2018(See #PZA3607125818G) and on 11/21/2018 (See #PZA2505114921G).</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P912	Wayne Farms, LLC	SVF591201 5317G	17JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Good Commercial Practices MOI: On January 17, 2019 at approximately 1250 hours, I observed a less than good commercial practice while performing an Ante-mortem and Good Commercial Practices (GCP) check at Wayne Farms (P-912). While performing the GCP, I noticed a bird with shallow breathing trapped beneath several DOAs in the DOA bin near live receiving. The bird's head was buried in the pile of DOAs. (b) (6) was informed of this finding. Upon retrieving the bird from the pile, the bird was exhibiting open mouthed breathing. (b) (6) immediately euthanized and decapitated the bird in my presence. Comingling live birds with DOAs can lead to suffocation and death by means other than normal slaughter methods. 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,</p> <p>(b) (6)</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P9197	Perdue Foods, LLC.	UAB23060 10718G	18JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At 0615 hrs, I was informed that a cadaver was hung on line 1 station 1 by FI Ann Hutsell. On observation, the carcass was red in color and dark red from the neck to the head with a blood engorged head still attached and a small 1/4 inch laceration on the top of the head. No major vessels were lacerated to allow for proper bleeding of the carcass. (b) (6)</p> <p>was immediately notified and shown the carcass before it was disposed in the USDA condemn barrel. At 0630 hrs, I was notified by (b) (6)</p> <p>that she had received a cadaver carcass and that (b) (6) had already been notified of the deficiency. I confirmed the carcass was a cadaver. It was seemingly normal from the hocks to the apex with a dark red neck and blood engorged head with no visible cut to the neck. The carcass was disposed in the USDA condemn barrel. 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. Blood from the killing operation must be confined to a relatively small area." USDA expects the establishment to follow FSIS policies for good commercial practices at all times to ensure no carcass enters the scalders breathing. Failure to comply with FSIS regulations and policies will result in further actions being taken by USDA.</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P9197	Perdue Foods, LLC.	UAB33100 22407G	07FEB2019	04C05	Poultry Good Commercial Practices	Open	<p>At 0710 hrs, (b) (6) was performing poultry good commercial practices in the hanging room for lines 2 and 3. While performing the task, she observed 3 live birds directly under dead birds on the DOA belt. A plant associate in the hanging room was immediately notified and they removed the birds from the DOA belt. (b) (6) was notified of the issue as well. This issue was brought up previously in the 1/29/19 USDA HACCP meeting, specifically regarding the increase in DOA carcasses being allowed to pile up on the DOA belt and the increased chances of live birds being covered by dead birds on the belt. USDA expects the establishment to follow FSIS policies for good commercial practices at all times to ensure no carcasses die by means other than slaughter. Failure to comply with FSIS regulations and policies will result in further actions being taken by USDA. With regards, (b) (6)</p>

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA171801 0704G	04JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2007 hours while performing antemortem and Good Commercial Practice (GCP) verification task I observed a live medium bird, head raised, breathing, eyes blinking and looking around enter the scalding tank. (b) (6)</p> <p>(b) (6) was notified of a bird dying other than by slaughter. At approximately 2012 hours I performed GCP verification by observing 200 carcasses enter the scalding tank and 200 carcasses at the kill blade. There were no further observation of live birds entering the scalding tank and the back-up kill performed a cut to the neck of all birds not cut by the kill blade. (b) (6) stated that the back up kill personnel will receive disciplinary action. 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)</p> <p>(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.)-935</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA111901 2622G	22JAN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1814 hours, I was notified that the inspector on line ^{(b) (4)} station 3 had hung back 2 birds for Veterinarian disposition. Upon arrival I observed the 2 birds had heads intact which were red to purple in color and had not received a cut to the neck. There was a small cut to the side of the heads of the each cadaver. ^{(b) (6)}</p> <p>^{(b) (6)} was notified of the observation of birds dying other than by slaughter. The inspector on line ^{(b) (4)} station 4 then notified me that he had condemned a cadaver as well. Upon investigation, this bird had the head intact which was red to purple in color and had a small cut to the left side of the neck however, both carotid arteries had not been cut. At approximately 1825 hours I went to perform Good Commercial Practice verification however there were no birds on line ^{(b) (4)} due to the lunch break. At approximately 1943 hours I performed Good Commercial Practice verification by observing 200 carcasses enter the scalding, and 200 carcasses at the kill blade. There were no live birds observed entering the scalding and the back-up kill performed a cut to the neck of all birds not cut by the kill blade.</p> <p>^{(b) (6)} was notified of birds dying other than by slaughter. ^{(b) (6)} stated that the responsible establishment employee would receive disciplinary action and the back up kill personnel for line ^{(b) (4)} will be monitored for 3 days. 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)},</p>

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								(b) (6) Allen Harim Foods, LLC. P-935 Harbeson, DE. 19951

Table: MOIs in Response to FOIA2019-259

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA511602 1605G	05FEB2019	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 1340 hours on February 5, 2019 while performing ante mortem verification I observed a loose live bird on trailer 6862, in the 4th bay of the cooling shed; a loose live bird on trailer 5777, in the 1st bay of the cooling shed and a live bird roosting in an approximate 6 inch by 6 inch hole in one of the coops directly above the loose bird on trailer 5777. In the 3rd bay of the cooling shed I observed a bird that had been run over by a trailer and lying partially under the back tire of the trailer. (b) (6)</p> <p>(b) (6) was notified of a bird dying other than by slaughter and birds being handled in a way that could result in their dying other than by slaughter. (b) (6) stated that he would discuss this issue with (b) (6)</p> <p>(b) (6) prior to providing a preventive measure. 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)</p> <p>(b) (6) Allen Harim Foods, LLC. P935 Harbeson, DE. 19951</p>

Table: MOIs in Response to FOIA2019-259

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA552202 3613G	13FEB2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1445 hours while performing inspection verification, I was informed by inspector on Line ^{(b) (4)} that there was 1 carcass hanging on the Veterinary disposition shackles behind line ^{(b) (4)} station 3. The carcass's head and neck were dark red to purple and had not received a cut to the neck. ^{(b) (6)}</p> <p>^{(b) (6)} was notified of the observation of bird dying other than by slaughter. ^{(b) (6)} informed me that he would take the carcass for the relevant Supervisor to observe and investigate the cause. I was later informed by ^{(b) (6)} that the Back Up Killer was reprimanded ^{(b) (6)} 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 ^{(b) (6)} 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, LLC. P-935 Harbeson, DE. 19951</p>

Table: Noncompliance Reports in Response to FOIA2019-259

12:20 Thursday, March 28, 2019 1

EstNbr	EstName	NR#	Date	Task	TaskName	Regs	Description	Status
P4734	New Lee's Live Poultry Market Inc.	XKD420 601053 ON-1	01/24/2019	04C05	Poultry Good Commercial Practices		On Thursday, 01/24/2019, at approximately 10:40 am, while performing a directed Good Commercial Practice PHIS task in order to verify the establishment was following GCP guidelines as written in 9CFR 381.65(b), I observed the following: In the live holding /killing floor area, three young chickens were in a barrel, however, they were still moving and had not been fully bled out. Retain tag #B42078601 was placed on the barrel. (b) (6) [REDACTED], was immediately notified of this non-compliance with 9 CFR 381.65(b) both verbally and in writing with this NR. (b) (6) [REDACTED] ordered the workers to place the chickens into the cones so they would bleed out appropriately. The retain tag was removed and slaughter proceeded.	CLOSED
P727+V727	Simmons Prepared Foods, Inc.	VCF592 102411 2N-1	02/11/2019	04C05	Poultry Good Commercial Practices	381.65(b)	On 01/28/2019, at approximately 1130 hours while verifying process control, (b) (6) [REDACTED] had observed two condemn barrels at the rehang table and found in excess of 30 cadavers. (b) (6) [REDACTED] informed (b) (6) [REDACTED], who placed two extra backup killers in the live hang room to assist. At approximately 2010 hours, on 01/29/2019, (b) (6) [REDACTED] informed (b) (6) [REDACTED] that he would continue to keep the extra backup killers in the live hang area for the current days production. At approximately 2048 hours I observed four chickens (responsive, eyes alert, and no visible cut on the neck) entering the kill line two scalders. I observed five chickens in the same condition entering the parallel kill line one scalders. This occurred in an approximate three-minute time interval for each respective kill line. I discussed the situation with (b) (6) [REDACTED] who went to the live hang area and ensured that there were two backup killers placed on each kill line and placed a supervisor to monitor them. (b) (6) [REDACTED] was notified of the forthcoming noncompliance. The establishment is noncompliant with 9 CFR 381.65(b).	CLOSED

Table: Noncompliance Reports in Response to FOIA2019-259

12:20 Thursday, March 28, 2019 2

EstNbr	EstName	NR#	Date	Task	TaskName	Regs	Description	Status
P325	Tyson Foods, Inc.	YDM57 050355 28N-1	03/22/2019	04C05	Poultry Good Commercial Practices	381.65(b)	<p>On 3-22, 2019 at approximately 0800 hours while performing my GCP task, I observed a bird laying on the ground underneath the roller bed where it meets the bird dump. The bird was obviously dead due to it being almost completely transected at the mid-section of its carcass. The skin and associated musculature on both sides of the transected carcass were macerated. Macerated viscera was present and still adhered to the central celiac cavity. I immediately contacted (b) (6), and advised him of the forthcoming enforcement action. (b) (6), was also contacted and advised of the situation. At approximately 0830 hours, (b) (6) t communicated to me that the Establishment had discovered an opening in the floor of the roller bed interface with the dump bin. This bird may have escaped from its cage during the dumping process, then killed by a rolling cage crossing the surface of the roller bed and dragged through the previously mentioned opening. Plant management is encouraged to investigate, address, and prevent the root cause of this occurrence and is expected to employ proper handling methods consistent with good commercial practices. It is important for the establishment to treat poultry in a manner that prevents needless injury and suffering in order that a commercially marketable, unadulterated product may be produced as described in 9 CFR 381.65. Establishment response to this noncompliance, including corrective and preventative measures, will be attached to this entry in PHIS. (b) (6)</p>	OPEN

EstNbr	EstName	NR#	Date	Task	TaskName	Regs	Description	Status
P206+V206	Pilgrim's Pride Corporation	KCC062 103461 5N-1	03/15/2019	04C05	Poultry Good Commercial Practices	381.65(b)	<p>On March 15, 2019 at approximately 2005 hours while performing a routine PHIS Poultry Good Commercial Practices task (b) (6) observed the following noncompliance. At the entrance of the stunning equipment there were two dead birds lying on the ground in a puddle of blood with both their legs ripped off. I proceeded to inform a (b) (6) (b) (6) was in the area. I showed him the dead birds and asked him to call the Live hang supervisor and management to find out what happened to these birds. As we were examining the birds, overhead on the west picking line a live bird was caught by its neck between the support bar and belly beam with both legs ripped off and its intestines hanging out. The bird instantaneously fell to the ground and (b) (6) immediately euthanized the (b) (6) by performing cervical dislocation. At this time, I then looked back up at the picking line and a bird was entering the stunner with both feet and its neck hung in a shackle loop. (b) (6) immediately ran over to stop the line to remove the bird's neck from the shackle loop. (b) (6) and (b) (6) (b) (6) came to the area and observed the birds. At this time, there were no more birds hung on the line. Failure to implement procedures for preventing accidental injury and/or death inconsistent with 9CFR 381.65(b) in regards to birds presented for slaughter, resulted in a GCP failure, and birds died by means other than slaughter. FSIS encourages establishments to develop and implement a systematic approach to ensure 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</p>	OPEN

EstNbr	EstName	NR#	Date	Task	TaskName	Regs	Description	Status
							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 was notified that the USDA expects the establishment to employ handling methods consistent with Good Commercial Practices. Plant Management is asked to consider these USDA concerns and prevent future occurrences. Copies of this noncompliance will be distributed to the establishment, inspection file and District Veterinary Medical Specialist per FSIS Directive 6100.3. The establishment is also reminded that NRs and MOIs documented for GCP issues can be FOIA requested and made available for viewing. Documented by (b) (6)	

Table: Noncompliance Reports in Response to FOIA2019-259

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EstNbr	EstName	NR#	Date	Task	TaskName	Regs	Description	Status
P218	Pilgrim's Pride Corporation	WOD06 220225 05N-1	02/05/2019	04C05	Poultry Good Commercial Practices	381.65(b)	<p>On February 5, 2019 (b) (6) observed the following GCP noncompliance. At approximately 1925 hours evisceration line 1 was stopped due to a maintenance issue on picking line (b) (6) entered the live hang area around 1955 hours to verify live birds were being handled appropriately. In the live hang room, the employees had already removed all the birds hung on the line prior to the stunner as well as humanely euthanized the birds after the stunner and before the blade. (b) (6) then observed the birds in the stunner and approximately all 15 birds were dead. (b) (6) was notified and shown the noncompliance. The dead birds had drowned in the stunner and were pulled off the line to be properly disposed of. Failure to implement procedures for preventing accidental injury and/or death inconsistent with 9CFR 381.65(b) in regards to birds presented for slaughter, resulted in a lack of response to a known GCP failure, and birds were allowed to die by a means other than slaughter. The establishment was notified that the USDA expects the establishment to employ handling methods consistent with Good Commercial Practices. Plant Management is asked to consider these USDA concerns and prevent future occurrences. Copies of this noncompliance will be distributed to the establishment, inspection file and District Veterinary Medical Specialist per FSIS Directive 6100.3. The establishment is also reminded that NRs and MOIs documented for GCP issues can be FOIA requested and made available for viewing by FSIS. Documented by (b) (6)</p>	CLOSED

EstNbr	EstName	NR#	Date	Task	TaskName	Regs	Description	Status
P533	Hain Pure Protein Corporation - FreeBird East	AKB170 201381 4N-1	01/13/2019	04C05	Poultry Good Commercial Practices	381.65(b)	<p>On January 13th, 2019 at approximately 2345hrs the following noncompliance was observed. (b) (6) and I went down to the evisceration department to give breaks, at that time we observed that between the three inspection stands 16 birds had been marked as cadavers on the poultry inspection lot tally sheets. After speaking to the (b) (6) birds were DOA's (Dead on Arrival). While I was still down in evisceration I was presented two birds from one of the inspectors and was able to determine that one was a DOA bird and the other was a cadaver. (b) (6) informed (b) (6) (6), of the situation while I was examining the birds and (b) (6) informed (b) (6) (6). I then went up to live receiving and saw approximately 20 birds piled on the DOA table and the floor next to the live hang belt. Upon further examination I saw that two of the birds were still alive and informed the plant employee that had started disposing of the DOA's when I entered the area of this; the plant employee placed the two live birds back on the live hang belt and disposed of the rest of the DOA's. I spoke with (b) (6) (b) (6), and told him about the two live birds in the DOA pile and the large number of DOA's getting hung for processing; he immediately counseled the employees on the live hang belt about being vigilant for DOA's as well as reminding them to double check that all birds are actual DOA before disposing of them. I then spent approximately 10-15 mins observing the blood tunnel and observed 4 birds that had made it past the kill wheel and the backup killer without being properly slaughtered. (b) (6) was standing with me and removed all the improperly slaughtered birds before they entered the scalding tank and placed them back on the live hang line to be properly slaughtered. I informed (b) (6)</p>	CLOSED

Table: Noncompliance Reports in Response to FOIA2019-259

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EstNbr	EstName	NR#	Date	Task	TaskName	Regs	Description	Status
							of the noncompliance and the loss of process control. Three other birds, one a DOA and two Cadavers, where pulled off the line by an inspector at approximately 0215, January 14, 2019. At approximately 0330 while giving breaks I pulled 1 DOA and 2 cadavers off of the line. I informed Randy Hertzog of this. This is a non-compliance with regulation 381.65(b).	
P44947	Two Brothers for Wholesale Chicken, Inc.	TRR471 102051 8N-1	02/15/2019	04C05	Poultry Good Commercial Practices	381.65(b)	On 02/15/19 at 1:15pm hours approximately, The (b) (6) heard a noise on the killing room after the killing process was finished. When we verified the area, we found a live chicken in the boiler room. If we would not find the chicken, provably it would have died by the cold weather during the weekend. The Plant manager (b) (6) was informed about this (b) (6) noncompliance. The chicken was brought to other establishment of custom sales. The establishment failed with 9CFR 381.65(b). 381.65(b): Good commercial practices for poultry slaughter	CLOSED

Table: Noncompliance Reports in Response to FOIA2019-259

EstNbr	EstName	NR#	Date	Task	TaskName	Regs	Description	Status
P44947	Two Brothers for Wholesale Chicken, Inc.	TRR021 502022 6N-1	02/26/2019	04C05	Poultry Good Commercial Practices	381.65(b)	On 2/26/2019 at 0210 hours approximately, in response at line speed violation, I made a GCP task and observed on the killing area one edible container with young chickens . The chickens still moving into the container because not had the properly bleeding process in the metal cones. Also, I was observed employees that not using the metal cones and skip that step and throw the chickens direct into the barrel. I stopped the operation and inform immediately the Plant Manager about this noncompliance. US. Retained Tag #B39598353 was applied on the barrel with young chickens. 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. (b) (6) condemned the 130 chickens and was present on the denature process. One previous NR's was associated about this non compliance.	CLOSED
P45939+V4 5939	Petersburg Poultry Processing	CZJ481 102242 8N-1	02/28/2019	04C05	Poultry Good Commercial Practices		On February 28, 2019 at Petersburg Poultry Processing, during slaughter operations around 11:00a.m. the (b) (6) observed a cadaver chicken come through the picking machine which demonstrated that the bird was still breathing upon entering the scalding tank. This is a violation of 381.65(b) , Plant Manager Mike Brockman was notified of the condition, who then instructed an employee to condemn the bird.	OPEN

U.S. Department of Agriculture Food Safety and Inspection Service GOOD COMMERCIAL PRACTICES CORRELATION VISIT REPORT	1. CASE NUMBER: BXL3213021725CP ALAMEDA DO# 05-19-GCP007	
	2. EST. NUMBER: M6137+P6137	3. EST. ID: 5308

4a. ESTABLISHMENT NAME:
 Foster Farms

4b. ESTABLISHMENT ADDRESS/ P.O. BOX
 843 Davis St.

4c. CITY, STATE, ZIP CODE
 Livingston, California 95334

5a. NAME OF DVMS (b) (6)	5b. NAME OF PHV (b) (6)	5c. NAME OF IIC same
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6. DATE(S) OF VISIT (MM/DD/YY) FROM: 2/19/2019 TO: 2/20/2019	7. CIRCUIT VISITED (4-digit no.) 0508	8. PLANT SIZE <input checked="" type="checkbox"/> Large <input type="checkbox"/> Small <input type="checkbox"/> Very Small
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9. SPECIES SLAUGHTERED <input checked="" type="checkbox"/> Chicken <input type="checkbox"/> Other	10a. LINE SPEED: 140 / Minute 10b. NUMBER OF LINES: 4
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11. STUNNING USED:
☒ YES ☐ NO

STUNNING METHOD: ☐ Controlled Atmosphere Stunning
 ☒ Electric Stunning

12. REASON FOR VISIT

☐ District Office Direction

☒ Routine Visit

☐ Repetitive Non-Compliance

☐ Data-Driven Visit

☐ Suspicion of Violations

☐ Special Correlation/Other

13. SYSTEMATIC APPROACH USED?

☒ Yes ☐ No ☐ IMPLEMENTATION NOT ASSESSED PER THIS DATE

IF YES, CHECK ITEMS BELOW THAT HAVE BEEN IMPLEMENTED; NUMBERS CORRESPOND TO THE THREE STEPS OF THE SYSTEMATIC APPROACH

- ☒ 1. Assessing under what circumstances poultry may experience excitement, discomfort, or accidental injury while being handled in connection with slaughter.
- ☒ 2. Taking steps to minimize the possibility of such excitement, discomfort, and accidental injury.
- ☒ 3. Evaluating periodically how poultry are being handled and slaughtered to ensure
- (a) that excitement, discomfort, or accidental injury is being minimized;
 - (b) that poultry are slaughtered in a manner that results in thorough bleeding of the poultry carcass; and
 - (c) that breathing has stopped before scalding.

14. RECOMMENDATIONS

- ☒ No Action
- ☐ NR by IIC
- ☐ NOIE
- ☐ Suspension/Withdrawal
- ☐ Other
- ☐ Letter of Concern

15. FINDINGS / Narrative Report:

Correlation:

(b) (6)

(b) (6)

(b) (6)

Correlation with IPP was conducted separately and included pre-assessment findings, as well as reviews of 9 CFR 381.65(b) and FSIS Directive 6110.1, Verification of Poultry Good Commercial Practices.

Pre-Visit Data Review:

PHIS data was reviewed from February 20, 2018 to February 19, 2019. This is a large poultry slaughter and processing establishment that operates on two (2) shifts, five (5) days per week. The establishment operates 2 separate plants within the same building, and birds are held on premises in a single, climate-monitored shed prior to staging for slaughter.

Inspection Program Personnel (IPP) have documented the following Good Commercial Practices (GCP) Noncompliance Reports (NRs) and/or

Memoranda of Interview (MOIs) during the time frame specified:

1. GCP MOI documented on 02/11/2019: 2 trailers of chickens held on premises greater than 12 hours prior to slaughter
2. GCP MOI documented on 01/30/2019: Birds on floor in live hang room thought to be deceased were alive.
3. GCP MOI documented on 01/14/2019: 4 trailers of chickens held on premises greater than 12 hours prior to slaughter
4. GCP MOI documented on 12/10/2018: 9 trailers of chickens held on premises greater than 12 hours prior to slaughter
5. GCP MOIs documented on 11/29/2018, 12/08/2018: Live birds found in large DOA pile
6. GCP NR documented on 11/19/2018, 12/08/2018: Multiple cadavers without neck cut
7. GCP MOI documented on 11/01/2018: Bird with leg caught in a cage during dumping was pulled out of cage by employee. The chicken's leg broke during the procedure. The bird proceeded through the conveyor system, live hang and into the slaughter line with this known injury.
8. GCP MOI documented on 07/07/2018: 2 trailers were parked on premises in direct sunlight for at least 15 minutes, and birds were exhibiting severe open-mouth panting and wing-flapping.
9. GCP MOI documented on 6/15/2018: Live bird found in large DOA pile
10. GCP MOI documented on 04/27/2018: Two cadaver birds found at pre-sorter, one had no neck cut, one had cut on dorsal portion of neck (no major vessels cut)
11. GCP MOI documented on 04/23/2018: Multiple cadavers without a neck cut found at pre-sorter after CSI noticed that the auto-killer was missing birds and the backup hand-cutter was having difficulty cutting all missed birds
12. GCP MOI documented on 04/06/2018: Three cadavers without a neck cut found at pre-sorter
13. GCP MOI documented on 03/01/2018: Six cadavers without a neck cut found at pre-sorter

Systematic Approach:

The Establishment has a written systematic approach in place that assesses under what circumstances poultry may experience excitement, discomfort and accidental injury as recommended in Federal Register Notice Docket #04- 037N, *Treatment of Live Poultry Before Slaughter*, and implements the systematic approach.

Recommendation:

No Action: The establishment's live animal handling met the requirements of the Poultry Products Inspection Act and 9 CFR 381.65(b).

Findings/Narrative Report:

(b) (6) and (b) (6) accompanied me during the evening shift walk-thru of the areas where live chickens are received, housed and moved. (b) (6) and (b) (6) accompanied me during the day shift walk-thru. I observed facilities structures, equipment, and live-bird handling and slaughter procedures/techniques during both shifts.

All facilities and equipment being used appear to be in good working order to prevent injury of live birds prior to them being stunned. I observed that all employees who handled live birds used appropriate handling techniques to minimize excitement and/or injury to the birds.

During my observation, I found that all birds were properly stunned, were appropriately cut, and appeared to have been properly bled out by the time they reached the scald tank. I observed that no birds were breathing when they entered the scalding.

EXIT MEETING: Attending the meeting on February 20, 2019 at approximately 11:30 am were (b) (6) (b) (6)

During the meeting, I discussed my observations and findings. I stated that my conclusion for the GCP visit would be "No Action Taken". The establishment complied with 9 CFR 365(b) during my visits to both shifts and both plants.

I suggested that the establishment investigate their holding times for trailers on premises, as there has been several MOIs documented from inspection personnel concerning birds held in cages more than 12 hours. The establishment covers this situation in their written animal handling plan, and the Foster Farms corporation is American Humane Certified, which audits include the measure of how long the birds are held in cages prior to slaughter. I suggested that establishment employees remain mindful of how much clotted blood and feathers are caught below the automatic killer knife and clean as needed and not only on the scheduled maintenance program to ensure best performance of these machines. I expressed concern about adequately observing stunned birds upon exit from stunner and automatic killer for Plant 1; the optimal location would be observing from inside both lines so the plant auditor or FSIS personnel could view the ventral structures of the neck as it is cut.

When no other questions or concerns were raised, the meeting was adjourned.

Respectfully,

(b) (6)

(b) (6)

USDA Food Safety and Inspection Service – Office of Field Operations

U.S. Department of Agriculture Food Safety and Inspection Service GOOD COMMERCIAL PRACTICES CORRELATION VISIT REPORT		1. CASE NUMBER: GSH3309045402CP	
		2. EST. NUMBER: P6058	3. EST. ID: 6025

4a. ESTABLISHMENT NAME:
 Perdue Foods LLC

4b. ESTABLISHMENT ADDRESS/ P.O. BOX
 1000 Jason Lane

4c. CITY, STATE, ZIP CODE
 Mount Vernon, Washington 98273

5a. NAME OF DVMS (b) (6)	5b. NAME OF PHV [REDACTED]	5c. NAME OF IIC (b) (6)
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6. DATE(S) OF VISIT (MM/DD/YY) FROM: 3/14/2019 TO: 3/14/2019	7. CIRCUIT VISITED (4-digit no.) 1530	8. PLANT SIZE <input type="checkbox"/> Large <input checked="" type="checkbox"/> Small <input type="checkbox"/> Very Small
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9. SPECIES SLAUGHTERED <input checked="" type="checkbox"/> Chicken <input type="checkbox"/> Other	10a. LINE SPEED: 140 / Minute 10b. NUMBER OF LINES: 1
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11. STUNNING USED:
☒ YES ☐ NO

STUNNING METHOD: ☐ Controlled Atmosphere Stunning
☒ Electric Stunning

12. REASON FOR VISIT

- ☐ District Office Direction
- ☒ Routine Visit
- ☐ Repetitive Non-Compliance
- ☐ Data-Driven Visit
- ☐ Suspicion of Violations
- ☐ Special Correlation/Other

Summary of Data Assessment Prior to Visit:

13. SYSTEMATIC APPROACH USED?

☒ Yes ☐ No ☐ IMPLEMENTATION NOT ASSESSED PER THIS DATE

IF YES, CHECK ITEMS BELOW THAT HAVE BEEN IMPLEMENTED; NUMBERS CORRESPOND TO THE THREE STEPS OF THE SYSTEMATIC APPROACH

- ☒ 1. Assessing under what circumstances poultry may experience excitement, discomfort, or accidental injury while being handled in connection with slaughter.
- ☒ 2. Taking steps to minimize the possibility of such excitement, discomfort, and accidental injury.
- ☒ 3. Evaluating periodically how poultry are being handled and slaughtered to ensure
(a) that excitement, discomfort, or accidental injury is being minimized;
(b) that poultry are slaughtered in a manner that results in thorough bleeding of the poultry carcass; and
(c) that breathing has stopped before scalding.

14. RECOMMENDATIONS

- ☒ No Action
- ☐ NR by IIC
- ☐ NOIE
- ☐ Suspension/Withdrawal
- ☐ Other
- ☐ Letter of Concern

15. FINDINGS / Narrative Report:

Correlated With:

USDA/FSIS:

(b) (6)

Establishment:

(b) (6)

Correlation with IPP was conducted separately and included pre-assessment findings, as well as a review of 9 CFR 381.65(b).

Summary of Data Assessment Prior to Visit:

Information was reviewed from 9/1/2018 to 3/1/2019. This is a small poultry slaughter and processing establishment that operates one (1) shift five (5) days per week. No issues or concerns by the IPP or a third party. There have been no Good Commercial Practices (GCP) Noncompliance Reports (NRs) and/or Memoranda of Interviews (MOIs) documented during the reviewed time frame.

Systematic Approach Comments:

Systematic Approach Observed

Summary of Reason(s) for Recommendation:

No Action. The establishment's live poultry handling met the requirements of the Poultry Products Inspection Act; 9 CFR 381.65(b) and other related regulations and directives.

Findings Narrative Report:

(b) (6) accompanied me during the walk-thru of the area where live young chickens are received, housed, and moved. The live bird receiving/staging area is covered, and fans and misters are available for use during warm weather months. The birds were evenly distributed in the coops and appeared comfortable. I observed three coops sedately moved by the forklift driver from the staging area to the coop dump conveyor.

I observed facilities structures, equipment, and live-bird handling procedures/techniques. All facilities and equipment being used appear to be in good working order to prevent injury of live birds prior to them being stunned. I observed the dumping of four coops with the establishment employee handling trapped birds appropriately. I observed that all employees who handled live birds used appropriate handling techniques to minimize excitement and/or injury to the birds. There were no live birds loose in the staging or live hang areas.

During my observation, I found that all birds were properly stunned, appropriately cut, and appeared to have been properly bled out by the time they reached the scald tank. I observed that no birds were breathing when they entered the scalders.

EXIT MEETING:

During the meeting, I discussed my observations and findings. I concluded that the handling and slaughter of live young chickens is being performed with minimal stress, discomfort and injury, and results in thorough bleeding of the carcasses. The establishment complied with 9 CFR 381.65(b) and performed live bird handling and slaughter in accordance with the GCP.

I reiterated that my recommendation for the day's visit would be "No Action Taken".

When no other questions or concerns were raised, the meeting was adjourned.

Respectfully,

(b) (6)

District Veterinary Medical Specialist

Denver District Office

Findings:

The establishment's live poultry handling met the requirements of the Poultry Products Inspection Act; 9 CFR 381.65(b) and other related regulations and directives.

From:

(b) (6)

To:

(b) (6)

Subject:

CORRECTED MOI Report 01/24/2019

Date:

Thursday, January 24, 2019 7:49:49 PM

Attachments:

[MOI Report.pdf](#)

**United States Department of Agriculture
Food Safety and Inspection Service**

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Humane Handling and Good Commercial Practice MOIs for a District(s): 40 from 1/1/2019 12:00:00 AM to 3/31/2019 12:00:00 AM

Filtered for Inspector: All

District	Circuit	Est Nbr	Est. Name	MOI Date	Task Name	MOI Number	Status	Inspector Name
40	4014	P33900	Foster Poultry Farms, A California Corporation	1/30/2019	Poultry Good Commercial Practices	NHH5709012730G	Finalized	(b) (6)
<p>Comments</p> <p>At approximately 0820 hours while verifying poultry Good Commercial Practices requirements four live chickens were observed falling through two large holes in the bottom of a cage while the cage was in the process of being dumped. The cage was lowered onto the birds crushing one. (b) (6), and (b) (6) Muldrow, first processing manager, were notified of the issue and took control.</p> <p>At approximately 0830 hours, inspection met with Mr. Matt Ottinger, plant manager, and (b) (6). As a corrective measure Mr. Ottinger elected to put extra personnel in place to make sure poultry were properly dumped and none were trapped under cages. Also, live receiving personnel would tag cages to make sure they were repaired prior to being returned to use.</p>								
40	4027	P46374	Sanderson Farms, Inc. Tyler Processing Division	2/18/2019	Poultry Good Commercial Practices	AQI2107022418G	Finalized	(b) (6)
<p>Comments</p> <p>Poultry Mistreatment Meeting at Est. P-46374, Sanderson Farms - Tyler in February 18, 2019 at 0545 hours.</p> <p>In attendance: (b) (6) and (b) (6)</p> <p>At approximately 0510 hours, while performing Poultry Good Commercial Practices task, IIC Santiago observed pile up of birds in the conveyor belt at the live hang room. Approximately 200 dead or bewildered birds were pulled out. The confirmed dead birds were promptly rendered and few birds that recovered are hanged back. According to PM Harris, piling up of birds is due to inappropriate and untimely belt adjustment by the lead man.</p> <p>I recommended to PM Harris to review the Federal Register Notice Vol. 70, No. 187, published September 2005 (Docket No. 04-037N). I also notified PM Harris that this Memorandum of Interview (MOI) will be written which 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) of Est. P46374 – Sanderson Farms at Tyler</p>								
40	4029	P218	Pilgrim's Pride Corporation	3/21/2019	Poultry Good Commercial Practices	WOD5622030021G	Finalized	Kayla Pitchford

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Food Safety and Inspection Service**

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District	Circuit	Est Nbr	Est. Name	MOI Date	Task Name	MOI Number	Status	Inspector Name
Comments	<p>On March 20, 2019 at approximately 1940 hours while performing a PHIS Poultry Good Commercial Practices task USDA SPHV Dr. Pitchford observed the following while outside at the establishment's dumping operations. There were five birds stuck, by their neck, between the conveyor belt and a newly installed Teflon board at the junction where the two belts meet on line 2. Regulatory control was taken, and the dumper operator was instructed to stop dumping live birds onto the belt. Live Hang superintendent Mr. Reynolds was called to the area, shown the birds and notified maintenance and (b) (6). Further inspection of the birds and the belt showed that there was a gap between the belt and the new Teflon board that allowed the birds' neck to get caught up, trapping it between the belts. The birds were all dead and had matted dirty feathers with generalized bruising. The Teflon board was removed, the belt was inspected and dumping operations resumed at 2020 hours.</p> <p>Plant Management is asked to consider these USDA concerns of good handling practices particularly to the design/setup of the conveyor belt equipment as well as establish and implement effective preventive measures to avoid future occurrences.</p> <p>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. 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 MOIs can be FOIA requested by individuals from the general public.</p> <p>Documented by (b) (6)</p>							
40	4029	P325	Tyson Foods, Inc.	3/13/2019	Poultry Good Commercial Practices	YDM2319031913G	Finalized	Cassie Rizzo
Comments	<p>On March 13, 2019 at approximately 1520 while conducting a GCP task (b) (6) observed the following conditions in the Live Hang department. Nine DOA birds were on the floor to the side of the metal DOA bin. The metal DOA bin at the end of the live hang belt was three birds deep and no one was removing the birds from the bin. (b) (6) asked the live hang supervisor to remove the birds from the bin. Upon closer inspection there were a total of three live birds mixed in with the DOAs in the bin. Those birds were underneath the other layer of dead birds. I notified GPM William Beck of the concern with live bird humane handling.</p> <p>GPM William Beck stated that the team member operating the dumper was dumping the cages too frequently and the birds became piled on top of each other causing the smothering of the birds and the increased number of DOA birds in the Live Hang department. He also stated that he had placed two team members to dispose of the DOA birds in the DOA bin, but when (b) (6) arrived there was no one removing the heads and disposing of carcasses in the condemn barrels.</p> <p>The mixing of live birds with dead birds in the DOA bin can suffocate the live, weak birds and is not consistent with the Agency expectations for handling of live poultry. Allowing the DOA bin to fill two three layers of birds deep with overflow onto the floor is indicative of a loss of process control and is not acceptable. The establishment is asked to ensure establishment employees handling live animals are aware of company policies regarding live bird handling. Employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product.</p> <p>Copies of this Memorandum of interview will be distributed to the establishment, inspection file and the District Veterinary Medical Specialist per FSIS Directive 6100.3. The issue will also be discussed at the next weekly meeting.</p>							
40	4029	P7044	Tyson Foods, Inc.	3/29/2019	Poultry Good Commercial Practices	GJJ2423034329G	Finalized	Cassie Rizzo

**United States Department of Agriculture
Food Safety and Inspection Service**

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District	Circuit	Est Nbr	Est. Name	MOI Date	Task Name	MOI Number	Status	Inspector Name
Comments	<p>At approximately 2139 on March 29, 2019, (b) (6) was doing an ante-mortem and good commercial practices check. Upon entering the hanging pen there was approximately 16 live birds walking around the hanging pen and in adjacent rooms. There were at least nine DOAs that were on the floor adjacent to the belt in the hanging pen. Dr. Rizzo stopped the line from hanging and then the team members picked up all the DOAs and live birds on the floor. As the GCP task was continued, there were two live birds under the stunner and in the corner adjacent to the backup cutter. Outside under the dumper there were three live birds walking around within and outside of the wire fencing under the dumper. Evisceration GPM Mike Harrison was informed of the non-regulatory concerns and the forthcoming MOI. There was no supervisor or floor person working the area.</p> <p>Employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product. Plant Management is asked to prevent future occurrences.</p> <p>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>							
40	4035	P19688	Sanderson Farms, Inc.	1/8/2019	Poultry Good Commercial Practices	KJA5409010708G	Open	Khurram Afzal
Comments	<p>Tuesday Morning on 01/08/2019 I was performing a good commercial practice (GCP) task at approx. 0645 hrs. I was standing between the bleeding tunnel and the scalders for kill line 1. I observed a bird on the line that passed by and seemed not had been slaughtered. I immediately stopped the kill line 1 and asked the plant employee to remove the bird from the line. (b) (6) also came and I explained to him of my observations, we looked at the bird that had been just removed from the line only inches before it had entered the scalders. The bird was fully conscious with both eyes open and was breathing. There were no signs of any cut made to the neck of the bird, hence the establishment failed to prevent a live bird entering the scalders. The line was allowed to start back up immediately and supervisor (b) (6) was verbally informed of the upcoming MOI. I expanded my check but didn't notice any evidence of process control as this was just an isolated incident. The findings were later discussed with the (b) (6) and the plant Manager Allen Laughlin.</p> <p>Dr. Khurram S Afzal (SPHV)</p>							
40	4043	P165H	OK Foods, Inc.	2/11/2019	Poultry Good Commercial Practices	DAF0023022311G	Finalized	Carol Williamson
Comments	<p>At approximately 2041 hours on 2-10-2019, while performing Ante Mortem inspection on Lot 1 and Good Commercial Practices at the back-dock area, I observed the fork lift driver place a cage onto the cage dumper dock. I immediately noticed that one of the cage doors was wide open and 4 chickens were sitting on top of the door. The fork driver never looked to see if the cage was acceptable or not before leaving to get another cage. One of the chickens fell off the door and landed on the edge of the dumper dock. The employee operating the cage dumper moved the line forward which caused the open door of the cage to be forced back upward. This resulted in 3 birds being caught at mid body between the door and the cage. The employee on the fork lift returned with a full cage and was about to place the cage on the dock, when I stopped him from doing so. I motioned to the cage dump employee to stop the moving line. After he stopped the line, he walked around the equipment stand and saw the birds that were caught in the cage door. He quickly moved the cage backwards to release the pressure on the door so that he could free the 3 chickens. After he removed the caught chickens, he tried to shut the door and realized that the door was broken and would not stay shut. He had a nearby employee utilize a long rod to hold the cage door shut while he moved the cage up to the dumping station. He also flagged the cage so that it would be sent to the repair shop.</p> <p>USDA's concerns are that live chickens are being injured and caught in broken cage doors. The establishment has a program in place for the humane handling of the chickens. Each of the employees are given this training when they are hired and again when issues arise. The failure of the fork lift employee to notice that the cage door was open or noticed that it was open and failed to notify the cage dump employee indicates that the establishment's program may not be effective in preventing injury to the live chickens. USDA has written several MOIs for open cage doors on trailers and/or broken cage doors. These MOIs were written on 11-14-18, 9-18-18, 7-31-18, 5-15-18, and 5-11-18. USDA strongly recommends that the establishment respond to this MOI and address this issue of concern.</p>							

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District	Circuit	Est Nbr	Est. Name	MOI Date	Task Name	MOI Number	Status	Inspector Name
Plant Management Response	Heavener Plant will continue implementing our programs that we have in place. In addition to our program Live haul will be hiring two general yard employees. These employees will monitor the trailers and will help ensure that cage doors remain closed. These employees will also help keep cages in good repair. Live haul has issued flashlights to yard hands to help inspect cages in the holding shed. Live haul has added additional trailer check for the drivers. Forklift operator was issued a discipline according to company policy.							

From: (b) (6)
To: (b) (6)
Cc: (b) (6) (b) (6)
Subject: Fw: GCP MOI at P-146
Date: Monday, January 21, 2019 12:38:53 PM
Attachments: [MOI Report.pdf revise 21jan19.pdf](#)

(b) (6)

This MOI was revise because corrected name change.

From: (b) (6)
Sent: Friday, January 18, 2019 11:26 AM
To: (b) (6)
Cc: (b) (6)
Subject: GCP MOI at P-146

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP MOI
Date: Thursday, January 24, 2019 6:11:10 PM
Attachments: [GCP MOI dated 12-28-18 and Establishment Response.pdf](#)

Attached is an MOI written on 12/28/18, the establishment's response and supporting documents.

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP MOI
Date: Friday, January 4, 2019 10:06:37 PM
Attachments: [GCP MOI 12-6-18 and Establishment Response.pdf](#)

Attached is a GCP MOI and the establishment's response

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP
Date: Friday, January 25, 2019 5:48:31 PM
Attachments: [GCP MOI 1-22-19 and Establishment Response.pdf](#)

Attached is the GCP MOI dated 1/22/19 and the establishment's response.

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP
Date: Tuesday, March 5, 2019 6:31:28 AM
Attachments: [Live bird 3-4-19.docx](#)

On 3/4/19 I observed a live bird entering the scalders at P-510. I have attached a copy of the MOI (RHB4413033204G) that was written.

(b) (6)
Raleigh District
USDA/FSIS/OFO
House of Raeford- P510
3333 US Highway 117 South
Rose Hill, NC 28458
(910) 289-6967
(b) (6) @usda.gov

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP
Date: Friday, March 29, 2019 9:25:47 AM

(b) (6)

Can you please read this and see if it should be an NR or MOI. (b) (6) and I think it should be an NR, but the plant is questioning if the process was really out of control.

Thank-you and have a good weekend!

On Wednesday, 27 March 2019 at approximately 0530 while going to perform a NPIS Leukosis check, I observed several cadavers in the red barrels next to the re-hangers. After completing the NPIS Leukosis, I performed a Good Commercial Practice task and observed 2 live birds as evidenced by their breathing, having eyes open, and showing coordinated body movements was about to enter the scalders on Line (b) (4). The 2 birds were observed within a few minutes of each other. The line was stopped and both birds were removed by plant employees before they entered the scalders. There was no plant employee at the scalders when the first bird was observed, but there was when the second bird was observed. There was no other intervention procedure in place at the entrance to the scalders, so if the establishment employee had not been notified/present to remove the birds from the line, the birds would have entered the scalders and would have died by means other than slaughter. (b) (6), (b) (6), was notified that a MOI would be issued.

1140 - When going to complete my Good Commercial Practice check with (b) (6), (b) (6), we observed several cadavers in the red barrels at the re-hangers on line (b) (4). One of the cadavers had no cut on its neck. At 1142 while performing the Good Commercial Practice task I observed on Line (b) (4) a live bird with no cut on its neck as evidenced by their breathing, having eyes open, and showing coordinated body movements was about to enter the scalders. (b) (6), (b) (6), who accompanied me when I did the task was able to retrieve the bird from the line before it could enter the scald tank. Within a few minutes 2 additional live birds as evidenced by their breathing, having eyes open, and showing coordinated body movements were observed by us and removed by (b) (6). Both birds were insufficiently cut enough to prevent them from entering the scalders alive. (b) (6) also removed an additional bird during this time. There was no other intervention procedure in place at the entrance to the scalders, so if the establishment employee had not been present to remove the birds from the line, the birds would have entered the scalders and would have died by means other than slaughter. (b) (6), (b) (6), stated they had added additional backup cutter to Line (b) (4) due to the person there had not been in the job long and would be adding a person at the entrance to the scalders.

(b) (6) and (b) (6) were notified that an NR would be issued due to today's observations and the findings of earlier in the morning would be incorporated to the noncompliance with 381.65(b) of the regulations. 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.

(b) (6)

Office of Field Operations
Food Safety and Inspection Service, USDA
c/o House of Raeford, P-737
253 Butterball Road
Teachey, NC 28464
(910) 463-7082

(b) (6) [@usda.gov](mailto:usda.gov)

Live Carry Over

Billy Davis <bdavis@butterball.com>

Thu 1/24/2019 3:48 PM

To: Kea, Danielle - FSIS <Danielle.Kea@fsis.usda.gov>; Herring, Michelle - FSIS <Michelle.Herring@fsis.usda.gov>; Sevilla, Leonardo - FSIS <Leonardo.Sevilla@fsis.usda.gov>;

Due to mechanical issues the below will be carry over. BH's will be processed 1st on D/s on Friday the St will be processed after NAE

1/24/2019	24	SMBT002	737	1/23/2019	22:45	3	720	83240	36740	51.93
1/24/2019	24	SMBT002	2886	1/23/2019	22:47	2	720	80560	36300	50.42
1/24/2019	24	SMBT002	177	1/23/2019	23:03	2	720	81200	38000	52.78
1/24/2019	24	SMBT002	768	1/23/2019	23:18	3	720	85600	36440	50.61
1/24/2019	24	SMBT002	1844	1/23/2019	23:56	2	720	84060	36820	51.14
1/24/2019	24	SMBT002	2281	1/24/2019	0:11	4	720	78800	35280	49.00
1/24/2019	24	SMBT002	748	1/24/2019	0:40	4	720	80480	35500	49.31
1/24/2019	24	SMBT002	580	1/24/2019	0:51	2	720	80620	36120	50.17
1/24/2019	24	SMBT002	2195	1/24/2019	0:54	4	720	83200	36340	50.47
1/24/2019	24	SMBT002	2421	1/24/2019	1:13	5	720	79600	35640	49.50
1/24/2019	24	SMBT002	4797	1/24/2019	1:34	4	720	82300	36080	50.11
1/24/2019	24	SMBT002	4796	1/24/2019	1:53	5	720	82980	35920	49.89
1/24/2019	24	SMBT002	762	1/24/2019	2:005	4	666	82780	33560	50.39
1/24/2019	24	SMBT002	772	1/24/2019	2:55	5	720	83420	36500	50.69
1/24/2019	24	SMBT002	2196	1/24/2019	3:19	5	720	82340	36440	50.61
1/24/2019	24	SMBT002	2001	1/24/2019	3:46	5	720	81720	35540	49.36
1/24/2019	24	SMBT002	4799	1/24/2019	4:45	5	720	83620	36580	50.81
1/24/2019	24	SMBT002	710	1/24/2019	5:33	6	720	81360	37100	51.53
1/24/2019	24	SMBT002	594	1/24/2019	5:50	6	720	82080	38580	53.58
1/24/2019	24	SMBT002	T1288A	1/24/2019	6:10	6	720	79200	34540	47.97
1/24/2019	24	SMBT002	T1599A	1/24/2019	6:50	6	720	82560	38480	53.44
1/24/2019	24	SMBT002	T1477A	1/24/2019	7:50	6	720	81720	37720	52.39
1/24/2019	24	SMBT002	T1377A	1/24/2019	8:23	6	416	65720	20960	50.38
	24 Total						16202		821180	50.68
1/24/2019	25	PT	709	1/24/2019	10:54		1040	77020	30360	29.19
1/24/2019	25	PT	1671	1/24/2019	11:41		1040	82060	30300	29.13
1/24/2019	25	PT	746	1/24/2019	12:42		1040	76260	29740	28.60
	25 Total						3120		90400	28.97

On Thursday, January 24, 2019, three truck loads of lay one breeder hens, flock "PT", were scheduled to be run as the last birds of the day (day shift hours are 0946-1816). Each truck contained 1040 hens. The trucks arrived at 1053, 1141, and 1242, respectively. I observed them at approximately 1400 and did not note any abnormalities. According to establishment paperwork provided, the hens went off feed on January 23, although they were still looking into what time. Due to mechanical issues with the chiller, the establishment was unable to run the hens that day (January 24) and elected to carry them over to the following day (January 25). Normally, when birds are carried over, they are run first thing on night shift (night shift hours are 0116-0946); however, night shift does not run breeder hens, so the establishment decided they would be run first on day shift on January 25 (see email from (b) (6) communicating this to me). While making GCP observations at 1420 on January 25, I observed that these three truck loads of hens were still on the yard and had not been run yet. I also observed an increased number of DOAs from the previous day and numerous hens with large, exposed wounds that the hens surrounding them were pecking into. Fresh blood was visible on the beaks of these birds and splashed onto surrounding feathers. In two cases, the hens had managed to peck open a wound and pull out intestines and were pecking at the intestines splayed out in the cage of two separate hens. The birds were seen aggressively pecking at each other and at the feces/eggs in the cages. At this point, the hens had been off feed for approximately two days and on the yard for 26-28 hours, and had not had access to feed or water during that time. According to Butterball's "Animal Care and Well-Being Program", "Time in holding area will not exceed 24 hours from time of on farm feed withdrawal. Any deviation from this maximum should be documented." I immediately proceeded inside and found (b) (6). I expressed my concerns with the birds being held at the establishment for a greater length of time than normal and that it was communicated to be yesterday that these birds would be run first and still had not been run. He said there had been some miscommunication due to changes in management/staffing and that the decision was made to run the hens *last* on dayshift, with the new breeders that had come in today. I expressed my concerns to him that the birds were being held without access to food or water. The birds did not end up being run until starting at 1715, or 31 hours from their arrival at the establishment. A similar situation occurred in October 2016 following Hurricane Matthew where birds were off feed/water for 60 hours before being killed. It was documented at the time in a meeting MOI on October 27, 2016 that our recommendation was to look at different options if a similar situation arose and the establishment said that they would take each on a case-by-case basis.



United States Department of Agriculture

Food Safety and
Inspection
Service

1400
Independence
Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 2/13/2019
Subject: Poultry Good Commercial Practices / YXA53220206131
Meeting Date: 2/13/2019
Meeting Time: 2:55 PM
Establishment: P935 - Allen Harim Foods, LLC.
Reason Code:
Other Reason Code:
Comments:

At approximately 1445 hours while performing inspection verification, I was informed by inspector on Line 3 that there was 1 carcass hanging on the Veterinary disposition shackles behind line 3, station 3. The carcass's head and neck were dark red to purple and had not received a cut to the neck. (b) (6) was notified of the observation of bird dying other than by slaughter. (b) (6) informed me that he would take the carcass for the relevant Supervisor to observe and investigate the cause. I was later informed by (b) (6) that the Back Up Killer was reprimanded.

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)
(b) (6)
(b) (6)

Allen Harim Foods, LLC. P-935

Harbeson, DE. 19951



Allen Harim Foods, LLC
Harbeson Processing Plant
18752 Harbeon Road
Harbeson, DE 19951
Phone (302) 684-1640

To: (b) (6)
From: (b) (6)
Date: February 20, 2019
Establishment: P-935 Allen Harim Foods, LLC
Subject: MOI GCP Dated 2/13/19

The establishment is aware of the importance of following Good Commercial Practices. On 2/13/19, was notified of a cadaver on Line 3 station 3. Production management was notified of USDA observations.

The team member responsible was disciplined according to company policy. In addition, a member of Management will monitor the backup killer twice a shift on 2/14/19 and 2/15/19. All documentation will be located in the HACCP office upon completion. Any team member observed not following company policy will be subject to disciplinary actions up to and including termination.

Respectfully,

(b) (6)

(b) (6)

2/21/19



To: (b) (6)

From: Craig Leviner

Subject: MOI – January 28, 2019 – Poultry Commercial Practice.

The plant incurred an unforeseen event with the drag chiller on this date causing to suspend operations for the day. This resulted in a higher than normal carry over of turkeys. In all cases it is the Plant's priority to operate with processing all carry overs within a 24-hour period. In this case, management did not recognize or verify the actual delivery time. The estimated time which was much later was used to determine when the carry over turkeys could be processed. Further corrective actions will be that actual delivery times to the plant will be used for carrying over decisions as it pertains to operational slaughter times. Thank you for your assistance in this matter.

Craig Leviner

Senior Plant Manager

1st / 2nd Processing and Retail Operations



United States Department of Agriculture

Food Safety and
Inspection
Service

1400
Independence
Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 1/28/2019
Subject: Poultry Good Commercial Practices / AGA1010013828I
Meeting Date: 1/28/2019
Meeting Time: 11:00 AM
Establishment: M7345+P7345 - Butterball, LLC
Reason Code:
Other Reason Code: GCP
Comments:

On Thursday, January 24, 2019, three truck loads of lay one breeder hens, flock "PT", were scheduled to be run as the last birds of the day (day shift hours are 0946-1816). Each truck contained 1040 hens. The trucks arrived at 1053, 1141, and 1242, respectively. I observed them at approximately 1400 and did not note any abnormalities. According to establishment paperwork provided, the hens went off feed on January 23, although they were still looking into what time. Due to mechanical issues with the chiller, the establishment was unable to run the hens that day (January 24) and elected to carry them over to the following day (January 25). Normally, when birds are carried over, they are run first thing on night shift (night shift hours are 0116-0946); however, night shift does not run breeder hens, so the establishment decided they would be run first on day shift on January 25 (see email from Billy Davis, first processing superintendent, communicating this to me). While making GCP observations at 1420 on January 25, I observed that these three truck loads of hens were still on the yard and had not been run yet. I also observed an increased number of DOAs from the previous day and numerous hens with large, exposed wounds that the hens surrounding them were pecking into. Fresh blood was visible on the beaks of these birds and splashed onto surrounding feathers. In two cases, the hens had managed to peck open a wound and pull out intestines and were pecking at the intestines splayed out in the cage of two separate hens. The birds were seen aggressively pecking at each other and at the feces/eggs in the cages. At this point, the hens had been off feed for approximately two days and on the yard for 26-28 hours, and had not had access to feed or water during that time. According to Butterball's "Animal Care and Well-Being Program", "Time in holding area will not exceed 24 hours from time of on farm feed withdrawal. Any deviation from this maximum should be documented." I immediately proceeded inside and found (b) (6). I expressed my concerns with the birds being held at the establishment for a greater length of time than normal and that it was communicated to me yesterday that these birds would be run first on day shift and still had not been run. He said there had been some miscommunication due to changes in management/staffing and that the decision was made to run the hens *last* on dayshift, with the new breeders that had come in today, based on ease of product flow through the establishment. I expressed my concerns to him that the birds were being held without access to food or water and bird welfare needed to be taken into consideration. The birds did not end up being run until starting at 1715, or 31 hours from their arrival at the establishment. According to paperwork submitted on January 28, there were 38 DOAs (1.2%). The "Animal Care and Well-Being Program" states that DOAs should not exceed 1% and if they do, cause will be determined, actions reviewed, and new procedures put in place. A similar situation occurred in October 2016 following Hurricane Matthew where birds were off feed/water for 60 hours before being killed. It was documented at the time in a meeting MOI on October 27, 2016 that our recommendation was to look at different options if a similar situation arose and the establishment said that they would take each on a case-by-case basis.



United States Department of Agriculture

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP MOI
Date: Friday, March 15, 2019 6:09:46 PM
Attachments: [GCP MOI 2-13-19 and Response.pdf](#)

(b) (6)

Allen Harim Foods, LLC. P935
18752 Harbeson Road
Harbeson, DE. 19951
302-684-1640 (b) (6)
Fax: 602-684-0718
(b) (6) @fsis.usda.gov



United States Department of Agriculture

Food Safety and
Inspection
Service

1400
Independence
Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 1/22/2019
Subject: Poultry Good Commercial Practices / YXA18180109221
Meeting Date: 1/22/2019
Meeting Time: 6:14 PM
Establishment: P935 - Allen Harim Foods, LLC.
Reason Code:
Other Reason Code:
Comments:

At approximately 1814 hours, I was notified that the inspector on line 3, station 3 had hung back 2 birds for Veterinarian disposition. Upon arrival I observed the 2 birds had heads intact which were red to purple in color and had not received a cut to the neck. There was a small cut to the side of the heads of the each cadaver. (b) (6) was notified of the observation of birds dying other than by slaughter. The inspector on line 3, station 4 then notified me that he had condemned a cadaver as well. Upon investigation, this bird had the head intact which was red to purple in color and had a small cut to the left side of the neck however, both carotid arteries had not been cut.

At approximately 1825 hours I went to perform Good Commercial Practice verification however there were no birds on line 3 due to the lunch break. At approximately 1943 hours I performed Good Commercial Practice verification by observing 200 carcasses enter the scalding, and 200 carcasses at the kill blade. There were no live birds observed entering the scalding and the back-up kill performed a cut to the neck of all birds not cut by the kill blade.

(b) (6) was notified of birds dying other than by slaughter. (b) (6) stated that the responsible establishment employee would receive disciplinary action and the back up kill personnel for line 3 will be monitored for 3 days.

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

(b) (6)

(b) (6)

1/22/19



Allen Harim Foods, LLC
Harbeson Processing Plant
18752 Harbeon Road
Harbeson, DE 19951
Phone (302) 684-1640

To: (b) (6)
From: (b) (6)
Date: January 25, 2019
Establishment: P-935 Allen Harim Foods, LLC
Subject: MOI GCP Dated 1/22/19

The establishment is aware of the importance of following Good Commercial Practices. On 1/22/19, USDA observed 2 cadavers that were hung back from Line 3 station 3. Production management was notified of USDA observations.

The Backup killer team member was disciplined according to company policy. A Supervisor will monitor the job performance 1 time per shift starting 1/23/19 and ending 1/28/19 to ensure disciplinary action was effective. All documentation will be located in the HACCP office upon completion. Any team member observed not following company policy will be subject to disciplinary actions up to and including termination.

Respectfully,

(b) (6)



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Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 1/22/2019
Subject: Poultry Good Commercial Practices / YXA18180109221
Meeting Date: 1/22/2019
Meeting Time: 6:14 PM
Establishment: P935 - Allen Harim Foods, LLC.
Reason Code:
Other Reason Code:
Comments:

At approximately 1814 hours, I was notified that the inspector on line 3, station 3 had hung back 2 birds for Veterinarian disposition. Upon arrival I observed the 2 birds had heads intact which were red to purple in color and had not received a cut to the neck. There was a small cut to the side of the heads of the each cadaver. (b) (6) was notified of the observation of birds dying other than by slaughter. The inspector on line 3, station 4 then notified me that he had condemned a cadaver as well. Upon investigation, this bird had the head intact which was red to purple in color and had a small cut to the left side of the neck however, both carotid arteries had not been cut.

At approximately 1825 hours I went to perform Good Commercial Practice verification however there were no birds on line 3 due to the lunch break. At approximately 1943 hours I performed Good Commercial Practice verification by observing 200 carcasses enter the scalding, and 200 carcasses at the kill blade. There were no live birds observed entering the scalding and the back-up kill performed a cut to the neck of all birds not cut by the kill blade.

(b) (6) was notified of birds dying other than by slaughter. Mr. Bethae stated that the responsible establishment employee would receive disciplinary action and the back up kill personnel for line 3 will be monitored for 3 days.

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



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Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 12/6/2018
Subject: Poultry Good Commercial Practices / YXA2719125804I
Meeting Date: 12/4/2018
Meeting Time: 5:53 PM
Establishment: P935 - Allen Harim Foods, LLC.
Reason Code:
Other Reason Code:
Comments:

On 12/4/18, at approximately 1753 hours while tagging a stainless steel bin of small birds I observed two whole small carcasses that were bright red in color with the head intact. Upon further investigation the two carcasses had no bleeding cut to the necks, the facial areas was swollen and purple in color, as was the necks. At approximately 1812 hours (b) (6) was notified of the observation of birds dying other than by slaughter.

At approximately 1822 hours I performed Good Commercial Practice verification by observing 200 carcasses enter the scalding and 200 carcasses at the kill blade. There were no live birds observed entering the scalding and the back-up kill performed a cut to the neck of all birds not cut by the kill blade. (b) (6) and (b) (6) were notified of the observation of birds dying other than by slaughter.

On 12/4/18 and 12/5/18 I requested a verbal corrective action from Mr. (b) (6) however none has been 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. (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

(b) (6)

(b) (6)

(b) (6)

12/6/18



Allen Harim Foods, LLC
Harbeson Processing Plant
18752 Harbeon Road
Harbeson, DE 19951
Phone (302) 684-1640

To: (b) (6)
From: (b) (6)
Date: December 14, 2018
Establishment: P-935 Allen Harim Foods, LLC
Subject: MOI GCP /YXA2719125804I

The establishment is aware of the importance of following Good Commercial Practices. On 12/4/18, at approximately 1753 hours while tagging a stainless steel bin of small birds I observed two whole small carcasses that were bright red in color with the head intact. Upon further investigation the two carcasses had no bleeding cut to the necks, the facial areas were swollen and purple in color, as was the necks. She did observe that the bird received a cut to the neck as blood was dripping from the neck. Production management was notified of USDA observations.

The Backup killer team member was counseled and given a disciplinary as they did not adhere to the job's specific duties and thereby, through their inaction, the process failed. Any team member observed not following company policy will be subject to disciplinary actions up to and including termination.

Respectfully,

(b) (6)



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Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 1/4/2019
Subject: Poultry Good Commercial Practices / YXA45170148041
Meeting Date: 12/28/2018
Meeting Time: 8:07 PM
Establishment: P935 - Allen Harim Foods, LLC.

Reason Code:

**Other Reason
Code:**

Comments:

At approximately 2007 hours while performing antemortem and Good Commercial Practice (GCP) verification task I observed a live medium bird, head raised, breathing, eyes blinking and looking around enter the scalding. (b) (6) (b) (6) was notified of a bird dying other than by slaughter.

At approximately 2012 hours I performed GCP verification by observing 200 carcasses enter the scalding and 200 carcasses at the kill blade. There were no further observation of live birds entering the scalding and the back-up kill performed a cut to the neck of all birds not cut by the kill blade. (b) (6) stated that the back up kill personnel will receive disciplinary action.

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. -935

(b) (6)

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP MOI at P-146
Date: Friday, January 18, 2019 12:26:45 PM
Attachments: [MOI Report.pdf](#)



Allen Harim Foods, LLC
Harbeson Processing Plant
18752 Harbeon Road
Harbeson, DE 19951
Phone (302) 684-1640

To: (b) (6)
From: (b) (6)
Date: January 23, 2019
Establishment: P-935 Allen Harim Foods, LLC
Subject: MOI GCP Dated 12/28/18

The establishment is aware of the importance of following Good Commercial Practices. On 12/28/18, USDA observed a live bird entering the scalders. Production management was notified of USDA observations.

The Backup killer team member was disciplined according to company policy. A Supervisor will monitor the job performance 1 time per shift starting 12/29/18 and ending 1/3/19 to ensure disciplinary action was effective. All documentation will be located in the HACCP office upon completion. Any team member observed not following company policy will be subject to disciplinary actions up to and including termination.

Respectfully,

(b) (6)

(b) (6)

(b) (6), (b) (4)

(b) (6), (b) (4)

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP MOI establishment response
Date: Monday, February 11, 2019 11:39:38 AM
Attachments: [GCP MOI 1.28.19.pdf](#)
[GCP MOI 1.28.19 establishment response.pdf](#)

Hi-

Attached is the GCP MOI I wrote a few weeks back and the establishment's response, which I received today. They are saying they did not verify the actual delivery time, which I think is a very poor excuse. Breeders are generally delivered later in the day than super toms due to traveling from a farther distance, but their arrival time of between 1053-1242 that day is very typical and not different from when they normally arrive. So there is really no reason for them to have even needed to verify a delivery time. Even if they had arrived later in the day, they were not run until starting at 1715 the following day, so it would have been very unlikely they could have run them within their supposed 24-hour period. The shift ends at 1816 and it would be very rare for birds to arrive close to the end of the shift. Also, they did not address that I was originally told (per email) that the birds would be run first on night shift and then their minds were changed due to plant needs and "product flow." They are saying it is their priority to operate all carry-overs within a 24-hour period but their "Animal Care and Well-Being Program" says that time in holding area will not exceed 24 hours **from time of on farm feed withdrawal**. By not running them on night shift, there is no way they could comply with that. This is the main issue at hand- they will not run breeders on night shift so if they have to carry them over, there is no way they could run them within that 24-hour period. That was not at all addressed in their response. I plan on verbally presenting these concerns in the weekly meeting this week and documenting them in the weekly meeting MOI. I wanted to see if you would like me to pursue this any further or close it out once I present my concerns at the meeting this week. Thanks.

(b) (6)
Supervisory Public Health Veterinarian
OFO
FSIS, USDA
Mt. Olive, NC P7345
Phone Number: 919-658-6743 (b) (6)
Fax Number: 919-658-5575
Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
To: (b) (6)
Cc: [Williams, Phillip - FSIS](#)
Subject: GCP MOI for 5 birds almost entering the scalders
Date: Thursday, March 28, 2019 9:30:26 AM
Attachments: [MOI DVMS GCP Live Bird Entering Scalders.pdf](#)

Good morning (b) (6),

Please see the attached MOI that I have issued to House of Raeford Farms Inc., P510, Rose Hill. During my GCP task today, I identified 5 live birds almost entering the scalders. Three of the birds were uncut and 2 birds were improperly cut and still alive. The plant has been in the process of training a new back up killer and they attribute it to the trainer not paying attention. A similar incident was documented by (b) (6) on 3/4/2019 for a single bird without a cut on the neck. The preventive given by the supervisor on 3/4/19 was to have the back up killer pay more attention, which is very similar to the response I received today.

Thank you,

(b) (6)
Relief Supervisory Public Health Veterinarian
Office of Field Operations
Food Safety Inspection Service/USDA
Tyson Foods, Inc. P-622
2023 Hasty St.
Monroe, NC 28110
704-296-1933
704-282-4400 (Fax)
(b) (6) [@usda.gov](#)

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP MOI P-146
Date: Thursday, January 17, 2019 6:07:24 PM
Attachments: [Scan0012.pdf](#)

Good evening,

Please find attached a mistreatment of poultry MOI at Glen Allen, Va.

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP MOI
Date: Friday, January 4, 2019 7:24:42 PM
Attachments: [GCP MOI 12-28-18.pdf](#)

Attached is a GCP MOI for your review

Filtered for Inspector All

[illegible]

From: [Roling, Mark - FSIS](#)
To: (b) (6)
Subject: GCP question
Date: Wednesday, February 13, 2019 4:38:10 PM

Can one of you call me on a question please

Mark Roling
Deputy District Manager
Raleigh District
Office of Field Operations, FSIS, USDA
6020 Six Forks Road
Raleigh, NC. 27609
Phone: 919-208-2935
(b) (6)
mark.roling@usda.gov

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: GCP
Date: Tuesday, January 22, 2019 8:21:07 PM
Attachments: [GCP MOI 1-22-19.pdf](#)

A GCP MOI is attached for your review

Ms. Nicole Reynolds, Plant Manager, P-510
House of Raeford
Rose Hill, NC 28458

Ms. Reynolds

At approximately 1352 while performing the Good Commercial Practices Verification task, I observed a live bird about to enter the scalders. The bird at the time of my observation had normal rhythmic breathing, eyes open and blinking with the head elevated. I immediately pointed out the bird to (b) (6), who stopped the line before the bird could enter the scalders and removed the bird from the line. After removing the bird from the line, it was observed that there was no cut on the neck which would not have allowed the bird to bleed out properly. (b) (6) took the bird back to live hang to show it to (b) (6). (b) (6) placed the bird back onto the kill line to allow it to go back through the stunner and the kill blade to allow proper bleeding. (b) (6), instructed the backup cutter to pay more attention to the smaller birds going through. I discussed my finding with (b) (6) and (b) (6) and notified them of the pending MOI and the establishment's failure to comply with 9 CFR 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), was also notified my findings.

Ms. Reynolds this MOI will be forwarded to the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.

If you have any questions or concerns regarding the above, please contact (b) (6) or (b) (6).

Respectfully,

(b) (6)



**United States
Department of
Agriculture**

**Food Safety
and Inspection
Service**

**Field
Operations**

Date: 3/11/2019

Certified Mail# 7017 0660 0000 7888 3852

(b) (6)

Mar-Jac Poultry-MS (Establishment # P517)
P.O. Box 991
Hattiesburg, MS 39401

LETTER OF CONCERN

Dear (b) (6)

Per the USDA FSIS team there at establishment #P517, USDA Inspection Program Personnel (USDA-IPP) have observed and documented issues of concern in live poultry handling/treatment, which documents a lengthy trend of live animal handling deficiencies. Specifically, USDA-IPP have observed, communicated, and documented repeated episodes of live bird mistreatment, defined properly as Good Commercial Practices (GCPs) failures/deficiencies, and communicated and documented these GCP deficiencies on numerous occasions within establishment issued GCP Memorandum of Information/Interview (GCP MOIs).

As per communication from the USDA-IPP, conditions have been described as follows:

Document	Date of Incident	Brief Description of Deficiency
GCP MOI	2/13/2018	Live bird observed in DOA pile
GCP MOI	2/27/2018	Live bird observed in DOA pile
GCP MOI	2/28/2018	Live bird entered scalders
GCP MOI	3/5/2018	Injured bird, damaged cage, in dried mud
GCP MOI	3/6/2018	Live bird entered scalders
GCP MOI	4/5/2018	Live bird observed in DOA pile

GCP MOI	4/18/2018	Distressed birds in damaged cages
GCP MOI	5/23/2018	Live bird entered scalders
GCP MOI	5/24/2018	Birds piled up at dump system
GCP MOI	6/22/2018	Piling and throwing birds at dump system
GCP MOI	6/28/2018	Live bird entered scalders
GCP MOI	7/9/2018	Birds left in heat and in distress
GCP MOI	9/4/2018	Birds piled up at dump system
GCP MOI	9/27/2018	Truck ran over live bird, crushing it
GCP MOI	10/5/2018	Live bird observed in DOA pile
GCP MOI	11/1/2018	Comingled live and deads at dump system
GCP MOI	11/15/2018	Live bird observed in DOA pile
GCP MOI	11/25/2018	Live bird observed in DOA pile
GCP MOI	2/9/2019	Live bird entered scalders
GCP MOI	2/19/19	Live bird observed in DOA pile
GCP MOI	3/5/2019	Live bird left in cage on trailer injured and in distress

Mr. Colee, I have reviewed the USDA-IPP GCP MOI issuances and I agree with their determinations that such deficiencies meet the criteria set forth for the GCP MOI issuances and that this information also supports the issuance of this Letter Of Concern (LOC).

The establishment has failed repeatedly to meet Good Commercial Practices (GCP) standards and the regulatory requirements of 9CFR381.65(b), as per the information within the referenced GCP MOIs. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Before Slaughter," the USDA's Food Safety and Inspection Service (FSIS) encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by GCPs, as described therein. (b) (6) based upon my understanding of these deficiencies, it is my determination that the procedures and or personnel employed at the Mar-Jac facility (#P517) failed in providing adequate, timely, appropriate and/or effective corrective actions to prevent or mitigate the recurrence of these deficiencies.

A copy of this LOC will be forwarded to the District Manager (DM) and the three (3) Deputy District Managers (DDMs) in the Jackson District Office, the Executive Associate for Regulatory Operations (EARO), (b) (6) the (b) (6) (b) (6) in Washington D.C. (b) (6) the IPP Veterinarian(s) (PHVs), and/or related staff, the Mississippi State Veterinarian, USDA Office of Investigation, Enforcement, and Audit (OIEA) Investigative Personnel, and the appropriate USDA APHIS State Representative, along with any other appropriate authorities as deemed appropriate.

The USDA FSIS Jackson District Office is encouraging you to make demonstrable and verifiable improvements (corrective actions) in the areas where these deficiencies have occurred in an effort to prevent recurrence.

If you have any questions regarding this matter, please feel free to contact the Jackson District

Office at (601) 965-4312.

(b) (6)



District Veterinary Medical Specialist

(b) (6) [@fsis.usda.gov](mailto:_____@fsis.usda.gov)

Jackson District Office

713 South Pear Orchard Rd., Suite 402

Ridgeland, MS 39157

Office - 601-965-4312

Cc:

DM Dr. Larry Davis, (via electronic copy)

DDM Dr. Greg Brookhouser, (via electronic copy)

DDM Dr. David Thompson, (via electronic copy)

DDM Mr. William Griffin. (via electronic copy)

(b) (6)



United States Department of Agriculture

Food Safety and
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1400
Independence
Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 1/24/2019
Subject: Poultry Good Commercial Practices
Meeting Date: 1/24/2019
Meeting Time: 5:49 PM
Establishment: M56+P56 - PILGRIMS PRIDE CORPORATION

Reason Code:

**Other Reason
Code:**

Comments:

On 01/24/2018 at approximately 5:49 pm, while performing the Poultry Good Commercial Practices Task. I was observing the birds go into the scalding when I noticed a live bird go into the scalding. The bird had its head raised up, eyes open and very alert. I immediately alerted the (b) (6), of my observation. At approximately 7 minutes after bird entered scalding, (b) (6) removed said bird from the line.

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 scalding. This MOI serves as a written notice that future deviations may result in the taking of additional administrative actions.

(b) (6) -8 at Est. P-56

cc:

(b) (6)
(b) (6)
(b) (6)
(b) (6)
(b) (6)
(b) (6)
(b) (6)
(b) (6)
(b) (6)



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Independence
Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 3/28/2019
Subject: Poultry Good Commercial Practices / RHB1605034728I
Meeting Date: 3/28/2019
Meeting Time: 7:31 AM
Establishment: P510 - House Of Raeford Farms
Reason Code:
Other Reason Code:
Comments:

Ms. Nicole Reynolds, Plant Manager

Establishment P510

House of Raeford Farm, Inc.

Rose Hill, NC 28458

Ms. Reynolds,

On 03/28/2019, at approximately 0721 hours, while performing a Good Commercial Practices task in the Live Hang Room, I noted 5 live birds in the span of 1-2 minutes about to enter the scalding. At the time of my observations, each bird had normal rhythmic breathing, eyes open and blinking with the head elevated. A team member was in the area who stopped the line and removed each bird from the line before they could enter the scalding. On further observation of each bird, 3 did not have a cut on the neck to allow the birds to bleed out properly. The remaining birds had incomplete cuts on the neck which did not allow the birds to bleed out completely before entering the scalding. Each bird was placed back on the line to go through the proper slaughter process.

(b) (6) was made aware of my findings and was notified that a GCP MOI would be written and sent to the DVMS as a result. He reported that a new back up killer is currently being trained. (b) (6) stated that the trainer was not paying attention and had stepped away from the platform. Following this incident, the trainer was instructed to pay more attention and to stay at the platform while the new team member is being trained. Following this conversation, I repeated my Good Commercial Practices task and verified that the trainer was present on the platform in a location closest to the automatic kill blade.

A previous memorandum was written on 03/04/2019 for similar findings. In this memorandum (MOI# RHB1412035404I), a live bird was found at the scalding entrance without a cut on the neck. The incident was attributed to the back-up cutter not paying attention and the preventive measure cited was to instruct the back-up cutter to pay more attention to the smaller birds as they pass the kill blade.

The plant's preventative measures must be proactive and effective to ensure that birds entering the establishment do not die from causes other than slaughter. 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. It is the establishment's responsibility to ensure that birds are slaughtered in accordance with 9 CFR 381.65(b). 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.



United States Department of Agriculture

If you have any questions or concerns regarding this MOI, please feel free to contact myself or (b) (6).

Respectfully,

(b) (6)

Relief SPHV-Tyson Foods, Inc., Monroe

From:

(b) (6)

To:

(b) (6)

Subject:

MOI Report 01/24/2019

Date:

Thursday, January 24, 2019 7:39:48 PM

Attachments:

[MOI Report.pdf](#)



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1400
Independence
Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 3/26/2019
Subject: Poultry Good Commercial Practices / CUA3720032026I
Meeting Date: 3/26/2019
Meeting Time: 7:00 PM
Establishment: P764 - Perdue Foods, LLC
Reason Code:
Other Reason Code:
Comments:

At 1857 hours while performing the Poultry Good Commercial Practices task in the kill room, I observed on kill line number two several birds with neck cut have intense body and wings motion entering the scalding. This might indicate that the bleeding equipment was not properly adjusted, and the neck cuts were inadequate to achieve thorough bleeding of the birds. Also, I was able to remove a live bird with no neck cut from the line before it enters the scalding.

Immediately, I notified (b) (6) the poultry welfare officer and the Night Shift 1st Processing shift leader of the incident, he inspected kill line number two and evaluated the bleeding equipment. Then 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 reminded (b) (6) that live poultry must be treated in a manner consistent with Good Commercial Practices. I notified him that this Memorandum of Interview would be forwarded to the District Veterinary Medical Specialist (DVMS).

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: MOI
Date: Tuesday, March 26, 2019 10:13:51 PM
Attachments: [MOI Report.pdf](#)

Hello (b) (6),

I trust all is well with you; I have enclosed a copy of a Good Commercial Practices MOI for your review.

Thanks,

(b) (6)

Office of Field Operations
Food Safety and Inspection Service, USDA
Perdue Foods LLC, P-764
521 Willow Street
Salisbury, MD 21801
Phone: (b) (6)
(b) (6) [@usda.gov](#)

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: P-146 GCP MOI update
Date: Friday, January 18, 2019 1:00:45 PM
Attachments: [Scan0013.pdf](#)

Good afternoon,

I have updated the MOI, the establishment pointed out a factual error on their GCP check. Their welfare check actually found no loose birds on the yard and in the DOA bin the day the bird was run over.

Thank you,

(b) (6)

From:

(b) (6)

To:

(b) (6)

Cc:

(b) (6)

Subject:

Please find attached GCP MOI for your review.

Date:

Thursday, February 14, 2019 3:48:26 PM

Attachments:

[Scan_0022.pdf](#)

From: (b) (6)
To: (b) (6)
Subject: Question
Date: Tuesday, February 26, 2019 9:34:36 AM

(b) (6)

If we go do a GCP and the plant is in front of us and takes off birds only when we are doing our check, should we write MOI stating like you did on the one from your visit? We had been told previously that if they remove the birds that we don't write one.

Thanks!

(b) (6)

Supervisory Public Health Veterinarian
Office of Field Operations
Food Safety and Inspection Service, USDA
c/o House of Raeford, P-737
253 Butterball Road
Teachey, NC 28464

(b) (6)

(b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
To: (b) (6) (b) (6)
Cc: (b) (6)
Subject: Re: GCP concern
Date: Monday, January 28, 2019 9:56:50 AM

They told me that night shift "cannot handle" running the breeder hens (they generally only run super toms on night shift) and based on product flow in the plant it made more sense to run them last thing on day shift grouped with the other breeder hens that had come in that day.

(b) (6)
(b) (6)

OFO

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 (b) (6)

Fax Number: 919-658-5575

Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
Sent: Monday, January 28, 2019 9:33:16 AM
To: (b) (6)
Cc: (b) (6)
Subject: RE: GCP concern

Good morning (b) (6)

I agree that a GCP MOI is the best way to document this issue. Did the plant give any reason/justification as to why they decided to go against their own program by not running the birds first?

(b) (6)
District Veterinary Medical Specialist
919.208.2946 office
(b) (6)
844.839.6360 fax
(b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6) - FSIS
Sent: Sunday, January 27, 2019 7:06 PM

To: (b) (6)

Cc: (b) (6)

(b) (6)

Subject: FW: GCP concern

Hello DVMS's,

Please review attached document from (b) (6) /P-7345 Butterball LLC. I believe we can move forward with a GCP MOI on this. According to the facts described on the information described by (b) (6). Your feedback/correlation will be appreciated.

(b) (6)

Wilson Circuit
Raleigh District Office
Food Safety and Inspection Service- OFO
Office : 919-208-2952

(b) (6)

(b) (6)

From: (b) (6)

Sent: Friday, January 25, 2019 5:58 PM

To: (b) (6) - FSIS <(b) (6)@fsis.usda.gov>

Subject: GCP concern

For your review.

(b) (6)

OFO

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 x (b) (6)

Fax Number: 919-658-5575

Email: (b) (6) @usda.gov

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: RE: GCP concern
Date: Monday, January 28, 2019 10:00:28 AM

Still they failed to consider GCP/Poultry Welfare practices in order to accommodate a better product flow resulting on the observations /facts that you described. That is my concern and something they will need to consider in the future. This support a GCP MOI.

(b) (6)

Wilson Circuit
Raleigh District Office
Food Safety and Inspection Service- OFO
Office : 919-208-2952

(b) (6)

(b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)

From: (b) (6)
Sent: Monday, January 28, 2019 9:57 AM
To: (b) (6)
(b) (6)
Cc: (b) (6)
Subject: Re: GCP concern

They told me that night shift "cannot handle" running the breeder hens (they generally only run super toms on night shift) and based on product flow in the plant it made more sense to run them last thing on day shift grouped with the other breeder hens that had come in that day.

(b) (6)

(b) (6)

(b) (6)

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 x (b) (6)

Fax Number: 919-658-5575

Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
Sent: Monday, January 28, 2019 9:33:16 AM
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Cc: (b) (6)
Subject: RE: GCP concern

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(b) (6)
District Veterinary Medical Specialist
919.208.2946 office
(b) (6)
844.839.6360 fax
(b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
Sent: Sunday, January 27, 2019 7:06 PM
To: (b) (6)
(b) (6)
Cc: (b) (6)
(b) (6)
Subject: FW: GCP concern

Hello (b) (6)

Please review attached document from (b) (6) /P-7345 Butterball LLC. I believe we can move forward with a GCP MOI on this. According to the facts described on the information described by (b) (6). Your feedback/correlation will be appreciated.

(b) (6)
(b) (6)
Wilson Circuit
Raleigh District Office

Food Safety and Inspection Service- OFO

Office : 919-208-2952

(b) (6)

(b) (6)

From: (b) (6)

Sent: Friday, January 25, 2019 5:58 PM

To: (b) (6) - FSIS < (b) (6) @fsis.usda.gov>

Subject: GCP concern

For your review.

(b) (6)

(b) (6)

(b) (6)

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 (b) (6)

Fax Number: 919-658-5575

Email: (b) (6)

From: (b) (6)
To: (b) (6)
Cc: (b) (6) (b) (6)
Subject: RE: GCP concern
Date: Monday, January 28, 2019 10:47:29 AM

Yes. Go ahead.

(b) (6)

Wilson Circuit
Raleigh District Office
Food Safety and Inspection Service- OFO
Office : 919-208-2952

(b) (6)

(b) (6)

From: (b) (6)
Sent: Monday, January 28, 2019 10:40 AM
To: (b) (6)
Subject: Re: GCP concern

I agree. Should I go ahead and submit the GCP MOI?

(b) (6)

OFO

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 (b) (6)

Fax Number: 919-658-5575

Email: (b) (6)

From: (b) (6)
Sent: Monday, January 28, 2019 10:00:25 AM
To: (b) (6)
Cc: (b) (6)
Subject: RE: GCP concern

Still they failed to consider GCP/Poultry Welfare practices in order to accommodate a better product flow resulting on the observations /facts that you described. That is my concern and something they will need to consider in the future. This support a GCP MOI.

(b) (6)
(b) (6)
Wilson Circuit
Raleigh District Office
Food Safety and Inspection Service- OFO
Office : 919-208-2952
Mobile: (b) (6)
(b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)

From: (b) (6)
Sent: Monday, January 28, 2019 9:57 AM
To: (b) (6)
(b) (6)
Cc: (b) (6)
Subject: Re: GCP concern

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(b) (6)
(b) (6)
(b) (6)

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 (b) (6)

Fax Number: 919-658-5575

Email: (b) (6) [@usda.gov](#)

From: (b) (6)
Sent: Monday, January 28, 2019 9:33:16 AM
To: (b) (6)
Cc: (b) (6)
Subject: RE: GCP concern

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(b) (6)
District Veterinary Medical Specialist
919.208.2946 office
(b) (6)
844.839.6360 fax
(b) (6) [@usda.gov](#)

From: (b) (6)
Sent: Sunday, January 27, 2019 7:06 PM
To: (b) (6)
(b) (6)
Cc: (b) (6)
(b) (6)
Subject: FW: GCP concern

Hello DVMS's,

Please review attached document from (b) (6) /P-7345 Butterball LLC. I believe we can move forward with a GCP MOI on this. According to the facts described on the information described by (b) (6) . Your feedback/correlation will be appreciated.

(b) (6)

Front Line Supervisor
Wilson Circuit
Raleigh District Office
Food Safety and Inspection Service- OFO
Office : 919-208-2952
Mobile: (b) (6)
(b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)

From: (b) (6)
Sent: Friday, January 25, 2019 5:58 PM
To: (b) (6)
Subject: GCP concern

For your review.

(b) (6)

(b) (6)

OFO

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 (b) (6)

Fax Number: 919-658-5575

Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: Re: GCP concern
Date: Monday, January 28, 2019 11:32:33 AM
Attachments: [GCP MOI 1.28.19.pdf](#)
[GCP concern email.pdf](#)

Please see attached GCP MOI. A copy was provided to the establishment.

(b) (6)
(b) (6)
(b) (6)

FSIS, USDA
Mt. Olive, NC P7345
Phone Number: 919-658-6743 (b) (6)
Fax Number: 919-658-5575
Email: (b) (6) [@usda.gov](#)

From: (b) (6)
Sent: Monday, January 28, 2019 10:47:27 AM
To: (b) (6)
Cc: (b) (6)
Subject: RE: GCP concern

Yes. Go ahead.

(b) (6)
(b) (6)
Wilson Circuit
Raleigh District Office
Food Safety and Inspection Service- OFO
Office : 919-208-2952
Mobile: (b) (6)
(b) (6) [@fsis.usda.gov](#)

From: (b) (6)
Sent: Monday, January 28, 2019 10:40 AM
To: (b) (6)
Subject: Re: GCP concern

I agree. Should I go ahead and submit the GCP MOI?

(b) (6)

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 (b) (6)

Fax Number: 919-658-5575

Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)

Sent: Monday, January 28, 2019 10:00:25 AM

To: (b) (6)

Cc: (b) (6)

Subject: RE: GCP concern

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(b) (6)

Wilson Circuit

Raleigh District Office

Food Safety and Inspection Service- OFO

Office : 919-208-2952

(b) (6)

(b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)

From: (b) (6)

Sent: Monday, January 28, 2019 9:57 AM

To: (b) (6)

Cc: (b) (6)

Subject: Re: GCP concern

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(b) (6)

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 x (b) (6)

Fax Number: 919-658-5575

Email: (b) (6) [@usda.gov](#)

From: (b) (6)

Sent: Monday, January 28, 2019 9:33:16 AM

To: (b) (6)

Cc: (b) (6)

Subject: RE: GCP concern

Good morning (b) (6)

I agree that a GCP MOI is the best way to document this issue. Did the plant give any reason/justification as to why they decided to go against their own program by not running the birds first?

(b) (6)

District Veterinary Medical Specialist

919.208.2946 office

(b) (6)

844.839.6360 fax

(b) (6) [@usda.gov](#)

From: (b) (6)

Sent: Sunday, January 27, 2019 7:06 PM

To: (b) (6)

(b) (6)

Cc: (b) (6)

(b) (6)

(b) (6)

Subject: FW: GCP concern

Hello (b) (6)

Please review attached document from (b) (6) /P-7345 Butterball LLC. I believe we can move forward with a GCP MOI on this. According to the facts described on the information described by (b) (6). Your feedback/correlation will be appreciated.

(b) (6)

Wilson Circuit

Raleigh District Office

Food Safety and Inspection Service- OFO

Office : 919-208-2952

(b) (6)

(b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)

From: (b) (6)

Sent: Friday, January 25, 2019 5:58 PM

To: (b) (6) - FSIS (b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)>

Subject: GCP concern

For your review.

(b) (6)

(b) (6)

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 x2310

Fax Number: 919-658-5575

Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
To: (b) (6)
Cc: (b) (6) - FSIS; (b) (6) - FSIS; (b) (6) - FSIS
Subject: RE: GCP concern
Date: Monday, January 28, 2019 9:33:18 AM

Good morning (b) (6)

I agree that a GCP MOI is the best way to document this issue. Did the plant give any reason/justification as to why they decided to go against their own program by not running the birds first?

(b) (6)
District Veterinary Medical Specialist
919.208.2946 office
(b) (6)
844.839.6360 fax
(b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
Sent: Sunday, January 27, 2019 7:06 PM
To: (b) (6)
(b) (6)
Cc: (b) (6) - FSIS (b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov); (b) (6) - FSIS
(b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov); (b) (6)
(b) (6)
(b) (6)

Please review attached document from (b) (6) /P-7345 Butterball LLC. I believe we can move forward with a GCP MOI on this. According to the facts described on the information described by (b) (6) . Your feedback/correlation will be appreciated.

(b) (6)
(b) (6)
Wilson Circuit
Raleigh District Office
Food Safety and Inspection Service- OFO
Office : 919-208-2952
(b) (6)
(b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)

From: (b) (6)
Sent: Friday, January 25, 2019 5:58 PM
To: (b) (6) - FSIS (b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)
Subject: GCP concern

For your review.

(b) (6)

FSIS, USDA

Mt. Olive, NC P7345

Phone Number: 919-658-6743 (b) (6)

Fax Number: 919-658-5575

Email: (b) (6) [@usda.gov](#)

From: (b) (6)
To: (b) (6)
Cc: (b) (6)
Subject: RE: GCP MOI for 5 birds almost entering the scalders
Date: Thursday, March 28, 2019 9:38:27 AM

Thank you. The MOI looks good.

Unfortunately there's not much we can do about their response. We don't have the authority to take regulatory action at this point, so they can give us any response that they want. But you are correct in that it's the same response given before, so we could discuss with them our concerns about the ineffective nature of their previous response and question why they think a similar response would yield different results this time.

(b) (6)
District Veterinary Medical Specialist
Raleigh District Office
Office of Field Operations
USDA FSIS
6020 Six Forks Rd.
Raleigh, NC 27609
(b) (6)
Office: 919-208-2936
Fax: 844-839-6359
Email: (b) (6)

From: (b) (6)
Sent: Thursday, March 28, 2019 9:30 AM
To: (b) (6); (b) (6) - FSIS
<(b) (6)@fsis.usda.gov>
Cc: Williams, Phillip - FSIS <Phillip.Williams1@fsis.usda.gov>
Subject: GCP MOI for 5 birds almost entering the scalders

Good morning (b) (6),

Please see the attached MOI that I have issued to House of Raeford Farms Inc., P510, Rose Hill. During my GCP task today, I identified 5 live birds almost entering the scalders. Three of the birds were uncut and 2 birds were improperly cut and still alive. The plant has been in the process of training a new back up killer and they attribute it to the trainer not paying attention. A similar incident was documented by (b) (6) on 3/4/2019 for a single bird without a cut on the neck. The preventive given by the supervisor on 3/4/19 was to have the back up killer pay more attention, which is very similar to the response I received today.

Thank you,

(b) (6)

Relief Supervisory Public Health Veterinarian
Office of Field Operations
Food Safety Inspection Service/USDA
Tyson Foods, Inc. P-622
2023 Hasty St.
Monroe, NC 28110
704-296-1933
704-282-4400 (Fax)
(b) (6) [@usda.gov](mailto:usda.gov)

From: (b) (6)
To: (b) (6)
Subject: Re: GCP MOI P-146
Date: Wednesday, February 13, 2019 5:27:33 PM

Thanks for the input

(b) (6)

Raleigh District
Office of Field Operations, FSIS, USDA
6020 Six Forks Road
Raleigh, NC. 27609
Phone: 919-208-2935

(b) (6)

From: (b) (6)
Date: Wednesday, February 13, 2019 at 4:57:24 PM
To: (b) (6)
Subject: FW: GCP MOI P-146

(b) (6)

District Veterinary Medical Specialist
Raleigh District Office
Office of Field Operations
USDA FSIS
6020 Six Forks Rd.
Raleigh, NC 27609

(b) (6)

Office: 919-208-2936
Fax: 844-839-6359
Email: (b) (6)

From: Kea, Danielle - FSIS
Sent: Thursday, January 17, 2019 6:07 PM
To: (b) (6)
Cc: Ahmad, Safwat - FSIS <Safwat.Ahmad@fsis.usda.gov>
Subject: GCP MOI P-146

Good evening,

Please find attached a mistreatment of poultry MOI at Glen Allen, Va.

From: (b) (6)
To: (b) (6)
Subject: Re: GCP question
Date: Wednesday, February 13, 2019 8:54:33 PM

Wow. I don't remember seeing that email at all. Who sent it to us?

From: "Auxier, Travis - FSIS" <(b) (6)>
Date: Wednesday, February 13, 2019 at 5:11:20 PM
To: "(b) (6) - FSIS" (b) (6)>
Subject: FW: GCP question

I called Mark about this. It was about a GCP MOI written at P146, Tyson (Glenn Allen) from 01/17. The SPHV took a regulatory control action after observing one bird being run over by the forklift/jack driver. There is no mention of what the RCA was specifically, other than telling the jack driver to stop operating the jack and go get a supervisor. She did say that she released regulatory control after approx. 9 minutes, so a pretty substantial amount of time for the process to be stopped (I know they have two picking lines, but I don't know how many cage dumps they have).

(b) (6)
District Veterinary Medical Specialist
Raleigh District Office
Office of Field Operations
USDA FSIS
6020 Six Forks Rd.
Raleigh, NC 27609
(b) (6)
Office: 919-208-2936
Fax: 844-839-6359
Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: Roling, Mark - FSIS
Sent: Wednesday, February 13, 2019 4:38 PM
To: (b) (6) - FSIS (b) (6)@fsis.usda.gov; (b) (6) - FSIS (b) (6)@fsis.usda.gov>
Subject: GCP question

Can one of you call me on a question please

Mark Roling
Deputy District Manager
Raleigh District
Office of Field Operations, FSIS, USDA
6020 Six Forks Road
Raleigh, NC. 27609
Phone: 919-208-2935

(b) (6)

mark.roling@usda.gov

From: (b) (6)
To: [Hodge, Stanley - FSIS](#)
Cc: (b) (6)
Subject: Re: GCP
Date: Friday, March 29, 2019 9:49:01 AM

That's a tough one. I think I'd have to say documentation with an MOI would be more appropriate, and here's why...

1. You have described 2 different incidents about 6 hours apart. The fact that this happened twice doesn't necessarily lead us to the conclusion that the process is out of control. In other words, 2 or more MOIs don't add up to equal an NR.

2. I think the first incident would be closer to describing a process out of control because you described seeing red birds at the re-hang table before doing your NPIS Leukosis check and then after the check, you observed live birds about to enter the scalded. To me, this seems to indicate an issue that continued for several minutes (i.e. out of control) with no apparent attempt to correct. However, I think the plant could argue that simply describing "red birds" at the re-hang table doesn't mean that the birds were cadavers. I think a better description of the red birds would strengthen your observation and then I think the NR would be fully supportable. As you have it documented though, I think the plant could appeal the NR successfully.

When in doubt, document with an MOI.

I have no doubt that this plant is going to continue to have issues like this because of their set-up. It's only a matter of time before we start having enough observation to document these incidents as NRs.

(b) (6)
District Veterinary Medical Specialist
Raleigh District Office
Office of Field Operations
USDA FSIS
6020 Six Forks Rd.
Raleigh, NC 27609
(b) (6)
Office: 919-208-2936
Fax: 844-839-6359
Email: (b) (6)

(b) (6)
Date: Friday, March 29, 2019 at 09:25:46
To: (b) (6)
Cc: (b) (6)
Subject: GCP

(b) (6)

Can you please read this and see if it should be an NR or MOI. Phillip and I think it should be an NR,

but the plant is questioning if the process was really out of control.

Thank-you and have a good weekend!

On Wednesday, 27 March 2019 at approximately 0530 while going to perform a NPIS Leukosis check, I observed several cadavers in the red barrels next to the re-hangers. After completing the NPIS Leukosis, I performed a Good Commercial Practice task and observed 2 live birds as evidenced by their breathing, having eyes open, and showing coordinated body movements was about to enter the scalding on Line ^{(b) (4)}. The 2 birds were observed within a few minutes of each other. The line was stopped and both birds were removed by plant employees before they entered the scalding. There was no plant employee at the scalding when the first bird was observed, but there was when the second bird was observed. There was no other intervention procedure in place at the entrance to the scalding, so if the establishment employee had not been notified/present to remove the birds from the line, the birds would have entered the scalding and would have died by means other than slaughter. ^{(b) (6)} ^{(b) (6)} was notified that a MOI would be issued.

1140 - When going to complete my Good Commercial Practice check with ^{(b) (6)}, we observed several cadavers in the red barrels at the re-hangers on line ^{(b) (4)}. One of the cadavers had no cut on its neck. At 1142 while performing the Good Commercial Practice task I observed on Line ^{(b) (4)} a live bird with no cut on its neck as evidenced by their breathing, having eyes open, and showing coordinated body movements was about to enter the scalding. ^{(b) (6)} ^{(b) (6)}, who accompanied me when I did the task was able to retrieve the bird from the line before it could enter the scalding tank. Within a few minutes 2 additional live birds as evidenced by their breathing, having eyes open, and showing coordinated body movements were observed by us and removed by ^{(b) (6)}. Both birds were insufficiently cut enough to prevent them from entering the scalding alive. ^{(b) (6)} also removed an additional bird during this time. There was no other intervention procedure in place at the entrance to the scalding, so if the establishment employee had not been present to remove the birds from the line, the birds would have entered the scalding and would have died by means other than slaughter. ^{(b) (6)} ^{(b) (6)} stated they had added additional backup cutter to Line ^{(b) (4)} due to the person there had not been in the job long and would be adding a person at the entrance to the scalding.

^{(b) (6)} and ^{(b) (6)} were notified that an NR would be issued due to today's observations and the findings of earlier in the morning would be incorporated to the noncompliance with 381.65(b) of the regulations. 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.

^{(b) (6)}

Supervisory Public Health Veterinarian
Office of Field Operations
Food Safety and Inspection Service, USDA
c/o House of Raeford, P-737

253 Butterball Road

Teachey, NC 28464

(910) 463-7082

(b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
To: [Simon, Theodora - FSIS](#); (b) (6) - FSIS; [Banks, Catherine - FSIS](#)
Cc: (b) (6) - FSIS
Subject: RE: Please find attached GCP MOI for your review.
Date: Friday, February 15, 2019 10:34:31 AM

No comments.

(b) (6)

Raleigh District Office
Office of Field Operations
USDA FSIS
6020 Six Forks Rd.
Raleigh, NC 27609

(b) (6)

Office: 919-208-2936

Fax: 844-839-6359

Email: (b) (6)

From: Simon, Theodora - FSIS

Sent: Thursday, February 14, 2019 3:48 PM

To: (b) (6) - FSIS (b) (6) @fsis.usda.gov; (b) (6) - FSIS

(b) (6) @fsis.usda.gov; Banks, Catherine - FSIS <Catherine.Banks@fsis.usda.gov>

Cc: Simon, Theodora - FSIS <Theodora.Simon@fsis.usda.gov>

Subject: Please find attached GCP MOI for your review.

From: (b) (6)
To: (b) (6)
Subject: RE: Question
Date: Wednesday, February 27, 2019 9:03:50 AM

Thanks!

(b) (6)

(b) (6)

Office of Field Operations
Food Safety and Inspection Service, USDA
c/o House of Raeford, P-737
253 Butterball Road
Teachey, NC 28464
(910) 463-7082
(b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)
Sent: Wednesday, February 27, 2019 7:48 AM
To: Hodge, Stanley - FSIS <(b) (6)@fsis.usda.gov>
Cc: (b) (6)
Subject: RE: Question

It's a tricky situation, I think.

They have no back-up person normally stationed just prior to the entrance of the scalding, so if anyone is there, then that is a circumstance that is out of the ordinary. That being the case, I think an MOI would be warranted because they wouldn't have been there under normal circumstances and the bird would have entered the scalding while still breathing. Even if they are performing their own daily/weekly/monthly audit of the system, they don't have anyone stationed there normally so any bird you identify as "live" would have entered the scalding while still breathing. It's no different than what we saw when I was there last week...we saw it, but their person retrieved the birds from the line.

I think the MOI is still warranted, but if you want to use discretion, then that would be okay as well. I think there will be plenty of times for us to document this issue when a plant person isn't there pulling birds off the line.

(b) (6)

Raleigh District Office
Office of Field Operations
USDA FSIS
6020 Six Forks Rd.
Raleigh, NC 27609

(b) (6)

Office: 919-208-2936

Fax: 844-839-6359

Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6)

Sent: Tuesday, February 26, 2019 9:35 AM

To: Auxier, Travis - FSIS (b) (6) [@fsis.usda.gov](mailto:(b) (6)@fsis.usda.gov)>

Subject: Question

(b) (6)

If we go do a GCP and the plant is in front of us and takes off birds only when we are doing our check, should we write MOI stating like you did on the one from your visit? We had been told previously that if they remove the birds that we don't write one.

Thanks!

(b) (6)

Office of Field Operations
Food Safety and Inspection Service, USDA
c/o House of Raeford, P-737
253 Butterball Road
Teachey, NC 28464
(910) 463-7082

(b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6) - FSIS
To: [Hodge, Stanley - FSIS](#)
Cc: (b) (6) - FSIS
Subject: RE: Question
Date: Wednesday, February 27, 2019 7:48:07 AM

It's a tricky situation, I think.

They have no back-up person normally stationed just prior to the entrance of the scalders, so if anyone is there, then that is a circumstance that is out of the ordinary. That being the case, I think an MOI would be warranted because they wouldn't have been there under normal circumstances and the bird would have entered the scalders while still breathing. Even if they are performing their own daily/weekly/monthly audit of the system, they don't have anyone stationed there normally so any bird you identify as "live" would have entered the scalders while still breathing. It's no different than what we saw when I was there last week...we saw it, but their person retrieved the birds from the line.

I think the MOI is still warranted, but if you want to use discretion, then that would be okay as well. I think there will be plenty of times for us to document this issue when a plant person isn't there pulling birds off the line.

(b) (6)
District Veterinary Medical Specialist
Raleigh District Office
Office of Field Operations
USDA FSIS
6020 Six Forks Rd.
Raleigh, NC 27609
(b) (6)
Office: 919-208-2936
Fax: 844-839-6359
Email: (b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)

From: (b) (6) - FSIS
Sent: Tuesday, February 26, 2019 9:35 AM
To: Auxier, Travis - FSIS <Travis.Auxier@fsis.usda.gov>
Subject: Question

(b) (6)

If we go do a GCP and the plant is in front of us and takes off birds only when we are doing our check, should we write MOI stating like you did on the one from your visit? We had been told previously that if they remove the birds that we don't write one.

Thanks!

(b) (6)

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Food Safety and Inspection Service, USDA
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253 Butterball Road
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(b) (6) [@usda.gov](mailto:(b) (6)@usda.gov)



United States Department of Agriculture

Food Safety and
Inspection
Service

1400
Independence
Avenue, SW.
Washington,
D.C. 20250

From: (b) (6)
Date: 2/13/2019
Subject: Poultry Good Commercial Practices / YXA5322020613I
Meeting Date: 2/13/2019
Meeting Time: 2:55 PM
Establishment: P935 - Allen Harim Foods, LLC.

Reason Code:

**Other Reason
Code:**

Comments:

At approximately 1445 hours while performing inspection verification, I was informed by inspector on Line 3 that there was 1 carcass hanging on the Veterinary disposition shackles behind line 3, station 3. The carcass's head and neck were dark red to purple and had not received a cut to the neck. (b) (6) was notified of the observation of bird dying other than by slaughter. (b) (6) informed me that he would take the carcass for the relevant Supervisor to observe and investigate the cause. I was later informed by (b) (6) that the Back Up Killer was reprimanded.

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



United States Department of Agriculture

Food Safety and
Inspection
Service

1400
Independence
Avenue, SW.
Washington,
D.C. 20250

From:

(b) (6)

Date:

1/17/2019

Subject:

Poultry Good Commercial Practices / EJJ43160123171

Meeting Date:

1/16/2019

Meeting Time:

5:00 PM

Establishment:

P146 - Tyson Foods, Inc.

Reason Code:

**Other Reason
Code:**

Comments:

The following MOI documents my concerns regarding the practices of P-146 associates in Antemortem:

On January 16, 2018 at approximately 1718 when (b) (6) and I started a Poultry Good Commercial Practices task we observed a nonconformance. As we approached the area where birds are retrieved from the trucks and conveyed to the cage dumper we observed a bird fall out of a cage directly onto the ground. The jack driver was moving the birds rapidly and backed over the bird as we were yelling to him and waving our hands in the air trying to get his attention. He saw us as we got closer and stopped. I took Regulatory Control Action. The actions of the driver resulted in the breaking of one of the bird's legs and it was partially eviscerated. The bird died 10-15 seconds later.

As I was verifying the bird had died, the jack driver tried to remove the carcass and I asked that he stop all actions until further notice. He replied, "What do you want to do play with it!"

I responded, "I have stopped the process, leave the bird here, I need you to get your supervisor."

When he left, Collier Woods, George Bell and Kevin Williams arrived to the area at about 1720. I described the sequence of events and that I had stopped the process due to the inhumane treatment of a bird having been killed by being run over.

During this time the jack driver again made comments such as, "What does me picking up the bird have to do with anything? I can't pick it up?" Another driver made comments stating, "Birds are falling out of the cages all the time".

This establishment and all Tyson Foods are committed to the proper handling of all animals used to produce meat and poultry according to their Animal Welfare Program. I did not see this mission expressed in the actions and comments of the associate moving the birds. I told all members of management and the driver that a bird should not die by means other than slaughter and establishments are to handle and treat live birds humanely in the loading and live hang areas as dictated by FSIS Directive 6100.3, VII, A, (b). The establishment has a plan in place for handling animals from the time they enter the premises.

On another note, Tyson's plan states that for Escaped birds, movement of trucks in the immediate area will be stopped to prevent injury to the escaped bird, contain it, recage or placed on the line or notify the Yard supervisor. The driver was speeding about moving too fast and not being vigilant enough to make this observation. Furthermore, I stopped production because the driver retrieved the bird from the ground and started carrying him to DOA bin prior to the bird dying. The bird did not die until I asked the driver to return it and



get his supervisor. This person did not try to kill the bird prior to disposing of the carcass. He did not communicate what he was doing he just headed in the direction of the DOA bin. That bird would have needed to be humanely euthanized in my presence then placed in the DOA bin.

CSI Lee went to get Night Shift Assistant Plant Manager, Andre McBride, who arrived around 1723. I explained the series of events and told him I would need a plan of action from the establishment to bring themselves back into compliance before they could start their process again. Mr. McBride listed the following:

- Coaching the jack driver
- Doing a retraining of all team members
- A supervisor monitoring the yard hourly doing a visual inspection

It will be documented.

- He also started to locate the damaged cage that had the bird

I accepted preventative measures and released Regulatory Control Action at 1727.

During the sequence of events Evisceration General Plant Manager, George Bell, reiterated that the cages that have been damaged and removed from production however current efforts to make cages safe for the transport of birds have been ineffective. On 1/17/19 I requested the Animal Welfare check of this establishment. It shows that a weekly Chicken Yard Audit is performed and it was done on that day. It was completed at 1430 and results showed Live birds were found on the yard and in the DOA bin.

MOIs regarding deviation from Good Commercial Practices has been written in the last 90 days. On November 9, 2018 and December 27, 2018 USDA cited that the establishment for failing to slaughter poultry in accordance with Good commercial practices. Should an ongoing pattern develop where birds are not being slaughtered in a manner that results in thorough bleeding of the carcasses in accordance with FSIS Directive 6110.1, II, B an NR for noncompliance with 9 CFR 381.65(b) (failure to handle birds in accordance with GCP) will result.



United States Department of Agriculture

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Independence
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From: (b) (6)
Date: 1/17/2019
Subject: Poultry Good Commercial Practices / EJJ43160123171
Meeting Date: 1/16/2019
Meeting Time: 5:00 PM
Establishment: P146 - Tyson Foods, Inc,
Reason Code:
Other Reason Code:
Comments:

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It will be documented.

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I accepted preventative measures and released Regulatory Control Action at 1727.

During the sequence of events (b) (6) reiterated that the cages that have been damaged and removed from production however current efforts to make cages safe for the transport of birds have been ineffective. On 1/17/19 I requested the Animal Welfare check of this establishment. It shows that a weekly Chicken Yard Audit was performed on 1/16/19, it completed at 1430 and inspection of the yard found no Loose birds/Escaped birds on the yard.

MOIs regarding deviation from Good Commercial Practices have been written in the last 90 days on November 9, 2018 and December 27, 2018 citing that the establishment failed to slaughter poultry in accordance with Good commercial practices. Should an ongoing pattern develop where birds are not being slaughtered in a manner that results in thorough bleeding of the carcasses in accordance with FSIS Directive 6110.1, II, B an NR for noncompliance with 9 CFR 381.65(b) (failure to handle birds in accordance with GCP) will result.