

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P164	Tyson Foods Inc	IJM212306 2410G	10JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>To: Mr. Steve Langford, Plant Manager Tyson Foods, P-164 Forest, MS At approximately 0404 hours, while performing a portion of the Good Commercial Practice task as I was observing the conditions in the Picking room area in the Establishment's Evisceration department. (b) (6)</p> <p>(b) (6) observed a deep red live bird entering the scalding tank for Picking Line #1, the live bird was small and no cut was evident on the bird's neck area. The bird was alert at this time. I proceeded to watch the bird until it could be safely removed from the picking line. Upon closer examination, the bird in question was still intact with no cut to the neck area or anywhere else on the bird. I informed (b) (6) of this finding. (b) (6) immediately notified (b) (6) as well as (b) (6) (b) (6) observed the bird. A second small red bird was observed with a bad cut along the neck area for Picking Line #3. However, I did not observe the second bird going into the scalding tank. 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. I recommend that (b) (6) review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter and provided him a copy of this document. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>(b) (6)</p> <p>(b) (6)</p>

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P164	Tyson Foods Inc	IJM030908 0009G	09AUG2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On August 08, 2019 at approximately 1128, I observed less than Good Commercial Practices (GCP), on the Back Dock/Live Receiving Area. I observed a live chicken in the DOA Bin. The chicken was on top of the dead carcasses, appeared to be in good health and was removed by Plant Personnel when notified of the issue.</p> <p>(b) (6) was notified of the violation at approximately 1132, along with (b) (6),</p> <p>(b) (6) was present with me when this issue was found and Plant Personnel were notified.</p>

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P165H	OK Foods, Inc.	DAF53040 55821G	21MAY2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0109, I went to live hang to perform part of the GCP task and immediately observed 3 live birds caught in the transfer belt gears. The belt was no longer covering the gears, which allowed live birds to get caught in them. The gears were ripping into their abdomens and crushing their rib cages. The live birds were unable to escape from the moving gears. One employee was trying to pull a live bird out from the gears while the gears were still moving. As I entered the live hang room, a maintenance employee exited the room through the back-dock door. There were 2 employees with white shovels pushing the live birds that were on the dumping belt over to the opposite side to avoid the moving gears. The live hangers were sorting through the injured birds on their belt and hanging the uninjured birds. At no time did any employee stop the line to prevent any further birds from being injured. I immediately took regulatory control and had the belts stopped. I placed US Reject Tag No. B-45141447 to the emergency stop lines. I asked a maintenance employee that had just walked out the back door to radio (b) (6).</p> <p>(b) (6). I showed (b) (6) the birds that were caught in the gears. Two of these birds were still alive and one had just succumbed to his injuries. There were approximately 3-4 dead birds mangled within the gears also. Upon further inspection of the birds that were on the hanging belt, approximately 15 birds were found dead. Some of these had been eviscerated while they were alive. There were another 4-5 live birds with severe injuries such as partially amputated legs and crushed rib cages with deep lacerations to the abdomens. These birds had shallow breathing, not moving and their eyes were closed, which indicates they were in a state of moribund. The birds were removed and immediately euthanized</p>



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							<p>via decapitation. During the time that I was in live hang, I discovered that the live hang transfer belt that covers the gears had come off its track earlier in the evening. At that time, Maintenance repaired the belt and had to remove a link in the belt during the repair (b) (6) and (b) (6) informed me that this had occurred and that they thought the problem had been fixed. I asked (b) (6) if anyone monitored this belt to ensure that it stayed on track. He told me that he did not believe anyone stayed to monitor the belt during operation. At approximately 0200 hours (b) (6) informed me that he had held a training session with all the live hang employees and leads. The training covered the topic of immediately stopping the line when a piece of equipment malfunctioned and notifying the lead or supervisor. (b) (6) informed me that (b) (6) was going to hold the same training for the maintenance employees as well. (b) (6) also stated that a maintenance employee would be placed in live hang for the rest of this shift to ensure that the belt stayed on its' tracks. Regulatory control was relinquished at approximately 0236 hours after I monitored the equipment to ensure that it was functioning appropriately. I reviewed the establishment's Animal Welfare Program, last updated 2-17-19. There are no written procedures that describe what an employee should do when a piece of equipment breaks and begins injuring the birds. The establishment's program has procedures for instructing employees how to hang birds, carry birds, stun birds, and euthanize birds but it does not instruct them on how to stop a line to prevent birds from becoming injured. USDAs concerns are that there were approximately 15 employees in the live hang room, and no one was willing to stop the line to prevent the birds from enduring</p>

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							the injuries or agonizing death that they had to endure. USDA encourages the establishment to respond to this MOI.
P165H	OK Foods, Inc.	DAF31090 65910G	10JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 06-09-19 at approximately 2126 while performing a good commercial practices check, I (b) (6) observed two live birds in the DOA dumpster outside the live hanging room. It was early in the shift, so the birds were towards the bottom of the dumpster. I observed a rhythmic in and out of the bird's abdomen as it breathed. I immediately notified (b) (6), (b) (6) who happened to be in the area at the time of my observation. A plant employee removed the live bird from the dumpster at which time I observed a second live bird that had been underneath it. During the removal process both birds had their eyes open and began moving around. Past practice at this facility is for all birds to receive cervical disarticulation prior to being placed in the DOA dumpster. The establishment's Animal Welfare Program states "Do not place any live birds in the DOS containers. (b) (6) explained that the employee responsible would receive additional animal welfare training.</p>

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P165H	OK Foods, Inc.	DAF13101 13319G	19NOV2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0902 on Tuesday, November 19, 2019, while performing a good commercial practice check in the live hang room I observed the following. An employee hanging live chickens on line 1 was repeatedly using excessive force to place the birds in the metal shackles. The force being applied was such that I was easily able to hear the metal shackles banging loudly against the metal guide bar as the employee used a rapid downward motion to force the birds into the shackles. After observing this same forceful technique used several times, I immediately proceeded to the cage dumper and motioned for the operator to cease dumping cages of live birds onto the transfer conveyor. US reject tag B-45009716 was attached to the dumper. Shortly thereafter, I met with Mr. Danny Houston, Plant Manager and (b) (6) and explained my observations. Mr. Houston explained that all the live hangers had received training on animal welfare. The live hanger who had been using excessive force had already been removed from the live hang room and sent to the HR department. Mr. Houston explained that the employee would be terminated. Mr. Houston personally reviewed the establishment's animal welfare expectations with the remaining live hangers. Additionally, Mr. Houston commented that the establishment will be considering placing functional cameras in the live hang room. At approximately 0930 I released regulatory control of the cage dumper. Later in the shift, I toured the live hang room again and observed all employees using the appropriate hanging techniques.</p>



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P165H	OK Foods, Inc.	DAF51041 11129G	29NOV2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0310, while performing Ante Mortem inspection on Lot #11 – trailer 2030 in the Live Shed, I observed a bird with its head caught in between the top of the door and the cage frame. The bird was showing obvious signs of distress with the eyes closed and labored open mouth breathing. The head of the bird was beginning to show areas that were turning purple, which would indicate that the air flow intake of the bird was impeded. I immediately went to the live dock and motioned for (b) (6) to follow me to the Live Shed. I showed (b) (6) the distressed bird. He gently opened the door and was able to turn the bird's head slightly so that it could be placed back inside the cage. Once the bird was freed from the door, the bird immediately collapsed for approximately 20 seconds. The bird then slowly raised its head/body and opened its eyes. The breathing became more regular and the purple color began to slowly dissipate from the head. USDA's concern is that if this bird had not been found at that time, it would have died due to suffocation. I asked (b) (6) if he knew when that trailer was checked by the live side employee. He informed me that he went to the Scale house to review the log but was unable to locate any log. The employee present stated that he did not know where any log was either. A MOI was written on 2-11-2019 for a cage door being open while the fork lift driver from back dock was transferring the cage to the cage dump area. There were 4 chickens sitting on top of the door and one of the four fell off the door when the cage was placed on the dock. The other 3 were caught between the door and the cage frame as the cage moved forward on the rolling dock. The establishment replied to that MOI by stating the following: "Heavener Plant will continue implementing our programs that we have in</p>

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							<p>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.". USDA is also concerned that the program that the Live Haul has in place is not being implemented as it is written. The records documenting the inspection of the cages on the trailers in live shed could not be provided to USDA when they were requested either. This brings into question whether the cages are being inspected by the live haul employees. USDA strongly recommends that the establishment respond to this MOI and address this issue of concern.</p>



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P165H	OK Foods, Inc.	DAF05021 15530G	30NOV2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2236 hours, while performing Ante Mortem on Lot 13 – trailer 2004, I observed a chicken with its head and upper neck caught between the door and the side wall of the cage. The chicken had its eyes closed and was not breathing. I continued to monitor this chicken for another minute to ensure that this chicken was no longer alive. This cage was located on the third row of cages from the front of the trailer. The chicken was in the top right section of that cage. This chicken died due to strangulation/suffocation from having the airway impeded. This would have occurred during the loading of the cage by the catch crew. As I continued my Ante Mortem inspection, I observed a door that was open approximately 2 inches. About this time, the scale house employee came to the live shed to perform his trailer inspections. I showed him the open door and he tried to close it, but it would not close. He stated that the springs were broken on the door. He also stated that he has flagged numerous cages for broken springs, but they do not seem to get repaired. After I finished Ante Mortem inspection of the trailer, I went to the scale house to notify (b) (6) of my observations. (b) (6) went to the live shed and had the employee free the chickens head from captivity. He also tried to close the open door on the other cage, but it would not close for him either. USDA is concerned that damaged doors are not being addressed in a timely manner and could result in the injury to chickens. USDA's concern is that the programs that the establishment has in place to prevent the injury to the chickens is not being followed. A similar incident was documented last night, 11-28-19, on MOI DAF5104111129G (Poultry Good Commercial Practices/DAF4701111529I). In that incident, a chicken had its head caught between the door and the upper cage frame. This chicken was</p>

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							semi-comatose with labored breathing. Although (b) (6) was able to free the chicken and the chicken survived, USDA is concerned that chicken would have succumbed to its injury if we had not found it. The establishment has not responded to that MOI at this time. The establishment's written program incorporates the catch crew checking every cage before it is loaded onto the trailer, the truck driver checking the cages prior to leaving the farm and again once the trailer is dropped off in the live shed, as well as the scale house employees performing routine inspections of all trailers that are in the live shed. If this protocol was followed as it is written, the incident tonight should not have occurred. USDA strongly recommends that the establishment respond to this MOI and address the concerns that are brought forth in this MOI.

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P165H	OK Foods, Inc.	DAF47080 13717G	17JAN2020	04C05	Poultry Good Commercial Practices	Finalized	<p>On the afternoon/evening of 1-15-20 birds were caught and brought to the plant from (b) (4) (b) (6) located in Waldron, Arkansas. The earliest load arrived at 1747. Due to water related issues, the establishment did not slaughter on the evening of 1-15-20 and did not resume normal operations until approximately 0715 on 1-17-20. These same birds are still on site and have been without food or water for an extended period of time (approximately 37 hours). The establishment's Animal Welfare Plan contains the National Chicken Council Animal Welfare Guidelines and Audit Checklist for Broilers. Page 11 of the plan states "Feed withdrawal must not exceed 18 hours prior to slaughter". Page 14 of the plan states "Holding times of live birds at the plant must be kept to the minimum consistent with good processing practices, with the maximum time from catching to slaughter recommended to not exceed 12 hours". Both of these timeframes were exceeded. On the morning of 1-17-20, I met with (b) (6) (b) (6) and discussed my concerns over the length of time these birds were kept on-site without food or water (b) (6) understood my concerns and explained that the plant had requested that OK Farms live haul division return the birds to a farm on 1-16-20. However, this did not occur.</p>



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P165S+V16 5S	OK Foods, Inc.	LWA41120 65714G	14JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>This MOI is to document my conversation with (b) (6). While performing a GCP task in the Live Hang area, I heard loud offensive music being played on a speaker device and being sang loudly by the employees. The lyrics contained vulgar content and foul language (b) (6) stated that he did not take the issue lightly and would directly take care of it. Also, while performing a GCP task, I observed a live bird on the line #1 Kill line enter the scalders. The neck of the bird had not been cut. The eyes of the bird were opened and moving. While (b) (6) and I were present, the cadaver carcass was sorted properly at the line #1 rehang table by being removed and placed into the marked "Condemned" barrel.</p>

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P17766	Southern Hens, Inc	SSN50140 92607G	07SEP2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 09/06/19 at approximately 0715 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. In the back-dock area, I, (b) (6) witnessed a live bird as it was stuck on the conveyer belt between a metal connecting piece of the sprayers above the crates and between the actively moving creates headed back to the loading trucks. The crates were pressed against the bird such that it was unable to free itself and causing the right side of it's body to scratch and rub pulling feathers and creating small cut wounds. The cage conveyer belt was stopped to prevent further harm to the live hen.</p> <p>(b) (6) was brought out to visually observe the situation and was informed of the GCPIP MOI failure. I explained to (b) (6) that allowing live birds to remain in this type of condition while crates are actively moving could cause discomfort, stress, and death depending on the size of the birds with the contributing factor of heat. Live birds could potentially get loose and could be crushed by crates as well. 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. A establishment meeting was held at 3:00 p.m. 09/06/19 and (b) (6) discussed briefly the less than GCPIP incident at back dock area. Respectfully,</p> <p>(b) (6)</p>

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P18557	Sanderson Farms, Inc.	QNA1408055806G	06MAY2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On May 6, 2019 at approximately 05:40 CDT, (b) (6) observed less than Good Commercial Practices while performing an Ante-Mortem Inspection and Good Commercial Practices check at 18557 P in Summit, MS. While observing the kill machine of each picking line for proper function, I did not observe any abnormality in the equipment's operation. I did observe that a new employee was backing the kill machine on line #2. I walked to the end of the blood trough to observe for any live birds entering the scalders. I observed a single, live bird at 05:40 CDT enter the scalders on picking line #2. The bird was hanging on the shackle with its eyes open, blinking, head retracted and showing voluntary head movement. I did not observe a cut on its neck. This bird entered the scalders alive and still breathing. I observed the head grossly swollen and hemorrhagic after the bird exited the scalders and before it went through the deheader. I did not take any regulatory action with this single-bird incident, since no evidence of a system failure existed. I notified (b) (6) of the observed nonconformance, during a brief meeting held in rehang at approximately 05:47 CDT. I presented the cadaver to him, explained my observation, informed him that a Memorandum of Information (MOI) was going to be documented, and relinquished the carcass into his control. A copy of this Memorandum of Information will be forwarded to the appropriate personnel in the Jackson District Office. Respectfully, (b) (6)</p> <p>(b) (6)</p>



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P18557	Sanderson Farms, Inc.	QNA53091 05817G	17OCT2019	04C05	Poultry Good Commercial Practices	Finalized	At approximately 05:55, while performing a Good Commercial Practices task (b) (6) noticed 5 birds in 4 minutes displaying conscious movement entering the scalding on line 1. Some had obvious cuts to the neck and were bleeding. In all 5 cases, the necks were not flaccid, and the birds had their heads cocked to the side, and were observed to be consciously looking around. I immediately notified (b) (6). He determined that the stunners on both lines had not been set to proper operating settings after maintenance. They were reset. A recheck at 06:00 by (b) (6) showed that the situation has been resolved.
P192	Pilgrim's Pride Corporation	OOB30090 44923G	23APR2019	04C05	Poultry Good Commercial Practices	Finalized	At 0452 while (b) (6) was performing Antemortem inspection the following failure to observe Good Commercial Practices was observed. A trailer with live birds from Lot 2 (b) (4) contained a cage in which the floor bottom divider had fallen down on top of several birds, which had to bear the weight of the divider and layer of birds atop it, and forcibly pinning one bird against the cage bars. The bird was alive, but its breathing appeared stressed. The inspector immediately notified (b) (6) to address the animal welfare concern. Cage conditions were recently discussed in weekly meeting with management held on 4/18/19, to confirm cages in poor condition were culled during slaughter renovation downtime 3/25- 3/29/19. Previous issued MOI OOB171212931I on 12/31/18 was for cage conditions affecting live birds.

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P192	Pilgrim's Pride Corporation	OOB34200 23111G	11FEB2020	04C05	Poultry Good Commercial Practices	Finalized	On February 11, 2020 at approximately 1840 hours while performing the poultry good commercial practices check, I observed a live bird enter the scalding. The bird was completely conscious, with its head raised, blinking, and looking around. The bird did not have a cut on its neck. I immediately notified (b) (6) of the situation.
P19688+V1 9688	Sanderson Farms, Inc.	KJA471812 3609G	09DEC2019	04C05	Poultry Good Commercial Practices	Finalized	On 12/9/2019 at 1820 hours, (b) (6) observed the following while performing a Good Commercial Practice task. On kill line #2 at 1820 hours, a live bird was observed without an incision on the neck of the bird. The live bird blinked numerous times when CSI shined a flashlight in its eyes. CSI took regulatory control action by stopping the affected line and notifying Establishment Management of the situation. (b) (6) removed the live bird from the line and confirmed no incision on the neck as the bird became extremely agitated while supervisor held bird in the air. (b) (6) was informed at 1824 hours of a MOI being written. The above aforementioned situation is not compliant with 9CFR381.65(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) 12/9/2019

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P19688+V1 9688	Sanderson Farms, Inc.	KJA501702 0814G	14FEB2020	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1714 hours on February 14, 2020 a live bird, that was still breathing, was observed entering the scalding tank on line 1. (b) (6),</p> <p>observed the cadaver. 9 CFR 381.65(b) requires that poultry be slaughtered in accordance with GCP and in a manner to ensure breathing has stopped before scalding. Furthermore, 9 CFR 381.90 states that poultry carcasses showing evidence of having died from causes other than slaughter are considered adulterated and must be condemned. (b) (6) disposed of the carcass immediately. As immediate corrective actions to prevent ongoing bird suffering and adulteration of product, (b) (6) said he would ensure the automatic knife was working properly, discipline the employee stationed at the back up kill position, and provide training to said employee. Preventing mistreatment and slaughtering poultry in compliance with 9 CFR 381.65(b) decreases the chances of producing adulterated carcasses.</p> <p>(b) (6)</p>



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P20251	Tecumseh Poultry, LLC	PBM00090 62110G	10JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 06/10/19, at approximately 0809 hours, while performing a routine Poultry Good Commercial Practice Verification task, I (b) (6) (b) (6) observed one instance of bird mistreatment on an NAE (No Antibiotic Ever) trailer, numbered T323, in the loafing shed. The bottom module had a compartment with a stuck bird. The bird's two middle toes (second and third digits) of the left paw were trapped between the spring wire and the door. The toes were squeezed flat by the spring door contraption causing the toe's segment at the distal phalange to turn slightly blue/purple, which may have indicated ischemia. The bird at this time was not moving or attempting to move. The bird had its eyes closed and was not fully alert/responsive to manipulation. The left leg of this bird was laid out, if not stretched out, horizontally behind it. I met with (b) (6) to show him the situation. He slowly opened the door and released the toes. The bird remained recumbent with the leg staying in the same position. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with Good Commercial Practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005), for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Sincerely, (b) (6)</p>

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P20251	Tecumseh Poultry, LLC	PBM57120 61413G	13JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 06/13/2019, at approximately 1150 hours, while performing a routine Poultry Good Commercial Practice Verification task, I (b) (6) (b) (6) observed three instances of bird mistreatment on two NAE (No Antibiotic Ever) trailers in the loafing shed. On trailer number 32, one bird had its wing tip squeezed between a metal board and the floor board of the compartment above. The bird had enough wing length to still be able to lay down. However, its wing was raised above its back. At this time, I released its wing by propping the top floor board from the metal bar. Due to the feathers, I was not able to see if there was damage to the wing tip. Then, on trailer number T786, on the very top tier of the stacked modules, one bird had its "shank" stuck between the floor board and the metal bar. This bird made multiple attempts of withdrawing this foot and as it did, blood was actively dripping from the area that was being scraped by the floor board. There was evidence of bleeding before I arrived to see this mistreatment. Small amount of blood could be seen on some of the metal bars of the lower part of the module and on the ground below the injured shank. On the same trailer, the module below the module with the bleeding bird had another bird with its left hock stuck between the floor board and the metal bar. The bird was not able to retract this leg against the floor board. The result was heavy bruising and scrapes on the medial aspect of the hock and distal thigh. This bird was not dripping with blood, but the floor board edge had a bloody color that was 4-5 inches in length. At approximately 1200 hours, I met with (b) (6) (b) (6) to show and explain to them what I saw. A scale house personnel was assisting the bleeding bird to retract its leg and was successful so that it was no longer stuck. The bird did not flex its hock back to a normal position after its</p>

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P206+V206	Pilgrim's Pride Corporation	KCC482006 4618G	18JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On June 17, 2019 at approximately 1955 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 was a dead bird lying on the ground just below the east picking line with both of its legs ripped off. I immediately informed (b) (6) (b) (6) to stop hanging birds so as to prevent anymore birds from dying before slaughter and call management to the area. (b) (6) (b) (6) was notified and observed the mutilated bird along with the remnants from where the bird was ripped apart. As I was examining the birds entering the stunners, one bird came down the west picking line hung by only one leg and the birds were being smushed up against one another inappropriately as the equipment was elevated too high (b) (6) instructed maintenance to adjust the stunning equipment and new shielding was installed to the east line to protect the birds from being pulled apart. A similar occurrence took place on March 15, 2019 for birds dying in this same way, with their legs ripped off by equipment. Failure to implement procedures for preventing accidental injury and/or death inconsistent with 9CFR 381.65(b) in regard to birds presented for slaughter, resulted in a GCP failure, and a bird 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 prevent excitement, discomfort, and accidental</p>

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							<p>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 by FSIS. Documented by (b) (6)</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P206+V206	Pilgrim's Pride Corporation	KCC421601 5015G	15JAN2020	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1146 hours, while performing ante mortem inspection at the back-dock area, I observed a chicken's leg caught between the door and the side wall cage frame. This cage was the 4th cage from the tail end of the trailer and on the top level, bottom cell on the right. I then observed a chicken with its head caught between the door and the top of the cage frame. This cage was directly beneath the cage that was mentioned above, third cell on the right. The chicken's head was pale in color, the eyes were closed, and the beak was open wide. I could not see any breathing pattern exhibited by this chicken, which indicated to me that this chicken was dead due to strangulation. I continued with ante mortem and observed a chicken with its wing caught between the door and the cage frame. The angle of the wing indicated that this wing could be broken. This cage was on the top level at the very tail end of the trailer, second cell on the right. I immediately located an employee that could find someone from management for me. The (b) (6) arrived, and I showed him the inhumane handling deficiencies that I had discovered. He immediately radioed for Plant Manager Jose Cabrera, (b) (6). (b) (6). I informed (b) (6) that no more cages were to be unloaded from this trailer at this time. He then told the back-dock forklift drivers not to remove any more cages from the trailer. When the management team arrived, I showed them the inhumane handling deficiencies that occurred when the chickens were being placed in the cages by the catch crew. I informed Mr. Cabrera that this was unacceptable, and a MOI would be written. I allowed the forklift driver to remove the cage with the chicken's leg caught in the door and place the cage on the ground at the end of the</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>trailer. (b) (5) opened the door to release the leg. I immediately noticed that the leg was broken from being caught in the door/frame. I then turned back around and noticed that the cage in which the chicken's head was caught was no longer on the trailer, nor was it on the ground at the end of the trailer. I asked (b) (5) where that cage went to. He stated that he did not know and that he did not tell the forklift drivers that they could remove any other cages. We then observed the forklift driver remove another cage from the trailer. (b) (5) immediately stopped the employee from going any further with that cage. I informed management at that time that I had not allowed any other cages to be removed from the trailer except for the cage in which the chicken's leg was caught in the door. I informed management that they needed to locate the cage in which the bird's head had been caught in the door. The cage was located on the back-dock, waiting to be dumped onto the live hang belt. The last cage in which the wing was caught was removed from the trailer and set on the ground. The door was opened, and the wing was released. Fortunately, the wing was not broken. The chicken with the broken leg was humanely euthanized by the establishment. USDA's concerns are that the inhumane handling of the chickens that were observed today should have been identified by numerous individuals (live catch crew, the employee that tightens the booms on the cages, the truck drivers that haul the trailers to the plant, the "yard dog" that brings the trailer from the live shed to back-dock, and the employee that releases the booms) prior to USDA observing them. The failure for the establishment and the live side to identify these issues has resulted in the injury of one chicken and the death of another chicken. The establishment should be aware that this Good</p>

**Table: MOIs in Response to FOIA2020-110**

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							Commercial Practice MOI is subject to the Freedom of Information Act and can be requested by organizations such as Mercy for Animals. USDA encourages the establishment to respond to this MOI as well as develop a strong live animal handling protocol in which their employees from live side and the establishment can adhere to. A similar GCP MOI was documented on 1-10-2020, MOI -KCC481801140G , for damaged cages being placed back into circulation and the potential for injury to the chickens.

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P208+V208	George's Processing, Inc.	XIC111306 2604G	04JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Tuesday, June 04, 2019, at approximately 11:45 hours, (b) (6)</p> <p>(b) (6)</p> <p>. The following is a synopsis of the events and discussion regarding possibly suffocated birds due to belt malfunction. At approximately 10:45 hours while performing Good Commercial practice verification, I observed that the Line 1 back-up killer was performing an abnormally high number of kill cuts (approximately 18 over one minute with the normal observations being six per minute), I immediately informed (b) (6)</p> <p>(b) (6) While discussing with him, the belt for the Line 1 live hang conveyor system malfunctioned. Since this area was next on my area to evaluate and due to previous history, I elected to observe the establishment implementing their procedures. As I observed the belt, I observed that birds were 3-4 layers deep with birds on top of each other on the conveyor from the wall until first live hang personnel position. As I continued watching, there was one (and at times a second person) that was pushing or lightly tossing birds further down the belt to allow the personnel to hang the birds on the line. One of the people that was pushing the birds further down the belt would stop every few minutes to retrieve birds that were no longer breathing. Another person positioned on the opposite was sporadically relocating birds further on down the belt. As I continued watching, I observed that numerous birds of the top layer were lifting their wings, beaks open, and their respiratory rate appeared faster than normal. It is important to note that while observing the condition of the birds in the trailers as well as the modules (outside), I only observed one or two birds with their beaks open and what appeared to be an increased respiratory rate. I also observed</p>



Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>that birds on the lower layers appeared to be repositioning to get out from other birds. In addition, I observed one bird that was sitting on top of two birds that was trapped on its back by two other birds. It was flapping its wings, attempting to roll, open beak, respiratory rate was fast, and the bird appeared to have increased respiratory effort. Before the establishment could remove the birds sitting on it, the bird stopped breathing. After about 20 minutes, the establishment was able to get the belt clear. As I watched the live hangers, I observed two birds that were not moving, no obvious breathing, and that were not responsive to stimuli that were hung on the line. During the 20-minute period of the belt being malfunctioning, I observed approximately 30-40 dead birds that had been removed from the belt by employees or fallen on to the floor at the end of the belt. Now that the belt was clear, I immediately informed (b) (6) of my observations and that the malfunction of a belt resulting in the suffocation of at least one bird (and possibly as many as 40) was not consistent with good commercial practices. I also informed him that at least two dead birds had been hung on the lines. I informed (b) (6) that this was not consistent with the establishment's sorting procedures which indicates that the live hang will not hang dead birds on the line. Then, we proceeded to the kill line between the end of the pickers and the post pick dip to retrieve any carcasses that died by methods other than slaughter. As we watched the line looking for cadavers, (b) (6) (b) (6) approached and I informed him of my observations, concerns, and that the malfunction of the belt resulting in at least one bird suffocating was not consistent with good commercial practices. After the conversation ended, (b) (6) removed a single carcass that</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>appeared to be a cadaver with red to purple discoloration of the neck and body. The meeting was adjourned at approximately 11:50 hours. On June 5, 2019, at approximately 10:30 hours (b) (6)</p> <p>(b) (6)</p> <p>met with (b) (6) in the USDA office. (b) (6) explained his observations and concerns from the belt malfunction from yesterday. (b) (6) explained that these birds were not slaughtered in accordance with Good Commercial Practices. (b) (6) informed establishment management that he wanted to provide the establishment with an opportunity to respond with a plan in action to prevent future occurrence. (b) (6) continued that memoranda of interviews (as well as noncompliance records) are not punishments and are an opportunity for FSIS to present concerns in writing to the establishment to provide them with due process. (b) (6) further summarized 9 CFR 381.65 and explained that this is the regulatory requirement for Good Commercial Practices. (b) (6) informed establishment management that based on conversations yesterday that the establishment was going to modify their preventative maintenance schedule for the live hang belt replacement. (b) (6) inquired if there were any additional steps that production could take to help alleviate the possibility of birds dying by methods other slaughter. (b) (6) informed (b) (6) that the establishment's goal (when the belt malfunctions) is to attempt to get the birds off the belt as soon as possible (to prevent any dying by methods other than slaughter). (b) (6) informed (b) (6) that the belt malfunction or the steps to correct was not intended to harm any chickens. Discussion involved potential steps to</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							improve efficiency of transporting the chickens from the dumper to the live hang personnel when the belt malfunctions. Establishment management also informed (b) (5) that the establishment will evaluate whether improving ventilation from the dumper to the live hang personnel would help minimize the number of birds in respiratory distress. The meeting was adjourned at approximately 10:40 hours.



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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P208+V208	George's Processing, Inc.	XIC221309 4310G	10SEP2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Monday, September 9, 2019, at approximately 1050 hours, (b) (6), met with (b) (6). he following is a synopsis of the events and conversation regarding live and dead birds that were trapped between the green fiberglass floor sheets of each layer of the module and the vertical partitions of the framework on the module. At approximately 1050 hours while performing antemortem due to a change in lot, I observed that there was module on the outgoing conveyor of the dumper. I immediately observed that there were numerous live and dead birds in the module. I observed that there were at least two dead birds whose neck was trapped between the vertical partitions of the framework of the module and the green fiberglass floor sheet. The forklift operator sat the module to the side and I requested that the receiving personnel wait to allow me to show it to establishment management. I immediately requested (b) (6) or (b) (6) to my location. While waiting for (b) (6) I observed that there was a total of 11 chickens. Three of which were still living with two who had wing caught between the framework of the floor of the layer module and the green fiberglass floor sheets. These chickens were unable to get their wings free. I also observed one carcass whose head was twisted and caught between the vertical partitions of the framework and the green fiberglass floor sheet. This carcass also had a compound fracture that was protruding between the vertical partitions of the module. I verbally and visually informed him of my observations. I also informed (b) (6) that these findings indicate that these poultry had not been slaughtered in accordance with good commercial</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							practices. (b) (6) informed me that (b) (6) was on his way down from the live haul building. When (b) (6) arrived, I visually and verbally informed him of my observations. I inquired about the cause. (b) (6) informed me that the module was likely dropped at the farm. (b) (6) informed me that he would address with the live haul crew. (b) (6) discussed with (b) (6) about which trailer the module had been unloaded from. The meeting was adjourned at approximately 1100 hours.

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P208+V208	George's Processing, Inc.	XIC391909 3230G	30SEP2019	04C05	Poultry Good Commercial Practices	Finalized	<p>September 30, 2019 at approximately 1915 hours, while observing the scalding and picking process on Kill Line #1 I observed a live, conscious bird enter the scalders. The bird did not appear stunned and there was no evidence of a cut on the neck or head. Due to the height and speed of the line I was unable to safely remove the live bird from the kill line before it entered the scalders. I immediately observed the stun and kill operations for both kill lines and determined that the slaughter process was not out of control. I then notified (b) (6) who immediately investigated the incident. I also notified (b) (6) of my findings. I monitored stun/kill operations on both kill lines for an additional 10 minutes and did not observe any more live birds enter the scalders, although I did note that approximately 1 bird per minute was being hung by one leg on Kill Line #1. I spoke to (b) (6) at 1950 hours and he stated that the backup killer on Kill Line #1 received counseling and would undergo additional GCP training (b) (6) was also addressing the one-legged hanging on Kill Line #1 at this time. At 2000 hours I observed stun/kill operations on Kill Line #1 and observed noticeable reduction in the number of birds being hung by one leg. Live poultry entering the scalders reflects poor commercial practices and may result in noncompliance with 9 CFR 381.65(b) which states that "poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding".</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P208+V208	George's Processing, Inc.	XIC131510 0224G	24OCT2019	04C05	Poultry Good Commercial Practices	Finalized	<p>October 23, 2019 at approximately 2140 hours. While walking through the live receiving area I observed a transport cage lying on its side on a trailer. The cage contained approximately 200 chickens which were piled on top of each other due to cage position. At this time I noted that there were several dead birds at the bottom of the pile. I observed as a forklift was used to remove the cage from the trailer, place it on the ground, and set it upright. The cage was then taken to the Line #1 cage dumper where the chickens were deposited onto the live hang belt. The live birds were then hung on Kill Line #1 to be slaughtered and then condemned by the establishment prior to entering the scalders. While monitoring the live hang and slaughter activities I noted that there were approximately 80 dead chickens from the overturned cage which were being removed from the live hang belt and condemned by establishment personnel. At 1750 hours on October 24, 2019 I discussed the incident with (b) (6) stated that the transport cage had fallen onto its side due to mishandling by a forklift driver. He also stated that the forklift driver will undergo additional training in humane poultry handling and forklift driving to help prevent similar instances in the future. Poultry dying from causes other than by slaughter reflects poor commercial practices. Poultry slaughter establishments are responsible for ensuring that humane methods of handling and slaughter are consistent with good commercial practices.</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P208+V208	George's Processing, Inc.	XIC2005123717G	17DEC2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Monday, December 16, 2019, at approximately 1150 hours, (b) (6) met with (b) (6), in the evisceration supervisor office. The following is a synopsis of the discussion and events regarding approximately 9 cadavers due to no back-up killer after production resumed due to a loss of electricity to the establishment. At approximately 0910 hours upon the restoration of electricity and power to the establishment, I observed that the kill lines were about to start. I observed (b) (6) don a cut-resistant glove and knife to attend to the birds missed by the kill machine on Kill Line 2. I observed the picking room employee who wears a maroon smock don the other cut resistant glove, but the receiving/paw lead requested the cut resistant glove from the employee wearing the maroon smock. It is important to note that no employee was in the role of the back-up killer for Line 1. At this point, the employee wearing the maroon smock dipped under the line and left the picking room (toward the picking room breakroom). I observed as (b) (6) and the receiving/paw lead began addressing the birds missed by the kill machine on Kill Line 2, but no one was addressing the birds missed by the kill machine on Kill Line 1. It is important to note that the (b) (6) and the receiving/paw lead appeared to be struggling to keep up based on my observation. As the last birds (due to break) passed by on kill Line 2, the picking room employee wearing the maroon smock returned to the area. Then, I proceeded to the area to watch the carcasses enter the scalding. While observing Kill line 1, I observed two birds that their head was tucked up against the breast muscle. It is important to note that this was an atypical observation. I observed as both birds missed the head puller stationed prior to the scalding. At that</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>time, I was unable to visualize any kill cut. Due to the uncertainty, I proceeded to watch the birds/carcasses exiting the pickers/scalder. I observed as approximately 9 carcasses over 15-20 seconds that had cherry red to purple discoloration of the neck and breast muscle with no visible kill cut. It is important to note that this was observed prior to the establishment's back up head puller. I requested (b) (6) presence as the cadavers passed by the rehang table and demonstrated the carcasses that had cherry red to purple discoloration of the neck indicate that they had entered the scalders alive. As three of the cadavers were condemned, I also visually inspected and verbalized my findings to (b) (6) in which these cadavers had no kill cut. At this time, I discussed with (b) (6) that these observations may indicate noncompliance with 9 CFR 381.65(b). At approximately 11:50 hours, I informed (b) (6) that birds should be slaughtered in a manner that results in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding. These 9 cadavers were not slaughtered in accordance with good commercial practices. I informed (b) (6) that no back-up killer was present which could potentially indicate a loss of process control. I explained the physiological and gross pathological differences between a cadaver and a DOA to (b) (6). (b) (6) also informed me that the back-up killers had been sent to lunch and that the picking room employee with the maroon smock (b) (6) informed me his name is (b) (6) should have been the back-up killer for Kill Line 1. I informed (b) (6) of my observations that (b) (6) had left the area and was not present at on Kill Line 1. I explained that if IPP identify a trend of cadavers that this may result in noncompliance with 9 CFR</p>



**Table: MOIs in Response to FOIA2020-110**

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							381.65(b). The meeting was adjourned at approximately 1200 hours.

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P211	Palmetto Pigeon Plant, Inc.	DJK231309 1210G	10SEP2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On September 10, 2019, at approximately 0935 hours while performing a Poultry Good Commercial Practices (GCP) task in the Slaughter Area, I made a few observations while the establishment was slaughtering Silkies. There were several birds with inadequate cuts jumping around on the floor area in excess scald water. I observed one (1) loose live bird walk under the scald tank into the flames. An employee had to drag the bird with the squeegee mop used to clean the floor to get the bird before being almost incinerated. Another observation was made of the employee applying the cut on the neck of the birds and sometimes having to apply more than one cut resembling a saw-like motion. Lastly, I observed several live birds that were not cut or had poor/inadequate cuts without allowing full time to bleed out, moving around in the barrels that are used prior to dumping in the scald tank. Some of the live birds were buried beneath dead birds and I observed breathing, body and wing movement from the live birds that were trapped. After observing the issues noted, I ask that the kill process be stopped, and I went to notify (b) (6). (b) (6). Once she arrived I notified her of my observations and she verbally counseled the employees and went to retrieve more knives that were sharpened. I then allowed the kill process to resume and observed for several minutes along with (b) (6) to ensure the slaughter process was in accordance with Good Commercial Practices. 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 (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P211	Palmetto Pigeon Plant, Inc.	DJK371101 2414G	14JAN2020	04C05	Poultry Good Commercial Practices	Open	<p>Today, at approximately 0930, as well as, on 01/13/2020; observations were made by (b) (6) (double placement of birds into one cup) and (b) (6) (Red Birds at Postmortem) (b) (6) made observations of plant employees placing two birds in one "bleed out cup". This was hindering the top bird from bleeding out properly. Also observed during this GCP was some of the top birds were moving so much that they were wiggling out of the cups onto the floor. I informed (b) (6) of my observations and she indicated she would address the issues. This observation was made while slaughtering "Black Meat Chickens" today. On Monday, I was informed by (b) (6) that she had a higher than normal count for birds that appeared to not have bleed out properly. My observation on today may have been the cause for the higher number of "Red Birds" coming in at the Postmortem station on Monday while slaughtering Squabs/Pusan's."</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P21234	Perdue Foods LLC	XGI331208 1127G	27AUG2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Perdue Farms P-21234 Date: 8/27/2019 Time: 1:36PM On Tuesday, August 27, 2019, at approximately 8:21am, I, (b) (6) observed the following: while performing Good Commercial Practices Verification, there were approximately 20-30 birds piled up on the DOA table. Mixed with these birds were 7 visibly live birds. The DOA birds were falling on top of the live birds, smothering them. I did not see anyone on the floor monitoring the DOA table so I went to find someone. I informed (b) (6) that they needed to retrieve the live birds immediately and appropriately condemn the DOA birds. I reminded him that someone should be monitoring the table at all times, even when they are short staffed. There were also several live birds (approximately 20) on top of and under the cage dumps and no one was retrieving them either. I spoke with (b) (6) informed him of my observations, and let him know that I would be documenting my findings in an MOI, because it is mistreatment and it is not consistent with good commercial practices. This MOI will be forwarded to my (b) (6) (b) (6) the District Office, and the District Veterinary Medical Specialist in case additional follow-up is recommended. Respectfully, (b) (6)</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P21234	Perdue Foods LLC	XGI541008 5030G	30AUG2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Perdue Farms P-21234 Date: 8/30/2019 Time: 11:56AM On Friday, August 30, 2019, at approximately 11:23am, I, (b) (6) while performing Good Commercial Practices Verification, observed under the holding shed a live bird dangling from a cage that was not in good repair. The side of the cage was not secure; the metal was sticking outward and twisted in an unorganized fashion, and the bird was caught on the side of the cage and hanging by one leg. The bird was obviously distressed flapping its wings hysterically and trying to throw its body back into an upright position. I quickly alerted (b) (6) (b) (6) to assist me with getting the bird down, which he did. This incident caused the bird to be significantly stressed. This is mistreatment and it is not consistent with good commercial practices. I informed (b) (6) (b) (6) of the mistreatment 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) (b) (6), the District Office, and the District Veterinary Medical Specialist in case additional follow-up is recommended.</p> <p>Respectfully, (b) (6)</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P21234	Perdue Foods LLC	XGI010811 5107G	07NOV2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Perdue Farms P-21234 Date: 11/7/2019 Time: 9:02AM On Thursday November 7, 2019, at approximately 8:31am, I, (b) (6), while performing Good Commercial Practices Verification in the picking room, observed 2 shackles that had 2 birds hanging on them coming out of the scalders on evis line 1. There should not be more than one bird per shackle. The extra birds were hanging by one leg, both were without a neck cut, and were not properly bled out. They were identified as cadavers. I informed (b) (6) of this issue and told them to remind the live hangers that there should be only one bird per shackle. The backup neck cutter also needs to be retrained as well to know what to do when this issue presents. I informed (b) (6) of the mistreatment 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) (b) (6), the District Office, and the District Veterinary Medical Specialist in case additional follow-up is recommended.</p> <p>Respectfully, (b) (6)</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P21234	Perdue Foods LLC	XGI312011 3725G	25NOV2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Nov. 20th at approximately 03:30 while doing a three-minute GCP check on line one, I observed one bird enter into the scald tank alive. The bird had raised its head above the level of the neck cutter. After observing this, I went and observed the back-up neck cutter, and discovered that instead of paying attention to the birds, he was washing down the floor with a water hose. As I watched he also turn the hose unto the blood troth in front of his station, spraying the birds with water as they went by. I notified (b) (6) of this event; and went with him to the end of the line one in the picking room and recovered the bird that had entered the scald tank. (b) (6) later informed me that a training was performed with all back-up neck cutters, instructing them not to be using a water hose when performing their job as back-up neck cutters. On Nov. 25th at 03:15 while doing a three-minute GCP check of line one, I observed a live bird again entered into the scald tank. The bird's small size allowed him to avoid the neck cutter. Accompanying me at the time was (b) (6). All three CSIs also witnessed the live bird entering the scald tank. Again, it was observed that the back-up neck cutter was using a water hose when the bird had entered into the scald tank (b) (6) was notified of this incident. (b) (6) accompany to the end of the picking room line to recover the bird. (b) (6) was also informed of this incident. The back-up neck cutter was given disciplinary action. These two incidents were discussed with (b) (6) and he agreed that though these incidents were of concern, they did not constitute a loss of process control.</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P2178	PERDUE FOODS LLC	MXM4804 125517G	17DEC2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 13:06 hours on Wednesday, December 11, 2019, while performing a routine Good Commercial Practice/Ante Mortem task as part of the routine USDA Poultry Welfare audit, in the receiving area of P-2178, Perdue Foods LLC in Georgetown, DE, two (2) live birds were found in the DOA bin. Both birds were on top of the tank: one was on its' back and the other had its head buried in the pile with its tail up. Both birds appeared to moribund, struggling to breathe and moving their feet slightly. (b) (6)</p> <p>(b) (6) at P-2178 who was performing the Audit also observed the findings. (b) (6)</p> <p>(b) (6)</p> <p>(b) (6) all observed the two birds. (b) (6)</p> <p>(b) (6) also was notified. The findings with were discussed in detail with all present at the time of the finding and stated that a MOI will be issued for this animal welfare concern. This is an isolated incident with the most recent finding related to this was from March 2018. On Thursday, December 12, 2019 at approximately 06:30 hours, I discussed the findings with (b) (6)</p> <p>(b) (6) told me that corrective actions including immediate and thorough training all associates in receiving, along with re-certification and evaluations of associates assigned to floor duty in receiving were already being implemented by Establishment Management. 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 the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

**Table: MOIs in Response to FOIA2020-110**

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							Respectfully, (b) (6) P2178, Perdue Foods CC: (b) (6) (b) (6) (b) (6)



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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P218	Pilgrim's Pride Corporation	WOD3113 085219G	19AUG2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On August 17, 2019 at approximately 2145 hours the following failure to adhere to Good Commercial Practices was observed: While observing birds coming out of the pickers, three carcass heads were observed pushed against the wall next to the metal drain cover where an employee was emptying a bucket of paws into a drain. The bird heads were red and engorged with blood. I did not observe bird carcasses, just the heads. I observed the Picker Line for several more seconds and then went over to observe conditions at the backup cutter. On approach, a live bird was observed on the floor near the backup cutter. On closer inspection the bird was observed to under the Picker/Kill Line and covered with blood. The bird was located directly behind the Line 2 Backup Cutter and in front of the Live Hang entrance door. The door to the Live Hang area from the Picker Room was closed. There was no one moving to retrieve the bird from the ground. I asked a Live Hang employee to notify (b) (6) (b) (6) that I would like to see him. (b) (6) came to the area. He was shown the bird. I asked (b) (6) how a bird would have gotten to this point in the Picker Room and he stated possibly when the doors were opening or closing to Live Hang the bird may have escaped. (b) (6) picked up the bird and demonstrated it to (b) (6). At that point I observed what I thought were two additional bird carcasses in a shallow drain under the Line 2 scalders also behind the backup cutter position. This drain is below the scalders and possibly connects to the Live Hang Department. On closer observation one of the birds moved and another lifted its head and began to look around. I moved closer and looked "up" the drain (towards the portion covered by the grate cover and towards the Live Hang department) and observed two additional birds at</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>the exit end of the grate right before the drain opened up. I notified (b) (6) of the four live birds in the drain and asked him to stop hanging and regain control of his Live Hang and Picker Room Departments. (b) (6) had a maintenance employee remove the birds from the shallow drain. The third of four birds was observed to not be breathing. It appeared to have drowned in the shallow drain. I then went to observe the birds exiting the feather picking equipment again as the backup cutter was no longer in his position and was observed to run after and grab a bird hanging on the line at the scald tank. He was unable to retrieve the bird. The bird exited the scald tank and was observed to have a red engorged head, a shallow neck cut and blood staining of the neck area. The bird was demonstrated to a QA technician who was standing behind me who went to the Paw Room to get the bird off the line. She did not come back. I then went into the paw room, because a few additional birds were observed to exit the pickers in the same condition after pointing that bird out to QA. The individual standing in the Paw Room sorting bird carcasses was observed to be taking the miscut birds off the line and throwing them into a drain below him. I motioned for him to hand me one of the birds and he threw it in the drain. I motioned for another and he threw that one in the drain as well. At that time an employee with a gray hat came over. I asked him to tell the employee to hand me one of the birds. He shook his head in affirmation and looked up at the employee making a motion to him to hand him the bird. The employee took a miscut bird carcass off the line and threw it in the drain. Neither employee made attempts to notify plant management when they observed the birds exiting the pickers with poor cuts to the</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>neck area. I asked the rehang employees to stop the evisceration line while I looked for plant management. I notified (b) (5) (b) (5) of my findings and she went to speak to the employee located at the exit of the feather pickers. I notified (b) (5) (b) (5) of my concerns and asked him to take measures to regain control of his Live Hang and Picker Room departments. The evisceration lines were restarted. I requested a meeting with establishment management and immediate short-term corrective actions to maintain process control in the Department for the remainder of the shift. I notified the establishment I would discuss long term actions with them on Monday August 19, 2019, as they needed to identify how the birds got out of the Live Hang Department into the Picker Room drain. Hanging operations were released back to (b) (5) at approximately 2205 hours when short term corrective actions had been provided and the issue had been discussed with plant management. The establishment later stated the bird found dead in the drain may have been a DOA as the backup cutter had been instructed to take them off the line if he saw them. The dead bird did not appear to be a DOA and that would not explain the presence of the other four birds in that same location. It is important to treat poultry in a way that minimizes accidental injury. Employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product. Observing live and dead birds in a drain in the Picker Room is of concern with the establishment's commitment to operate under good commercial practices its' ability to properly maintain operations in the departments where live birds are intended to be handled and slaughtered in accordance with Good Commercial Practices. The establishment is asked to ensure</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							establishment employees handling live animals are aware of the requirements to check all animals, in the Live Hang and Picking Room areas, for life before they are condemned as dead. The establishment is also reminded it is important to treat poultry in a way that minimizes accidental injury to include proper sorting of live and dead birds in the Live Hang/Receiving areas, proper euthanasia and proper disposal of condemned carcasses. In addition, employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product. 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.

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P218	Pilgrim's Pride Corporation	WOD3417 105426G	26OCT2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On October 26, 2019 at approximately 1455 while conducting a GCP task (b) (6) observed the following conditions in the Live Hang Area. When (b) (6) walked through the hanging pen there were six live birds scattered throughout the floor and one DOA. No supervisor nor team member were attending to the birds on the floor. Upon walking outside of the hanging pen, she notified (b) (6) of the birds on the floor and he stated he would take care of them. (b) (6) began performing ante-mortem examination and at approximately 1502, she located two live birds in a cage that was tied down and the driver was honking signaling he was leaving. (b) (6) went around to the driver and signaled to not move. (b) (6) came to see what the concern was, and she showed him the birds in the cage. He had the fork lift drive remove the cages, so the birds could be removed from the cage and then it was replaced on the trailer. (b) (6) took the birds and placed them in an unloaded cage. Allowing birds to be left in cages loaded onto trailers and having live and DOA birds on the floor of the hanging pen is inconsistent with the Agency's expectations of Good Commercial Practices. The establishment is asked to ensure establishment employees moving 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 FSIS Directive 6100.3. The issue will also be discussed at the next weekly meeting.</p>

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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P2186	GEORGE'S FOODS, LLC	YJO472001 0727G	27JAN2020	04C05	Poultry Good Commercial Practices	Finalized	<p>P2186 - George's Foods, LLC At 21:33 on 1/27/2020 while performing a GCP check in the live hang room, (b) (6) observed the following instance of poultry mistreatment. The live hang floor and under the conveyor belt was covered in an abundance of live and dead poultry. When I stepped in the room, an employee began picking up all of the birds and either placing them back on the belt or in the DOA bin behind the belt, respectively. I walked to the end of the belt where it empties into a yellow condemn barrel. When I looked into the condemn barrel, I saw the head of a single live chicken buried up to the neck in feathers, feces, and other debris. I shined my light in its eye to ensure it was alive, and it blinked. I immediately notified the employee picking up birds from the ground and he dug the bird out of the condemn barrel. He asked what to do with it and I instructed him to put it back on the belt. I then notified (b) (6) immediately went out to check on the situation. The est. determined that the metal guard at the end of the belt is too short and live birds could occasionally get over the guard and fall into the condemn barrel. They will discuss making adjustments to the guard. (b) (6)</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P244	Plainville Brands, LLC	GCN23050 80203G	03AUG2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0430 hours on 7/31/2019, while performing Ante mortem Inspection and Good Commercial Practices Verification, Inspection (b) (6) observed a concerning amount of dead turkeys in the trucks due to failure to protect the birds from extreme heat.</p> <p>The establishment had held over birds from the previous day production. Temperatures reached approximately 92 degrees Fahrenheit on Tuesday 7/30. The establishment had moved trailers so that there were 2 trailers in each barn to try to maximum air flow in the trailers. They also had driven the trucks during the night to provide airflow to the turkeys. However, this was inadequate to prevent a concerning number of dead turkeys (361 DOAs for lot 429 and 864 DOAs for lot 428). It was explained to (b) (6) that the Poultry Products Inspection Act (PPIA) and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices and that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS).</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P247	Sanderson Farms, Inc. (Procesing Div)	ETG321008 1428G	28AUG2019	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 10:04am on 8/28/19, (b) (6) while performing an unannounced GCP site verification visit/check, discovered a Good Commercial Practices (GCP) deficiency. After reviewing outside premises, near the live bird holding and dumping areas, (b) (6) entered the Live Hang Room. All employees were absent, due to it being a scheduled break time. Upon entering Live Hang, (b) (6) found a pile of dead birds with one moribund bird comingled among the pile of dead birds and two additional birds sitting upon and immediately adjacent to the same pile of dead birds. As there was no establishment personnel to immediately notify in the area (b) (6) immediately proceeded to the USDA Office, where the IIC and he paged and notified (b) (6) of the GCP deficiency and the forthcoming issuance of this GCP MOI, documenting both the deficiency and notification of plant management.</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P300	Maple Leaf Farms, Inc.	EDK41020 71502G	02JUL2019	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 0520 on 6/28/19, I observed a crate that was placed near the hanging belt. In the crate, there were five dead ducks that had been placed around and on top of one live duck, which was at the bottom of the crate. The five dead ducks were in rigor mortis, and the live duck was alert and obviously alive. I notified (b) (6), who was covering for (b) (6) of my findings. (b) (6) euthanized the live duck. He also stated that it was sometimes difficult to be sure a duck was dead, and that could be the cause of a situation like this. I told him this duck was obviously alive and could not be mistaken for a dead duck. I also described how to use the palpebral reflex to help determine consciousness, and that if there was any doubt to utilize their euthanasia method (at this time cervical dislocation) to ensure a duck was dead. I then informed (b) (6) that I would be documenting this event in an MOI. Directly after meeting with (b) (6), I notified (b) (6) of what had happened. At approximately 0330 on 7/2/19, I met with (b) (6) to ensure he was aware of the above situation. He was aware of it, and he stated that the employee responsible had already been counseled.</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P300	Maple Leaf Farms, Inc.	EDK28020 75116G	16JUL2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0145 on 7/8/19, while performing line inspection duties, I observed six ducks at inspection stand #1 that had severe antemortem compound fractures and/or leg bruises. I notified (b) (6), who took the identified ducks and showed them to (b) (6) in Live Hold. At approximately 0230 on 7/10/19, again while performing line inspection duties, I observed one duck with a severe antemortem compound fracture. I also observed an additional duck that had an old partially healed fracture that had fused the leg joint, forming a twisted immovable joint; this duck was septic, probably due to the fracture and resulting synovitis. I met with (b) (6) on 7/10/19 at approximately 0320 in Evis, and both (b) (6) photographed the ducks. I told (b) (6) that I was unable to discern whether the fractures and bruising occurred at the plant, in transit, or at the farm. If the fractures occurred at the plant or in transit, they indicated GMP issues that needed to be identified and corrected. If they occurred at the farm, the ducks would not have been able to walk on to the trucks, and the shipment of these ducks would then be a violation of the plant's own SOPs, which state that ducks must be able to walk on to the truck. I also told (b) (6) that the duck with the old fracture/fused joint would not have been able to walk on the truck without extreme suffering, so its presence at the plant indicated either an SOP violation or inhumane treatment (making it "hobble" on that fracture). I met with (b) (6) at approximately 0630 on 7/10/19 in my office. He indicated that he would investigate these issues, and stated that some recent repairs/modifications had been made to the belt that, although it is unknown at this time where these injuries occurred, would further</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							prevent fractures like these from occurring at the plant. (b) (6) stated that he has observed ducks with old fractures walking, but that the duck with the fused joint should have been culled at the farm.
P300	Maple Leaf Farms, Inc.	EDK59151 02616G	16OCT2019	04C05	Poultry Good Commercial Practices	Finalized	At approximately 1154 hrs. on 10/16/2019 while watching birds exit the bleeding room to the scalding I saw 1 bird that was still alive, I took it off the line and gave it to (b) (6) who took it to be rehung and stunned. While he was doing this a second live bird appeared I immediately took it off the line and took it to the live hang area and gave it to (b) (6) to be stunned a second time. I returned to the line and at approximately 1158 hrs. a third live bird appeared. I took it off the line and gave it to (b) (6) who was standing nearby. It was then taken to the live hang area to be stunned. I observed the line for approximately 10 more minutes and did not see any more live birds.

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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P300	Maple Leaf Farms, Inc.	EDK28020 21519G	19FEB2020	04C05	Poultry Good Commercial Practices	Open	<p>(b) (6) informed me that at approximately 1315 on 2/17/20, while observing the animal handling at the entrance tunnel and the live hang area, she observed the first employee (the one closest to the entrance tunnel) repeatedly grab multiple ducks with his hands and push the ducks backwards on the moving conveyor toward the entrance tunnel - he neither slowed nor stopped the conveyor to facilitate having ducks in front of him to hang. This conduct not only constitutes inhumane handling and increases fractures and bruising, but also violates the plant's own SOPs. I discussed this issue with (b) (6) in the Feather Room at approximately 2300 on 2/17/20. I asked (b) (6) to inform 1st shift plant management of the issue, and also asked (b) (6) to reinforce the proper procedures with his 3rd shift personnel (I have not observed this conduct on 3rd shift). This issue will also be on the weekly meeting agenda for 2/19/20.</p>



Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P300	Maple Leaf Farms, Inc.	EDK24020 23420G	20FEB2020	04C05	Poultry Good Commercial Practices	Open	
P325	Tyson Foods, Inc.	YDM07230 60705G	05JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On June 5, 2019 at approximately 1650 while conducting a GCP task (b) (6) observed the following conditions in the Live Hang department. There were two condemn barrels at the end of the DOA bin. (b) (6) noticed the birds in one barrel were moving up and down signifying the possibility of a live bird underneath. Upon further investigation, she removed approximately 3 layers of birds and found a live bird breathing. (b) (6) took regulatory control action and stopped live hang from hanging any birds until the barrel was cleared of any further live birds mixed with the DOA birds. I notified (b) (6) of the concern with live bird humane handling. (b) (6) stated that the team member had just been up to HR due to some concern over pay that was owed to him. The concern was when (b) (6) arrived, there was no one attending to the carcasses in the condemn barrels. The mixing of live birds with dead birds in the condemn barrels can suffocate the live, weak birds and is not consistent with the Agency expectations for handling of live poultry. 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 FSIS Directive 6100.3. The issue will also be discussed at the next weekly meeting.</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P325	Tyson Foods, Inc.	YDM23230 63306G	06JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On June 6, 2019 at approximately 1545 while conducting a GCP task (b) (6) observed the following conditions in the Live Receiving Area. She was performing ante-mortem examination on the trailer that had just been placed in live receiving. There was one cage approximately midway on the trailer that had three doors open. (b) (6) noticed the birds sitting on the doors and not in cages. Upon further investigation, she noticed a total of 5-6 birds outside of a bottom cage on three different levels (or sections). They were sitting on the cage doors and trailer bed. One bird had one of its legs stuck between the door and an adjacent cage. (b) (6) immediately notified Nightshift (b) (6) of the concern with live bird humane handling and transport. (b) (6) and (b) (6) came out to the trailer and began removing the birds that were sitting on the cage doors they could reach. They instructed the fork lift driver to remove the cage on top of the one with the open doors to get to the birds and close the cage doors. While removing the top cage adjacent damaged cage, the fork lift driver manipulated both the top and bottom cage onto the bird's leg that had been pinned. (b) (6) immediately instructed them to stop. A team member came over to release the bird's leg and remove it from the cage door. The establishment removed the adjacent cage and the remaining birds before closing the cage doors. At the time of the observation described above, there were no establishment employees attending to the open cage or attempting to remove the birds who had come out of the cage onto the doors. Allowing birds to be outside cages and be pinned between cages is inconsistent with the Agency's expectations of Good Commercial Practices. The establishment is asked to ensure establishment employees moving live animals are</p>

**Table: MOIs in Response to FOIA2020-110**

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							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 FSIS Directive 6100.3. The issue will also be discussed at the next weekly meeting.



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P325	Tyson Foods, Inc.	YDM28210 60713G	13JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On June 13, 2019 at approximately 1530 while conducting a GCP task (b) (6) observed the following conditions in the Live Hang department. Approximately five DOA birds were on the floor to the side of the metal DOA bin and approximately 10 live birds on the floor in the hanging pen throughout the floor. 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 two live birds mixed in with the DOAs in the bin. Those birds were underneath the layer of dead birds. I notified (b) (6) of the concern with live bird humane handling. (b) (6) informed (b) (6) that the normal team member that picks up live birds and removes DOAs from the bin was not present this evening and the establishment was using someone new in that position. While (b) (6) continued her GCP task at 1545, a live bird was found under the stunner that was soaked and huddled up. No one was attending to or removing the bird (b) (6) took regulatory control action and stopped the live hang lines. (b) (6) was notified of the bird under the stunner. He removed the bird from under the stunner and (b) (6) released regulatory control back to the plant. 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</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							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 FSIS Directive 6100.3. The issue will also be discussed at the next weekly meeting.
P325	Tyson Foods, Inc.	YDM29230 64921G	21JUN2019	04C05	Poultry Good Commercial Practices	Finalized	While performing presentation checks at about 1640 there were 2 cadavers hung back for veterinary disposition. Upon further investigation, there were no cuts on the necks of either bird. Exiting the picking room an additional cadaver was observed without a neck cut. (b) (6) (b) (6) was notified of the cadavers. The presence of birds that are not thoroughly bled out and cadavers that would have entered the scald tank while still breathing constitute a concern with 381.65(b) and good commercial practices. (b) (6) )

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P325	Tyson Foods, Inc.	YDM44230 91619G	19SEP2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On September 19, 2019 at approximately 1706 while conducting a GCP task (b) (6) observed the following conditions in the Live Receiving Area. When (b) (6) walked outside the hanging pen there was a bird on the side of the track that cages run to the dumper. She notified a team member because no supervisor was available at the time and there was a concern for the safety of the bird. She began performing ante-mortem examination and at approximately 1710, another bird was observed on the same side of the track that moves cages (b) (6) (b) (6) was notified of the concern and removed the live bird from the area. At approximately 1714, one live bird was visualized inside a cage that was loaded onto a trailer after being dumped. (b) (6) was notified of the concern, had the forklift driver remove the cage from the trailer, removed the bird from the cage, and took it into the hanging pen. At approximately 1716, there was one cage approximately midway on a trailer in live receiving that was approximately half unloaded that had a cage door open and birds were sitting on the door outside of the cage. (b) (6) noticed the birds sitting on the door and not in cages. She immediately notified (b) (6) of the concern with live bird humane handling and transport. (b) (6) came out to the trailer and placed the birds back into the cage and shut the door. As (b) (6) entered the hanging pen there were 19 live birds and three dead birds on the floor. (b) (6) pointed them out to (b) (6) and he picked up the birds. At the time of the observations described above, there were no establishment employees attending to the open cage or attempting to remove the birds who had come out of the cage onto the doors, removing the birds from the side of the track cages were</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							moving, removing the bird from the cage loaded onto the trailer, nor picking up the live birds on the floor of the hanging pen. Allowing birds to be outside cages, left in cages loaded onto trailers, and having live and DOA birds on the floor of the hanging pen is inconsistent with the Agency's expectations of Good Commercial Practices. The establishment is asked to ensure establishment employees moving 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 FSIS Directive 6100.3. The issue will also be discussed at the next weekly meeting.

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P325	Tyson Foods, Inc.	YDM45171 20203G	03DEC2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2130 hours, 27th of November 2019, (b) (6) railed out one suspected DOA (Dead on Arrival) young chicken. I, Relief (b) (6) inspected the carcass and observed a strong odor of putrefaction, dark red and congested viscera, limp neck, and reddish discoloration of the carcass. I showed the suspected DOA to (b) (6) (b) (6) and the latter concurred it is a DOA. At approximately 2220 hours, 27th of November 2019, I, Relief SPHV railed out one DOA (Dead on Arrival) young chicken. The carcass emits a strong odor of putrefaction, has dark red and congested viscera, friable liver which easily disintegrated to light pressure, limp neck and reddish discoloration of the carcass. (b) (6) inspected the carcass and insisted it is not a DOA but a cadaver. (b) (6) (b) (6) vehemently challenged the basis of my DOA disposition. At approximately 2015 hours, 30th of November 2019, (b) (6) railed out one suspected DOA (Dead on Arrival) young chicken. I, (b) (6) inspected the carcass and observed a mild odor of putrefaction. There is only one lobe of friable liver which is congested and dark red in color. The gizzard is congested with grayish and reddish discoloration. The interior walls of the cavity is dark red in color. The neck is limp. At approximately 2100 hours, (b) (6) came to the USDA office and argued about my disposition. Plant Manager Brian Shankle quietly listened and before leaving, told me that DOA is a serious matter to the plant.</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P33900+V3 3900	Foster Farms	NHH44091 23405G	05DEC2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On the morning of December 5, 2019 at approximately 0655 hours while performing Good Commercial Practices verification activities in the Live Receiving area at establishment P-33900, a plant employee was observed removing two live chickens that had failed to dump from the cage and throw them onto the hang belt. Minutes later, the same employee was observed attempting to remove a live chicken that had failed to dump because its wing was stuck between the cage bars, by placing a metal rod with a hooked end around the hock and forcibly trying to pull the bird out of the cage by jerking on the rod. When that failed the employee reached into the cage, freed the wing and removed the bird. A second employee was observed removing two live chickens and placing them on the top of the cage and then dumping them onto the hang belt. (b) (6), (b) (6), was immediately notified of the observations described above and was informed that all poultry should be processed using Good Commercial Practices. (b) (6) stated to prevent recurrence the employees would be retrained. The meeting adjourned and (b) (6) went to the live receiving area to initiate corrective actions. No further issues were observed in a subsequent observation of the area at approximately 1245 hours.</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P34668	Simply Essentials Poultry, LLC	SFJ381507 5525G	25JUL2019	04C05	Poultry Good Commercial Practices	Finalized	July 19, 2019 DOAs and plant rejects. Poultry lot information: Lot 1- 3246 DOA and 1675 disposed carcasses. Lot 2- 2751 DOA and 2645 disposed carcasses. The temperature was in the mid 90s with high humidity. Viscera pacs at the leucosis inspection station showed the lungs and viscera to appear healthy. We experienced assorted breakdowns lasting approximately 4 1/2 hours causing birds to be held in the CAS CO2 slaughter system and on the line. Some of the birds thrown away at live hang appeared to be in a state of advanced decomposition indicating that they were not newly deceased. Examine the reasons for the high DOAs that occurred on 7/19/19, and develop a plan to prevent recurrence.

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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P445	Wayne Farms, LLC	FKA501405 1328G	28MAY2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1600, as I went to the live receiving department to perform my good commercial practices task, I observed an unusually large number of Dead on Arrival birds (DOA's). The DOA vat was full to overflowing, if you tried to place another bird to the vat, that bird would fall to the floor. Additionally, there was a pile of DOA's next to the DOA vat that was approximately 8 feet long, 3 feet wide and 2 feet deep. Also, there was a plant employee continuously throwing DOA's from the hanging area through the plastic strips onto the pile. I found (b) (6) in the evisceration department, and notified her of my findings. She went out to live receiving to gain control of the operation (b) (6) had a plant employee empty the DOA vat and dispose of the rest of the DOA's. She was also monitoring the belts bringing the live birds to the people hanging the birds on the shackles, since this is where she found the cause of the increased DOA's to be coming from. This seemed reasonable because the cages of live birds did not have many visible DOA's in them, maybe one DOA per 10 cages. (b) (6) was present and he started dousing the birds in cages on the trucks with water (in addition to the fans and water mist) in an effort to keep them cool.</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P45910	SANDERSON FARMS, INC	GRI082001 4907G	07JAN2020	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2057 hours (b) (6) and myself, (b) (6) were performing a Good Commercial Practice task and observed a forklift operator place a cage full of chickens on the deck. He proceeded to tear the top right door off using the forklift to rip it off. At that moment I told (b) (6), "I hope he doesn't plan to raise that cage up and take it to the cage dumper which could cause the chickens to fall out of the cage and onto the deck." At that moment the forklift operator raised the cage up with the forklift to it's full height, which appeared to be approximately 12-15 feet in the air, as far as myself and (b) (6) could surmise. At that point he started to move forward and a live chicken fell out of the cage and dropped to the deck, landing on it's head and side body with a loud thud. We observed it fluttering a few times on the ground before the forklift operator lowered the cage and picked the bird off the deck and put it back into the cage. I stopped the forklift operator and informed him that I witnessed the bird fall from the cage and the trauma that the bird suffered from the fall would most likely lead to it's mortality. The forklift operator told me that the bird wasn't dead. He proceeded to take the cage over to the right side of the dumper at which point I don't know what he did with the birds in the cage. I had informed him that I was going to let (b) (6) know and document this in an MOI. I proceeded into Live Hang and found (b) (6) and took him out to Live Receiving and explained what myself and (b) (6) witnessed. (b) (6) told me that sometimes the cage doors get stuck and they have to rip them off to get the birds out of the cage. I informed him that I had no problems with them doing whatever they need to do so they can dump the chickens out properly, however, the forklift operator should have taken</p>



Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>the cage over to the side of the dumper and placed the live chickens, from the broken coop, into another one that was secure so that the birds wouldn't fall out during the cage dumping process. The forklift operator came over to us at that point and told me that there were no dead birds in the cage. At this point there were already two cages with birds staged on the left side of the dumper with a bird, outside the cage, sitting on top of the cages and another live bird sitting on the deck, out of their cages, sitting next to the cage. I informed (b) (6) that this is a recipe for disaster and these birds need to be properly secured in their cages or there would be risk of them getting run over leading to further issues. He informed me that he would take care of this. This Memorandum of Interview is to document the observations and discussion that myself, (b) (6) had between USDA FSIS and Establishment Management, (b) (6) (b) (6)</p>
P45939+V4 5939	Petersburg Poultry Processing	CZJ320905 4623G	23MAY2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Upon arrival at Petersburg Poultry Processing for slaughter processing on May 22, 2019 while performing the antemortem check on the chickens to be slaughtered the (b) (6) observed multiple deceased chickens in the crates which, after confirming with establishment employees, were left uncovered in the rain overnight from the previous day, they were the remaining chickens that were not slaughtered from the day before. After the slaughter was finished the establishment counted 83 DOA chickens that had passed as a result of being left unprotected from the inclement weather.</p>

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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P4602A	NEW MARKET POULTRY, LLC	YCG19140 60121G	21JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 6/21/2019 at approximately 1005 hours, I, (b) (6) while performing the Good Commercial Practices verification task noticed a live hung hen pass the area on the kill line where the backup killer was stationed lift its head, look left and right, and blink. I took regulatory control action by stopping the hanging area line. I informed the lead supervisor of the issue and we both observed the backup kill find and slaughter the chicken with a knife cut across the throat area. The lead continued to monitor the backup killer until he was satisfied that no more birds were passing the final checkpoint uncut. I then informed (b) (6) (b) (6) of my observations. Later, during the weekly meeting, establishment management mentioned adding an emergency stop button to the backup killer's side of the line so that he could more quickly stop the line if signaled. Had I not stopped the line, it is likely the live chicken would have entered the scalding water while alive and breathing producing a true cadaver [381.65(b)]. Such a cadaver was previously on May 6, 2019. Evidence of a developing trend of loss of process control such that true cadavers are produced may result in a NR for 381.65(b).</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P4602A	NEW MARKET POULTRY, LLC	YCG18100 74315G	15JUL2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On July 15, 2019 at approximately 0958 hour I, (b) (6) while performing a Good Commercial Practices verification task inspection of Lot 2 noticed traffic passing the establishment swerving towards the midline and opposite lane. I looked further down the road and saw a loose rooster walking on and off the lane nearer the official premises. I informed an area lead supervisor of the issue and observed him capture the rooster and take it to the live hang area. Later at approximately 1025 hours while giving an online inspector a break and performing postmortem inspection of eviscerated carcasses on Line 1 Station 1, I identified a heavy fowl hen carcass with a diffusely bright "cherry" red appearance and attached neck and head. There was no cut in the throat area of the carcass. When inverted, a small amount of fluid freely drained from the oral cavity. I judged this presentation to be consistent with a "true cadaver," a bird that entered the scalding tank without being slaughtered, and informed (b) (6) of my noncompliant finding. I observed the QAM take the cadaver to the live hang and slaughter supervisor for corrective instructions. These observations are suggestive of suboptimal process control in the establishment's obligation to uphold 9 CFR 381.65 (b), which stipulates that poultry animals are not to die by any means other than slaughter (such as being struck by a moving vehicle) and that they are not to enter the scalding water while still breathing or without having been first sufficiently exsanguinated. Greater numbers of loose birds leaving the official premises or multiple identifications of true cadavers would represent a loss of process control meriting a noncompliance record (NR) documentation. Deficiencies in the establishment's GCP were</p>



**Table: MOIs in Response to FOIA2020-110**

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							previously documented on 5/06/2019 (YCG1013054606G), 6/21/2019 (YCG1914060121G), and 7/09/2019 (YCG5210075609N).

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P46091	Ozark Mountain Poultry, Inc.	FAA02210 94315G	15SEP2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On 7/22/19 at approximately 8:00 pm I observed a cadaver, decapitated, on line 1 exiting the stunner prior to the neck cut station in the picking room. I requested an establishment employee to remove the cadaver from the line and dispose of it in an inedible container. On 3rd shift on 7/24/2019 at approximately 3:00 am I again observed a cadaver, decapitated, exiting the stunner on line 1 prior to the neck cut station in the picking room. I requested an establishment employee to remove the cadaver from the line and dispose of it in an inedible container. I notified (b) (6) of my observation. On 3rd shift on 7/25/2019 at approximately 2:00 am. I observed several mutilated chickens, legs torn open and torn off, on the line 1 conveyor belt in live hang area. I notified (b) (6) of my observations. (b) (6) later informed me that they had checked all their equipment and determined that their equipment was not the cause of the mutilated chickens. He also explained to me that he thought the chickens were being brought in from the farm with the injuries. On 3rd shift on 7/25/2019 at approximately 4:00 am I observed several more, approximately 15, mutilated chickens, legs torn open and torn off, on the line 1 conveyor in live hang. Upon further inspection of the line 1 equipment I observed that the plastic guards next to the conveyor needed repair and were coming loose from the metal wall they were attached to. I also observed parts of mutilated chickens (legs and feet) still stuck underneath the guard. I determined these partially detached plastic guards were the likely cause of the mutilated chickens and plant management agreed with my observations. The establishment made repairs to the equipment. I did not observe further mutilation, during that</p>

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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>shift, after the repairs were made. On 9/08/2019 at 7:41 pm I observed a cadaver, the posterior head was mutilated, exiting the stunner on line 1 prior to the neck cut station. I requested an establishment employee to remove the bird from the line and dispose of it in an inedible container. I notified (b) (6) of my observation. That same shift at 12:06 am I observed a cadaver, with a mutilated neck, exiting the stunner on line 1 prior to the neck cut station. I requested an establishment employee to remove the bird from the line and dispose of it in an inedible container. I notified (b) (6) of my observation. Less than ½ an hour later, at 12:30 am. I observed a dying mutilated chicken on the floor in live hang area next to line 1. The chest area was mutilated exposing the breast muscle. I notified (b) (6) of my observation and directed them to humanely euthanize and appropriately dispose of the chicken. I also asked (b) (6) to have the equipment on line 1 checked for any defects that could cause the mutilation. He informed me that they had checked all the equipment and found no cause for the mutilation. Later that same shift at 2:40 am I observed a chicken with the neck area mutilated but still alive exiting the stunner on line 1 prior to the neck cut station. I notified (b) (6) of my observation. On 09/09/2019 at approximately 11:00 pm I observed a chicken exiting the stunner on line 1 prior to the neck cut station that had the leg area mutilated. I notified (b) (6) of my observation. I again asked (b) (6) if they had checked the equipment on line 1 for defects during the previous shift, he again assured me that the equipment had been checked and that they found no concerns with their equipment. On 3rd shift</p>



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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>on 09/09/2019 at approximately 4:00 am I observed a dead chicken in the DOA bin that had the leg and back areas mutilated and exposing the viscera on the outside of the body. I notified (b) (6) of my observations. I asked Area Supervisor if they had checked their equipment for any repairs needed that could be causing the mutilation. He informed me that they had checked their equipment the prior shift and found their equipment was in good repair and not causing the injuries. Upon further inspection I observed a beak, wattle and skin from the head of a mutilated chicken and stuck under the plastic guard next to the conveyor belt on line 1. I further inspected the line and found 2 more areas that were causing the mutilation. Despite the establishment's assurance on at least 3 prior occasions that their equipment on line 1 had been thoroughly checked for problems that could be related to the mutilation of poultry on line 1, the mutilation of birds continued, the cause of which was ultimately determined to be the equipment that was in poor repair and had not been properly maintained. On 3rd shift of 09/09/2019 at approximately 4:00 am I met with (b) (6) I reminded all present that the PPIA and the 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.</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P46374	Sanderson Farms, Inc. Tyler Processing Division	AQI4008045124G	24APR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. P46374, Sanderson Farms Tyler Processing, April 23, 2019, 1337 hours. In attendance: (b) (6)</p> <p>(b) (6)</p> <p>(b) (6) s also present. At approximately 0545 hours, 23rd of April 2019, while performing Poultry Good Commercial Practices verification task, I observed at pre-scald two young chickens still breathing. (b) (6) who is right behind me immediately stopped the line when I said "still breathing". (b) (6) instructed the plant neck cutter to make a cut on the neck of the two young chickens still breathing which apparently have cut on their necks already. Then, (b) (6) adjusted the blades of the kill machine accordingly. (b) (6) told the plant neck cutter to be more alert to ensure that all the necks of the young chickens are properly cut. The plant neck cutter is a back up to the kill machine. (b) (6) asked if what I saw is not a reflex reaction of the bird who may already be dead. (b) (6) said the two aforementioned birds open their beaks gasping for breath with eyes wide open and the other one flapping its wings. (b) (6) requested if MOI may not be issued as due process with the consideration that the plant has not found cadaver on the line except for 3 birds on the 3rd week of operation. (b) (6) replied that IPP would give the opportunity for the establishment's system to work before making a compliance determination however, the establishment does not have GCP monitoring or procedures at pre-scald which consequently cannot prevent these birds from entering the scald while still breathing. (b) (6) also said that under NPIS, FSIS is not monitoring the cause of condemnations. (b) (6) added that based on FSIS Directive 6110.1, the aforementioned</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>incident has to be documented in an MOI. 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. I recommended that (b) (6) review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter and provided him a copy of this document. I also recommended that (b) (6) review FSIS Directive 6110.1 which is Verification of Poultry Good Commercial Practices. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>Respectfully, (b) (6)</p> <p>P46374 Sanderson Farms Tyler Processing.</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P46374	Sanderson Farms, Inc. Tyler Processing Division	AQI330604 0426G	26APR2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Poultry Mistreatment Meeting at Est. P-46374, Sanderson Farms - Tyler in April 16, 2019 at approximately 1000 hours. In attendance: (b) (6).</p> <p>(b) (6) At approximately 0900 hours, on 15th of April 2019, while performing Poultry Good Commercial Practices task on Lot 2, I, (b) (6) sensed the live chicken dumper dump a new batch of young chickens sooner than usual. I was beside the wall looking through the opening and observing few young chickens left behind in the cage. So, I did not have a visual on what actually happened. Then, I positioned myself strategically and watched carefully the next dump and I confirmed that the dumper is dumping young chickens over other young chickens on the first belt. I notified (b) (6) accordingly. When I went outside to check on few young chickens left over in the cage, the dumper motioned on me to climb up the control stand and he showed me that the first belt is a lot slower than the second belt. He explained that it is the reason why approximately 25% of the dumped young chickens are able to walk back to the first belt. I said, it is not a reason to dump new batch of young chickens on other young chickens. (b) (6) later told me that the maintenance crew is adjusting the speed of the belt. 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 (b) (6) (b) (6) 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. Respectfully, (b) (6) of Est. P46374 ???Sanderson Farms at Tyler</p>

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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P46374	Sanderson Farms, Inc. Tyler Processing Division	AQI041305 0931G	31MAY2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1325 hours on 30th of May 2019, while performing Poultry Good Commercial Practices task, I, (b) (6) observed the following: One young chicken still breathing at pre-scalder for Lines 1 and 2 which I pointed to (b) (6). He had the line stopped and pulled out the breathing young chicken off the shackle. Closer examination revealed uncut trachea, esophagus and right jugular vein and right carotid artery. The vent and thoracic cage is rhythmically moving. After few minutes, one young chicken still breathing is also observed at pre-scalder for Lines 3 &amp; 4. (b) (6) had the line stopped but the breathing young chicken is unreachable on the second shackle next to the scalders. It went to the scalders flailing. One day before, 29th of May 2019, at approximately 0900 hours, while performing Poultry Good Commercial Practices task, I, (b) (6) observed the following: One young chicken still breathing at pre-scalder. This time, there is no supervisor that magically appears behind to pull out the breathing young chicken before it goes to the scalders. The back up neck cutter stopped the line and promptly cut the head off of the breathing young chicken. Few days before, 25th of May 2019, at approximately 0840 hours, while performing Poultry Good Commercial Practices task, I, (b) (6) observed the following: One young chicken still breathing at pre-scalder. (b) (6) appeared from behind and pulled out a different bird from the shackle. Turned out, the one he pulled out is also breathing – flailing, vent and rib cage moving rhythmically for at about 2 minutes and eventually stopped moving. The breathing young chicken I saw entered the scalders flailing. The aforementioned incidents are evidences of isolated instances in which a bird was still breathing when it entered the scalders or about to</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>enter the scalders, but the system is otherwise in control. At approximately 1245 hours, 31st of May 2019, I summoned (b) (6) to notify him of these findings. 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 to die from causes other than slaughter. I recommended that (b) (6) review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter and provided him a copy of this document. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6), IIC P46374 Sanderson Farms Tyler</p>



EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P468	Peco Foods, Inc.	JVD420606 1804G	04JUN2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On June 3, 2019 at approximately 0950 hours, I (b) (6) observed a trailer containing live chickens underneath one of the establishment's live haul sheds that had ten open cage doors. The opening of each of these cages was located between each stack of cages. Numerous birds were sitting on the open cage doors, outside of the cages. Additionally, three live birds had their heads caught in the cage doors, presumably after the cage door opened and then closed back. I notified (b) (6) (b) (6) of the situation. (b) (6) immediately attended to the hung birds by placing them back in the cages. He then had the trailer moved to where the birds are unloaded via forklift and transported to the dumping area. The damaged cages were then carefully lowered by forklift from the trailer and the birds were placed back in the cages and the cage doors closed. Upon lowering one cage that had three separate open doors, one chicken did fall to the ground upon the cage being lowered by the forklift. The bird did not appear harmed and was placed back in the cage by an establishment employee. All cages on this trailer were transported to the cage dump area. (b) (6) informed me that this was likely caused by the driver of the trailer slamming on the brakes en route to the establishment. (b) (6) then ensured that the driver retraced his route to make sure there were no live chickens left along the driving path. He also discussed the situation with the live haul crew. I informed (b) (6) that I would discuss this situation with my supervisor and that this does not follow Good Commercial Practices for poultry and may result in a memorandum of interview. (b) (6) (b) (6)</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P46826	SHENANDOAH VALLEY ORGANIC	BOK37110 93303G	03SEP2019	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0855 hours, while performing good commercial practices (GCP) verification, I (b) (6) entered the picking room and noticed that the kill line had been stopped by the establishment. I entered the blood room and saw approx. 5 live chickens on the floor near the back-up head puller's stand. Many (at least 15) of the chickens hanging on the line had not been stunned or cut. Also, many of the stunned chickens on the line had no neck cut. (b) (6) (b) (6) was manually cutting the necks of the stunned chickens and pulling the non-stunned, non-cut chickens off the line. I returned to the picking room to inspect the birds hanging on the line prior to the scalding. The establishment started the kill line and I saw one chicken that was alive and breathing, not stunned or cut, moving towards the scalding. I pulled the chicken off the line just before it entered the scalding. (b) (6) was present at the time. I returned to the blood room and saw that the establishment had again stopped the kill line. I told (b) (6) (b) (6) that I had pulled a live chicken off the line just prior to it entering the scalding. I was informed that the kill blade had stopped working and maintenance personnel were repairing it. I instructed (b) (6) (b) (6) to keep the line stopped until the kill blade was functioning and the chickens on the kill line had been appropriately slaughtered. I then observed the live hang and evisceration supervisor (b) (6) (b) (6) ensure that all chickens on the kill line were either manually slaughtered or (if not stunned or cut) returned to the to the beginning of the line to go back into the normal slaughter process. The kill line was restarted at 0902 hours, and I verified that the stunner and blade were functioning appropriately. I observed (b) (6)</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							verbally counsel (b) (6), and the back-up cutter. 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." Since this is an isolated incident, it will not be registered as a noncompliance record because the establishment recognized and corrected the issue, and the process appears to be in control; no further live birds were observed entering the scalding. All precautions should be taken by the establishment to adhere to slaughter that is consistent with good commercial practices. Any deviation from such is unacceptable.



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EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P46897	IHSAN FARMS, IIC	SVH43091 11205G	05NOV2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Memorandum of Interview</p> <p>November 05, 2019</p> <p>Ihsan Farms, LLC</p> <p>P-46897</p> <p>Princess Anne, MD Attendees: Mr. Ted Zadeh, Plant Manager, P-46897, Ihsan Farms</p> <p>(b) (6) USDA, P-46897</p> <p>(b) (6), P-46897 A meeting was held at 0927 hours in the USDA office of Ihsan Farms, Princess Anne, Maryland between establishment management and USDA at my request. I identified myself as (b) (6), (b) (6). The establishment management acknowledged they understood my official capacity through the conversation. The purpose of the meeting was to communicate my findings of a poultry good commercial practices / poultry welfare concern that I observed within the establishment. I said that at 0917 hours I was inspecting the area around the live hang conveyor belt inside the establishment facilities. I looked inside a yellow condemn barrel and saw approximately 8 birds that had pink denaturant appropriately applied to their outside surfaces. I observed one bird to move its head and make agonal-type gasps. This bird was at the bottom of the pile of birds. I immediately showed (b) (6) the bird and told him it appeared to be still alive. After he removed it from the barrel, the bird</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>continued to exhibit movements of its head. I suggested that it be euthanized since it could not be slaughtered on the production line after denatured; he passed it over to the person who slaughters birds and the bird was killed / bled out manually. I looked inside the condemn barrel again and saw another bird towards the bottom moving its head / gasping. I showed this to [REDACTED]. (b) (6) [REDACTED] who took the bird and it was also killed and bled out manually. I reminded Mr. Zadeh that the Poultry Products Inspection Act 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 told him that there are no regulatory requirements for a euthanasia protocol to be written; however, the establishment should have a plan (written or not) to address birds that cannot be placed onto the slaughter line (non-ambulatory, weak birds). I notified Mr. Zadeh that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. I attest that this memorandum includes all the information discussed during the meeting to the best of my knowledge.</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P47016	The Best Dressed Chicken, Inc.	OFG13140 10823G	23JAN2020	04C05	Poultry Good Commercial Practices	Finalized	<p>On this date of record at approximately 1300 hours, I went into the picking room to perform Good Commercial Practices verification task. While standing between the two picking machines, I observed five red carcasses with heads still attached and engorged and no incision mark on the necks exit picker one. Two of them were separated by one carcass that had been properly bled out. The other three occurred at random sequence within 15-20 carcass time period that occurred 5-7 carcasses after the first two were pulled. I then went to the blood trough and observed a live bird with an uncut neck entering the scalding. At that moment, (b) (6), (b) (6) stepped in and I showed him the cadavers. He went to the kill machine technician with the cadavers to determine the cause of the issue. I then observed another live bird that was conscious and without an incision on its neck enter the scalding. I observed the line for live birds for another minute and the blood trough and saw no more live birds heading to the scalding. (b) (6) determined that the cause of the cadaver issue was human error and space design. The kill machine attendant was not able to see the birds due to excess condensation on his face shield. Additionally, the attendant was working on the side of the machine that impeded his ability to see if the birds were fed into the machine correctly. As corrective action, (b) (6) cleaned the attendant's face shield and did hourly monitoring of the attendant and process. The monitoring continued throughout the next day. (b) (6) and I met after the end of slaughter to discuss the issue. (b) (6), as preventative measure, is working with (b) (6) (b) (6), to provide the necessary changes to the area so that the attendant can work on the opposite side of the machine. While the cadaver issue was discussed</p>



**Table: MOIs in Response to FOIA2020-110**

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							at the weekly meeting with the establishment, this MOI serves as separate documentation of the event of the day. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow up in necessary.

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P47016	The Best Dressed Chicken, Inc.	OFG42080 10827G	27JAN2020	04C05	Poultry Good Commercial Practices	Finalized	<p>It was observed on this day, January 21, 2020, at approximately 1010 hours, that there were several cadavers making it to the inspection stand (seven (7) within 5 minutes). These cadavers were bright red in color and had their heads and necks still attached with no identifiable incision mark on the necks. There were also numerous carcasses that were pink in color with red wing tips and red upper breast as well as red necks with some attached heads. Just prior to that at approximately 0955 hours, while completing a Good Commercial Practices verification task, I had observed one live bird with an uncut neck enter the scalding. The carcasses on the bleed line also appeared to have the bleed out cuts further back on the neck. I notified (b) (6), of my observations both on the line and in the picking room. At approximately 1020 hours, I took regulatory control of the line due to the number of cadavers being presented at the inspection stand (approximately twenty (20)). (b) (6) implemented corrective action by adjusting the stunner depth, adding salt to the stunner, and having (b) (6) adjust the neck cutter so that the bleed out cuts were over the vein. Preventative measures were discussed later in the afternoon and (b) (6) stated that the bird size was the issue but would increase monitoring of the kill area to decrease the amount of live birds entering the scalding. I notified (b) (6), that this MOI was being forwarded to the District Office and the District Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P476	Pilgrim's Pride Corporation	ODA27230 52022G	22MAY2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Daniel Shaw, Plant Manager Pilgrim's Pride Corporation P-0476 616 Kingsbridge Rd. Carrollton, GA 30117 On Wednesday, May 22, 2019 at approximately 1850 hours while performing a Good Commercial Practices Task at P-0476 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the evisceration department. I observed approximately thirty-five cadaver birds both on evisceration line number one and removed from the line inside a condemn barrel within the evisceration department. I immediately notified (b) (6) this issue. I notified (b) (6) shortly thereafter by phone. Both (b) (6) observed the cadavers on the line in my presence. I was notified by (b) (6) that there was no water in the stunner and the backup killer was trying to kill each bird by hand, which lead to the large number of cadavers seen on the evisceration line. (b) (6) stated water was replaced in the stunner on picking line number one and the problem was corrected. Once all cadavers were removed by UDSA inspection and notated on the lot tally sheets, no other cadaver birds were observed. The topic will also be discussed again at the next UDSA weekly meeting on May 27, 2019 at 2330 hours and the minutes will be documented in the corresponding MOI. Respectfully, (b) (6)</p>



Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P476	Pilgrim's Pride Corporation	ODA57220 82322G	22AUG2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Daniel Shaw, Plant Manager Pilgrim's Pride Corporation P-00476 616 Kingsbridge Rd. Carrollton, GA 30117 On Wednesday, August 21, 2019 at approximately 2100 hours while performing a Good Commercial Practices Task at P-00467 I (b) (6), observed an issue with the implementation of Good Commercial Practices in the yard/holding area for trailers. I observed two live birds left inside of two separate cages on trailer #220790. This trailer was positioned in the middle of the yard with no overhead covering or ventilation for cooling. I immediately notified the yard driver employee, who was in the immediate area, and he removed the observed live birds placing them on another trailer filled with live birds parked under the shed covering equipped with fans and misters. This issue was discussed with (b) (6), (b) (6) shortly after the occurrence. He stated that he would look further into the occurrence and notify those whom it concerned. The topic will also be discussed again at the next UDSA weekly meeting on August 26, 2019 at approximately 2330 hours and the minutes will be documented in the corresponding MOI.</p> <p>Respectfully, (b) (6)</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P481	Tyson Foods, Inc.	VHF49040 55308G	08MAY2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On May 6, 2019 at approximately 2200 hours the night shift (b) (6), observed the following good commercial practice failure. While conducting a routine antemortem inspection, (b) (6) was walking on the pathway parallel to the loading dock when she noted the seventh cage from the rear of trailer 228 had been pushed off the truck, lodging it between the vehicle and a metal wall. The cage was positioned such that it was partially rotated with the bottom corner positioned on the ground and the top corner still supported by the truck. Due to this all the birds were condensed into the lowest point of the cage, causing them to pile on top of each other. Wings and feet of multiple chickens could be seen pushed out of the bars of the cage, and loud vocalization could be discerned from the affected birds. It was noted that none of the cage doors opened during the fall so all the birds were contained. (b) (6) notified (b) (6), (b) (6) of the situation. In response maintenance was called to the loading dock to assist in the retrieval of the cage. Once the situation was properly assessed chains were connected from the fallen cage to the forklift. The cage was then lifted via said chains and slid back into position on the trailer with minimal disturbance to the chickens contained within. After the chains were detached the cage was removed from the trailer and presented to the SPHV for further inspection at 2216. The birds in the affected cage were found to be restless, but vocalizations had subsided, and they had spread out across the module's floor. The majority of visualized chickens appeared unharmed by the drop and pressure of the animals on top of them, likely due to their small size. One bird appeared reluctant to stand, but it was unclear if it had been injured during or prior to the drop. Visual</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>inspection revealed no frank blood, nor any obviously broken limbs. The plant was given permission to run the birds once the cage was sound enough to be put through the dumper. A broken and bent support bar of the cage was then affixed back into place, with care taken to prevent any sparks from hitting the birds. The chickens proceeded through the slaughter system as normal with no increase in broken limbs or bruises noted by inspection personnel. When the forklift driver was interviewed about the incident by plant supervision it was determined that the issue occurred secondary to live haul cage mishandling. When the prongs of the forklift entered the bottom track of the cage the driver found that he could not progress further. When he tried to remove the prongs, they were found to be stuck on detritus lodged inside the tracks during the catching process. The driver attempted to push forward to free his forklift, but unintentionally pushed the cage off the trailer in the process. Upon inspection of the cage it was found that the track along the bottom of the cage used for unloading birds were bent. It was also noted that multiple cages on the same truck had litter and debris filling the entirety of the forklift tracks due to the catch crews pushing cages through the litter in the houses. Plant management observed the issue and stated they would be discussing proper cage handling with the live haul supervision. Please note it is not within the standards of good commercial practice to cause birds undue stress or injury during the slaughter process. Repeated incidences, such as this, can result in further action being taken by FSIS personnel.</p>



Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P48304	Lincoln Premium Poultry	YOT02141 25017G	17DEC2019	04C05	Poultry Good Commercial Practices	Finalized	<p>On Monday December 16, 2019, at approximately 0425 hours, I observed an incident of poultry mistreatment while passing through the live-hang area of Lincoln Premium Poultry, on my way to perform antemortem inspection. I first noticed a red condemn barrel that did not appear to have been cleaned by the sanitation company, as there were dried feathers, feces, and a small amount of blood and denaturant present on the upper inside rim of the barrel. All the other condemn barrels had been cleaned and stacked up near the wall. As I approached, I saw that there were two live chickens sitting in this condemn barrel. The barrel was otherwise empty, aside from some feces and feathers at the bottom. I met with (b) (6) to discuss the situation. As slaughter operations had not yet started for the day, and because the condemn barrel had not been cleaned during routine sanitation on Friday December 13th, these chickens were most likely left loose in the establishment after the end of production on December 13th. Management concluded that the sanitation crew may have found the birds loose in lairage or live hang area and placed them in the barrel to keep them contained. The establishment management elected to humanely euthanize and condemn the two chickens. It is not consistent with Poultry Good Commercial Practices for birds to be loose in the establishment, not provided with food or water for up to 72 hours, or for live birds to be placed in condemn barrels. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with Good Commercial Practices (GCPs). The establishment is encouraged to maintain the standards of GCP through a systematic approach that focuses on treating poultry in such a manner as to minimize excitement, discomfort, and</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>accidental injury the entire time that live poultry is held in connection with slaughter.</p> <p>Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter," 70 Fed. Reg. 56624 (September 28, 2005), for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>Sincerely, (b) (6)</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P48304	Lincoln Premium Poultry	YOT29110 12504G	04JAN2020	04C05	Poultry Good Commercial Practices	Open	<p>On January 3, 2020, Est. P48304 Lincoln Premium Poultry held approximately 30,500 young chickens overnight in the lairage area, after slaughter operations could not be completed within operating hours that day. These chickens were first placed in transportation modules around 4:00 a.m. on January 3rd. They were then held in the modules overnight at the establishment and were slaughtered beginning at 4:52 am on January 4th. While performing antemortem inspection on January 4th, I noticed a higher than usual number of deceased birds in the group that was held overnight. The chickens were crowded in some trays, and I observed them clustered towards the sides of the trays, with live birds resting on top of dead birds. I met with (b) (6) at 6:50 a.m. on January 4, 2020 to discuss the situation. The establishment suspects that there were more chickens than usual loaded into some modules. Two trailers of birds received on the afternoon of January 4th weighed 10,000-20,000 pounds higher than average weight. It is believed that the prolonged time being held in modules without access to food and water, in crowded conditions, led to the higher mortality rates. In total, 1,622 chickens were deceased out of the approximately 30,500 birds held overnight. This equates to a DOA rate of 5.3%. The average DOA rate for this establishment is approximately 0.4% (b) (6). (b) (6) said that the establishment will be investigating why some of the modules were over-crowded with birds, so that it may be addressed directly at the farms where the birds are loaded. Chickens dying by means other than slaughter is not consistent with Poultry Good Commercial Practices. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with Good</p>



Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							Commercial Practices (GCPs). The establishment is encouraged to maintain the standards of GCP through a systematic approach that focuses on treating poultry in such a manner as to minimize excitement, discomfort, and accidental injury the entire time that live poultry is held in connection with slaughter. Establishment management may review Federal Register notice Treatment of Live Poultry before Slaughter Fed. Reg. 56624 (September 28, 2005), for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Sincerely, (b) (6)

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P48304	Lincoln Premium Poultry	YOT03080 13518G	18JAN2020	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 17th, 2020 at 11:22 a.m., while performing a Poultry Good Commercial Practices Task, I observed two young chicken cadavers on the line at the pre-sort area in the picking room of (b) (4) at Lincoln Premium Poultry, Est. P48304. Both cadavers were generally dark red in color, with their heads and necks very dark red and swollen, and no cut was present on their necks indicating bleeding of the carcass. These cadavers were pulled off the line by the pre-sorters and condemned. I proceeded up the line to monitor the chickens entering the scalding tank and asked a maintenance employee to call a supervisor to the picking room. I observed one bird with no cut on the neck enter the (b) (4) scalding tank. (b) (6) arrived shortly, and I notified him of the three birds that were not cut at the kill step. He immediately spoke with the back-up cutter to notify him of the birds that were not cut. (b) (6) also raised the automatic neck cutting blade so that it would be less likely to miss the smaller sized birds. I continued to observe the chickens on (b) (4) for 15 more minutes and did not see any more birds entering the scalding tank without being bled. Chickens dying by means other than slaughter is not consistent with Poultry Good Commercial Practices. Continuing with my Poultry Good Commercial Practices Task, I entered the stunning and live hang area at approximately 11:55 am. Under the De-Stack machine of (b) (4), I observed three birds on the floor that appeared to have fallen out of the modules during the de-stacking process. One chicken was deceased, one was alert and appeared unharmed, and one chicken was alive but injured. The injured chicken was lying sternal, unable to stand but attempting to move. Its legs were stretched behind its body, and both wings had blood on the feathers at the base of the wings. The right wing was turned at an unnatural</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>angle. There were not any establishment employees nearby, so I walked to the live hang area to notify the lead about the injured bird. At 1:50 p.m. I spoke with (b) (6) about the GCP concerns. He had already discussed the situation with (b) (6). (b) (6) watched the slaughter process closely for the remainder of the day and there were no further incidents of birds not being bled out properly. The establishment plans to pursue disciplinary action if the back-up cutter continues to miss birds. They will also adjust the automatic blade when they observe that the birds are of varying sizes, so that it works more efficiently. The establishment will be monitoring for injured and loose birds more closely. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with Good Commercial Practices (GCPs). The establishment is encouraged to maintain the standards of GCP through a systematic approach that focuses on treating poultry in such a manner as to minimize excitement, discomfort, and accidental injury the entire time that live poultry is held in connection with slaughter. Establishment management may review Federal Register notice Treatment of Live Poultry before Slaughter Fed. Reg. 56624 (September 28, 2005), for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Sincerely, (b) (6).</p>



Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P48304	Lincoln Premium Poultry	YOT55130 13221G	21JAN2020	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 21, 2020 at approximately 4:30 a.m., while performing ante-mortem inspection of young chickens at Lincoln Premium Poultry, Est. P48304, I observed several incidents of poultry mistreatment. In the lairage area of Line 1, there were two chickens, each with one wing trapped in the right side of the locking mechanism of the tray above them. These two birds were in the same module, but in different trays. The bird in the lower tray had blood on its wing over a 1-2 cm area and was unable to sit or lay down because of the trapped wing. The bird in the upper tray was pulling at the wing repeatedly and vocalizing, had a 1 cm area of blood on the wing feathers, and could not sit or lay down. I notified the lead, (b) (6), of the trapped birds. He was able to free the chicken in the lower tray. The chicken's wing did not return to a normal position after being freed. The upper chicken had freed itself, leaving behind a clump of wing feathers in the latch. Then, approximately 5 minutes later, a module of birds was being loaded into lairage on Line 2, and I saw another chicken with its wing trapped in the locking mechanism of the tray above. The establishment employee was notified and released the bird's wing from the tray. I spoke with (b) (6) and he asked the forklift drivers to monitor for trapped birds more carefully, so that they can be released. While performing a Poultry Good Commercial Practices Task at 12:20 p.m., I observed an additional three live chickens with wings trapped in the tray locking mechanism. The first bird was in a lower tray on Line 1. Much of the wing was trapped in the latch, and the bird was unable to lay down. I notified (b) (6), and he found an establishment employee to help release the bird. There was blood on the chicken's wing, and it did not return to normal position after it was released. On our way out of lairage, I</p>

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							<p>showed the employee two more chickens with wings crushed in the tray latch. These birds were not able to be released because their location high in the modules created safety concerns for the employee. When chickens are trapped in the trays above them, and not released by establishment personnel, they are subject to further injury or death when the module proceeds through the destack machine. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with Good Commercial Practices (GCPs). The establishment is encouraged to maintain the standards of GCP through a systematic approach that focuses on treating poultry in such a manner as to minimize excitement, discomfort, and accidental injury the entire time that live poultry is held in connection with slaughter. Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter," 70 Fed. Reg. 56624 (September 28, 2005), for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Sincerely, (b) (6)</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P510	House Of Raeford Farms	RHB41120 75516G	16JUL2019	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 0809 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) (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 (b) (6) also placed an employee at the entrance of the 1st scalding to monitor for live birds that might enter the scalding. I discussed my finding with (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) (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).</p>



**Table: MOIs in Response to FOIA2020-110**

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							(b) (6) Respectfully, (b) (6)

Table: MOIs in Response to FOIA2020-110

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P510	House Of Raeford Farms	RHB04081 03304G	04OCT2019	04C05	Poultry Good Commercial Practices	Finalized	<p>Ms. Reynolds Plant Manager, P-510 At approximately 0807 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 and no cut on its throat. The line was stopped before the live bird could enter the scalding and was removed by a plant employee.</p> <p>(b) (6) was notified of my findings, of the 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." While talking to (b) (6), plant employees took two more live birds off the line prior to the scalding that had no evidence that their throats had been cut. All three birds were taken back to live hang and put back on the kill line to be properly slaughtered. (b) (6) told me that there was a new back up cutter who was supposed to have a person working with them until they were fully trained but no one was there. He said that they did put an experienced person with the new person on the line and that they would watch the line to make sure no other birds were on the line that had been missed. I remained there for approximately 5 additional minutes and did not see any more live birds. A copy of 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 or wish to appeal this decision, please contact (b) (6).</p> <p>(b) (6). Respectfully, (b) (6) (b) (6) P510</p>

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
P510	House Of Raeford Farms	RHB04111 03107G	07OCT2019	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 0710 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) (b) (6) who stopped the line before the bird could enter the scalding and had the bird removed from the line by (b) (6). After removing the bird from the line, it was observed that there was a small shallow 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 the backup cutter. (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) stated that the backup cutter was just relieved for breaks and he instructed the backup cutter to pay more attention when switching places. I discussed my finding with (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) (b) (6) was also notified my findings. There was a similar occurrence documented on 10/4/19 on MOI RHB0408103304G. 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).</p>



**Table: MOIs in Response to FOIA2020-110**

EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
							(b) (6) (b) (6) Respectfully, P510