

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	M10038	Scotts Hook & Cleaver Inc.	RSH101303 1422G	2018-03-22	04C02	Livestock Humane Handling	Finalized	<p>On 3/22/2018 at approximately 0830 hour, while verifying humane slaughter regulatory requirements, I observed some livestock handling practices of concern. I witnessed establishment personnel bring an injured beef heifer, which had passed ante-mortem inspection, to the stun restraint box holding pen (the pen animals are held in before bringing them onto the slaughter floor for stunning). Immediately after bringing the injured heifer to the stun box holding pen, establishment personnel brought another beef animal into the stun box holding pen. By this time the injured heifer had laid down. Establishment personnel let the injured heifer rest for 5 to 10 minutes, but it remained lying down. Establishment personnel then removed the other beef animal from the stun box holding pen, so they could work on getting the recumbent beef heifer on its feet. To accomplish this personnel prodded this heifer with a battery powered electric prod three times, in the rump area. The heifer tried to rise, but was unable to stand. Establishment personnel then repositioned the heifer by rolling her slightly to get the heifers legs underneath her. The heifer then tried again to stand after a light hand slap on the rump from an employee. The heifer crept forward, but still could not stand. At this point, I condemned the heifer as non-ambulatory. In all this animal handling, there appeared to be a general lack of careful consideration of the circumstances before establishment personnel proceeded with moving this heifer to the stunning area or when establishment personnel proceeded to get the heifer to stand (for example by ensuring extra good footing).</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M17776	Trenton Halal Packing Company	BBE251002 5507G	2018-02-07	04C02	Livestock Humane Handling	Open	<p>During the 30-day verification visit for the Humane Handling NOIE at Trenton Halal, (b) (6) and I observed an egregious noncompliance, the details and determinations of which (b) (6) describes in the following statement; During the 30-day Verification Visit for their humane handling NOIE, I, (b) (6) observed the following egregious humane handling noncompliance. At approximately 9:15 am, while observing animal handling in the pens, I observed an employee pick a goat up off the ground by its fur along the back of its lumbar spine and throw it into the pen behind him. The goat landed on its side and slid into another goat already in the pen. I immediately stopped the employees from sorting additional animals. (b) (6) placed US Reject/Retain tag #B36924979 on the chute/hanging area. The plant has a documented animal handling plan, but their recent noncompliance history and lack of implementation does not qualify it as being robust.</p>

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85	M17980	Pilgrim's Pride Corporation	ZBB261201 1531G	2018-01-31	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1215 hours after giving relief breaks, I was notified by (b) (6) that he observed several loose birds around the live hang dock. I followed up with his concerns and at approximately 1244 hours while performing a Good Commercial Practices (GCP) task in the Live Hang Area, I observed the following situation which resulted in mistreatment of poultry: There were five (5) loose birds on the cage unloading system that were wedged between the cages as they were coming down to the cage unloader. One of the bird's legs was jammed in between a cage and the unloading conveyor system and another bird had its wing stuck as the cages continued to be loaded and moving forward. I immediately notified (b) (6) and (b) (6) of my observations. I notified (b) (6) that I wanted all cage loading by the forklift operator to be stopped until the birds were safely removed, otherwise the birds were at risk of being crushed. After I had the cage loading stopped, all the loose birds were removed. Once they were removed cage loading was allowed to proceed. While watching the unloading process at the live hang belt, I observed a few birds that were getting hung up on the transfer belt at the cage dumper. It was also observed that there was one (1) dead bird (cause of death undetermined). The birds were getting hung up at the junction of two transfer belts. I also showed (b) (6) my observations. She had an employee try to remove the one dead bird, but he was unsuccessful. While observing, I notified and showed an area maintenance technician of the problem at the junction of the two transfer belts. 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</p>

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								with Good Commercial Practices. I notified (b) (6) [redacted] that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. (b) (6) [redacted]

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85	M17980	Pilgrim's Pride Corporation	ZBB430403 2307G	2018-03-07	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0507 hours while observing operations in the Kill Room, I observed that there was not very many birds on the kill line so I proceeded to the Live Hang area and observed the following situation which resulted in mistreatment of poultry: There were too numerous to count of dead on arrival (DOA) birds piled behind the live hangers. The DOA sorting process was not being addressed and there were several live birds that were piled under and between the DOA birds. Some of the live birds were being stepped on so the live hangers could have access to the line to hang. Since shift change had just occurred there was no supervisor in the immediate area at the time of my observation. I immediately asked (b) (6) for the live hanging process to be stopped until all DOAs could be properly sorted and disposed of in the DOA bin and the live birds buried in the pile could be removed and placed on the live hang belt. After the live hang operation was stopped for several minutes, I showed (b) (6) my observations. She immediately called for (b) (6). All the live hangers began clearing the area and disposing of the DOAs and the getting the live birds from off the floor. At approximately 0520 hours, I allowed the live hang process to resume. Concerns with the DOA process and handling it in a timely manner to prevent live birds from being buried was previously discussed with establishment management during the weekly meeting documented on MOI # ZBB4015023527G dated 2/27/2018. This MOI serves to remind the establishment that the Poultry Products Inspection Act (PPIA) and Agency regulations require that poultry are handled in a manner that is consistent with Good Commercial Practices. The establishment was notified that this MOI will</p>

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								be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. (b) (6) [REDACTED]

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M17D	Smithfield Packaged Meats Corp.	WLJ09220 12715G	2018-01-15	04C02	Livestock Humane Handling	Finalized	<p>I, (b) (6), am documenting this MOI in (b) (6) absence. Below are observations of (b) (6) late in the shift starting on 1/13/2018 of the describe incident. HATS Category VIII Stunning Effectiveness On 01/14/2018 at 0255 hours (late in the shift starting on 01/13/2018) while performing the humane handling verification task in the barns, I observed the following: I was walking past the cripple pens. (b) (6) and a barn employee were performing captive bolt stunning on a hog in the north cripple pen. From where I was standing, I could not see the hog. I heard a captive bolt shot followed by a quick vocalization from the hog. I peered over the wall and observed the hog "dog sitting" (sitting on its hind quarters and standing on its forequarters) and breathing with chest movement. The employees instantly noticed the hog was still sensible. An additional, loaded captive bolt gun was within reach and was used to take a second shot which rendered the hog insensible immediately. I followed the unconscious hog all the way through the process until the stick pen, and it remained unconscious. I informed (b) (6) that I would be documenting this incident. On 01/05/2018, a noncompliance report, WLJ2217012905N/1, was issued for an ineffective stun with a captive bolt gun. 9CFR 313.15(a)(1) requires that an animal be rendered immediately unconscious through the application of a captive bolt device with a minimum of excitement and discomfort. On 1/16/17, I, (b) (6), verified that the incident was noted on the Fatigue Pen Monitoring Form for second shift 1/13/18.</p>

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25	M17D	Smithfield Packaged Meats Corp.	WLJ34070 42102G	2018-04-02	04C02	Livestock Humane Handling	Finalized	<p>HATS Category VI - Electric Prod/Alternative Object Use This MOI is to document a conversation between myself and (b) (6) regarding an observation I had in the west (b) (4) push gate system on 03/31/2018 at 0906 hours. While observing humane handling activities in the (b) (4) room, I observed concerning behavior from two company employees. In the west (b) (4) alleyway, it appeared that a group of hogs was backed up against the push gate as the push gate was in the middle of the alleyway but was not moving forward. Two employees were standing outside the alleyway, just in front of the push gate. I observed these two employees using their rattle paddles excessively. Both were repeatedly picking up the rattle paddles over their head and coming down very quickly with excessive force. There was vocalizing from the group of hogs in the west (b) (4) alleyway while they were using the paddles. I could not see any of the hogs as they were hidden behind the alleyway wall, so I cannot definitively say that the employees were striking the hogs. I spoke to (b) (6) and told him that I was concerned about my observations. I told him that I couldn't see if they were striking the hogs. If they were, the rattle paddles were being used excessively. I also told him that he should ensure his employees are not using rattle paddles with that much force on the hogs. I said that there is a regulation that requires hogs to be moved with "minimal excitement", and such rattle paddle use on a hog would be a violation of that regulation. As a corrective action, (b) (6) said in the future he could "back up" the push gate if a group of hogs is stopping the gate's forward progress, which would create more room to help the group of hogs disperse.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M19290	Working H Meats, LLC	NAW45110 30808G	2018-03-08	04C02	Livestock Humane Handling	Open	<p>Today, March 8, 2018, at approximately 1020 hours, I verbally notified Mr. Grant Hardesty, Establishment Manager, of my decision to suspend slaughter at Establishment 19290. I advised Mr. Hardesty that I would be contacting (b) (6), and the Raleigh District Office about my decision. I based my decision to suspend inspection at the establishment on the following: At approximately 0945 hours, an Angus bull, weighing 1800 pounds according to the owner, was loaded into the knock box. Mr. Grant Hardesty attempted to stun the bull using a .22 Magnum rifle. The bull remained calm and standing. The establishment did not have a larger caliber rifle available. Another plant employee, who lives nearby, went to her home and returned with a .223 rifle. Mr. Hardesty attempted to stun the bull a second time, and I confirmed with establishment employees that the second shot produced immediate unconsciousness with the animal dropping to the floor and the tongue hanging out. Mr. Hardesty chose to give a security knock with the .223 rifle. On examination of the skinned head, there were two bullet holes in the skull. I then examined the skin to determine if all three rifle shots made contact with the bull. I found three bullet holes through the skin, indicating that all three rifle shots did make contact with the bull. At this point (1020 hours), I notified the establishment that I was taking a regulatory control action and slaughter was suspended. I further advised the establishment that I was contacting the Frontline Supervisor and the Raleigh District Office to discuss the suspension. After speaking with the Raleigh District office, a tag was placed on the knock box at approximately 1040 hours, US Reject Tag #B43223417. Establishment 19290 does not operate under a robust systematic approach to</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								humane handling. Establishment 19290 had a recent humane handling NR for an ineffective stun in a sow on February 23, 2018.

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50	M20855	Chenoa Locker, Inc.	SSH111102 5216G	2018-02-16	04C02	Livestock Humane Handling	Finalized	<p>Discussed with owner about methods of Humane Handling of animals that may become wedged in the runways during slaughter and the use of "Safety Shots" after the animal has been successfully stunned. Disposition of Cattle that Become Entrapped in Livestock Handling Areas after Receiving Ante-mortem InspectionPublished 05/26/2009 12:46 PM Updated 08/14/2017 06:23 AM What happens to a bovine animal that, after it has received ante-mortem inspection, becomes entrapped (e.g., stuck/ wedged/ trapped) in the livestock handling areas (including pens, drive alleys, chutes, and restrainers), and the establishment cannot humanely extract it from its entrapment? Slaughter establishments need to design and provide adequate livestock facilities and employ personnel trained in the humane handling of livestock. This obligation includes the need to carefully plan how they will handle livestock whose physical features, size, or conformation (e.g., longhorn cattle; wide-bodied or short-legged cattle) suggest that special handling will be necessary. It should be a rare occurrence that livestock become stuck in a chute or other area if the establishment has assessed how it will handle such animals to facilitate their movement. The Agency has several concerns with this situation and possible Agency actions follow: First, the Agency is concerned with the humane handling of the cattle that become entrapped and would question why such animals would become entrapped (e.g., stuck, wedged) in the establishment's facilities. Under 9 CFR 313.1 and 313.2, the establishment is to provide and maintain adequate facilities for the handling of all cattle that are accepted for slaughter by the establishment. Thus, should the Agency determine that there are facility deficiencies or mishandling practices, under 9 CFR 313.1 and 313.2,</p>

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								<p>noncompliance exists, and appropriate action will follow. Second, in the rare and isolated instance that an animal does get entrapped, and it cannot be freed in a humane manner, the Agency will expect the establishment to notify IPP to observe the humane stunning and removal of the animal. Otherwise, if inspection personnel find dead animals in alleyways, chutes, or pens, these animals will be considered to have died other than by slaughter and will be US Condemned. Third, IPP examination of these entrapped cattle will determine what action will be taken: Cattle that are entrapped and found sitting or lying down and cannot rise and ambulate will be condemned as non-ambulatory disabled cattle. The PHV makes the disposition on non-ambulatory disabled cattle. They will be tagged as US Condemned and properly disposed of. However, the establishment may choose to not wait for a PHV disposition and proceed to euthanize the animal. IPP will condemn this carcass. Cattle that are entrapped and still standing will need to be evaluated to determine whether they are non-ambulatory disabled. The PHV makes the disposition on non-ambulatory disabled cattle. If he/she determines that the animal is non-ambulatory disabled, then it will be tagged as US Condemned and properly disposed of. However, the establishment may choose to not wait for a PHV disposition and proceed to euthanize the animal. IPP will then condemn this carcass. Ambulatory cattle that are driven to a restrainer with a center track conveyor belt (which suspends the animal on the conveyor belt once it moves into the restrainer) and, when entering the restrainer become entrapped because of incorrect positioning (e.g., all four legs on one side of the belt or the front legs are suspended and the animal's weight is on its chest and rear legs), are to be humanely euthanized so</p>

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								<p>that they are not injured as they continue through the restrainer. These cattle do not need to be US Condemned and may be slaughtered for human consumption. Finally, establishments should be aware of incoming cattle that may require special handling and slaughter methods if the cattle are to avoid becoming entrapped in the facilities. For example, cattle may need to be stunned before they pass through the chutes or drive alleys, in a place other than in the restrainer or knock-box. Additionally, the Agency is aware that some cattle breeds (e.g., Longhorns, Watusis) are prevented from moving through slaughter facilities by the size of their horns and are typically stunned in outside pens and then moved inside for processing. (This type of situation should be discussed with IPP before implementation.) As long as these animals can be handled and slaughtered in a humane manner, the new rule on non-ambulatory disabled cattle has no affect on this practice. Also, some establishments may choose to reject cattle for slaughter and then ship them to another destination.FSIS Directive 6100.1 Ante-Mortem Livestock Inspection - Revision 1 Facilitator Guide for Situation-Based Humane Handling Training Module Two – Stunning and Post-Stunning Situations Facilitator Handout – Page 2 Situation-Based Humane Training11-14-11 Step 4 - Read each situation and lead inspection personnel to an understanding of a supportable decision. Note: this training is not intended to cover all possible “what if” situations. It is more important to stress the thought process from the objectives. It should take approximately 45 minutes to discuss the situations. Allow 15 minutes to complete the exam at the end. Situations 1) Inspectors at the cattle head inspection station notice that some heads have 2 or 3 “knock holes”. They notify</p>

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								<p>offline IPP of the multiple knock holes. The offline inspector immediately proceeds to the stunning area and observes that establishment personnel consistently produce insensibility with one shot of the captive bolt gun. The establishment has a good history of properly stunning animals and sometimes the employee doing the knocking administers additional "security" knocks to ensure animals remain insensible. Does this scenario represent noncompliance? No, there is no noncompliance as described if the establishment is consistently producing immediate unconsciousness with a single blow. The establishment may be using additional "security" or "safety" knocks to ensure animals do not return to sensibility. Note: make sure participants understand that "security knocks" are sometimes used especially on large bulls and that the knocks may be administered on the forehead or behind the poll to the back of the head. The key point is that the first shot consistently renders the animals insensible. Additional knocks are used to ensure there is no return to sensibility. Is it an egregious situation? Not applicable What action should be taken by inspection personnel? None</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	M20856	Eureka Locker, Inc.	GGG58080 51701G	2018-05-01	04C02	Livestock Humane Handling	Finalized	<p>The below email was sent asking about off-hour animal drop-off: Some of our slaughter establishments have their pens available for drop off overnight. FSIS would like us to be aware of these situations and be observant that animals dropped off during the non-inspection hours are treated the same as the animals dropped off when we are on site inspecting. Observing overnight drop offs are referred to as 'odd hour inspections'. As a current practice, FSIS would like a minimum of one (1) Odd Hour Inspection per month at cull cattle/veal establishments and one (1) Odd Hour Inspection per quarter at all other establishments. So, we need some information: Do the establishments have cull or veal animals and do they allow overnight or weekend drop offs? Establishment Cull or Veal? (Never, rarely, or commonly) Overnight drop-offs? Comments</p> <p>Chenoa Locker, Inc Forrest Meats Eureka Locker Meat Science Laboratory, Univ. of Il</p>

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50	M2130	Cooper Foods	HEF182101 1004G	2018-01-04	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 2rd at approximately 11:45 PM, I, (b) (6), while performing antemortem inspection outside in the cooling sheds, observed a topmost rear trailer cage that was missing the door on the front of the cage, leaving an open space for turkeys to fall through. There was at least one live turkey visibly within the open cage. I also observed two live turkeys that were loose within close proximity to the trailer. The topmost trailer cages are not reachable without the aid of steps or a ladder, and pose a significant distance for a turkey to fall onto the concrete floor of the cooling sheds, which may result in injury to live turkeys. I informed the employees in the live hang area of the open trailer cage and the loose turkeys, and spoke with (b) (6), who said that the loose turkeys will be caught according to the relevant handling policy, and that maintenance will be attaching a temporary cage door to the open trailer cage until the turkeys are stunned.</p>

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50	M2130	Cooper Foods	HEF530004 1304G	2018-04-04	04C05	Poultry Good Commercial Practices	Finalized	At 4:15 AM on 4/03/2018 while returning from checking the trailers in the cooling shed, I was passing through the live hang area where stunned turkeys are shackled on a conveyor belt (approximately 3-4 feet in height from the floor), and observed an employee push a stun failure (fully conscious turkey) off of the belt, causing the turkey to fall on the concrete floor on the opposite side of the belt from the employee, where another conscious turkey was also sitting on the floor. The potential for injury of conscious turkeys to occur as a direct result of this handling method is not insignificant. I spoke with (b) (6) about what I observed, and she said she would speak with the employees in the live hang area. An SOP for proper handling of conscious birds was to have been newly implemented in December 2017. This same improper handling method has been observed and documented previously in the following MOIs: (11/01/2017) MOI # HEF1804111001G (11/20/2017) MOI# HEF5520114920G (11/28/2017) MOI# HEF5820111429G (12/14/2017) MOI# HEF3203122815G
50	M2130	Cooper Foods	HEF550305 0515G	2018-05-15	04C05	Poultry Good Commercial Practices	Finalized	On May 15th 2018 at approximately 3:45 AM while performing antemortem inspection in the cooling sheds, I, (b) (6), observed a trailer with a set of cages that was unsecured by the metal bar that normally prevents the cage doors from swinging outwards. Live turkeys were visible within all five cages that were affected, and at least one live turkey had fallen from the cages onto the concrete floor of the cooling shed. The upper trailer cages are not reachable without the aid of steps or a ladder, and pose a significant distance for turkeys to fall, which may result in injury to live turkeys. I informed employees in the live hang area of the unsecured cages and the loose turkey.

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35	M2316	Whisnant Meat Packing LLC	FSF270703 2807G	2018-03-07	04C02	Livestock Humane Handling	Finalized	<p>On 2-28-18, eighty one head of market hogs had been in a holding pen on Est. 2316 premises since 2-14-18 and were being fed ground corn once a day. At 12:15 pm on 2-28-18, they were fed 100 lbs of ground corn in three open plastic tubs. This computes to 1.2 lbs of feed/head/day. In a weekly meeting with the establishment on 2-29-18, (b) (6) addressed this and other humane handling concerns (trailer/pen densities, bedding, sorting boards, ramps). Documented support that the amount fed is a daily maintenance amount, was requested at that time. The next day the 81 hogs were fed 150 lbs of ground corn and on 3-2-18 forty of the eighty-one were slaughtered (averaging 220 lbs dressed – eviscerated, head removed, and skinned). The remaining 41 hogs were fed 100 lbs of ground corn daily over the weekend. On 3-5-18 plant manager Brett Powell offered an e-mail reply from Temple Grandin that the amount of feed was adequate but no actual amount was stated in the document. This is not adequate support that 1.2 lbs of ground corn provides a daily maintenance for that size hog. The establishment needs to be aware of, and feed, a maintenance amount for market hogs. Feed containers that cannot turn over and result in spilled feed should also be considered. The longer the hogs are on the premises, the more important these issues become for the humane treatment of the animals.</p>

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50	M244I	Tyson Fresh Meats, Inc	GEH10190 25022G	2018-02-22	04C02	Livestock Humane Handling	Finalized	<p>At the end of shift, the humane handling liaison said that the south (b) (4) was not functioning and they would be sending hogs back outside. The liaison spoke with the four remaining employees about the situation and requested that they open the alley gates to give the hogs more room to maneuver. The gates between pens 4 and 5 were opened and hogs were sent back down the ramp to the section between pens 4 and 5 in the drive alley. Another group of hogs was sent back from inside and bunched up at the gate between pen 3 and 4. The team members were continue to guide more hogs outside as the team member in the middle exited the drive alley and started to get the hogs into the door for the north (b) (4). This caused the hogs to move in a circle. In the middle of that circle, a hog went down and was determined to have split out its back legs. The downer hog was moved out of the alley and captive bolt stunned. The situation may have been preventable. The management of space and the stress levels in the hogs is a very important issue. It is understandable that the team members may want to move the hogs faster, because they want to go home. It is never appropriate to increase speed at the expense of humane handling.</p>

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25	M244P	Tyson Fresh Meats, Inc	FJJ340901 2019G	2018-01-19	04C02	Livestock Humane Handling	Finalized	<p>At approximately 1500 hrs, when the outdoor temperature was 6 degrees Fahrenheit, feeling like 10 below zero according to the Weather Channel app, a truck (Kenworth, BL 1994) was seen in the unloading dock with less than 90% of it's slats covered. The same thing had happened the day before and I made the establishment aware of the situation both times, speaking to (b) (6), and (b) (6). The producers were notified by the establishment, and the truck drivers were both made aware of the violation of the Transport Quality Assurance requirement which this establishment adopts and requires 90-95% closure of slats when it is below 10 degrees Fahrenheit.</p>

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25	M244W	Tyson Fresh Meats, Inc.	BTD480102 2008G	2018-02-08	04C02	Livestock Humane Handling	Finalized	<p>At about 16:55 hours on Monday 02/05/18, I (b) (6) was performing ante-mortem inspection at Establishment #244W. I observed the team members who drive for kill putting hogs in the West drive alley and filling the spaces between gates with hogs and leaving little extra room in these spaces. The team members used noise by banging their rattle cans on walls and gates to get a group of hogs on one side of a gate to move North towards the CO2 room. The hogs on the other side of the gate (to the South) also moved away from the noise and piled up on the closed gate to the South of the group, with four or so hogs completely on top of other hogs, feet and all. The was a lot of struggling and squealing going on in the Southern group of hogs. (b) (6) later told me he had, as a preventive measure, instructed his animal handlers to move smaller groups of 30 or so hogs at a time. At about 20:34 hours on Wednesday 02/07/18, I observed a team member moving hogs in pen #6. A group of 60 to 80 hogs had been moved West of the center gate and the gate was closed. When the team member tried to move some of these hogs to the West drive alley, he was banging his rattle can on the wall and then climbed over the wall and about half of the hogs moved West and about half moved East towards the closed mid-gate. The hogs piled up against the closed gate with a marked degree of struggling and squealing and there were six or more hogs which had partially jumped up with their front feet on the backs of other hogs. Animals are to be moved with a minimum of excitement and discomfort to the animals according to 9 CFR 313.2. Furthermore, 9 CFR 313.5(a)(2) explains "delivery of calm animals to the anesthesia chamber is essential since the induction, or early phase, of anesthesia is less violent with docile animals."</p>

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								<p>FSIS & Plant weekly meeting notes bear testament to similar issues being discussed in the past. 01/26/18 B-shift: "hogs should be moved at a walking pace" and "Hog pile-ups should be a clue to stop rattling and allow pile-up to settle." 11/30/17 A-shift: "Saturday hogs were observed piling on top of each other..." 11/30/17 B-shift: "Hog drivers need to move hogs with minimal excitement." 08/31/17 B-shift: "[team members] ...trying to move too many [hogs] at one time causing the hogs to pile and squeal..." 05/04/17 B-shift: "Hogs piling up in the drive alley."</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M244W	Tyson Fresh Meats, Inc.	BTD331204 4106G	2018-04-06	04C02	Livestock Humane Handling	Finalized	<p>At about 22:30 hours on Thursday 04/05/18, I (b) (6) was performing ante-mortem inspection at Establishment #244W. I observed the procurement team members who drive hogs from the scale through the tattoo area to the pens. The team members used noise by banging their rattle cans on walls and gates and a black flag as a visible aid to get a group of hogs on one side of a gate to move north towards the tattoo chutes. The hogs resisted moving through the chutes and circled and piled near the last closed gate before the chutes. One hog climbed over the others and jumped through the closed gate to get away from the noise and scrambling. The animal slid to the ground but got up and moved away without any signs of injury. The struggling and squealing continued for a few moments longer until a few hogs at a time moved through the tattoo chutes. Animals are to be moved with a minimum of excitement and discomfort to the animals according to 9 CFR 313.2. Furthermore, implements employed to drive animals are to be used as little as possible to minimize excitement and injury. FSIS & Plant weekly meeting notes bear testament to similar issues being discussed in the past. 1. 02/07/18 B-shift: "hogs piled up against the closed gate with a marked degree of struggling and squealing and there were six or more hogs which had partially jumped up with their front feet on the backs of other hogs 2. 01/26/18 B-shift: "hogs should be moved at a walking pace" and "Hog pile-ups should be a clue to stop rattling and allow pile-up to settle." 3. 11/30/17 A-shift: "Saturday hogs were observed piling on top of each other..." 4. 11/30/17 B-shift: "Hog drivers need to move hogs with minimal excitement." 5. 08/31/17 B-shift: "[team members] ...trying to move too many [hogs] at one time causing the</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								hogs to pile and squeal..." 6. 05/04/17 B-shift: "Hogs piling up in the drive alley."

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M244W	Tyson Fresh Meats, Inc.	BTD140705 1315G	2018-05-15	04C02	Livestock Humane Handling	Finalized	<p>On May 14, 2018 in the barn at Establishment 244W at approximately 10:00 I, (b) (6), observed the following incident: I was near the west drive alley observing prod usage (HATS Category VI), when I saw a production supervisor heading quickly toward the CO2 stunning area; I followed him to the loading area of the South (b) (4). It was immediately apparent that the situation was chaotic and not likely to be quickly resolved, so I started my stopwatch. At that point, there were 3 hogs down over the gondola threshold and facing into gondola. Another supervisor was standing near the gondola entrance holding the outer door up with his hands. Soon thereafter, the post that is used to ensure the outer gate doesn't close by accident was wedged into place to hold the door open. One hog was captive bolt euthanized and removed from the area, and alert/ambulatory hogs were directed out of the gondola with flags. After 5min 15sec there were two hogs down and slowly paddling over the threshold, and, within the gondola, I could see one alert hog with its head up laying over another hog, and two gasping and recumbent on the gondola floor. Team members used flags to try to rouse the hogs, but it was 9min 15sec before one of the hogs over the threshold stumbled its front end out of (b) (4) and it was promptly euthanized via captive bolt. The other hog moved enough that it was entirely in the (b) (4). The gate closed with three hogs in the (b) (4), alive but recumbent and laboriously breathing. (b) (6), two (b) (6) and two (b) (6) and two (b) (6) and (b) (6) were all present by this point. I stopped my watch at 10min 15sec when the gate closed, and I do not know how long the incident was in progress before I came upon it. Per 9CFR313.5 (b)(3),</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>regarding CO2 stunning: "gas concentration shall be maintained uniform so that the degree of anesthesia in exposed animals will be constant." It is inappropriate for hogs to have prolonged exposure to uneven or sublethal concentration of CO2 near the entrance of the (b) (4). This vulnerability of hogs becoming non-ambulatory near the entrance to the (b) (4) was identified and has been brought up multiple times since the (b) (4) were installed in 2015.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M248B	Butterfield Foods Company	GXN19160 23523G	2018-02-23	04C05	Poultry Good Commercial Practices	Finalized	<p>On 2/21/18, I performed ante-mortem inspection on truck 12 for Lot 3 at approximately 1120 hours. I observed that approximately 50% of the hens on the truck were dead and the carcasses were frozen solid. The dead, frozen birds were focused on the bottom half of the truck (bottom four rows of cages). Evaluation of the rest of the live birds noted no overt signs of disease, but many of the birds were not well feathered and on the thinner side. As the live birds on the upper half of the truck appeared cold, but healthy, I ante-mortem passed the lot. The establishment appeared to be doing a good job ensuring the frozen birds were not entering the facility, to prevent adulterated product; this was achieved by hangers sorting out DOAs from live birds during the hanging process and directing the DOAs to the white, inedible barrels below and hanging live birds for slaughter. However, the concern is with the number of birds frozen upon arrival at the facility and while being held at the facility prior to slaughter. This issue was discussed with Mr. Juan Cervantes (Plant Manager) at approximately 1130 hours 2/21/18, as I observed approximately half a trailer of frozen DOA birds presented for ante-mortem inspection. I asked Mr. Cervantes where Lot 3 birds were from and when they arrived at the establishment; he stated they were transported approximately 2 hours and arrived the day before at approximately 1300 hours (on 2/20/18). The slaughter of Lot 3 started on 2/21/18, at approximately 1150 hours and ended at approximately 1630 hours. Thus, the birds from Lot 3 were held on establishment premise for approximately 22 to 28 hours prior to being slaughtered; the temperature on the morning of 2/21/18 was in the single digits, (approximately 2F) and had risen to the teens (approximately 18 degrees) in the afternoon (Fahrenheit). A weather archive of average high/low temperatures in for</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>these dates in Butterfield, MN, can be found at www.accuweather.com At approximately 1230 hours, I observed the rest of Lot 3 trucks in the holding shed (Trucks 13, 19, and 15; a total of 4 trucks for Lot 3). While being held at the establishment prior to slaughter, the trailers of birds were kept paneled in a 3-sided non-temperature controlled building. Trucks 13, 19, and 15 were all completely paneled with every fourth panel pulled up at the top approximately 8 inches to allow for ventilation. At this time I could not visualize any of the birds. As the trucks entered the hanging room, I observed each one as it was unpaneled. Although these trucks did not exhibit the excessive percentage of dead, frozen birds as truck 12, there were consistently dead, frozen birds in the bottom 1 to 2 rows of each battery on every truck in this lot. Evaluation of the health status of the live birds on these trucks was consistent with truck 12, and passed for slaughter. I observed excessive DOA carcasses piled up in the hang room throughout the live hang process of Lot 3 and did not observe any live birds in the inedible white barrels/floor. All DOAs were denatured and rendered per regulatory requirements. The issue was further discussed with Mr. Cervantes at approximately 1600 hours on 2/21/18. He asked what the health status of the birds were on inspection, and I reported a high number of condemn rates due to septicemia/toxemia (approximately 7.5% due to all condemnable conditions except contamination and plant rejects, calculated on 2/22/18). I also pointed out that the cages are slatted, as I observed the majority of egg white/yolk and fecal/urinary excrement accumulating on the bottom caged birds which also contributes to the freezing process. I discussed that the birds were on the thinner side and not well feathered, but I was also</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>concerned that they had been in very cold temperatures on site for over 24 hours prior to slaughter. It was discussed that multiple factors may have contributed to these birds in particular being more affected by the cold, but the percentage of DOAs in Lot 3 was concerning. Mr. Cervantes stated that they are going to aim for loading trucks with (b) (4) birds or more to help maintain heat of the lot during cold conditions, as he had noted from his records that trucks with fewer birds than that had increased DOA percentages. Mr. Cervantes had recorded the total number of birds on truck 12 from Lot 3 from the daily kill schedule which was determined to be approximately (b) (4) birds. He also stated they were going to monitor each truck when they arrive on premise to assess the status of the birds going forward. (b) (6)) discussed in the weekly meeting on 2/22/18 that the trucking company was also contacted by plant management to discuss the issue regarding Lot 3 DOA numbers slaughtered on 2/21/18. After reviewing the daily totals on 2/22/18, the establishment reported 9,750 DOA birds out of a total count of (b) (4) birds (approximately (b) (4) DOA rate).</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M248B	Butterfield Foods Company	GXN31070 32309G	2018-03-09	04C05	Poultry Good Commercial Practices	Finalized	<p>On March 8, 2018 at approximately 11:53 AM, while performing a Good Commercial Practices Verification Task I observed that the plant was experiencing a higher than normal amount of Dead on Arrival (DOAs) birds in the first load of Lot #2 (Truck #22). I requested (b) (6) accompany me to examine the truck and provide his impression of the condition of the birds on the trailer. Approximately 20 dead chickens were observed on the exterior two lower level cages of the trailer and on palpation approximately 12 were "hard" and "non-flexible". (b) (6) made the observation that here was what appeared to be a larger than "normal" quantity of eggs and waste on the bed of the truck indicating a possible longer amount of time in transit than usual accentuating the effects of the cold weather. While the plant staff went on beak and the truck was waiting to be unloaded, I requested (b) (6), and (b) (6), come to the unloading dock with me to examine the condition of the birds on the truck. Gross examination of these birds revealed no remarkable pathology indicating a flock disease. However, many birds had large unfeathered areas. The unfeathered areas revealed deeply reddened skin tissue suggestive of prolonged exposure to extreme temperatures. Many appeared to be dead, as they were not noticeably moving or breathing. Post-mortem pathology observed in live slaughtered birds from this lot was unremarkable. Cold weather protective panels on livestock haulers were in place during transport and holding until the birds were prepared for unloading. The plant ensured all dead birds were properly disposed of and the load was finished with no further incident. The plant subsequently reported that of the (b) (4) birds in lot #2, 330 were DOA. The DOA numbers from previously</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>unloaded trucks delivered prior to the unloading of Truck #22 ranged from 32 to 82 DOA per load. The establishment indicates they will fully employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with Good Commercial Practices increases the likelihood of producing unadulterated product. Similar GCP observations were made by (b) (6) on 2/23/2018 in an MOI, Subject: Poultry Good Commercial Practices / GXN5608022123I. We will discuss this situation during the weekly meeting on March 9, 2018 with establishment management to determine any additional corrective actions and/or preventive measures could be adopted in the future to minimize the possibility of a similar (or worse) incident happening in the future, especially when birds are held overnight in extreme weather conditions.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M248B	Butterfield Foods Company	GXN21130 32023G	2018-03-23	04C05	Poultry Good Commercial Practices	Finalized	<p>On 3/23/18, at 1010 hours while performing routine poultry good commercial practices verification task by monitoring shackled birds in the immediate vicinity to the entrance of the scald tank, I observed the following: I observed a live, conscious shackled bird with no neck cut enter the scald tank; I verified consciousness as I observed it blinking and it reacted to physical stimuli by trying to avoid contact with my hand by arching its neck and body as I attempted to reach for its head. Approximately one minute later, I collected the cadaver after it emerged from the scald tank/pickers and was placed in a condemn barrel by the sorters. I immediately notified the (b) (6) [REDACTED] informing him that I observed this cadaver enter the scald tank alive. He stated that his monitors must have missed one. I continued to monitor the shackled birds immediately prior to the scald tank until approximately 1015 hours and did not observe any more live birds. I then went to the neck cutter/stun area and observed an increase in un-stunned, vocalizing birds prior to the neck cutter (at a rate of approximately 1 bird every 10 seconds with a line speed of approximately (b) (4) [REDACTED] birds per minute). I observed the two establishment neck cutter monitors actively trying to pull down necks multiple birds to assure adequate neck cuts and reroute un-stunned birds on the axillary blade. I also observed the monitor identify and cut the necks of three birds with a straight knife on the bleed chain that missed the primary and axillary neck cutter blades entirely. At approximately 1025 hours, I identified another cadaver on the shackle line after the scald tank/pickers that did not have a neck cut which was the second cadaver identified. I immediately notified the (b) (6) [REDACTED], showing him both cadavers and informing him that there is an</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>increase in un-stunned birds prior to the neck cutter. I observed (b) (6) check out the situation and adjust the electric plate height. After this adjustment, I observed the shackled birds immediately after the electric stun plate and neck cutter. The majority of the birds were adequately stunned with better positioning into the neck cutter apparatus, and I did not observe any other birds that were conscious or without neck cuts after the neck cutter step. (b) (6) informed me also that he spoke to his monitors to take action sooner and notify him if they are unable to keep up with the conditions in the neck cutter room. Employing humane methods of handling and slaughtering that are consistent with good commercial practices increase the likelihood of producing unadulterated product. Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcass and ensure that breathing has stopped prior to scalding. Stunning of poultry, when performed, is also expected to be done in a consistent and effective manner.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M248B	Butterfield Foods Company	GXN32170 42612G	2018-04-12	04C05	Poultry Good Commercial Practices	Finalized	<p>On 4/12/18, at approximately 0918 hours, I observed the following while performing routine Poultry Good Commercial Practices verification task in the New York Room/Pinning Room, which is located after the feather picker machine: I observed a bright pink to red, de-feathered bird carcass on the shackle line immediately exiting the picker that was also showing generalized muscle fasciculation; no other birds on the line at this time exhibited these signs. I immediately pulled this particular bird off the line to examine it. I observed no neck cut with the bird exhibiting no sign of bleed out as it was engorged, red to pink, and involuntarily twitching in my hand; this bird was determined to have entered the scald tank alive and died other than by slaughter. At this time, the company was going to break and there were no more birds at the neck cutter or the scald tank area; there were no other cadavers seen in the condemn barrels in the pinning room at that time. I immediately called for the (b) (6), and showed him the cadaver with no neck cut. I informed him that the bird entered the scald tank alive. Poultry slaughter in accordance with GCPs requires that birds need to be slaughtered in a manner that results in thorough bleeding and ensures that breathing has stopped prior to entering the scald tank. (b) (6) came to talk to me at approximately 0955 hours and stated that he checked the stunner and the neck cutter when slaughter resumed and there were no issues noted. I observe the bleed chain from the neck cutter to the scald tank at approximately 1005 hours and did not observe any issues at that time. He also stated that he discussed the incident with his neck cutter monitors and that the monitors were changed out with a new rotation after break. On 4/13/18, at approximately 0850 hours, (b) (6) informed</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>me that they had officially wrote up the employee stationed at the neck cutter at the time of the incident for failing to appropriately monitor the birds for un-cut necks. An MOI was also issued on 3/23/18 for observing two live birds without neck cuts entering the scald tank.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M248B	Butterfield Foods Company	GXN53170 42318G	2018-04-18	04C05	Poultry Good Commercial Practices	Finalized	<p>On 4/18/18, at approximately 1153 hours, I observed the following while performing routine Poultry Good Commercial Practices verification task in the New York Room/Pinning Room, which is located after the feather picker machine: I observed a bright pink to red, de-feathered bird carcass on the shackle line immediately exiting the picker; no other birds on the line at this time exhibited these signs. I immediately pulled this particular bird off the line to examine it. I observed no neck cut with the bird exhibiting no sign of bleed out, as it was engorged (especially of the head and neck) and was red to pink in color. This bird was determined to have entered the scald tank alive and died other than by slaughter. At this time, there were no other birds entering the scald tank and no supervisor in the area as it was just before lunch break. There were no other cadavers observed in the condemn barrels in the pinning room. I immediately tried to locate a supervisor but none was present in the hanging area, stun/neck cutter room, or pinning room. I went onto the evisceration floor and spoke to (b) (6)) and asked her to call a supervisor for the neck cutting area. She informed me that the leadmen and the supervisor were not here (either at lunch or gone). I then asked for her to call the evisceration supervisor, but he was also at lunch. I asked for her to contact the next supervisor in charge and she called (b) (6) . I showed them both the cadaver with no neck cut that I pulled off the line immediately after the picker machine and told them I would be following up with a supervisor who is more in charge of that area when they get back from lunch. At approximately 1310 hours, I spoke to (b) (6)) and showed him the cadaver, stating this was the second cadaver found within a week, identified just prior to</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>company break and/or lunch. I told him these are isolated incidents with no loss of overall process control. However, my concern was that there may be a trend in poor monitoring of neck cuts in poultry carcasses just prior to breaks, and that there was no immediate supervision in this area, as it was very hard for me to even locate an applicable supervisor at the time of identification. (b) (6) informed me that he spoke to (b) (6) during lunch at around 1230 hours, who briefed him on the situation. He followed up with all the monitors in that area and the (b) (6), reiterating that all birds need to be monitored for adequate neck cuts, especially before break time or lunch. He stated that the leadman usually leaves after the last bird goes through the neck cutter step. After our conversation, the cadaver was placed in an inedible bin. An MOI (#GXN3217042612G) was issued on 4/12/18 for observing a cadaver exit the picking machine with no neck cut right before company break. In addition, an MOI (#GXN2113032023G) was issued on 3/23/18 for observing two live birds without neck cuts entering the scald tank. Poultry slaughter in accordance with GCPs requires that birds need to be slaughtered in a manner that results in thorough bleeding and ensures that breathing has stopped prior to entering the scald tank.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M248B	Butterfield Foods Company	GXN34160 41327G	2018-04-27	04C05	Poultry Good Commercial Practices	Finalized	<p>At approx. 1802 hrs. on 4/26/18, following the completion of eviscerating operations, I went to the pinning room and unloading area to gather information on approx. how many birds would be carried over to the next day's production. When I entered the unloading (live hang) area I observed that there were two establishment hourly employees whom were gathering live fowl from the hoist pit area. As I observed the employees gathering the birds from the hoist pit, one of the establishment hourly employees, who had approx. 6 live birds in one hand, took one of these birds, grabbed it by the head with his other hand, and began to spin the neck of the bird until the neck was broken. As the employee was doing this the bird was vocalizing excessively and violently flapping its wings. Before I could stop him, he had done this to two other live birds. I was finally able to get him to stop what he was doing, and relay to the other employee in the area that what he was doing was not allowed. I then watched as the employee began to shackle the live birds and use a knife to make a decapitation cut on the remaining live birds. I then returned to the USDA office, and informed (b) (6) of my observations. (b) (6) than accompanied me to (b) (6) office, where he was informed of my observations. We (b) (6) (b) (6), and myself) then went to the unloading area at approx. 1808 hrs. where I showed each of them several (6-8) carcasses in an inedible barrel which had no decapitation cut made, and evidence (hemmoraging in cranium/ cervical area(s) not expelled from the carcass) consistent with being killed by hand. (b) (6) then consulted with each of the employees and informed (b) (6) and myself that he would be correlating with the supervisor of the employees right away in the morning. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>was then informed of the requirements of part 381.65(b) which clearly outline required handling practices for fowl at official establishments, specifically "Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses..."</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M2580	IBR Group Inc	XWI50130 52103G	2018-05-03	04C02	Livestock Humane Handling	Open	<p>Humane handling meeting at M2580, Winona, MN May 2, 2018 2:30 PM Plant personnel attendees: Shanna Eichmann, Plant Manager USDA Personnel attendees: (b) (6)</p> <p>Reason for meeting: On April 30 at approximately 1630 hours a cow not destined for slaughter escaped from the trailer while other bovines were being unloaded at M2580. The trailer was a horse trailer owned by the farmer and the cow was able to squeeze past a divider. The cow was euthanized with a firearm in a lot (off-premise) in close proximity to the federal establishment. An FSIS employee did observe part of the event, though she did not have a direct line of sight. She heard a shot fired, looked out the window approximately 100 feet away and saw the cow standing. Another shot was fired. The cow went down. She picked her head up and a third shot rendered her immobile. FSIS personnel did not witness the entire event nor did we have a direct line of sight, during the incident. It appears that three firearm shots were fired. (b) (6): cow showed aggression coming off the trailer and scared establishment management. This was a safety concern for the humans involved. (b) (6) (b) (6)</p> <p>Animals for custom slaughter must be euthanized humanely. The same humane handling regulations apply to custom slaughter. The animals must be rendered insensible in one attempt, with minimal excitement. Regulatory control action will be taken if USDA personnel learn of inhumane custom slaughter. (b) (6)</p> <p>(b) (6): We understand. Safety of discharging firearm outside in city limits. (b) (6): This is a concern of ours as well. History of issues in unloading. A humane handling visit conducted by (b) (6) in August 2017 noted issues during unloading where employees struggled to separate animals and encourage them off the trailer.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>Animals slipped during unloading. Also, (b) (6) has seen gaps in the trailer/chute which can be a humane handling issue. Animals need to be provided adequate footing to prevent slips and falls. Animal owners who come to unload animals are also responsible for humane handling. It is very important to step in if you see humane handling issues with owners. (b) (6): There was a metal plate would cover up the gap and wouldn't startle an animal. It has not been cleaned as often as it has been, which means that sometimes owners don't use it. (b) (6): we will look at this. Trend of vulnerabilities for an inappropriate trailer being used. This is not the first time an inappropriate trailer was used and an animal escaped. This is a very big concern. If vehicles and ramps are not properly positioned to unload animals, this may lead to regulatory control action being taken. (b) (6): We have purchased a removable gate to be used in these situations. We can bolt the trailer to keep animals from escaping with this temporary gate. MN law does forbid animals from being removed from a slaughter establishment without a specific permit. This definitely applies if all animals were destined for FSIS slaughter. Please inform USDA personnel if this occurs and we will notify the proper authorities. If a future humane handling incident occurs when slaughter is ongoing, we would put a retain tag on the knock box while we contact the district office. Again, if an animal were to escape during unloading, this could lead to regulatory control actions up to and including suspension (depending on circumstances). Nonambulatory animals are not eligible for the marks of inspection. MN law also forbids these animals for custom slaughter. Additionally once an establishment offers an animal for ante-mortem inspection, the establishment cannot change the animal status to "intended for</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								custom exemption. This is not related to yesterday's discussion, but it is important for the establishment to know. Establishment response: We will look at the end of the chute and the establishment to see what can be modified. Perhaps the plates can have better traction. We will also unload with two people. We will look at Temple Grandin's book on humane handling.
90	M27257	Central KY Custom Meats, Inc.	KIF330805 4407G	2018-05-07	04C02	Livestock Humane Handling	Finalized	While IPP (b) (6) was performing Antemortem inspection at approximately 7:35 AM on the USDA hogs this morning I observed that the custom hog did not have available water to drink in pen 4. I advised (b) (6) and (b) (6) that then needed available water at all times. This was a custom hog so an NR was not issued. This MOI is the means of informing plant management that agency policy was not being followed regarding Human Handling.
05	M27389	Pitman Farms	NCO19150 33915G	2018-03-15	04C05	Poultry Good Commercial Practices	Open	This MOI is being issued by (b) (6). On 03/13/18 at approximately 0634, while performing a routine tour of the receiving area, I observed two chickens on the ground under one of the trailers. Upon closer inspection I discovered an open cage on one of the modules of trailer (Lic. # 4LJ5260). There was a total of nine chickens out of their cage running around on top of the trailer and in between the modules. At 0643 (b) (6) and three other employee's arrived and recovered the chickens by 0705.

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M32130	Dakota Provisions LLC	JEB350804 2111G	2018-04-11	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. 32130, Dakota Provisions, 04/11/18, 0545 hours. Meeting Attendance: (b) (6) and (b) (6). On 04/11/18 at approximately 0450 hours, while performing ante-mortem inspection, I observed a turkey that had his left wing caught between the framework and the fiberglass floor above him. The bird was discovered in trailer #27, back cage, middle tier under the trailer shed outside. The cages are designed with 3 compartments/levels per coop and the floors are comprised of green fiberglass material held to the cage framework with rivets. I immediately notified (b) (6), (b) (6) and (b) (6), of the injured bird. (b) (6) used two bars to leverage between the floor and framework which took pressure off the wing and allowed the wing to be dislodged. Evaluation of the turkey wing revealed excessive bruising approximately 6 inches in width and a laceration that was bleeding. I placed a US Reject Tag No. B42252448 on the cage so it could be evaluated and repaired. The fiberglass floors need to be installed appropriately to prevent injury. This was previously discussed in three other instances which were documented in MOI JEB 5009052618I on 5/18/17, MOI JEB2207055216L written on 5/16/17 and MOI JEB0206055711I written on 5/11/17. It was also discussed in the establishment weekly meeting on 5/11/17. A discussion was held with (b) (6) of my observations and concern for animal welfare at approximately 0545 hours. Allen stated that today production personnel would mark cages needing repair with a repair card. They have arranged for a crew to work on those cages needing repair on Saturday, 4/14/18.</p> <p>The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with good commercial practices increase the likelihood of producing unadulterated product.</p>
80	M33831	Ayrshire Farm Management, LLC	PVD37060 23906G	2018-02-06	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 8:10 hours, I, (b) (6) met with (b) (6) to discuss the execution of Good Commercial Practices at the establishment. Earlier, while performing the Poultry GCP verification task, I had observed that, after being stunned and then given the kill cut, some of the very small chickens being slaughtered were not remaining inside of the cones being used for this process. When necessary, these birds were being pulled through the cones and reinserted but twice I observed birds fall through the cones and into the blood trough. These two birds were picked up out of the trough and then also reinserted into the cones for full bleed out. I informed (b) (6) of my observations and then noted the apparent need for better accommodations for the smaller birds during the slaughter process; especially as the demand for these birds increases. (b) (6) stated that he would order smaller cones to accommodate these birds and then said that he expected these cones to arrive in time for next week's slaughter. This meeting was then adjourned. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M33940	Fauquier's Finest Custom Meat Processing, Inc.	DAG16150 15309G	2018-01-09	04C02	Livestock Humane Handling	Finalized	<p>The following incident occurred at establishment M33940 (Fauquier's Finest Custom Meat Processing) at 12:45pm on January 9, 2018: The slaughter floor personnel brought the last hog of the day into the chute. It was a large hog, in the 1000-1200 lb. range. As per their protocol, they applied the squeeze chute to immobilize it, then applied the electrical stunner to the brain at the voltage recommended for a 1200-lb. hog (580 V) until it went limp and dropped to the ground. At this point, the animal was unconscious. As per their protocol for swine, slaughter employee applied a secondary ("security") knock, in this case with the .22 rifle due to the size of the animal, and because of the size of the animal, applied a second rifle shot. Still following protocol, the slaughter employee stuck the animal, at which time it began paddling in a circle, but remained recumbent. Once it had circled about 120 degrees, it came to a stop, at which point the slaughter employee applied the full cut severing both carotid arteries. It was at this point that the animal came to its feet and began staggering. It eventually fell into sternal recumbency. The slaughter employee applied two more shots with the .22 rifle. In each case, the animal vocalized, paddled a bit, but did not get up. At this point, since the animal was still breathing intermittently, they elected to have their co-worker shoot it with his .357, which he did (twice). Shortly after this, the animal was fully unresponsive (clinically dead) and they were able to process it. The animal regained consciousness after the initial stunning event; therefore, this constitutes an egregious noncompliance with 9 CFR 313.30(a)(1). (b) (6) applied U.S. Rejected tag #B41301176 to the knock box at 2:35pm and informed both slaughter floor personnel of the regulatory control action (Plant Manager Michael Rodrigues was informed by</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								phone). The establishment does not currently have a robust systematic approach to the humane handling of livestock.

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M3W	Swift Pork Company	GJC052105 2910G	2018-05-10	04C02	Livestock Humane Handling	Finalized	<p>At approximately 7:20pm, (b) (6) met with (b) (6); and at approximately 8:50pm, (b) (6) met with (b) (6) and (b) (6). The following concerns and observations were pointed out and discussed. 1. (b) (6) noted that stressed hogs are regularly brought into the area between the two chutes leading to the (b) (4). She noted that on occasion, these hogs are not immediately stunned and are left sitting in the area. (b) (6) stated that the employees are supposed to stun the hogs ASAP. She pointed out to (b) (6) a hog that was sitting in the area when she walked by, probably about 10 minutes earlier. Employees were not moving towards stunning the animal immediately. These hogs do not have access to water, and while this area is not a typical holding pen, FSIS expects animals that are held be provided access to water. Compliance with 9 CFR 313.2(e) is questionable in this area. (b) (6) agreed to provide these animals with water. The establishment will provide a pan of water in the area for now, and follow up with running a line and water nipples into this area for the future. 2. (b) (6) noted that in the central area between the (b) (4) chutes, hogs that are brought into that area occasionally get up and wander around. She observed that there are areas in this place that could lead to injury of hogs. For example, she observed a hog wander to the corner behind (b) (4) (b) (4) #1. The hog, if startled, could jump through the bars and fall and injure itself. The establishment will look at this area more closely. A cursory look through the establishment's written Systematic Approach to Humane Handling does not appear to specifically address this area.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	M40041	Marksbury Farm Foods, LLC	NRW10130 25615G	2018-02-15	04C02	Livestock Humane Handling	Open	On 02/15/2018 at 1100 at Marksbury Farm Foods, LLC on the slaughter floor, (b) (6) heard activity at the knock box. She proceeded to the stair of the knock box and observed the stunner use a captive bolt gun to administer a stun to a beef. After the stun was administered the beef retained ability to stand and displayed conscious eye movement. Another stun was immediately applied; (b) (6) observed the beef continued to retain the ability to stand and display conscious eye movement. Another stun was immediately applied rendering the beef unable to stand and insensible. (b) (6) applied U.S. Rejected tag #B28142221 to the knock box and notified (b) (6).
90	M40041	Marksbury Farm Foods, LLC	NRW33120 35814G	2018-03-14	04C02	Livestock Humane Handling	Open	On 3/14/2018 1230 hours at Marksbury Farms Foods(M40041)on the livestock slaughter floor while observing activity at the knock box, (b) (6) observed a market lamb roll out of the knock box after being stunned. When it hit the floor landed on its belly, head was raised and displayed conscious eye movement. Immediate corrective action was applied however the stun proved to be ineffective since the lamb was able to rise on its front limbs and still had conscious eye movement .An additional stun was applied and proved effective. (b) (6) applied USDA Rejected Tag #B41495755 to the knock box and notified Plant Manager Leonard Harrison.

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Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	M44779	Faulkner Meats	VMV20060 51509G	2018-05-09	04C02	Livestock Humane Handling	Open	May 8, 2018 Today at approximately 1330 while performing the Livestock Humane Handling task at Faulkner Meats, Taylorsville, KY the following observation was made by the SVMO. A small holding pen of 20+ mature sheep was observed to be without water. There did not appear to be sufficient space in the pen for all animals to lie down, either. Granted, the animals had not been declared for Federal Inspection. However, according to Directive 5930.1 Rev 4, the HMSA (Humane Methods of Slaughter Act) requires that livestock be humanely handled in connection with slaughter, (21 U.S.C. 610(b)). The animals should have access to water and if held overnight the ability to lie down. A MOI dated May 1, 2018 was presented to the establishment for a similar incident involving the lack of water access.
80	M44791	Doublebrook Farm LLC	VUF44070 43006G	2018-04-06	04C02	Livestock Humane Handling	Finalized	When checking the livestock outside I noticed that the water containers were not filled with water. (b) (6) said that the swine had knocked the water over and so it was spilled. I asked him to refill the container.

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	M45029	Vermont Packinghouse LLC	FUU20110 12823G	2018-01-23	04C02	Livestock Humane Handling	Finalized	<p>HAT Category VIII – Stunning On 1/22/2018, at approximately 10:00am, while on break in the observation room above the slaughter floor, the stunning employee informed (b) (6) he had double stunned a couple of lambs that morning because although they went down, he was unsure as to whether or not they were unconscious or not when he was dragging them in. (b) (6) immediately went to observe stunning activities following break. At approximately 10:20am that same morning, (b) (6) observed the following: The employee stunned a lamb. The lamb’s head went down, but the lamb remained standing, and started to shake its head back and forth. The employee immediately grabbed the backup captive bolt and attempted to re-stun the lamb. The lamb fell to the ground, but when the employee went to grab the lamb’s back leg, the lamb stood up and ran to the back corner of the weigh-in chute area where the animal had been restrained. The animal was observed by (b) (6) to have blood running out of one of the stun holes, and both eyes were open and blinking. The animal also demonstrated the following movements: standing, running, walking, and rhythmic breathing. The employee reloaded the captive bolt and re-caught the animal. The employee stunned the animal. There was a delay of approximately 2-3 minutes between the second and third stunning attempt. The third stunning attempt was successful and the animal remained unconscious throughout the bleeding process. Immediately (CSI) took a regulatory control action to the weigh-in chute area where the lambs are stunned. Regulatory tag#B43049629</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	M45134	Birdsboro Kosher Farms Corp.	FKJ071505 1007G	2018-05-07	04C05	Poultry Good Commercial Practices	Open	<p>On 05/07/2018 at approximately 1545 hours, I was walking through the ante-mortem area and looked inside the DOA barrel and found a slaughtered bird that wasn't completely dead and still breathing and moving. I stopped the line and informed Mr. Urieta, Plant Manager and (b) (6). The bird was removed from the DOA barrel and put in the area specified for that situation until it completely died and stopped breathing, and then was moved to DOA barrel. It is not consistent with Good Commercial Practices to have breathing birds in a barrel specified for dead birds. (b) (6)</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M45856	Prime Pork LLC	ODB43120 41520G	2018-04-20	04C02	Livestock Humane Handling	Finalized	<p>On April 17, 2018, while performing routine Veterinary inspection at 1415 hours on the harvest floor, I was presented with a carcass (MPD65229431) for Veterinary disposition. This carcass had tattoo 70XX on the dorsal mid line. In addition, there were six additional tattoos one each on the shoulders, the flank, and the hams. I made an inquiry with (b) (6) as to the placing of the tattoos and if they were applied while the hog was still alive. I was informed that this was a "sub" (Slow or crippled) and that the tattoos were applied while the hog was still alive. I advised him that this may be excessive. On April 18, 2018, while performing ante-mortem with (b) (6) I described my findings from the previous day and again asked if the hog was alive when the tattoos were applied. Again I was informed that these tattoos were applied immediately after moving the hog to the "sub pen" and before the hog being stunned. I let (b) (6) know that this was an excessive number of tattoos to be applied. The "subs" are already at a higher level of stress and care should be taken not to increase their stress and excitement. On April 19, 2018, (b) (6) advised me that the procedure for handling the "subs" was modified to have the additional tattoos applied after the hog had been stunned.</p>
25	M45856	Prime Pork LLC	ODB54110 42824G	2018-04-24	04C02	Livestock Humane Handling	Finalized	<p>While performing Ante-mortem inspection with (b) (6) at pen 0954 hours I discovered the following issue. While inspecting the hogs in pen 22, there was a hog with his head under the gate in a manner that the corner of the gate appeared to be penetrating the left eye at the medial canthus (b) (6) gently opened the gate and on inspection both the eye and the icitating membrane were intact. This gate does pose a potential hazard.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	M46185	Detweiler Meats N More	WPP09100 34121G	2018-03-21	04C02	Livestock Humane Handling	Finalized	At 7:15 this morning I witnessed (b) (6) attempt to stun a hog with a captive bolt. He shot twice with this not effectively stunning the hog. After two attempts the hog was still not effctly stunned. (b) (6) left the slaughter floor to retrieve a rifle in which he shot the hog and at that time the hog was effectively stunned.. I placed a tag on the knock box and called (b) (6) and then I called District Office. This establishment is Detweiler Meats M 46185.
80	M56	PILGRIMS PRIDE CORPORATION	MBJ01130 32726G	2018-03-26	04C05	Poultry Good Commercial Practices	Finalized	At approximately 1007 hr. I, (b) (6) performed a Good Commercial Practice check in the Live Hang Department, along with (b) (6). We observed a live bird breathing in the outside dumper. I went to the Pinning Room to find (b) (6). We returned to the dumper where (b) (6) observed the live bird. He then took the bird to the live hang line. (b) (6) and I returned to the USDA office and informed (b) (6) of our findings. This incident is not in keeping with Good Commercial Practices, especially those practices related to handling of live poultry. This MOI serves as a written notice that future oversight of this nature may result in the taking of additional administrative actions. Please submit documentation of corrective and preventive measures relating to this incident. (b) (6) cc: (b) (6) Raleigh District (b) (6), (b) (6), Raleigh District (b) (6) (b) (6)

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	M5842	Tyson Foods, Inc.	NPF37210 12902G	2018-01-02	04C05	Poultry Good Commercial Practices	Finalized	<p>On 01/02/2018 at approximately 2130 hours (b) (6) was notified by the online inspector on Evisceration Line #1 stand #2 that he had identified and hung back for disposition a carcass with the head still attached and no identifiable neck cut (b) (6) notified me of the finding and upon inspection I noted that the carcass was cherry red to purple in color with no neck cut and no evidence of exsanguination. I confirmed that the carcass was a cadaver and showed it to (b) (6) and (b) (6). At this time one additional carcass that was cherry red to purple in color with the head attached and no evidence of exsanguination was observed in the condemn barrel at the Line #1 rehang area. Poultry carcasses which show evidence of having died other than by slaughter reflect poor commercial practices. 9 CFR 381.65(b) states that "poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and ensure that breathing has stopped prior to scalding".</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	M5842	Tyson Foods, Inc.	NPF40190 15705G	2018-01-05	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1840 hours as I was walking through the live hang area I observed movement inside a condemn barrel located next to the end of Kill Line #1. The condemn barrel was almost completely filled with dead chicken carcasses. I notified (b) (6) and observed as he uncovered a live, bright alert chicken underneath approximately 6 carcasses. The live chicken was removed from the condemn barrel and placed on the kill line for slaughter. At 1900 hours I discussed my findings with (b) (6). We discussed the unlikely possibility of a live hang employee inadvertently placing an alert live chicken into the condemn barrel. (b) (6) suggested that the live bird could have jumped or been inadvertently pushed into the barrel because of the proximity of the barrel to the kill line. He stated that as a preventative the condemn barrels would be moved further away from the kill lines to reduce the chance of a live bird jumping/falling into the condemn barrels. A live bird being covered by dead chicken carcasses has a high risk of smothering. Death caused by smothering reflects poor commercial practices and is noncompliant with 9 CFR 381.65(b).</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	M5842	Tyson Foods, Inc.	NPF58130 43025G	2018-04-25	04C05	Poultry Good Commercial Practices	Finalized	<p>As described to me by (b) (6) on 4-23-2018: "April 23, 2018 at approximately 1313 hours, at the start of second shift as I entered the evisceration department I noticed that the evisceration line 1 was running empty. The live hang line one was stopped and maintenance personnel were making repairs on it at the rehang area. I proceeded to the live hang area and observed that birds were still hanging on the kill line 1. The birds between the stunner and the kill blade had a purplish color and were not moving and not breathing; I did not see a cut on the bird's necks. The birds showed evidence of dying other than normal slaughter process. Multiple birds that were hanging on the kill line prior to the stunner machines had swollen reddish purple heads and there was drool coming from their beaks. They were also vocalizing and flapping their wings excessively. I stood in front of the stunner machine for a few minutes and I did not see anyone attempting to retrieve these birds from the line. At approximately 1320 hours I walked out of the area to inform the SPHV of my observations. When I came back to the area the birds that were hanging prior to the blade had been removed (approximately 11 birds). (b) (6) was in the area at this time and I described my previous findings to him. I also showed him two of the birds that were left hanging near the neck cutter. I informed him that the other birds were in the same conditions as these birds prior to being removed." On April 24, 2018 I held a discussion with night shift Assistant Plant Manager Brad Massengale concerning the above issues. Mr. Massengale stated that he had interviewed employees in the area in order to gather information about the events. I expressed to Mr. Massengale my concerns about birds dying other than by slaughter and the condition of live birds that</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>remain hanging on the kill line during extended down time. He stated that he intends to correlate with plant management personnel in order to develop a program to address live birds that remain on the kill lines during extended down time to ensure that poultry good commercial practices are maintained.</p>
05	M6012	U. C. Davis Meat Laboratory	BKO25170 20214G	2018-02-14	04C02	Livestock Humane Handling	Finalized	<p>I asked (b) (6) on 2/14/18 at approximately 1120 hours after our regular weekly meeting (Est. 6012, U.C. Davis Meat Laboratory, located at 1 Shields Avenue, Davis, CA 95616) if the animals (Market and Roaster hogs) that were harvested today had access to water during their brief stay in the ante-mortem pens alley way prior to the lead up chute. I was performing post-mortem duties inside of Harvest Room and could not go outside to verified that the animals had access to water. He explained that there is no access to water in the alley way and would be difficult to place water in area because animals (Cattle, Hogs for example) could knock off the water containers or similar units. Policy considers the alley way a holding pen and per 9 CFR 313.2(e) "Animals shall have access to water in all holding pens and,....". I returned to first assignment of my work day and informed (b) (6) of the discussion and decided to write the Memorandum of Interview (MOI) in regards to this issue. I informed (b) (6) via text message of the impending MOI. (b) (6) Badge (b) (6) Cc: (b) (6) file @ Est. 6012, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
05	M6137	Foster Farms	BXL331603 0202G	2018-03-02	04C05	Poultry Good Commercial Practices	Finalized	<p>Establishment P6137 – Plant 2, Foster Farms, March 12, 2018 In attendance : (b) (6)</p> <p>This MOI is intended to document the discussion I had with (b) (6) about the Poultry Good Commercial Practices incident that occurred in Plant 2 - Line 01 on Thursday, March 1, 2018. At Approximately 1450 hours on March 1, 2018 I noticed a carcass hanging on the rack adjacent to the pre-sorter station in line 01 of plant number 2 that had the characteristic appearance of a cadaver. As I approached the pre-sorter station, I noticed a number of carcasses inside the condemn barrel placed near the pre sorter station that also have the characteristics appearance of a “Cadaver”. I verified that 5 out of 8 carcasses in the condemn barrel were Cadavers with the head intact and no visible cuts along the neck. In addition 1 out of the 8 carcasses had a cut on the neck area that had only penetrated the subcutaneous tissue of the neck. I called the attention of (b) (6) and showed her what I saw and she immediately called (b) (6) I showed (b) (6) the cadavers from the barrel. After a few minutes, the sorter on the pre-sorter station pulled another cadaver with the head intact and without any neck cut as well. (b) (6) informed me that they are addressing the problem as this was a result of moving kill line employees from plant 1 to plant 2. I also informed (b) (6) through the phone what my observations were. I reminded (b) (6) that the PPIA and Agency Regulations do require that live poultry be handles in a manner that is consistent with good commercial practices, and that they not die from other causes other than slaughter. Please review Federal Register Notice Vol. 70, No 187, published September</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>2005 (Docket No. 04-037N) for FSIS recommendations concerning treatment of live poultry before slaughter. (b) (6) was informed that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. (b) (6) - Livingston Circuit Establishment P6137 FSIS- USDA</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
05	M6137	Foster Farms	BXL340504 2724G	2018-04-24	04C05	Poultry Good Commercial Practices	Finalized	<p>This MOI is intended to document the discussion I had with (b) (6) about the Poultry Good Commercial Practices incident that occurred on Monday, April 23, 2018. On 4/23/2018 at approximately 2320 hours while performing the Poultry Good Commercial Practice in plant 1, (b) (6) observed that the auto-kill machine for line 2 was not functioning correctly and groups of birds (approximately 3-6 birds at a time) were going through the machine without cuts or not adequately cut to bleed out. The backup cutter was struggling to keep up with the amount of miss-cuts and I observed one bird go through without a cut. I went to the pre-sorter station for line 2 and observed one cadaver removed from the line and hanging on the rack for further disposition. I later learned this was already the third cadaver that was found on the line. I informed (b) (6) of the problem with the auto-kill machine. (b) (6) response to me was that he would go investigate the issue. I discussed the issue with (b) (6) and was informed that the pre-sorter for line 2 notified (b) (6) for each cadaver found but there was no communication with (b) (6) to address the issue until I had brought it to his attention. At approximately 0710 hours I observed that three more cadavers were pulled from the line at the pre-sorter stations. When I went to discuss my findings with (b) (6), he informed me that one cadaver from line 1 was pulled but he was unaware that another two cadavers were pulled off line 2 at a later time. (b) (6) was called down to evisceration and he was not aware more cadavers were occurring. "I reminded (b) (6) that the PPIA and Agency Regulations do require that live poultry be</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>handles in a manner that is consistent with good commercial practices, and that they not die from other causes other than slaughter. Please review Federal Register Notice Vol. 70, No 187, published September 2005 (Docket No. 04-037N) for FSIS recommendations concerning treatment of live poultry before slaughter." "I informed (b) (6) [redacted] 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>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M6541	Gunnoe Sausage Company, Inc.	SLD540904 0818G	2018-04-18	04C02	Livestock Humane Handling	Finalized	<p>Held a meeting with plant manager, Craig Gunnoe, regarding the use of an electric prod in driving the animals and the set-up of the holding pen directly prior to the knock box. While observing humane handling and stunning today, the employee responsible for movement held just an electric prod and used it exclusively to move sows into the knock box. The employee was approached and notified that a rattle paddle is to be used unless the sows are being more difficult and an electric prod is required to get them to move. The employee proceeded to switch to only a rattle paddle and had a lot of difficulty moving the sows (at this time only four were left in the building). The employee needs to be more judicious in the use of the electric prod and was notified of this fact. During the meeting with Mr. Gunnoe, we discussed not only the use of the electric prod but the limitations in the design of the facility to help with movement of sows from the holding pen in the building directly into the knock box. We discussed ideas such as blocking vision on the narrow alley towards the box (slowly limit the sow's vision on one side and then both sides in the box), boarding off one side of the pen diagonally to create more of a funnel effect, when having trouble moving just 3-4 sows that are left (too much room is available for them to turn around and avoid the box) either run them back out to the pens to let them calm down, or routinely move additional animals into the building to limit the space available so the alley is the only option. We also discussed running two animals towards the knock box and letting one completely enter before removing the second.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M6590	Randolph Packing Co., Inc.	YBB261204 4812G	2018-04-12	04C02	Livestock Humane Handling	Finalized	<p>Attendees: (b) (6); Mr. Craig Hamlet, Vice President M6590 Meeting Time and Date: Approximately 11:30am on April 12, 2018 Location: Veterinarian USDA office of M6590 in Asheboro, NC I notified Mr. Hamlet of the following situation: On the morning of April 12, 2018 at approximately 9:00am, (b) (6) and I observed a concerning incident in the alleyway to the knocking box at M-6590. A Holstein dairy cow was refusing to go into the knock box from the alleyway. When we began observing the incident, the plant employee was using his boot to inappropriately push the cow into the knock box area. He and other employees also used the cattle electric "hot shot" prod about 10-12 times over the course of about 4 minutes. The animal kept backing up and still refused to enter. No breaks were taken in the attempts to coerce the animal into the knock box. Mr. Hamlet agreed that the above situation was not acceptable and that he would have a meeting with the barn manager to address the situation. He also stated that he would monitor the employee for conformance to the establishment's standards. I agreed that it is appropriate to address the issue immediately. The information provided in this MOI includes all of the topics discussed during the meeting.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	M717	Smithfield Fresh Meats Corp.	TAE080702 4007G	2018-02-07	04C02	Livestock Humane Handling	Finalized	<p>While (b) (6) was performing the Livestock Humane Handling task on 02/05/2018 at Est. 717 in Denison, IA., she observed the following: While observing an establishment employee driving hogs to a pen, there was one hog that repeatedly would sit down, get back up and take a few steps, then sit back down and move with its front legs and drag its back legs. She informed the employee to not put that hog in the pen. The employee left that hog in the alley and proceeded to move the rest of the group into the pen. The employee then came back and using a rattle paddle to move the hog, drove it back approximately 30 feet to where the skid loader was waiting. At that point, another employee attempted to load the hog into the skid loader bucket but did not get the hog loaded completely before the employee driving the skid loader lifted the bucket. Another establishment employee and (b) (6) instructed the skid loader driver to stop because the hind legs of the hog were hanging over the edge of the bucket. The employee then proceeded to lower the bucket and the hind legs of the hog curled underneath. (b) (6) and the establishment employee again told her to stop, which she did, preventing the hog's hind legs from becoming stuck. After a discussion with (b) (6) and (b) (6), the following is a summary of the conversation I had with (b) (6) and (b) (6), procurement and humane handling management at Est. 717: There are a couple of concerns that were raised from this incident – how the hog was identified and moved as a non-ambulatory/disabled animal, and how it was loaded into the bucket. For the most part the employees are very conscious and follow both your voluntary segregation program and properly identify, protect, and transport non-ambulatory/disabled animals. From the</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>description it sounds like this hog was attempting to walk and went down repeatedly and then was still moving somewhat. From what I was told the hog was not vocalizing, but its inability to fully walk to the pen should have resulted in its identification as a non-ambulatory/disabled animal. At that point, the employees typically bring the skid loader to the disabled hog; I'm not sure what was different in this situation that caused them to drive the hog back to the skid loader, but it should have been brought to the hog. I know we have had conversations before about making sure the hog is fully in the bucket before raising it and you have addressed it with your employees. In this instance the hog didn't vocalize and wasn't injured, but in the future, the hogs should be completely loaded into the bucket before it is lifted. These concerns do not rise to the level of non-compliance; therefore this discussion will be documented in an MOI. Establishment management immediately held a meeting with the employees involved after notification from (b) (6) of the incident. After my discussion with them they planned to have a meeting with all employees in the barns to ensure that they were aware of FSIS' concerns and how to correct these issues in the future and stated that they would continue to monitor to ensure compliance.</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M717CR	Smithfield Fresh Meats Corp.	RZG091601 5010G	2018-01-10	04C02	Livestock Humane Handling	Finalized	<p>At 1300 hours on January 10, 2018, I, USDA (b) (6) (b) (6), met with (b) (6) and (b) (6) to discuss humane handling concerns. Concerns are: - Creating excitement when moving hogs from holding pens to kill alley and stunning alleys. - Placing more hogs in holding areas than is stated in the establishment's animal welfare program. We discussed signs of excitement in hogs when being handled. National Pork Board Transport Quality Assurance Handbook, "Pig Behavior, Handling & Fitness" was used as a reference. This falls under 9CFR 313.2(a). (b) (6) stated that she will monitor the kill and stunning alley areas and talk to the supervisors responsible for the employees in that area. There were no other concerns or questions.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	M7356	Harmon Brothers Meats, Inc.	IJK5810040 813G	2018-04-13	04C02	Livestock Humane Handling	Open	<p>April 13, 2018 HATS Category VIII-Stunning Effectiveness: At approximately 1045 EDT while performing the Livestock Humane Handling task at Harmon Bros. Meats, Warsaw, KY a stunning failure was observed on the kill floor. A market hog was placed in the knock box; plant personnel shot the hog with a rifle and vocalization was heard; plant personnel attempted a second shot with the rifle, again vocalization was heard. I looked in the knock box and observed the hog standing-conscious righting reflex. After a period of time a third shot was attempted with the rifle; the hog went into a sternal position. Plant personnel retrieved the captive bolt device; the side of the knock box rose and the hog was observed to have conscious eye tracking and a conscious righting reflex—it attempted to crawl out of the knock box. Plant personnel lowered the side of the knock box to prevent the hog from escaping and in doing so lowered the side onto the hog’s neck causing it to vocalize. The fourth attempt to stun the hog was made with the captive bolt device and it did render the hog insensible. U. S. Rejected tag # B19860162 was placed on the knock box. Plant manager Roy Palmer was informed of this observation and the regulatory control action.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	M7356	Harmon Brothers Meats, Inc.	IJK3711052 311G	2018-05-11	04C02	Livestock Humane Handling	Finalized	<p>At 1028 Hours on 11 May 2018, (b) (6) and I observed a hog in the end hog pen with a large bloody abscess on left rear knee. The hog was lying down, and another hog was eating the abscess. I immediately informed a plant employee that the injured hog needed to be separated immediately from the others. There were a total of 19 hogs in the pen. The establishment employee moved the injured hog to a holding area, and (b) (6) discussed this incident with Karen Allen, Vice Manager, and the Plant Manager, Roy Palmer. These animals had not been declared for FSIS inspection. The plant has stated that they were not doing anymore USDA inspected hogs today. Based upon the fact that the affected animals were not declared for federally inspected slaughter, the guidance of FSIS Directive 5930.1, Revision 4, and as such this MOI was issued per that Directive's guidance.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	M7470	Mountaire Farms Inc. - NC Division	YRA341204 1613G	2018-04-13	04C05	Poultry Good Commercial Practices	Finalized	<p>On 04/12/2018, at approximately 1337 hours evisceration line station 3 Food inspector ask for me to look at a bird that was pulled and hung back on the station's USDA/VET shackle for disposition. I observed that the bird had a swollen head: the skin on the head and neck area was dark purple in color and around the upper breast area the skin was a light reddish color. These are indications of bird dying from causes other than slaughter. No viscera was presented. I informed the (b) (6) that I did not see any cut along the neck/head that would allow the bird to bleed out properly. (b) (6) took the bird and stated the bird will be shown to the kill floor supervisor and condemned. At approximately 1344 hours I informed (b) (6) about the bird and MOI would be issued. (b) (6) stated that he had seen the bird and did notice a small nick on the back of the head. The PPIA (21 U.S.C. 453(g)(5)) as well as the Agency's regulation (9 CFR 381.90) require that live poultry be handled in a manner that is consistent with good commercial practice (GCP), and that they not die from causes other than slaughter.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M751	Pitman Farms Inc. (Moroni Turkey Processing)	MMK2912 035614G	2018-03-14	04C05	Poultry Good Commercial Practices	Finalized	<p>Memorandum of Interview to Discuss Birds Held in Shackles during a Line Breakdown Norbest Turkey / Est# P01049 Meeting Time: Tuesday, March 13, 2018 between 1402 and 1540 Attendees: USDA (b) (6) Establishment (b) (6) (b) (6) (b) (6) (b) (6) (b) (6)</p> <p>This memorandum was necessitated by observations and discussions made while performing a Good Commercial Practices task during a prolonged mechanical breakdown on March 13, 2018. On March 13, a chiller malfunction caused the evisceration line to be stopped from 1402 to approximately 1540. During that time, I visited with the five different supervisors listed above and asked each of them what their protocol was in regard to the live birds remaining in shackles in the hanging bay. All stated the birds are monitored for signs of discomfort and would then be either killed or removed from the line if signs of discomfort developed. After approximately one hour of downtime, (b) (6) and (b) (6) removed the birds in the hanging bay from the shackles which were within reach. I observed a couple which had already died but did not observe the actual removal of the rest as I was not in the area at that time. The shackle line travels up and around the ceiling before descending again to enter the stun and kill area so not all shackles were within reach. After they removed the birds which were within reach, I counted approximately 45 birds remaining in shackles around the ceiling and descending toward the entry to the stun and kill area. After the chiller was repaired and the line</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>was restarted, I was in the rehang area to observe the approximately 45 birds which had remained in the shackles. When they presented in the rehang area, I counted eight dead birds on line within the group. Seven were rehung to enter evisceration and were condemned by USDA inspectors in the evisceration department as cadavers. The establishment protocol concerning birds remaining in shackles during a breakdown of the line is documented in SOP #332 Line Breakdown. According to the SOP, birds in shackles are assessed for signs of discomfort. For birds hanging in elevated shackles where it is not possible to reach them, they will be left to hang if comfortable "but at the first signs of discomfort they will be bled." To reach the birds, "they will be accessed by the proper personnel with a lift." Lastly, "All animals will be treated in the most humane and sanitary manner possible." During the incident of March 13, no attempt was made to access the elevated birds with a lift. They remained in the shackles for the duration of the breakdown and yielded seven which had died prior to stunning and bleeding. This memorandum serves to document what was discussed and also provide the Denver district office with information concerning the operations being conducted at this establishment. A copy of this memorandum of interview was provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M751	Pitman Farms Inc. (Moroni Turkey Processing)	MMK1516 030316G	2018-03-16	04C05	Poultry Good Commercial Practices	Finalized	<p>Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, March 16, 2018 at 0945 Attendees:</p> <p>USDA Establishment (b) (6) (b) (6)</p> <p>This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of March 11, 2018. The establishment protocol concerning live birds held over is documented in both their Animal Welfare Program and also SOP #307 Live Bird Holdover. The written procedure pertains to an unscheduled live bird holdover due to a deviation such as a breakdown or shutdown and “is in conjunction with applicable best industry practices, notably National Turkey Federation (NTF) “Animal Care Best Management Practices, 2012.” Tuesday Holdover (approx. 2,700 toms) Three full trailer loads and a partial trailer load of toms were held over from Tuesday morning to Wednesday afternoon. According to (b) (6), the deviations in production causing the holdover were “due to the delayed start from sanitation and the breakdown experienced with the chiller.” Toms from this particular producer had a high incidence of airsacculitis, inflammatory process and synovitis which were associated with documented failures of an FPS check and a zero tolerance check as well as reduced line speeds on Tuesday. When unloaded on Wednesday for slaughter, company records show the three full trailers yielded 26, 23 and 24 dead birds in comparison to 5, 1, 6, 5, 3 and 3 for the other trailers which arrived from the same producer Wednesday and were slaughtered Wednesday. Line speed reductions occurred during the processing of those toms on Wednesday. Wednesday Holdover (approx. 1,000 toms) A</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>trailer load of toms (truck #74) from the same producer was held over from Wednesday morning to Thursday afternoon. According to (b) (6), "the holdover was necessitated by a picket breakdown and subsequent lower line speeds." Another FPS failure and reduced line speeds occurred during the processing of those toms on Thursday afternoon. During the weekly meeting on Thursday morning, the holdovers were discussed with Colby Mellor, the plant manager. A review of the matter included the condition of the toms coming from this particular producer, the dead counts on the holdover trailers Wednesday afternoon, and the failure of an FPS check and a ZT check and lower line speeds during the processing of these particular toms. Despite those findings, Thursday's slaughter schedule showed an increase from the planned (b) (4) toms to a scheduled (b) (4) toms plus the holdover trailer, all from the same producer. In addition, the hens planned and delivered for slaughter Thursday remained the same. Colby stated the scheduled numbers for Thursday's toms may have been an overestimation. On Thursday, all trailers of scheduled toms were delivered for slaughter. Colby later informed FSIS there would be an additional holdover of toms on Thursday evening, but the scheduled hens on Friday would be decreased to allow for the additional toms held over from Thursday. Thursday Holdover (approx. 1,800 toms) Three trailer loads of toms were held over from Thursday to Friday afternoon. According to (b) (6), the "birds are held due to slower than anticipated line speeds needed for the condition of the birds." Birds held over at this facility, including this week, are routinely held for more than 24 hours because production begins with hens and ends with the toms so the toms held over didn't get killed until the following afternoon even though they had arrived the</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>previous day. As documented in previous MOI, issues outside of mechanical breakdowns (a trend of lower line speeds due to quality of birds, zero tolerance failures, FPS failures, etc) may be historical and anticipated aspects of a particular poultry operation for a prudent establishment to consider when planning production. (b) (6) is going to review the matter further with Mr Mellor. According to (b) (6), production schedules are built for a roughly 5 week projection, and they can be modified long term or short term in response to holdovers; however, the short term modifications are more problematic to absorb thus contributing to the holdovers becoming a multiple day event. Also according to (b) (6) returning the birds to the farm may contribute to higher losses which compounds the problem. As was discussed previously, it is not a good practice nor is it in the establishment's interest to hold birds overnight. A previous complaint was filed with the district office by an observer that concerned holdover birds. (b) (6) understood, therefore, that FSIS will continue to issue MOI for this matter. This memorandum serves to document what was discussed and also provide the Denver district office with information concerning the operations being conducted at this establishment. A copy of this memorandum of interview was provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M751	Pitman Farms Inc. (Moroni Turkey Processing)	MMK4017 033423G	2018-03-23	04C05	Poultry Good Commercial Practices	Finalized	<p>Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, March 23, 2018 at 1245 Attendees:</p> <p>USDA Establishment (b) (6)</p> <p>This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of March 18, 2018. The establishment protocol concerning live birds held over is documented in both their Animal Welfare Program and also SOP #307 Live Bird Holdover. The written procedure pertains to an unscheduled live bird holdover due to a deviation such as a breakdown or shutdown and "is in conjunction with applicable best industry practices, notably National Turkey Federation (NTF) "Animal Care Best Management Practices, 2012." Tuesday Holdover (approx. 500 toms) A partial trailer load of toms (truck #96) were held over from Tuesday morning to Wednesday afternoon. According to (b) (6), the holdover was determined appropriate due to the unscheduled deviation from a late start due to sanitation contractor performance and our inability to process all of the birds scheduled. Birds held over at this facility, including this week, are routinely held for more than 24 hours because production begins with hens and ends with the toms so the toms held over didn't get killed until the following afternoon even though they had arrived the previous day. As documented in previous MOI, issues outside of mechanical breakdowns may be historical and anticipated aspects of a particular poultry operation for a prudent establishment to consider when planning production. According to (b) (6), production schedules are built for a roughly 5 week projection, and they can be modified long</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>term or short term in response to holdovers; however, the short term modifications are more problematic to absorb thus contributing to the holdovers becoming a multiple day event. Also according to (b) (6) returning the birds to the farm may contribute to higher losses which compounds the problem. As was discussed previously, it is not a good practice nor is it in the establishment's interest to hold birds overnight. A previous complaint was filed with the district office by an observer that concerned holdover birds (b) (6) understood, therefore, that FSIS will continue to issue MOI for this matter. This memorandum serves to document what was discussed and also provide the Denver district office with information concerning the operations being conducted at this establishment. A copy of this memorandum of interview was provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M751	Pitman Farms Inc. (Moroni Turkey Processing)	MMK2417 044820G	2018-04-20	04C05	Poultry Good Commercial Practices	Finalized	<p>Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, April 20, 2018 at 1600</p> <p>Attendees: USDA Establishment (b) (6) (b) (6)</p> <p>This meeting was necessitated by observations made while performing a Good Commercial Practices task on Friday, April 20, 2018. The establishment protocol concerning live birds held over is documented in both their Animal Welfare Program and also SOP #307 Live Bird Holdover. The written procedure pertains to an unscheduled live bird holdover due to a deviation such as a breakdown or shutdown and (b) (4)</p> <p>(b) (6)</p> <p>Thursday Holdover (approx. 1,000 toms) A trailer and a partial trailer load of toms (trucks #78 and 59) were held over from Thursday morning to Friday morning. According to (b) (6), the deviation in production causing the holdover was “due to the late start experienced this morning in relation to Sanitation issues.” The start of operations in evisceration was delayed on Thursday morning due to deficiencies found during USDA preoperational inspection. It was observed that the partial trailer of toms was moved back to the storage area with many of the coops of birds remaining open. Live birds were observed on the ground under the trailer Thursday afternoon. Friday morning, when the trailer was brought into the facility, live birds were found outside where the trailer had been parked despite the supervisor’s affirmation that all birds had been collected and brought into production. The lead supervisor for the (b) (6) (b) (6) went back out and collected the loose</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>birds after I notified him not all had been gathered. Those birds would have remained loose in the trailer storage area until Monday's production at the earliest had they not been collected. As documented in previous MOI, issues outside of mechanical breakdowns (a trend of lower line speeds due to quality of birds, zero tolerance failures, preoperational deficiencies, FPS failures, etc) may be historical and anticipated aspects of a particular poultry operation for a prudent establishment to consider when planning production. As was discussed previously, it is not a good practice nor is it in the establishment's interest to hold birds overnight. A previous complaint was filed with the district office by an observer that concerned holdover birds. (b) (6) understood, therefore, that FSIS will continue to issue MOI for this matter. This memorandum serves to document what was discussed and also provide the Denver district office with information concerning the operations being conducted at this establishment. A copy of this memorandum of interview was provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	M791C	Clemens Food Group, LLC	QCF55090 30128G	2018-03-28	04C02	Livestock Humane Handling	Finalized	<p>(b) (6) met with M791C (b) (6) from approximately 1000 to 1015 hours in the west alleyway of the barn today (03/28/2018). Also in attendance was (b) (6). Discussed during this meeting were observations (b) (6) has made concerning hog movement at the entrance of the serpentine. Of note were (b) (6) observations that the leading hogs in a group being moved fairly consistently balk at the vertical opening gate (with it's bottom consisting of an approximately 3 foot high black rubber flap) that separates the main central alleyway in the barn from the serpentine. When the vertical gate is in the full open position the opening through which the hogs must pass is approximately three feet high. Other than when exiting a trailer this is the first location in the barn where hogs are required to pass through a more "confined" opening. Usually two barn employees drive the hogs into the serpentine from the main alleyway but because of the balking, this movement is often done with at least some difficulty for the initial hogs as they approach this opening. Once a few hogs have traversed this opening, the remainder of the hogs, in most cases, seem to follow without much difficulty or hesitation. (b) (6) also discussed the inefficiency and often times inability to drive larger groups of hogs from the rear, especially at this location. As far as the opening is concerned, (b) (6) indicated that he is aware of this potential bottle neck location. (b) (6) indicated that he had previously tried cutting a few inches off the bottom of the flap to increase the opening height. (b) (6) indicated that this helped a little but not sufficiently so. He is planning as a next step to paint the rubber flap a grey color so that it blends in more with the overall grey surroundings. He is hoping that the grey will make the upper limit of the opening (now demarcated</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								by the black rubber flap) less noticeable to the hogs and thus hoping that they will have less of a tendency to balk at this location.
15	M9252	Bright Oak Meats, Inc.	GHD29170 43618G	2018-04-18	04C02	Livestock Humane Handling	Finalized	A customer attempted to unload a non-ambulatory cow and attempted to pull its tail. The CSI and plant personnel stopped the customer before the tail was touched or any other potentially harmful actions taken. The animal was humanely euthanized and discarded. Plant management immediately discussed the incident with the customer and informed the customer that this was unacceptable behavior. Plant management will follow-up with additional written information to this customer as well as provide general humane handling information to all customers to inform them of the expectations of appropriate animal handling at the establishment and in accordance with USDA regulations.

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M9289	Oregon Beef Co.	AKG16150 21601G	2018-02-01	04C02	Livestock Humane Handling	Finalized	<p>A lot of 6 longhorn bulls were slaughtered at M9289 Oregon Beef Company on the morning of 2/1/18. The bulls' horns were too wide to enter the normal chute, so the animals were unloaded from the owner's trailer directly into a chute specifically designed for longhorn cattle ("Joe's Longhorn Chute") that the owner had provided. The chute was placed flush with the trailer and adjacent to the side entrance of the kill floor. The first 5 bulls were unloaded and stunned uneventfully. The sixth bull was unloaded successfully into the chute. The bull was positioned in the chute with its head facing away from the building and its horns locked between two rails of the chute. The chute contains a small gate on the top that can be opened so the animal's head can be accessed. This gate is approximately 32 inches wide by 36 inches high and placed approximately 36 inches from the bottom of the chute. The animal's horns were approximately 62 inches wide. The gate was closed but unlatched as the employee performing stunning was about to shoot the animal. The bull made a sudden movement to butt open the gate, turned its head sideways, and leapt out of the opening. It then ran off premises and into the grassy hills around the plant. Plant employees immediately ran after the bull. Mr. Tom Jones, plant manager, retrieved a high-powered rifle equipped with a scope. When the bull was spotted after approximately 15-20 minutes, Mr. Jones was able to effectively shoot the bull with one shot. Appropriate facilities to unload, pen, and restrain livestock are required for humane handling. This incident was considered an aberration from typical handling that occurs at this plant and the bull exhibited very unique behavior. However, should the escape of animals from holding facilities become a routine occurrence or should an animal be injured upon</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>escape, the behavior could be considered non-compliant or even egregious and further enforcement action would be necessary.</p>
35	P1009	Wayne Farms LLC	DSM39150 20527G	2018-02-27	04C05	Poultry Good Commercial Practices	Finalized	<p>While doing a good commercial practices task, I visited the live hang area and observed a live hang employee hurrying along from the incoming conveyor belt past the stunner with a live chicken in each hand. He then proceeded to hang a chicken by one leg just before the automatic kill machine and back up killer. It seemed he couldn't find another empty shackle to place the other bird in, so he walked back to the live hang conveyor area with the other bird. The hung bird was noticed by the back up killer and able to be bled out. The bird that was hung on the line, wasn't stunned prior to being slaughtered. There is some room for improvement in this case. I discussed the issue with (b) (6) and (b) (6) counseled the employee to not hang birds past the stunner and to hang the birds by both legs in a single shackle.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1209	Whitewater Processing Co.	FFG280805 1604G	2018-05-04	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. P1209 Whitewater Processing Co. At 0903 hours while observing birds entering the scald tank as part of a routine DVMS GCP audit, (b) (6) observed the following. An old breeder turkey (hen) was observed to be breathing on the production line just before the scald tank. (b) (6) alerted (b) (6) of the finding, and (b) (6) hit the kill switch in the immediate area to stop the production line. She then left to retrieve a knife. When (b) (6) returned to the area, she was joined by an establishment employee, who re-cut the hen's neck and then removed the bird from the production line and carried her away. The line was then restarted. (b) (6) observed this area for an additional 12 minutes without further incident. The stunning and sticking area was then observed. No issues were identified. The observations were discussed during the exit meeting of the audit. Exit Meeting 1020 hours in attendance Establishment Management- (b) (6) (b) (6), FSIS- (b) (6) and (b) (6).</p>
50	P1209	Whitewater Processing Co.	FFG191305 4309G	2018-05-09	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1412 while observing live hang at the end of the kill last truck pulled out of the live hang dock. As the truck pulled out I noted a breeder Tom between the rear wheels he has still alive and moved briefly after the wheel passed over and crushing him. I also noted a breeder hen also alive who was sitting on the ground in the center of the dock area where the trailer had passed over her. I instructed a plant employee to retrieve the bird and he hung it on the kill shackle. I informed (b) (6) immediately following the incident and informed her I was issuing a GCP MOI.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1241	Tyson Foods, Inc.	MGJ31150 14323G	2018-01-23	04C05	Poultry Good Commercial Practices	Finalized	<p>Poultry Mistreatment MOI At approximately 1455 hours, while performing a Poultry Good Commercial Practices task on the Live Receiving dock, I observed an establishment employee dump a coop of chickens onto the live hang belt. After he dumped the coop, I observed a live chicken that remained in the coop. The coop was then removed from the dump system and replaced back onto a trailer of empty coops. I informed the forklift driver that there was a live chicken still in the coop, and he retrieved the coop and removed the live chicken from it. I immediately informed (b) (6) and (b) (6) of my finding and of the impending MOI. This finding was not in accordance with Poultry Good Commercial Practices because the chicken would have remained in that coop for an extended period of time. At approximately 1710 hours, I met with (b) (6) and asked him what actions were taken to prevent a recurrence of this incident. (b) (6) informed me that (b) (6) was going to have a meeting with all of her live hang employees at the next scheduled break, and she was going to inform each of these employees to make a visual inspection of each coop after dumping it, to make sure that no live chickens remained in the coop. (b) (6), Est.1241-P Corydon, IN 47112</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P1241	Tyson Foods, Inc.	MGJ26210 15224G	2018-01-24	04C05	Poultry Good Commercial Practices	Finalized	<p>Poultry Mistreatment MOI At approximately 2215 hours on Wednesday, January 24th, while performing a Poultry Good Commercial Practices task on the Live Receiving dock, I observed an establishment employee dump a coop of chickens onto the live hang belt. After he dumped the coop, I observed a live chicken that remained in the coop. The coop was then removed from the dump system and replaced back onto a trailer of empty coops. As that same employee dumped the next coop of chickens onto the live hang belt, I again observed a live chicken that remained in that coop. I immediately informed the forklift driver and (b) (6) of my findings. The forklift driver removed the live chicken from the coop that had been placed back on the trailer, and (b) (6) instructed the employee working the dump system to remove the live chicken that remained in the second coop. Once I observed that the chickens had been removed from the coops, I then informed (b) (6), and (b) (6) of my findings and of the impending MOI. This finding was not in accordance with Poultry Good Commercial Practices because the chickens would have remained in those coops for an extended period of time. I had already issued a MOI for the same finding the night before this incident occurred. I also had just addressed this same issue in the weekly USDA/Establishment meeting earlier this afternoon. (b) (6) informed me that the establishment employee working the dump would receive a written reprimand for failing to ensure that all chickens were emptied from the coops at the time they were dumped. (b) (6) also informed me that additional measures would soon be implemented in an attempt to prevent this from happening again. One such measure will be the</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								installation of a mirror which will enable the employees working the dump system to see inside the coops after they are dumped. (b) (6) [REDACTED], Est. 1241-P Corydon, IN 47112
80	P1243	Perdue Foods, LLC.	XLB370804 1418G	2018-04-18	04C05	Poultry Good Commercial Practices	Finalized	While performing the good commercial practice task at approximately 0649 hours on 04/18/2108, I observed a live bird in the DOA bin. It was on top of the pile and had denaturant on its feathers and body. I observed the bird blink its eyes and move its head. (b) (6) [REDACTED] was walking by at the time and I called out to him. As he approached, I asked him to look at this bird. He picked the bird up and saw that it was breathing, moving its head, and blinking. He agreed that it was alive. At this time, he had the bird humanely euthanized via cervical dislocation. I prepared this report on 04/18/2018 and I certify that this report has recorded in it a summary of all pertinent matters discussed. (b) (6) [REDACTED]

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P1254	Koch Foods of Ashland, LLC	YFA442002 0111G	2018-02-11	04C05	Poultry Good Commercial Practices	Finalized	<p>On February 9, 2018 at approximately 2111 hours while performing the Good Commercial Practices and Ante Mortem task with (b) (6) the following was observed outside where the establishment disposes of DOAs. A long transfer belt is used to bring DOAs outside from live hang and drops them into a metal basket prior to them being disposed of in a final large metal dumpster. At the end of the belt in the basket there were approximately 15 birds, two of which were alive. One of the live birds was very weak. There were dead birds on top of the live birds in the basket. Upon finding the live birds intermingled with the DOAs and them being in imminent danger of becoming crushed/suffocating/death by means other than slaughter, I asked (b) (6) to notify a Supervisor since there was no one in the area. DOAs (approximately 7) continued to pile on top of the live birds while waiting for assistance. (b) (6) an establishment employee and (b) (6) (b) (6) arrived to the area and (b) (6) was informed of the issue. One of the live birds was returned to production and the other bird was humanely euthanized. The Supervisor was also notified that a GCP MOI would be issued. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>less than Good Commercial Practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on February 9, 2018 (b) (6)</p> <p>Cc: (b) (6)</p> <p>Dr. David Thompson, DDM (b) (6)</p>
85	P1272	Pilgrim's Pride Corporation	CCA420802 1108G	2018-02-08	04C05	Poultry Good Commercial Practices	Finalized	<p>Todd Shoemak, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Wednesday, February 7, 2018 at approximately 1718 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6)</p> <p>(b) (6) observed an issue with the implementation of Good Commercial Practices in the live hang/receiving area. I observed one live bird enter the scald vat on line number one alive. The bird was holding its head up and blinking. I notified (b) (6) of the observation. (b) (6) stated he would be switching out backup killers immediately as a corrective action. No other live birds were observed entering the scald vat alive. This issue was discussed with management at a small meeting in the USDA veterinarian's office shortly after the occurrence. (b) (6) and (b) (6) were present. (b) (6) stated the matter would be addressed immediately. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
85	P1272	Pilgrim's Pride Corporation	CCA420904 2218G	2018-04-18	04C05	Poultry Good Commercial Practices	Open	<p>Mark Dean, Plant Manager Pilgrim's Pride Corporation P-1272 113 McNeal Drive Douglas, GA 31533 On Monday, April 16, 2018 at approximately 0840 hours while performing a Good Commercial Practices Task at P-1272 I, (b) (6), observed an issue with the implementation of Good Commercial Practices in the pre-evisceration area. After approximately 30 minutes of downtime in the pre-evis area on line number one, I observed the stunner filled with water. I immediately notified (b) (6) of my concern of the stunner being filled with water and birds still hanging on the line in the water. The water was drained from the stunner to reveal approximately 15 birds deceased. Once observed, I immediately notified (b) (6), (b) (6), and (b) (6) all of which observed this. All deceased carcasses (approximately 15) were removed from the line and verified as deceased. All previous mentioned establishment personnel observed these birds as being deceased. All deceased birds were placed in the DOA bin for condemnation. This issue was discussed with management at a small meeting in the USDA veterinarian's office shortly after the occurrence. (b) (6) and (b) (6) were present. (b) (6) stated that as a preventative in the future, stunners will be drained immediately and will not be refilled until instruction is given from himself or another supervisor in his absence. Also, it was stated that in future instances, a designee will be assigned to the area to ensure no one fills stunners before the correct time. These things as stated by (b) (6) were given as a preventative.</p> <p>Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
85	P1284	Pilgrim's	GDA21200 44524G	2018-04-24	04C05	Poultry Good Commercial Practices	Finalized	<p>Est. P-1284, Pilgrim's April 24, 2018, 0138 hours. (b) (6) At approximately 0138 hours, while verifying Good Commercial Practices in the live room, I (b) (6) observed a live chicken in the DOA trailer. The chicken was beneath several layers of DOA's. The chickens head and neck were visible and I could see the chicken slowly moving its neck. I immediately called (b) (6) to notify him of this finding, and he was accompanied by establishment (b) (6). (b) (6) informed me that the chickens often move their head and neck after cervical disarticulation. I requested the chicken be retrieved from the trailer. The chicken was removed with a catch wire. The chicken opened it eyes and was alive despite its thin and unkempt appearance. (b) (6) elected to euthanize the chicken by decapitation. I then notified (b) (6) of my findings. I reminded (b) (6) that the PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs), and that they not die from causes other than slaughter. Poultry are also to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Compliance with these requirements helps insure that poultry are treated humanely. I recommended that the Federal Register on Treatment of Live Poultry before Slaughter, published September 2005, be reviewed for FSIS recommendations concerning treatment of live poultry before slaughter. A copy has been provided to the establishment. The establishment will provide any planned actions with their written response. This MOI will be forwarded to the District Office and the District Veterinary</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								Medical Specialist (DVMS) in the event additional follow-up is recommended. Respectfully, (b) (6) [REDACTED] , P1284, Pilgrim's

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	P1304	Farmers Pride Inc.	YVB500001 3405G	2018-01-05	04C05	Poultry Good Commercial Practices	Open	<p>On 01/05/18 (shift started on 01/04/2018), at approximately 0119 hours, a night shift meeting was held at establishment 1304P, Farmer's Pride, Inc., located at 154 West Main Street, Fredericksburg PA, 17026. (b) (6) attended the meeting for USDA. (b) (6) (b) (6), attended the meeting for the establishment. At approximately 0119 hours on 01-05-2018, I (b) (6) was conducting a GCP audit in the live receiving/live hanging area. While observing operations on the live hanging area, I noticed that the birds taken out of the coops and dropped onto the walking stand by the live hanging establishment employees, were making a rock like thump when they hit the stand. I proceeded to further investigate and noticed that most all of the feathers were missing from the belly of the birds and the birds were hard to the touch. A total of five to seven birds appeared to be frozen birds. Furthermore, two and one quarter barrels containing birds identified by plant management as DOA birds were present at the time of the audit. Discussion during this meeting focused on these observations during the GCP audit and on the prolonged period of abnormally low temperatures. Night time temperatures in Fredericksburg, Pennsylvania during the week of December 31, 2017 thru January 6, 2018 were in the single digits with daytime highs in the teens. In addition, the birds originated from a truck intended to be processed during day shift beginning on January 4, 2018 but was held over because of production delays until night shift of January 4, 2018 (approximately 11 hours). Moreover, there was a marked increase in the total number of birds listed by the plant as DOA and plant rejects identified in the lot that included the birds from the truck that was held over. Lot</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								#1 (DOA) = 38-Birds (Plant Reject) =453-Birds Lot #2 (DOA) =32-Birds (Plant Reject) = 238-Birds Lot#3 (DOA) = 65-Birds (Plant Reject) = 70-Birds Lot #4(DOA) = 43-Birds (Plant Reject) = 956-Birds

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P1307	Mar-Jac Poultry-AL	KIL241301 5718G	2018-01-18	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 07:15 on January 18, 2018, I observed less than Good Commercial Practices (GCP) while performing Antemortem/GCP/Mishandling verification at Mar-Jac Poultry in Jasper, AL. I observed a large pile of DOA carcasses (approximately three feet tall and approximately two feet in diameter) on the floor at the end of live hang belt #2. At the time of my initial observation, no one was working to remove the DOA's from the area. I notified (b) (6) to stop the hanging process on line #2 because the process appeared to be out of control, and there could possibly be live, weak chickens trapped under the pile of DOAs. I also notified (b) (6) of the situation. As two live hang employees removed DOA chickens from the pile, I observed three live chickens being removed from the pile and placed back on the hanging belt. (b) (6) and (b) (6) also observed the finding of these live chickens. I notified (b) (6) that this is not consistent with good commercial practices because of the potential for the live chickens to be suffocated and die from causes other than slaughter. I further notified him that the findings would be documented on a GCP MOI. While the live employees on line #2 were completing the cervical dislocation of the pile of chickens, I observed that there was an accumulation of DOA's at the end of line #1 (approximately 2 feet high and approximately one foot in diameter). Three live chickens were removed from this pile and hung on the line. Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Before Slaughter" states that under the Poultry Products Inspections Act (PPIA) and Agency Regulations, all establishments engaged in the slaughter of poultry to make every effort to treat poultry</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>humanely and abide by Good Commercial Practices. cc: (b) (6)</p>
90	P1317	Wayne Farms LLC	QUI121301 4826G	2018-01-26	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 10:01, on January 26, 2018, while performing the Review and Observation component of the PHIS task, "Poultry Good Commercial Practices," I, along with Guntersville (b) (6), observed three live birds covered by and comingled with dead birds in a pile on the floor at the end of the live bird belt. (b) (6) was notified of the finding and implemented corrective action(s). As per Federal Register Notice Docket No. 04-037N dated September 28,2005, 'Treatment of Live Poultry before Slaughter,' the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. Corrective and preventive measures addressing this incident are appropriate. I look forward to your response. Respectfully submitted, (b) (6) P-1317 Cc: (b) (6) Dr. Lorraine Dozier, Acting DDM (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P1317	Wayne Farms LLC	QUI221702 0702G	2018-02-02	04C05	Poultry Good Commercial Practices	Finalized	<p>TO: Mr. BRYAN ELROD, Plant Manager Wayne Farms LLC. 700 McDonald Ave. Albertville AL, 35950 FROM: (b) (6)</p> <p>Dear Mr. Elrod, At approximately 16:30 hours, on February 2, 2018, while performing the Review and Observation component of the PHIS task, "Poultry Good Commercial Practices," I, observed one live bird covered by and comingled with dead birds in a pile on the floor at the end of the live bird belt (b) (6) and (b) (6) were notified of the finding and implemented corrective action(s). As per Federal Register Notice Docket No. 04-037N dated September 28,2005, 'Treatment of Live Poultry before Slaughter,' the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. Corrective and preventive measures addressing this incident are appropriate. I look forward to your response. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office (b) (6), Acting DDM (b) (6)</p> <p>Respectfully submitted, (b) (6)</p> <p>Albertville 02/02/2018</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P1353	Pilgrims Pride Corporation	WUM3902 023005G	2018-02-05	04C05	Poultry Good Commercial Practices	Finalized	<p>On February 5, 2018 at approximately 0255 hours, while performing a Good Commercial Practice Check, I observed a pile of dead birds at the end of the live hang belt. The pile had reached the belt itself and was approximately 3 feet in height. I immediately notified (b) (6) [REDACTED] and instructed that he cease hanging birds until the pile of birds was taken care of. Two live birds were on the top of the pile, but no additional live birds were uncovered when transferring to a DOA container. The inattentiveness of plant personnel put live birds at risk of dying of means other than by slaughter. Under my observation, the plant employees finished disposing of the dead birds at approximately 0300 hours and resumed hanging at that time. (b) (6) [REDACTED] was notified that a MOI would be filed with the Jackson District Office. Per Federal Register Docket #04-37N, the establishment is to treat poultry in a manner consistent with good commercial practices and take steps to prevent the mistreatment, harm, distress and injury by means other than slaughter. Also such abuse of poultry and treatment in a manner not consistent with good commercial practices, and death by means other than slaughter, may render the poultry adulterated. Respectfully submitted, (b) (6) [REDACTED] Cc: Dr. David Thompson, DDM; (b) (6) [REDACTED]</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
85	P1480	Tip Top Poultry, Inc.	JBA091903 5108G	2018-03-08	04C05	Poultry Good Commercial Practices	Finalized	<p>This MOI is for P-1480 Tip Top Poultry at approximately 1635 on 03/07/2018. Attendees at the meeting were (b) (6) (b) (6) (b) (6) and (b) (6) (b) (6). At approximately 1730 (b) (6) asked me (b) (6) to come to the picking room. (b) (6) informed me that she had observed 5 birds that were entered the scalders alive. (b) (6) notified (b) (6) (b) (6) and I observed 500 birds. We both observed 3 birds that were vigorously moving when entering the scalders. I notified (b) (6) that I observed several birds moving vigorously when in the scalders. I mentioned to (b) (6) that I would give him five minutes due process. I returned to the picking room at approximately 1740 -1745 with (b) (6) and I observed several birds vigorously moving as they entered. We also observed several birds that did not have the neck cut enter the scalders moving violently and water being splashed on us. (b) (6) said that he would adjust the kill line speed. I again checked another 500 birds at 1750-1755 and observed several birds moving violently once into the scalders. (b) (6) said he would adjust the kill line speed again. I again checked from 1800 -1817 and observed 5 birds once into the scalders violently moving and observed a bird entering the scalders without the neck being cut. I mentioned to (b) (6) what I had observed. (b) (6) said he was going to check and explain to the backup cutter to cut the necks of the birds that miss the kill blade. I performed a 500 bird check at approximately 1830 and (b) (6) and I observed a bird enter the scalders without the neck being cut and observed the bird moving violently</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>in the scalders. I took regulatory control and said to (b) (6) to stop the live hang area. (b) (6) said he is stopping the live hang area and asked me if we could take an early lunch. We took an early lunch break. I mentioned to (b) (6) that production in the evisceration area would not resume until management could assure me that they could control this process. I met with (b) (6), (b) (6) and (b) (6). At approximately 1930 I performed a 500 bird count and did not observe any birds moving as they entered the scalders. At approximately 2145 I performed a 500 bird count and did not observe any birds moving when in the scalders. I performed a 500 bird check at 2300 hours and did not observe any birds moving at all once entering the scalders.</p>
90	P164	Tyson Foods Inc	IJM261201 3515G	2018-01-15	04C05	Poultry Good Commercial Practices	Finalized	<p>Excessive DOA, weather related 7.5% for the day's production. IPP did not observe any moribund birds that were handled contrary to Principles of Good Commercial Practices. All were euthanized in accordance with AVMA humane methodology.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P164	Tyson Foods Inc	IJM120802 5014G	2018-02-14	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6), On February 12, 2018 at approximately 0540, I, (b) (6), observed less than Good Commercial Practices (GCP). In the Picking Room while performing a Good Commercial Practice Task, I observed a live small chicken, prior to entering the Scalder, with its head lifted up, eyes wide open and then it entered into the Scalder on Line (b) (4). I immediately brought the matter to the attention of (b) (6). (b) (6) and I went back into the picking room and waited for the bird to exit the Scalder. (b) (6) and a Plant employee got the carcass in question off the Picking Line after the carcass exited the Scalder and the first Picker. Upon closer observation the carcass was red in appearance, with lots of blood under the skin in the neck area. No visible cut was present to the neck. This finding is consistent with a Cadaver, having died by means other than slaughter. (b) (6) was notified at approximately 0544. (b) (6) notified (b) (6) at 00164—P, of her findings while performing the GCP Task. At approximately 0640 Mr. Ricky Meyers, Assistant Plant Manager at P-164 was notified verbally of a GCP MOI that would be written. Allowing birds to enter the Scalder live is not consistent with Good Commercial Practices and bird(s) dying by means other than slaughter results in adulterated product. Every effort must be made by the Establishment to prevent live bird(s) from entering the Scalder, and measures to prevent mishandling of poultry must be adhered to by the Establishment to ensure unnecessary suffering by poultry under the Establishment's control. Refer to FSIS Docket No. 04-37N, Treatment of Live Poultry before Slaughter. (b) (6), 00164--P Forest, Ms CC. (b) (6), (b) (6)</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								(b) (6)
40	P165H	OK FoodsProcessing Plant	DAF42070 25727G	2018-02-27	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0623 on 2/27/18, while performing a good commercial practice check, I observed a sensible bird (eye open) proceeding down the line and into the line 2 scalders. (b) (6) was notified of my observation. We traveled down the line and observed a cadaver exit the pickers. (b) (6) removed the cadaver from the line, examined it and notified me that there was no cut on the neck. Shortly thereafter, I performed a recheck and observed zero sensible birds prior to the scalders. During the discussion that followed, (b) (6) and (b) (6) notified me that both employees past the automatic knife would be retrained and be disciplined according to company policy.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P165H	OK FoodsProcessing Plant	DAF02040 52216G	2018-05-16	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2036 hours, while performing ante mortem in the live shed, I noticed a bird that had its head caught in between the door and the cage cell side. The bird was not showing any signs of life at the time of my observations. The live side employee also saw this and immediately began trying to open the door to free the bird's head. Although he was able to free the bird's head, the bird was not alive due to the crushing of the throat in the extremely narrow space that exists between the door and the side wall of the cage cell. I immediately located (b) (6) who works for the live side department of OK Foods. I explained to (b) (6) my observations and concerns for the welfare of the chickens. (b) (6) stated that he would address this with the appropriate people on live side. I also informed (b) (6) of my observations. USDA's concerns are that the employees are not being watchful when the chickens are loaded into the cages, which has resulted in the strangulation type death as seen today. Last week, both live side and the establishment were notified 4 out of 5 nights for cage doors being open on cages loaded with birds. USDA is concerned that the continued situation with the doors may result in additional birds being seriously injured. The establishment is encouraged to reply to this MOI.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P165S	OK Foods, Inc.	LWA00060 15303G	2018-01-03	04C05	Poultry Good Commercial Practices	Finalized	<p>On Tuesday, January 02, 2018, at approximately 0525 hours, while performing the Good Commercial Practices Task, I observed DOAs, too numerous to count. It was 17 degrees F. The trailers of birds had shield boards on the front end and back end of the end cages, and side shield boards on approximately 1/4 of each cage, leaving 3/4 of each cage exposed to the weather conditions. I met with (b) (6) about the conditions and my concern of numerous DOAs. I asked (b) (6) if there were additional ways to keep the birds warm. He stated that there wasn't. I met with (b) (6), to inquire of actual counts of DOAs. (b) (6) presented me with the record that indicated a high number of DOAs in the morning weather conditions, and quite a significant reduction as weather temperatures warmed. (b) (6) had also met with Plant Manager Amelia Lawhorn regarding this issue. He had requested information regarding the distance the birds were hauled and if the trailers were going to be tarped or if there were some other measures going to be implemented to protect the birds from the cold. She said that she would have to get with Live Haul for that information. She returned to the USDA office approximately 7AM Wednesday. She said that she was told that the birds had been hauled about 50 miles and that the trucks stopped for 15 minutes about half way to let the birds warm up. (b) (6) asked how stopping alongside the road would allow the birds to "warm up" when the temperature was in the mid teens. (b) (6) wasn't sure. She stated that she was relaying information that had been given to her. (b) (6) also asked about if/when measures were going to be taken to protect the birds from the cold. She said that they were going to begin adding boards to the outside of the cages. She said that they may have done some of</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>them. (b) (6) stated that as he was coming to work this morning (Wednesday, 1-3-18) he met two live haul trucks on their way out. He didn't see any protection on the cages of either trailer. However, they were empty.</p>
90	P17766	Southern Hens, Inc	SSN441501 0031G	2018-01-31	04C05	Poultry Good Commercial Practices	Finalized	<p>Good Commercial Practices MOI: On January 30, 2018 at approximately 1338 hours, (b) (6) and (b) (6) observed a less than good commercial practice while performing Ante-mortem inspection and a Good Commercial Practices check at Establishment P-17766. While performing a 500 bird count, a live, uncut bird was observed entering the scalders. The bird was lifting its head in an attempt to right itself as it approached and entered the first scalders. (b) (6) was immediately notified of this finding. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P17766	Southern Hens, Inc	SSN281502 1612G	2018-02-12	04C05	Poultry Good Commercial Practices	Finalized	<p>Good Commercial Practices MOI: On February 9, 2018 at approximately 1020 hours, (b) (6) and (b) (6) and I observed less than Good Commercial Practices while performing a routine Ante-mortem and Good Commercial Practices audit at P-17766. On the back loading docks, the workers were aggressively tossing cages containing live hens onto the conveyer belt that feeds into the live hanging room. The cages were being tossed from stacks ~10ft high, as well as ~3.5ft from left to right. The metal unloading chutes were not in use at the time. We immediately informed (b) (6) and (b) (6) of this mistreatment; each manager was accompanying us as we were performing the GCP task. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Information will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6)</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P17766	Southern Hens, Inc	SSN171203 3416G	2018-03-16	04C05	Poultry Good Commercial Practices	Finalized	<p>On March 15, 2018 at approximately 0750 hours, I observed less than Good Commercial Practices while performing a routine Ante-mortem and Good Commercial Practices task at P-17766. On the back loading docks, a worker was aggressively tossing cages containing live hens onto the conveyer belt that feeds into the live hanging room. He was working without any assistance from other back dock employees. The cages were being tossed from stacks ~10ft high, as well as ~3.5ft from left to right. The metal unloading chutes was not in use at the time. (b) (6) was immediately informed of this mistreatment. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Information will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6),</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P17766	Southern Hens, Inc	SSN341705 3314G	2018-05-14	04C05	Poultry Good Commercial Practices	Finalized	On 5/14/18 at ~1640 hours, while performing a routine Ante-mortem and Good Commercial Practices check, I observed less than Good Commercial Practices at establishment P-17766. In the live hang room, a live bird was submerged in water in the drain beneath the receiving conveyer belt. The bird was trapped between a grate and the floor of the drain. The bird was retrieved and evaluated until it was deemed eligible for slaughter; the breaths were mildly shallow. Immediately next to this area was a 2-3 ft. gap in the drain cover. This missing grate was eventually located against the wall of the live hang room. A few moments prior, a carcass was retrieved from standing water from another drain gap. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6) (b) (6) P-17766
60	P18414	MB Consultants LTD	JYI4807010 230G	2018-01-30	04C05	Poultry Good Commercial Practices	Finalized	At 0814 while performing antemortem inspection of young chickens on trailer #87210, IPP noted an empty plastic bottle of Welch's Orange Pineapple juice in a crate with the chickens on the right side of the truck, mid-truck, in the second row of crates from the bottom. What initially drew the attention of IPP to this crate was an amputated, decomposing foot that was spanning the space between this crate and an adjacent row of crates.

Table: MOIs in Response to FOIA2018-328

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	P18414	MB Consultants LTD	JYI4207025 901G	2018-02-01	04C05	Poultry Good Commercial Practices	Finalized	While performing ante-mortem inspection at 0828, IPP observed a blue rubber glove in a crate with chickens on truck #148 between the bottom crate and second crate on the right side of the trailer in the second column. The blue fingers of the glove were extending into the bottom crate.

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	P18414	MB Consultants LTD	JYI5608032 928G	2018-03-28	04C05	Poultry Good Commercial Practices	Finalized	<p>On 03/27/2018 at 14:55 I was conducting a routine Poultry Good Commercial Practices task. I observed the chickens entering the bleed-out loops from the kill room by looking through the small window in the hallway where the kill line shackles return to live hang from the bird transfer machine. I noticed that one chicken was still attempting to right itself near the end of the first loop although its neck had been cut and it was visibly bleeding. I continued to watch to confirm that the chicken had stopped trying to right itself, but the chicken was still attempting to right itself when it reached the end of the second loop. The third loop is not visible from the window in the hallway, so I ducked under the kill line to walk through to the rooms with the scalding vats in order to confirm that the chicken was dead before it entered the water. As the chicken entered through the doorway from the bleed out room, it was still attempting to right itself, and as it entered the cold water vat, it was struggling violently. On exiting the cold water vat, the chicken was coughing up water and shaking its head from side to side. At this point I chose not to continue to observe the chicken as it entered the first scalding vat still alive. No other chickens were observed to be attempting to right themselves after their necks were cut, and this was the first time that I have observed an animal entering the water vats while still alive. In accordance 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. Furthermore, in accordance with 9 CFR 381.1(d)(v) a poultry carcass is considered adulterated if it has died other than by slaughter as would be the case with a chicken that died by drowning in the scalding. As a reminder, our</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								expectation is that all live poultry should be treated in a manner consistent with good commercial practices, which means they should be treated humanely.

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P18557	Sanderson Farms, Inc.	QNA31060 31229G	2018-03-29	04C05	Poultry Good Commercial Practices	Finalized	<p>On March 29, 2018 at approximately 0615, (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 several of the birds on line 1 were only being hung by one leg and the employee was having some difficulty addressing the birds that were missed by the kill machine. 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 0615 enter the scalders on picking line #1. The bird was hanging on the shackle with its eyes open, still breathing, and without a cut on its neck. This bird entered the scalders alive and still breathing. I did not take any regulatory action with this single-bird incident, since no evidence of a system failure existed. I notified (b) (6), of the observed nonconformance, during a brief meeting held in his office at approximately 0618. I presented the cadaver to him, explained my observation, informed him that a Memorandum of Information (MOI) was going to be documented, and relinquished the carcass into his control. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. A copy of this Memorandum of Information will be forwarded to</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								the appropriate personnel in the Jackson District Office. Respectfully, (b) (6) cc: (b) (6), and (b) (6) Jackson (b) (6)

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P19128	Case Farms of North Carolina, Inc.	FCA430901 4227G	2018-01-27	04C05	Poultry Good Commercial Practices	Open	<p>On Saturday 1/27/18 at approximately 1006 hours I was returning to the inspection office after performing ante-mortem evaluation of birds presented for slaughter. As I walked in front of one of the trailers staged under the live dock canopy I heard a loud "Bang" and then looked down and saw at least one loose chicken under the trailer. I walked back around the trailer and noticed an entire cage had dropped off the fork truck from the 2nd tier of the trailer and it was now sitting on its side next to the trailer. I observed that all 5 individual tiers of the cage had open doors with several loose chickens on the ground in front of it. There were many more chickens remaining in the tiers of the cage and they were sitting on top of one another at least 2 to 3 birds deep. I tried to communicate with the fork truck driver regarding what happened but due to a language barrier could not; however the driver pointed up to the cage next to where that one came from and I noticed the top right cage door was open with chickens poking their heads out. I went to the dumper operator to see if he had a radio but he did not so I entered the back end of live hang. I observed a maintenance employee and I asked him to notify a supervisor to come outside due to a cage falling. He did come out and radioed (b) (6) to come to the back dock. In the interim I requested that an empty cage be placed to begin unloading birds to reduce suffocation deaths. Several more people arrived and began to move birds however there was a lot of discussion amongst them on how to proceed including knocking the cage down for it to sit properly and load onto the dumper platform. However, I interceded more than once informing (b) (6) that while everyone was discussing what to do birds were suffocating, i.e. no one was trying to move birds during some of these</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>discussions. I had already noticed several chickens that displayed signs of recent death including agonal breathing or muscle fasciculation observable during the dying process. I also observed injuries such as broken and bleeding wings and cut skin. Associates did end up knocking the cage back down about half-way through the process of unloading chickens from one cage to another. Ultimately, all birds were removed to a new cage however at least 4 to 6 birds per tier, i.e. 20 to 30 birds, likely suffocated due to the pile up. I notified (b) (6) that I would document a MOI and that he needed to determine what happened and how he would ensure it didn't happen again. The incident was resolved around 1045 hours. At approximately 1100 hours (b) (6) entered the inspection office and informed me that a video from the dock showed that while the cage was being removed it caught on a partially opened cage door on the cage next to that one causing it to hang up and come off the forks. The door that caught was the one I had previously observed open. (b) (6) informed me both cages were removed from the process for repairs. I did discuss my concerns with (b) (6) that it was not clear of who was in charge of responding to the incident on the dock as I had to point out the suffocation issue on more than one instance. The continued discussions between establishment associates on how to deal with the cage on its side likely lost valuable time that may have reduced suffocation deaths. (b) (6) discussed his concerns regarding the event in which he believed the associates were not entirely sure what to do in this type of event as none of them had ever been involved in one. He also felt they responded in the manner they thought appropriate and there was a concern with safety of associates with the cage sitting on its side. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>(b) (6) suggested that moving forward they would include training for the associates on how to address birds involved in a pile up situation after ensuring personnel safety was not at risk. I conceded this was a good practice and I informed (b) (6) about the Federal Register regarding treatment of live poultry before slaughter. Also, I informed him that the documentation of our discussion would be forwarded to my supervisor and the DVMS in case additional follow-up was necessary. Respectfully, (b) (6) P19128</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P192	Pilgrims Pride Corporation	OOB23190 22313G	2018-02-13	04C05	Poultry Good Commercial Practices	Finalized	<p>Establishment P-912 Prigrim’s Pride, February 13, 2018 @ ~1835 hr. At approximately 1835 hour, while observing conditions during Ante mortem inspection and Poultry Good Commercial practice task, I observed ~5 or more live birds lying underneath a pile of approximately 3 feet high full of dead birds and debris in the Live Hang area from off the floor. The amount of birds was ~ 50-75 that were on the floor, surrounding the entire area. I could walk the area for full inspection of the birds due to the pathway being blocked by the birds; one person started to work on removing the pile of birds from off the floor, but it wasn’t sufficient enough to keep up with the constant moving of birds on the conveyor belt pushing more loose birds onto the floor and by birds not being picked up at a reasonable amount of time to make a significant difference. I took regulatory action by instructing all live hanging personnel to stop hanging immediately until the live birds were removed from the floor and DOA birds were cleared out enough to walk the passageway for more observation. I informed the (b) (6) and (b) (6) of finding live birds cluttered among dead birds, and that it was not acceptable due to discomfort and suffering of birds in such conditions. I also told them that I will document it as an MOI for failure of humane handling. (b) (6) discussed to me that the plant would be assigning additional personnel to the live hang area to prevent such high numbers of birds on the floor. He also mentioned that he was not aware of negligence concerning the high volume of birds on the floor, and that he will be sure it doesn’t happen again during the remainder of shift.</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P192	Pilgrims Pride Corporation	OOB32200 30315G	2018-03-15	04C05	Poultry Good Commercial Practices	Finalized	<p>On March 12, 2018 at 1835, while performing a Good Commercial Practices (GCP) task, I observed a live bird underneath a pile of DOAs. The bird was moving his leg and breathing. I immediately notified live receiving clerk and she immediately removed the birds. I asked to speak with the live receiving supervisor, but was not able to because he was hanging birds in the hanging pen. The live receiving clerk immediately notified the supervisor of the noncompliance and informed him that they would be receiving an MOI. The establishment has failed to adhere to the Federal Register 04-037N, which encourages those involved in the slaughter of poultry to abide by Good Commercial Practices.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P20245	Equity Group Kentucky Division, LLC	ISL112101 5424G	2018-01-24	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 24, 2018 at approximately 0003 hours while performing the Ante Mortem and Good Commercial Practices Verification Task, the following was observed in live hang at the distal end of the belt under the shackles that feeds evisceration line one. There was a pile of approximately 15-20 DOA birds with one live bird towards the bottom of the pile that was weak, moribund and in imminent danger of dying from becoming crushed or suffocating. When I first entered live hang I approached the belt that feeds evisceration line two first and used my flashlight to check for any live birds intermingled with DOA birds at the end of the belt as this has been a previous issue at this establishment. There were only two DOAs on this belt. I then approached the belt that feeds evisceration line one and discovered the large pile of DOAs. There was no floor person in the area working on the pile of birds. I started to look through the pile for several minutes prior to a line lead and (b) (6) arriving and removing the dead birds. As several layers of dead birds were removed I discovered the live bird by shining my light on it. I pointed this bird out to the supervisor and informed him that this would be documented in a GCP MOI and was unacceptable to have live birds intermingle with dead birds. In depth discussions have been had with Supervision / Management at this establishment about this issue in the past.</p> <p>The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than Good Commercial Practices.</p> <p>Respectfully submitted on January 24, 2018 (b) (6)</p> <p>Cc: (b) (6)</p> <p>Dr. David Thompson, DDM Dr. Lorraine Dozier, acting DDM (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P20245	Equity Group Kentucky Division, LLC	ISL120201 4424G	2018-01-24	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0135 hours on January 23, 2018 while performing the Good Commercial Practices verification task, the following was observed at the entrance to the scald tank. A young chicken was seen entering the scald tank with an uplifted head, pupillary reflexes, rhythmic breathing, controlled movements and a superficial cut that only penetrated the skin (no vasculature was cut). This bird by-passed both of the establishments head pullers thus entering the scald tank alive. Just after the start of this evenings shift (approximately 2020 hour) I informed (b) (6) [redacted] that I had seen numerous superficial cuts on the birds necks and many birds were by-passing the first head puller and it only would take one bird entering the scald tank live to result in documentation. An additional verification was started at approximately 0100 hour and the same conditions were present and again this information was relayed to plant supervision. When the bird went in alive at approximately 0135 an establishment maintenance worker with a radio was in the area. I had asked him to please radio (b) (6) [redacted] for me and let him know a live bird just entered the scald vat. A brief meeting was held in the USDA office and (b) (6) [redacted] was notified that a GCP MOI would be issued as well as live birds entering the scald vat was discussed. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P20245	Equity Group Kentucky Division, LLC	ISL420303 3902G	2018-03-02	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0130 hours on March 2, 2018 while performing the Good Commercial Practices and Ante Mortem task, the following was observed in live hang. At the end of the belt under the shackles that feeds evisceration line #1 there was a pile of 4 large/heavy birds. Two of the birds were dead, one of the birds on top of the pile was alive and more alert, and the bird on the bottom of the pile was barely breathing and could not be observed well due to the other birds on top of it. There were no supervisors in the immediate area or any "floor employees" to alert to the pile of birds. As part of the establishment's previous corrective actions to GCP MOI's written for live birds intermingled with DOAs they were to have a floor person present at all times. This has been the fourth incident this week where a floor person was not present and has been discussed with management. The bird on the bottom of the pile was pulled partially out for closer observation. This bird was breathing agonal, was weak and could not support its own neck in an upright position. An establishment employee was seen and I flashed my flashlight at him. Once he approached I asked for him to please get a supervisor for me. By the time (b) (6) arrived the weak bird now was breathing normally, sitting up and blinking now that it was no longer being crushed/suffocated. I informed Supervision of my observations and that a GCP MOI would be issued. At approximately 0136 (b) (6) and (b) (6) arrived at the USDA PHV office. The above information was relayed to them and it was also discussed again that live birds should not be comingled with DOAs due to imminent danger of birds becoming crushing and dying by means other than slaughter. The establishment is responsible for ensuring that birds under their control on the official premises</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than Good Commercial Practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on March 2, 2018 (b) (6)</p> <p>██████████ Cc: Dr. David Thompson, DDM (b) (6) ██████████</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P20245	Equity Group Kentucky Division, LLC	ISL022104 5011G	2018-04-11	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0126 hours on April 11, 2018 while performing the Good Commercial Practices verification task, the following was observed at the entrance to the scald tank that feeds evisceration line two. A young chicken that was much smaller than the remainder of the lot was seen entering the scald tank with an uplifted head that was moving from side to side, rhythmic breathing, controlled movements with wing flapping, blinking and a superficial nick that only penetrated the skin (no vasculature was cut) to the very front of the neck. This bird by-passed both of the establishments head pullers thus entering the scald tank alive. Verification of a 500 bird sample set was done shortly after the incident was observed and no other live birds were observed entering the scald vat alive. A brief meeting was held with (b) (6) to discuss the above and he was notified that a GCP MOI would be issued. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on April 11, 2018 (b) (6) Cc: Dr. David Thompson,</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								DDM (b) (6)
15	P20251	Tecumseh Poultry, LLC	PBM18100 22609G	2018-02-09	04C05	Poultry Good Commercial Practices	Finalized	<p>On 02/09/2018, at approximately 0940 hours, (b) (6) and (b) (6) observed the following Good Commercial Practice (GCP) issue. In the dead-on-arrival (DOA) barrel in the CAS room, IPP observed a live bird (breathing, bright, alert, responsive, and blinking) in the barrel, sitting on top of dead birds. Live birds coming into contact with dead birds in the DOA barrel is not consistent with Good Commercial Practices. IPP immediately showed (b) (6) the GCP issue. She removed the live bird from the DOA barrel and placed the bird back on the belt prior to the CAS system. The Poultry Products Inspection Act and Agency regulations (9 CFR 381.65(b)) require that live poultry be handled in a manner that is consistent with Good Commercial Practices (GCPs). Compliance with GCPs increases the likelihood of producing unadulterated product. Poultry are to be handled in a manner that prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6) MPH, CPH</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	P20251	Tecumseh Poultry, LLC	PBM58100 23809G	2018-02-09	04C05	Poultry Good Commercial Practices	Finalized	<p>On 02/06/2018, at 610 hours, while performing ante-mortem inspection and Good Commercial Practice task in the loafing shed for the “veggie” trailers, I, (b) (6), observed a Good Commercial Practice mistreatment of young chickens on trailer T325. The trailer had a module on the bottom row with a compartment that had damaged floor board. The floor board was bent downward on one end of the compartment creating a dip. This dip collected several birds that were piling on each other. When viewed on the side of the trailer, 3 birds can be seen in plain view layered on each other to create 3 layers of birds. The bird on the bottom, under 2 other birds, was stretching its neck and was open-mouth breathing. It was unable to move. Further back toward the middle of the compartment, there were also an unknown number of birds on top of each other. One of these birds attempted to unsuccessfully climb (flapped its wings and moved its legs) out of the dip onto the even surface of the floor board. At 639 hours, when I showed (b) (6) of the mistreatment, the bird on the bottom that was open-mouth breathing has died (stopped breathing and did not move its head when I manipulated its head and neck). (b) (6) stated that when the “veggie” lot is slaughtered, she would have Trailer T325 be one of the first trailers to be slaughtered. She also took a picture of the mistreated birds. At 930 hours, I met with (b) (6) and (b) (6) to discuss this mistreatment. 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</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>prevents needless injury and suffering in order to produce a commercially marketable product. Establishment management may review Federal Register notice "Treatment of Live Poultry before Slaughter", 70 Fed. Reg. 56624 (September 28, 2005) for FSIS recommendations concerning the treatment of live poultry before slaughter. This MOI will be forwarded to the District Office and the District Veterinary medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	P20251	Tecumseh Poultry, LLC	PBM05140 45509G	2018-04-09	04C05	Poultry Good Commercial Practices	Finalized	<p>On 04/09/2018, at approximately 1003 hours, while performing a routine Poultry Good Commercial Practice Verification task, I, (b) (6) observed a live bird (bright, alert and flapping its wings) in an inedible barrel in the carousel room (where the hangers hang stunned birds). The bird had its neck bent toward the bottom of the barrel and laid in an almost vertical angle. This barrel in the carousel room is often used to hold birds that are dead-on-arrival (DOA) and disposed of by the establishment hangers. (b) (6) and (b) (6) were in the area and were notified of this live bird. (b) (6) agreed that this bird was alive, removed it from the barrel, and placed it onto the conveyor belt to be stunned again in the CAS 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). 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>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	P20251	Tecumseh Poultry, LLC	PBM22090 40417G	2018-04-17	04C05	Poultry Good Commercial Practices	Finalized	<p>On 04/12/2018, at approximately 0600 hours, while performing a routine Poultry Good Commercial Practice Verification task, I, (b) (6) [REDACTED], observed three instances of bird mistreatment on two “veggie” trailers in the loafing shed. On trailer number 529, I observed a bird with its left antebrachium being trapped between a metal bar and the floor board of the compartment above. Due to the anatomical part being trapped, the bird was unable to lie down and its breast was slightly held above the floor board so that it appeared to be partially “hung” by its trapped wing. On trailer T-797, I observed two trapped birds. One of these birds had its left distal antebrachium trapped between the hinged door mechanism. The bird had attempted to unsuccessfully free itself and was resting in an abnormal position; the medial side (inner wing) of the stretched out left wing and the left side of its body were resting adjacent to the side of the compartment. The other bird had its left foot also trapped by the hinged door mechanism. I observed the bird struggle to free its leg and flap its left wing multiple times against the compartment’s side bars, leading to an abrasive injury on this wing. At 0630 hours, I met with (b) (6) [REDACTED] and (b) (6) [REDACTED] to show them the mistreatments. The birds were subsequently freed with only one showing signs of visible external injury. 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</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>“Treatment of Live Poultry before Slaughter” 70 Fed. Reg. 56624 dated September 28, 2005, for FSIS recommendations concerning the treatment of live poultry before slaughter.</p> <p>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>
40	P206	Pilgrim's Pride Corporation	KCC131201 2102G	2018-01-02	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1000 hours after identifying three birds that appeared to be misbleeds, I observed a large number of DOAs piled on the floor in the Live Hang area. There were birds piled behind both hang lines (approximately 100 birds total) as well as birds piled approximately 2 feet high against the east wall. Upon closer observation, live birds (approximately 4-5) were observed interspersed in with the DOAs. Due to the loss of process control, regulatory control action was taken immediately by stopping both lines. (b) (6) and (b) (6) were notified. (b) (6) stated that he did not know if the birds had been transported for a long distance or had been at the complex for a long period of time. The area was experiencing cold temperatures. Regulatory control action was relinquished at approximately 1025 hours after all of the birds had been sorted and the area was cleaned.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P206	Pilgrim's Pride Corporation	KCC480805 4202G	2018-05-02	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1200 hours, on my way to re-inspect the offal trailer area, I immediately noticed a cage with major damage on a trailer that was waiting to be picked up and reloaded. I went back to the USDA office and requested Plant Manager Tonya Byers to walk with me so that I could show her the cage. As we approached the trailer, I showed Ms. Byers the damaged cage. One of the metal sides of the cage was bent outward leaving an approximate 4-5" gap between the metal and the cage floor. The metal was bent in an arc shape which would allow for a chicken to get caught in this gap and injure itself. Depending on the size of the chicken, a medium size chicken could fall out of the cage through this gap. I continued then to show her other cages with minor damage to them. I asked her if anyone was supposed to be identifying these cages so that they could be repaired. She told me that they did have someone that was supposed to be identifying these cages. As we were standing there discussing the issue, a semi backed up to the trailer and hooked up to it to take it to a farm and reload. Ms. Byers immediately spoke to the driver and told him that he could not take this trailer. I then showed her another trailer that had several of the wires broken on the metal frame. The broken ends of the wires were sharp and pointed. They were also angled inward which could cause injury to a bird. Approximately 4 weeks ago, I was covering for (b) (6) and noticed several damaged cages on trailers that were going to be reloaded with chickens. At that time, I informed and showed (b) (6) the damaged cages. Yesterday, 4/30/18, I also noticed numerous damaged cages on trailers that were waiting to be reloaded. I informed (b) (6) of my findings at that time. On both occasions, (b) (6) informed me that he had spoken to the necessary</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>employees to ensure that these cages were being identified and removed for repair. The observations that were made today indicated that the employees are continuing to fail in identifying cages with major damage. USDA's concerns are that cages with major damage in which a bird could be injured are not being removed from circulation for repair but instead are being refilled and putting more birds at risk of injury. The establishment has not been proactive in addressing this issue since it was discussed with them approximately 4 weeks ago and yesterday. USDA encourages the establishment to respond to this MOI.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P206	Pilgrim's Pride Corporation	KCC241405 0404G	2018-05-04	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1350 hours, while performing ante mortem on Lot 3 at the back dock area, I observed a chicken with its head caught in an approximate 2" gap. The chicken had its eyes closed and the mouth was opening in a gasping motion. I immediately had the driver radio for a management team member (b) (6) [REDACTED] arrived and I showed him the chicken that was caught in the gap. The wires on the cage were bent at an angle which allowed for this gap to be created. I requested that the cage be gently removed from the trailer and placed on the ground so that the birds head could be freed. (b) (6) [REDACTED] had the employee gently place the cage on the ground and then gently freed the bird's head. I expressed my concern to (b) (6) [REDACTED] about the cages having both major and minor damage that could injure birds on several occasions (week of 3-11-2018, Monday 4-30-18, and 5-1-2018). On Tuesday, 5-1-2018, a MOI was issued to the establishment for the failure to identify and repair cages with sufficient damage that would cause injury to a bird. At that time, I encouraged the establishment to respond to the MOI and implement a program that would identify these cages to prevent unnecessary injury to a bird. USDAs concerns are that the establishment is not being proactive in addressing these cages in which birds can become injured, which has resulted in this incident today. I strongly encourage the establishment to respond to this MOI and prevent any further incidents where birds could become injured or trapped.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P208	George's Processing, Inc.	XIC592001 0804G	2018-01-04	04C05	Poultry Good Commercial Practices	Finalized	<p>January 04, 2018 at approximately 1940 hours, while observing the scalding and picking process on Kill Line #1 I observed a live, conscious bird enter the scalding. 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 bird from the kill line before it entered the scalding. I immediately observed the stun and kill operations for both lines and determined that the slaughter process was not out of control. I notified (b) (6) and (b) (6) of my findings. (b) (6) immediately investigated the incident. I monitored scalding and picking operations on both kill lines for an additional 10 minutes and did not observe any more live birds enter the scalding. Live poultry entering the scalding reflects poor commercial practices and is noncompliant 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>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P208	George's Processing, Inc.	XIC461901 1615G	2018-01-15	04C05	Poultry Good Commercial Practices	Finalized	<p>On 01/15/2018 at approximately 1935 hours while observing operations in the live hang area I noticed a condemn barrel staged next to the condemn auger and filled to near capacity with carcasses. Upon closer observation I identified a live chicken in the condemn barrel partially covered by two of the carcasses. The live chicken was depressed and cool to the touch but was breathing and slightly responsive to being handled. I immediately removed the live chicken from the condemn barrel and notified (b) (6) of my findings. (b) (6) quickly directed a live hang employee to sort through the remaining carcasses in the condemn barrel for signs of other live chickens. No other live chickens were found in the condemn barrel. The stainless steel condemn auger located in the live hang area macerates chicken carcasses allowing them to be delivered to offal through a pipe system. A live chicken in a condemn barrel which is staged next to the condemn auger could potentially be placed in this auger. I discussed my findings with (b) (6) who told me that a meeting would be held with live hang personnel at the end of the shift to discuss proper bird handling in the live hang area.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P208	George's Processing, Inc.	XIC181204 5423G	2018-04-23	04C05	Poultry Good Commercial Practices	Finalized	<p>On 4/23/18 at approximately 0736 hours, I observed the line two pile of carcasses at the end of the live hang belt and observed there was a live carcass on the left side of the pile that had about 1/4 to 1/3 of the tail end of its body sticking out from the dead-on-arrival (DOA) carcasses on top of it. (b) (6), removed the bird and placed it back on the line. I started looking through the pile and identified another live bird that was completely covered and surrounded by DOA carcasses. (b) (6) removed this bird and placed it back on the line. I notified (b) (6) that this was not in accordance with good commercial practices and I would be issuing an MOI relating to this incident. I stated I would need to know the actions he was going to take to prevent this in the future. At about 1155 hours that same day, I met with (b) (6) and (b) (6) and (b) (6) stated that the event happened during their water breaks and they are going to pull the lead from the paw room to the area during the water breaks to ensure that there is someone offline at all times.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P2178	PERDUE FOODS LLC	MXM2910 023307G	2018-02-07	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0950 hours, one of the Food inspectors on Evisceration Line#2 identified a cadaver. She held that carcass for Veterinary disposition and immediately notified me. Upon arriving at her station I observed that head of the carcass was intact with no bleeding cut on neck. The facial area was swollen; skin around the neck area was purple in color while rest of the carcass was bright red in color. (b) (6) and (b) (6) were notified of USDA findings. I reminded (b) (6) that the PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs), and that they not die from causes other than slaughter. I recommended that (b) (6) review the Federal Register on Treatment of Live Poultry before Slaughter, published September 2005 for FSIS recommendations concerning treatment of live poultry before slaughter, and provided her 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>Respectfully, (b) (6) P-2178 Perdue Foods</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P2178	PERDUE FOODS LLC	MXM0208 033921G	2018-03-21	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 12:55 hours on Tuesday, March 20, 2018, while performing a routine Good Commercial Practice/ Ante Mortem task in the receiving area of P-2178, a live bird was found in the DOA bin. The bird was on top, head down, tail up and appeared to be struggling to breathe. I immediately notified (b) (6) (b) (6) of the finding. The bird was removed from the DOA tank; its head was bloody, was breathing and was not dead at the time of my finding. The bird was hung on the line for appropriate slaughter. I discussed the finding with (b) (6) at approximately 13:45 hours and stated that a MOI will be issued for this animal welfare concern. On Wednesday, March 21, 2018 at approximately 08:00 hours I discussed the finding and that an MOI will be issued with (b) (6) told me that corrective actions including immediate trainings, re-certification and evaluations of associates assigned to floor duty in receiving were already being implemented by Establishment Management. Thank you for this consideration in this important matter. (b) (6) at P-2178 CC: (b) (6) and (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P218	Pilgrim's Pride Corporation	WOD4216 013204G	2018-01-04	04C05	Poultry Good Commercial Practices	Finalized	<p>At about 1440 on 01/04/2018 while performing a Poultry Good Commercial Practices task USDA (b) (6) observed a yellow condemned barrel at the end of live hang belt number two that contained one DOA and one live bird. Upon further inspection, the live bird could be seen breathing buried underneath a pile of feathers and dirt. (b) (6) was notified and he removed the live bird from the barrel. He stated that the employee working with DOAs and the condemned barrels would be disciplined. The establishment is reminded it is important to treat poultry in a way that minimizes accidental injury to include proper sorting of live and dead birds at rehang as well handling prior to euthanasia. In addition, employing humane methods of handling consistent with Good Commercial Practices can help produce an unadulterated product. (b) (6) was notified that although, non-regulatory, 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 Memorandum of Interview (MOI) will be distributed to the establishment, inspection file and District Veterinary Medical Specialist per FSIS Directive 6100.3. Documented by (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P218	Pilgrim's Pride Corporation	WOD5219 013910G	2018-01-10	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 1640 while performing a Poultry Good Commercial Practice task USDA (b) (6) observed birds on line #1 not being properly bled out prior to entering the scalding. While observing birds entering the head remover just prior to the scalding for about one minute 15 birds could be seen flapping their wings, moving their heads up and down, and swallowing before their head was pulled off. (b) (6) was notified immediately. He stated that the cutting machine was making improper cuts and needed to be adjusted. (b) (6) was instructed to stop hanging birds. Maintenance was notified to replace the blade on the cutting machine and make the proper adjustments. Following the plant break around ~1720 (b) (6) observed the birds being properly bled out prior to going into the scalding. 9 CFR 381.65(b) states " Poultry must be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcass" and thus the establishment was not operating in accordance with Good Commercial Practices for Poultry. Plant Management is asked to consider properly investigating the root causes contributing to the observations at P-218 regarding GCPs, particularly to the design/setup of the stunning/kill equipment. The establishment is asked to establish and implement effective preventive measures to avoid future occurrences. Copies of this Memorandum of Interview (MOI) will be distributed to the establishment, inspection file and District Veterinary Medical Specialist per FSIS Directive 6100.3. The establishment is reminded that NRs for noncompliance with 381.65(b) and MOI for GCPs when finalized are posted for public review on the FSIS website and that the information associated with NRS and GCPs can be FOIA requested by individuals from the general</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>public. Documented by (b) (6)</p>
40	P218	Pilgrim's Pride Corporation	WOD5016 051803G	2018-05-03	04C05	Poultry Good Commercial Practices	Finalized	<p>On May 3, 2018 at approximately 1430 (b) (6) observed a chicken in the middle of the road in route to the Pilgrim's Pride facility. (b) (6) informed (b) (6) as well as (b) (6) of the observation. (b) (6) performed a Poultry Good Commercial Practice task to observe the truck trailers and cages that the birds are transported in. On inspection of the trucks there were numerous damaged cages with holes variable in size with some big enough for chickens to fit through. There were also cages with wire bars bent inward with the ends of the rods pointed toward the chickens. The damaged cages were marked by establishment personnel with blue tape to be identified for repair. (b) (6) (b) (6) was notified of the findings. The establishment is reminded that it is important to treat poultry in a way that minimizes accidental injury and death prior to humane euthanasia. This includes the transportation, loading and unloading of chickens onto the truck trailers. The cages should be maintained in good repair so that the chickens remain safe during transportation, loading and unloading. It is the expectation that the establishment employ handling methods consistent with Good Commercial Practices. Plant Management is asked to consider these USDA concerns and prevent future occurrences. Copies of this Memorandum of Interview (MOI) will be distributed to the establishment, inspection file and District Veterinary Medical Specialist per FSIS Directive 6100.3.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	P244	Hain Pure Protein Corporation - Plainville Farms LLC	GCN43150 13609G	2018-01-09	04C05	Poultry Good Commercial Practices	Finalized	<p>Attendees: (b) (6), (b) (6), FSIS USDA On 1/9/18 at approximately 12:30 pm, while walking in the yard, I observed 2 trucks with multiple pointy wire grates that were bent inward into the cages creating a hazard. The cages that were in disrepair utilized a thinner more tightly spaced grate that appeared to be more malleable, and thus easier to bend. The trucks were # 832303 and # 220227. This is not consistent with Good Commercial Practices. Following Good Commercial Practices prevents mistreatment of poultry and decreases the production of adulterated carcasses. (b) (6) met with (b) (6) at approximately 3:30 pm to discuss the findings. And she will pass along the information to (b) (6) (b) (6) It was discussed that the pointy wires can injure the birds and result in mistreatment, adulterated product and production losses. (b) (6) understands and was in agreement. (b) (6) said the cages with the smaller metal mesh are probably the older cages, and they plant is probably trying to phase those out.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P308	Koch Foods of Mississippi LLC	SPL421602 2706G	2018-02-06	04C05	Poultry Good Commercial Practices	Finalized	<p>P-308 Koch Foods of Mississippi LLC Dear (b) (6)</p> <p>Today at approximately 0642 hr, I observed a less than Good Commercial Practice. While performing portions of a routine Good Commercial Practice check in the live hang area, (b) (6) observed a pile of DOAs inside the DOA catch bin just past the DOA conveyor. Upon further observations, I observed a live bird commingled in with the DOAs. The bird was in eminent danger of smothering under the pile of others birds. The bird was breathing and the pile of birds was moving as the live bird was breathing. This occurred on the big bird side along the north side of the holding shed. I asked the (b) (6) to notify the supervisor for the area to come to the bin. However, the (b) (6) arrived, observed the live bird and removed the bird from the bin. (b) (6) was informed of the finding of the bird, but did not arrive in time to see the bird. My observation leads me to conclude that had I not observed, discovered, or otherwise intervened, it is reasonable to conclude that the bird would have been crushed or suffocated and as such died by means other than slaughter. (b) (6) as well as (b) (6) was notified of the good commercial practice issue. I was informed by (b) (6) that the lead person turned the DOA conveyor on but did not see the live bird. I informed Management for the establishment that preventing mistreatment of poultry decreases the production of adulterated carcasses. This MOI documents the discussion between myself, (b) (6) and the establishment management about this poultry mistreatment event. It has been discussed with Management previously about the concerns of the treatment and conditions relative to the establishment handling of birds.</p>

Table: MOIs in Response to FOIA2018-328

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

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P320	Sanderson Farms, Inc.	MRA39160 10517G	2018-01-17	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0942 hours on January 16, 2018 while performing the Good Commercial Practices verification task, the following was observed at the entrance to the scald tank. One young chicken was seen entering the scald tank with an uplifted head, pupillary reflexes, rhythmic breathing, controlled movements and a superficial cut to the side of the neck that only removed the skin (did not penetrate any vasculature). At 0945, 0946 and 0948 additional live birds entered the scald tank that appeared physically the same as the one described above. The (b) (6) was present and shown the last two birds that entered the scald vat live and informed that as of that moment it would be documented as a GCP MOI but was approaching the point where they would have to stop hanging to take corrective actions prior to resuming production and would lead to a noncompliance being issued. (b) (6) elected to stop hanging and start lunch a couple minutes early to be proactive with corrective actions and avoid any further live birds entering the scald vat. Several minutes later (b) (6) entered the USDA office of inform USDA that the blade had been adjusted to make deeper cuts and he asked to be present at my next verification check. I informed him that I would do a 500 bird verification as soon as production resumed after lunch. During that time no additional live birds were seen entering the scald system. Verification was done approximately 1 ½ hours later with (b) (6) present as well and again no other live birds were seen entering the scald system. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P320	Sanderson Farms, Inc.	MRA36140 23615G	2018-02-15	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2105 hours on February 14, 2018, while verifying the PHIS Good Commercial Practices in Poultry (GCPIP) verification task at P320, Sanderson Farms, Laurel, MS, the following less than GCPIP incident was observed. One live young chicken from an approximately 500 bird sample subgroup entered the first scald tank exhibiting rhythmic breathing, pupillary reflexes, uplifted head, controlled movement of the head, and an approximately ½ inch cut to the neck. Establishment took immediate action according to their written welfare policy and made adjustments to machinery. A second verification prior to the scalding of an approximate 500 bird sample subgroup had three live birds exhibiting the same signs entering the scalding at approximately 2125 hours. The establishment took further action, added a second backup killer and readjusted the machinery. Slaughter process ended approximately 2135, so a third verification was not performed. This was determined to be an isolated incident and not a loss of process control. Birds entering the scalding while still breathing is not consistent with GCPIP and results in adulterated product. Establishments are responsible for birds entering the official premises and must employ GCPIP to prevent unnecessary suffering, injury and death. This will be discussed at the weekly meeting with establishment personnel on 2/15/2017 As per Federal Register Notice Docket 04-037N, dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6)</p> <p>Public Health Veterinarian USDA FSIS OFO Jackson District, Est. P-320, 2nd Shift Phone: (b) (6) Email:</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								(b) (6) @fsis.usda.gov Cc: Dr. David Thompson, DDM (b) (6)

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P320	Sanderson Farms, Inc.	MRA02170 45124G	2018-04-24	04C05	Poultry Good Commercial Practices	Finalized	<p>To: (b) (6) (b) (6) Sanderson Farms, Inc., P320 At approximately 1426 hours on April 24, 2018, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at P320 Sanderson Farms, Inc., Laurel, MS. A live bird was observed by (b) (6) sitting on a pile of decapitated carcasses inside the dead on arrival (DOA) bin. The (b) (6) was present at the time of discovery and immediately removed the live bird from the DOA bin. The live bird was not covered by any carcasses, and appeared to be sitting up with no obvious sign of morbidity. As there was no sign of morbidity and the bird had no denaturant on it, the live bird was returned to production. (b) (6) and (b) (6) were notified of the incident at approximately 1430 hours. This incident was determined to be an isolated event and not a loss of process control or systemic event. Allowing live bird(s) to become entrapped under other live birds and DOAs is a less than GCPIP and can cause needless suffering and death from suffocation resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control on the official premises are treated in a humane manner, subjected to minimal excitement, discomfort, and injury, or death by means other than slaughter. (b) (6), and (b) (6) met at the time of notification to discuss the less than GCPIP. No response to the incident was given at this time, other than they will investigate the incident and the employee responsible for removing the DOAs and live birds from the hanging pen floor would be disciplined. (b) (6) was advised a GCPIP Memorandum of Interview would be issued to management</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, treatment of Live Poultry Prior to Slaughter the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6) USDA FSIS OFO Jackson District Sanderson Farms, Est. P-320, 2nd Shift cc: Dr. Larry Davis, DM Dr. Gregory Brookhauser, DDM (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P34308	Sanderson Farms, Inc.	PHY102103 3807G	2018-03-07	04C05	Poultry Good Commercial Practices	Finalized	<p>On March 7, 2018 at approximately 1600 while conducting a Poultry Good Commercial Practice task, I was reviewing at the Animal Welfare records and found the following concerns with the broken wing section of the animal welfare record. The paper work states: All of the checks below are to be conducted on 500 birds per line. If the limits are exceeded on any item immediately notify Production and QC Supervisor A retest must be done following corrective action. The Limit for broken wings is 15 per line. On 2/21/2018 First shift at 0523 on line 1 had 22 broken wings. There was no corrective action recorded. A retest at 11:36 on line 2 resulted in 15. On 2/22/2018 Second shift at 1507 on line 1 had 24. There was no corrective action recorded. A retest on line 2 resulted in 14 2/26/2018 First shift at 0826 had 20 on line 1. There was no corrective action recorded. A retest on line 1 resulted in 15 Second shift at 1505 had 24 on line 1 There was no corrective action recorded. A retest on line 1 resulted in 15 2/27/2018 Second shift at 1510 had 18 on line 2. There was no corrective action recorded. A retest on line 2 resulted in 11 3/01/2018 First shift at 0523 had 17 on line 1 and 22 on line 2 Retest line 1 14 Line 2 15 There was no corrective action recorded. A retest on line 1 resulted in 14 A retest on line 2 resulted in 15 Second Shift at 1502 had 17 on line 1 and 19 on line 2 There was no corrective action recorded. A retest on line 1 resulted in 14 A retest on line 2 resulted in 15 03/02/2018 Second shift at 1501 had 20 on line 1 and 23 on line 2 There was no corrective action recorded. A retest on line 1 resulted in 14 A retest on line 2 resulted in 15 03/05/2018 Second</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>shift at 1459 had Line 1 20 and line 2 20 There was no corrective action recorded. A retest on line 1 resulted in 14 A retest on line 2 resulted in 15 The monitoring form states a retest must be done following corrective action. There is no corrective action on the monitoring form. Documented by (b) (6)</p>
40	P34308	Sanderson Farms, Inc.	PHY071703 2721G	2018-03-21	04C05	Poultry Good Commercial Practices	Finalized	<p>Sanderson’s Farm (est. #P34308) has developed a procedure which allows only 10 miscuts in a 500 bird inspection to prevent birds still breathing from entering the scalders. These machines are used to properly cut the necks of the birds prior to stunning. When the kill machine is properly working, the time that is allowed for proper bleeding of the birds will make inspection stations easier. On March 21, 2018 at approximately 1400 hours, various size birds were being slaughter on the evisceration floor. Upon further investigation in the picking room, TNTC (too numerous to count) miscuts were observed from both kill machines. At approximately 1530 hours, the kill machine on line #2 missed 30 cuts and the kill machine on line #1, 15 cuts was missed in a 3 minutes 10 seconds time. (b) (6) was verbally notified. A retest was conducted at 1645 hours, and kill line #2 and passed with 7 miss cuts and kill line #1 had 5 miss cuts. Due to the smaller bird size, the establishment adjusted the height of the kill machine and reduces the possibilities of a bird still breathing from entering the scalders. Documented By: (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P34668	Simply Essentials Poultry, LLC	SFJ461501 2605G	2018-01-05	04C05	Poultry Good Commercial Practices	Finalized	<p>While performing ante-mortem inspection in the Live Receiving area at approximately 0530 hours on 01/04/18, I observed the following Good Commercial Practice concern on Trailer #40. I observed a live chicken with both wings trapped between the corner of the floor above it and the metal frame of the cage. The chicken was exhibiting signs of extreme lethargy: shallow breathing, did not open its eyes to stimuli of flashlight and touch, and felt cold when I touched it. There was no available management personnel to show the affected chicken to at that time. I also observed in the Live Receiving area during this same time a cage move down the track after being dumped and going past the door closing machine with several drawers still full with chickens and all the doors to the cage open. One chicken fell out through an open door as the cage was lifted by the forklift from the track. I continued my observations with walking over to the dumping apparatus. There, I observed 4 live chickens under it and 2 dead chickens. One of the dead chickens appeared to have been smashed by a cage because its belly and chest were ripped open, exposing torn and strung-out viscera, and a leg and awing were separated from the body and laying strung-out on the floor between the dumping apparatus and the door closing machine. The other dead chicken's breast skin was partially removed, exposing muscle beneath. One of the live chickens appeared to have broken wings because they were not tucked in close to its body and it was reluctant to move. At approximately 0630 hours while in the Live Receiving area, I observed employees remove approximately 20 DOAs from a cage that had already been dumped and removed from the track. I observed 4 DOA hoppers full of chickens at this time, as well. I checked the number of DOAs recorded by that time and saw that out of</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>2.5 trucks, approximately 800 DOAs had been recorded. Usually there is approximately (b) (4) chickens per truck, indicating the establishment was at a (b) (4) DOA rate already for the day. This was addressed in the Weekly Meeting MOI from today (MOI #SFJ3911015504G) and at that time Management still did not know the cause of the large number of DOAs. At approximately 1530 hours I observed a cage removed from the trailer but the roof was not intact above one of the top drawers. It had partly fallen inside of the drawer on top of chickens. I did not see an employee remove any DOAs from the drawer prior to placing the roof back on top of it. I noticed the roof did not appear to be secured back into place, but rather resting on top. I watched the cage get dumped and saw the roof fall into the drawer blocking the door and chickens from getting dumped out of the cage. I was walking away from the dumper when I heard the alarm go off at the dumper. I saw that the roof from the cage I watched dump was under the next cage at the dumper. It must have fallen off when the cage moved away from the dumper and then jammed up the track for the next cage. The chickens in the top drawer that was now missing the roof appeared to be unharmed. This MOI is associated with weekly meeting MOI #SFJ3911015504G dated 01/04/18 and GCP MOI #SFJ4108121230G dated 12/30/17. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with Good Commercial Practices increases the likelihood of producing unadulterated product.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P34668	Simply Essentials Poultry, LLC	SFJ051101 2806G	2018-01-06	04C05	Poultry Good Commercial Practices	Finalized	<p>While performing ante-mortem inspection in the Live Receiving area at approximately 0415 hours on 01/05/18, I observed 4 live chickens sitting directly on the bed of Trailer #42 in the space between the 4-tier cages and the 5 tier cages. One of the chickens was lying on its back and struggling to correct itself onto its feet by kicking and trying to push itself up with the back of its wings. The other 3 chickens appeared to be uninjured. In the top 5-tier cage on one side of the space, I noted a larger-than-normal gap between the roof and the backside of one of the top drawers. A chicken from this drawer climbed onto the edge of the drawer in the mentioned gap and jumped down to the bed of the trailer with the other loose chickens. The chicken showed some difficulty walking at first, but was able to stand and appeared to be uninjured. There was no supervisor in the area at this time and at approximately 0430 I asked an employee to turn the chicken that was lying on its back over to its feet, and he did so. I also noted that the second drawer of the mentioned 5-tier cage was missing a door and half of its floor and the back corner of the other half of the floor was collapsing into the 3rd drawer. Neither the 2nd or 3rd drawer were holding any chickens. At approximately 0610 hours while in the Live Receiving area, I observed on Trailer #40 2 cages each with a chicken with its wing trapped between the floor above it and the frame of the cage. I also observed a cage with its plastic side and metal bar bent inward toward chickens. I showed (b) (6) my observations and he released the trapped wings. As I continued to make my observations, I observed 5 live birds under the dumping apparatus and one dead chicken with skin torn away from its body and muscle exposed. I observed a cage dump and from where I was standing I observed a smashed chicken on</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>the arm that lifts the cage to dump it. After the cage dumped, I observed 5 more chickens fall to the floor under the dumping apparatus. One chicken had a broken wing where the humerus bone was protruding through the skin at the elbow joint, and another chicken appeared half-dead (purplish in color, hanging head, gasping for air) when it fell and died shortly after landing on its back on the floor. The other chickens that fell appeared unharmed. I watched the second cage dump without incident. As I was walking away from the dumping apparatus I observed a cage that had already been emptied and the doors closed, sitting up on the track second in line to be removed by the forklift. One drawer door was closed on a live chicken's neck with its head out the door. The chicken was struggling to breath/ gasping for air and its head was starting to turn purple in color. I asked an employee if there was any way he could open the door for that bird. He first shook his head, but then he ran and got a hook (used to snare a loose chicken by the leg) and pulled the door open with it. The chicken was still alive. The cage behind this one also had a chicken caught in a door in the same way, but it appeared to be dead. The employee opened this door too, and we were able to confirm the chicken was dead. At this time I observed one full DOA hopper and another that was a quarter of the way full. I saw that 900 DOAs had been recorded with the first trailer only half way through. At approximately 0800 hours I met with (b) (6) and told him of my observations. He informed me that the birds falling from the dumper was likely due to all the DOAs, and that he did not know at that time what could be the cause for the large number of DOAs. At approximately 1000 hours I met with (b) (6) to find out what he found out about the previous two</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>days (Wednesday 1/3/18 and Thursday 1/4/18) high numbers of DOAs, and to discuss the possible cause of this morning's high number of DOAs. I explained that I had not noticed anything on ante-mortem nor post-mortem inspection indicating that a disease process could have caused the high numbers of DOAs. He said that the previous two days is still unexplained because the holding shed checks were all okay. He explained that today's DOAs are very surprising because the chickens had a short travel time of about an hour. He said that the trailer were parked in the holding shed for approximately 3 hours prior to slaughter, which is about an hour longer than they usually like to hold them, but that it should not have caused an issue like this. This MOI is associated with GCP MOI #SFJ4615012605G for the discussion on the DOAs from productions day 1/3/18 and 1/4/18 and previously mention observations of injured and/or loose chickens due to poor cage conditions. The establishment must employ human methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with Good Commercial Practices increases the likelihood of producing unadulterated product.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P34668	Simply Essentials Poultry, LLC	SFJ131001 0410G	2018-01-10	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0900 hours, while I was performing a Good Commercial Practices Task in the Live Receiving area, I observed a cage on Trailer #44 (second trailer of lot 2) that the floor panel on the door-side of the cage was collapsed from the middle (where it meets with the other floor panel) in to the drawer below. It appeared that both drawers likely had been holding chickens prior to the collapse, based on the number of chickens affected. When the cage was removed from the trailer by the forklift, I could only observe two chickens that appeared to be dead. They were located on the bottom floor. The driver placed the cage on the track in the same condition as found on the trailer. I observed the cage as it approached the dumping apparatus. From where I was standing I could not see the affected drawers during dumping. When the cage was lowered back onto the track after dumping, it appeared to get "hung-up" on the dumping apparatus and did not move. Two employees came over to the dumper and tried to push it down the track and at first were unsuccessful. I could see there were still chickens in the bottom drawer affected by the collapsed floor. I walked over to the other side of the track to get a better view of the situation causing the hang-up of the cage. I could see several chicken still inside the bottom drawer/ behind the collapsed floor. I could also see the floor had slid forward through the second drawer door. The part of the floor sticking out the door got caught on one of the arms on the dumping apparatus that open the drawer doors. After approximately five to ten minutes the cage was freed. I observed approximately eight dead chickens removed from the affected drawer and approximately thirty live chickens. One of the live chickens had a broken wing where the humerus bone was protruding through the skin at the location of the elbow</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>joint. Almost immediately after my observations, I met with (b) (6) to share them with him and notify him of my intent to document an MOI. This MOI is associated with MOI #SFJ0511012806G for previously mentioned observations of loose and/or injured/dead chickens due to poor cage conditions. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with Good Commercial Practices increases the likelihood of producing unadulterated product.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P34668	Simply Essentials Poultry, LLC	SFJ241001 4523G	2018-01-23	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1000 hours on 1/22/18, I was performing a Good Commercial Practices Task on the trailer that was parked inside the Live Receiving area. It was during the company break time and only one cage had been unloaded from the trailer. The cages are stacked two-high on the trailer, and therefore I cannot see inside every cage and every drawer of every cage. I first examined the cages from the driver's side of the trailer. The chickens on this side appeared to be of normal health. I continued my inspection to the passenger side of the trailer, starting from the back of the trailer. I first noted that the chickens on this side were wet and lethargic compared to the other side. As I continued to walk toward the front of the trailer I noticed all the chickens on this side of the trailer were wet and the DOAs per cage seemed to be increasing. I counted 141 dead chickens, which includes the DOAs that I observed in the cage that was unloaded from the trailer and waiting to be dumped. In this cage I also observed dry normal healthy appearing chickens on one side and wet, lethargic, and dead chickens on the other side just like the rest of the cages on the trailer. I summoned (b) (6) to show him my findings. He contacted (b) (6) by phone, who contacted the catch crew supervisor to investigate the findings. At approximately 0830 hours on 1/23/18, I met with (b) (6) to discuss their findings on the incident. He informed me that the trailer was already untarped at the holding shed before it was brought over to 1st Processing, and that the truck driver did not notify anyone of any abnormalities with the tarp or trailer at the time of parking and untarping the trailer. Through their investigations, they suspect that the tarp became unlatched somewhere toward the front of the trailer during transit, which caused the DOAs</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>and wet birds. A total of 166 DOAs were recorded from Trailer #36. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with Good Commercial Practices increases the likelihood of producing unadulterated product.</p>
25	P34668	Simply Essentials Poultry, LLC	SFJ161402 0112G	2018-02-12	04C05	Poultry Good Commercial Practices	Finalized	<p>There were a large number of DOAs on loads 1 and 2 for this lot. There were a total of 3,361 Dead on Arrival for the day, 2/9/18. The slaughter number was (b) (4). On 2/12/18 I spoke with (b) (6), and was told a cause and corrective action will be documented and provided to USDA.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P419	Case Farms Processing, Inc.	VDB48090 20408G	2018-02-08	04C05	Poultry Good Commercial Practices	Finalized	<p>Establishment: 00419P Case Farms 121 Rand St. Morganton, NC 28655 At approximately 0612 hours on 2/8/2018, while observing maintenance working on line 2. I (b) (6) observed a cadaver with its head attached and no cut mark on the neck. It had obviously died by means other than slaughter. The cadaver was identified on line 1 rehang table in the evisceration department. (b) (6), was notified. Also notified was (b) (6) and Mr. Matthew Martin, plant manager. The carcass was condemned. PPIA and Agency regulations require that live poultry be handled in a manner that is consistent with good commercial practices, and that they not die from causes other than slaughter. I recommended that management review Federal Register Notice Vol. 70, No. 187, published September 2005 [Docket No. 04-037N] for FSIS recommendations concerning treatment of live poultry before slaughter. A copy of this federal register notice can be provided on request. A copy of this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P425	Northern Pride, Inc.	MYG25120 44920G	2018-04-20	04C05	Poultry Good Commercial Practices	Finalized	<p>Attendees: (b) (6) (b) (6) Plant Manager Warren Leighton, (b) (6) (b) (6) (b) (6) On Friday April 20, 2018 at approximately 0700 hours a cadaver was hung back by IPP. The cadaver was a large tom. I observed a superficial laceration through the skin, however the jugular vein on the left side was intact and a large blood clot was present on the right side of the neck, over the right jugular vein. At 0723 hours and 0725 hours respectively two additional cadavers were hung back by IPP. Between 0735 hours and 0745 hours 6 additional cadavers were identified on the line and hung back by IPP. I confirmed that these additional 8 birds were cadavers, and all had ineffective neck cuts. At approximately 0745 hours I discussed the above observations with plant management. Plant management discussed that the auto killer is only able to cut an estimated 98% of the birds, and due to varying bird sizes this number can fluctuate. Establishment management determined the auto killer would be adjusted immediately to deliver a deeper cut this morning. Concerns about bird head loss due to a deep neck cut was discussed, and establishment management agreed the head loss needs to be kept at a level where presentation on the line is acceptable. It was discussed that the employee performing the back-up cutting is responsible for identifying those birds of abnormal size and those birds receiving ineffective cuts. Plant management discussed the visibility concerns of the back-up cutter caused by blood splashing that is exacerbated by the birds beating their wings. It was noted the employee has a face shield, but no way to maintain its cleanliness. Plant</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>management will provide material for the back-up cutter to maintain cleanliness of the face shield (wipes or towels), and a curtain will be hung to minimize the blood splashing onto the employee at his work station. The back-up cutter employee's station will be moved down the line to improve visibility. I advised plant management that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6) to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6)</p>
25	P425	Northern Pride, Inc.	MYG00150 42223G	2018-04-23	04C05	Poultry Good Commercial Practices	Finalized	<p>Attendees: (b) (6) On Monday April 23, 2018 at approximately 1410 two cadavers were identified on the line and hung back by IPP. Both birds did not have any cuts on the neck. At approximately 1425 hours I discussed the above observations with plant management. Plant management acknowledged the back-up cutter had missed these two birds. (b) (6) stated that she would discuss this incident with the back-up cutter. She stated the back-up cutters would be rotated (b) (4) to assist with maintaining attention to the job. I advised plant management that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6), to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P425	Northern Pride, Inc.	MYG39160 43224G	2018-04-24	04C05	Poultry Good Commercial Practices	Finalized	<p>Attendees: (b) (6), (b) (6). On Tuesday April 24, 2018 at approximately 0950 hours two cadavers were identified on the line and hung back by IPP. Both birds had a cut on the distal neck. The cut was ineffective and lacerated only the skin. At approximately 1040 hours, while observing at the back-up cutting station, I observed 3 conscious birds in approximately 2 minutes. Observing the stunner operation I noted approximately 5 birds in several minutes that were not stunned. These birds were able to elevate their heads above the stunner. I discussed the above observations with (b) (6). (b) (6) stated that it is the back-up cutter's first day on the job, as the back-up cutter employees are rotating. We discussed the ineffective stuns, and (b) (6) contacted maintenance to adjust the stunner. (b) (6) stated she would talk to the back-up cutter and provide coaching. At approximately 1200 hours two additional cadavers were identified by IPP and were confirmed to have only a superficial cut on the distal neck. I observed the stunner, and found the equipment was appropriately adjusted and was effectively stunning the birds. These findings were discussed with (b) (6), who said she would provide additional training to the back-up cutter. I advised plant management that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6), to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P425	Northern Pride, Inc.	MYG21170 45825G	2018-04-25	04C05	Poultry Good Commercial Practices	Finalized	<p>Attendees: (b) (6)</p> <p>On Wednesday April 25, 2018 at approximately 1330 hours I identified four cadavers in the condemn barrel located in the picking room. None of the birds had a cut on the neck. Observing the back-up cutter for several minutes I observed two birds that were not stunned. I noted the bird sizes were highly variable in this lot. I notified (b) (6) of the finding of the cadavers in the condemn barrel. (b) (6) stated that she wants cadavers hung on the line so that they are identified by IPP at inspection and the issue can be addressed immediately by plant management. (b) (6) also stated she would be meeting with the back-up cutters today to discuss the cadaver issue. She is evaluating the lighting to see if a second light would help the back-up killers identify uncut birds. (b) (6) stated the back-up killers will be rotating at lunch to improve variability in the day and thus attention span during the back-up cutting shift. (b) (6) contacted maintenance to check the stunner and auto killer. I proceeded to the stunner and auto killer where I observed for approximately 5 minutes. I noted two smaller birds that were not stunned, and I noted 2 stunned birds which missed the auto killer because their necks were not long enough to be caught in the guide to the auto killer. (b) (6) and I observed for approximately 5 additional minutes, and noted approximately 5 more birds that either were not stunned or not killed by the auto killer. (b) (6) adjusted the stunner upwards approximately 3"-4" and the auto killer upwards approximately 2". This adjustment was successful in stunning and killing more of the smaller birds in the lot, but it was discussed that this adjustment would not kill</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>100% of the birds. While observing at the auto killer, I noted that the birds which are stunned drag their head on the decline on the way to the blood tunnel, which is covered in blood. This makes the stunned birds harder to identify, as the head and proximal necks are covered in blood. This was brought to (b) (6) attention, and we discussed that just observation of a blood covered head is not synonymous with being cut, or an effective cut. We discussed that the visible appearance of good blood flow from the neck is a better indication of an effective cut. We discussed that it is a hindrance that the back-up killer cannot see the auto killer to visibly see what birds the auto killer misses. I advised plant management that an MOI would be written and forwarded to the District Office for the (b) (6) (b) (6) and (b) (6) to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P425	Northern Pride, Inc.	MYG28130 41827G	2018-04-27	04C05	Poultry Good Commercial Practices	Finalized	<p>Attendees: (b) (6), (b) (6) On Friday April 27, 2018 at approximately 0945 hours one cadaver was identified by online IPP and hung back for disposition. The bird was a large tom and had a superficial cut on the distal neck. The cut was ineffective and lacerated only the skin. At approximately 1230 hours a second cadaver with the same presentation (superficial but ineffective cut) was hung back for disposition. At approximately 1245 hours I discussed the above observations with (b) (6) stated that she knows which back-up cutter is occasionally missing birds. At the time of the meeting (b) (6) had already addressed the issue with the employee. Their discussion included the importance of checking all larger and smaller birds in a lot to ensure they are cut. (b) (6) stated that maintenance will be installing a second light in this area at a different angle to improve the visibility. I advised plant management that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6), to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P425	Northern Pride, Inc.	MYG08060 52001G	2018-05-01	04C05	Poultry Good Commercial Practices	Finalized	<p>Attendees: (b) (6), (b) (6) On Monday April 30, 2018 at approximately 1420 hours I identified one cadaver in the condemn barrel located in the picking room. The bird did not have a cut on the neck. I notified (b) (6) of the finding of the cadaver in the condemn barrel. (b) (6) had previously stated that she wants cadavers hung on the line so that they are identified by IPP at inspection, and the issue can be addressed immediately by plant management. We discussed the installation of a second light at the back-up cutter station, which was the corrective action provided by establishment management on 4/27/18 in response to a cadaver identified on the line. I observed that a second light had been installed. (b) (6) stated the light was not installed at the correct location, and she requested that maintenance move the light closer to the back-up cutter station (currently it is located slightly to the south). (b) (6) stated she will be discussing the issue of missing birds with the back-up cutter. I advised plant management that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6), to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P425	Northern Pride, Inc.	MYG14120 53002G	2018-05-02	04C05	Poultry Good Commercial Practices	Finalized	<p>Attendees: (b) (6) (b) (6) On Wednesday May 2, 2018 at approximately 0605 hours one cadaver was hung back by online IPP. The bird had a superficial cut on the mid neck, consistent with an insufficient cut by the auto killer. At 0700 hours a second cadaver was hung back. This cadaver had both a cut on mid-neck area consistent with a superficial auto killer cut, and a cut on the ventral proximal neck consistent with a back-up killer cut. Both cuts were ineffective in sufficiently lacerating the vessels in the neck. At 1130 hours a third cadaver was hung back, which had the same presentation as the second cadaver (ineffective auto killer cut, and ineffective back-up killer cut). I notified (b) (6) of the findings. We discussed the lighting at the back-up killer station. A third spotlight had been added last night and positioned correctly, just to the south of the back-up killer station. The purpose of the light was to effectively illuminate the area and help to eliminate shadows. I observed at the back-up cutting station at approximately 0730 hours for approximately 4 minutes and observed the back-up cutter palpating the neck of each bird to assist with determining efficacy of the auto killer cut. (b) (6) and I discussed this observation. We also discussed that a superficial cut on the ventral aspect of the neck may fail to lacerate the vessels in the neck, which sit more laterally. (b) (6) stated she will be discussing the issue immediately with both back-up cutters with a translator in Spanish, and she will meet with them for a longer meeting after the shift is complete. I advised plant management that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6), to review and they will</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P425	Northern Pride, Inc.	MYG09110 54511G	2018-05-11	04C05	Poultry Good Commercial Practices	Finalized	<p>Previous MOIs Documented for Cadavers: 4/20/18 MYG2512044920G MOI / Poultry Good Commercial Practices: Cadavers / MYG2512042220I 4/23/18 MYG0015042223G MOI / Poultry Good Commercial Practices- Cadavers / MYG5914044623I 4/24/18 MYG3916043224G MOI / Poultry Good Commercial Practices- Cadavers / MYG3916040624I 4/25/18 MYG2117045825G MOI / Poultry Good Commercial Practices / MYG2117043225I 4/27/18 MYG2813041827G MOI / Poultry Good Commercial Practices / MYG4309040927I 5/1/18 MYG0806052001G MOI / Poultry Good Commercial Practices- Cadaver / MYG5013043630I 5/2/18 MYG1412053002G MOI / Poultry Good Commercial Practices- Cadavers / MYG1312052102I 5/7/18 MYG3415051507G MOI / Poultry Good Commercial Practices- Cadaver / MYG3207053207I Attendees: Plant Manager Warren Leighton, (b) (6)</p> <p>[REDACTED]</p> <p>On Monday May 11, 2018 ten cadavers were identified at P425 between approximately 0620 hours and 0740 hours. All of the ten cadavers had an ineffective auto killer cut and an ineffective back-up killer cut. At approximately 0700 hours, after four cadavers had been identified, (b) (6) stated she had contacted maintenance to adjust the auto killer. I observed stunning, which was effective, and I observed for conscious birds on the line and found none. At approximately 0720 hours after two additional cadavers were identified, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>(b) (6) stated she had contacted maintenance to adjust the auto killer a second time. At approximately 0725 hours I observed the auto killer was not making effective cuts on a majority of the birds. The back-up cutter was struggling to identify those birds needing a second cut. I observed (b) (6) and (b) (6) remove approximately six conscious birds from the line. 0740 hours, after nine cadavers total had been identified, (b) (6) stated the auto killer was not operating properly and was “down.” The back-up cutters would be assuming the job as primary killers for the remainder of the day. At approximately 0820 hours, plant management met with IPP to discuss the auto killer function and the identified cadavers. (b) (6) stated that the auto killer was checked first thing this morning. About 30 minutes after the initial check a maintenance team member noted loose screws on one of the rollers that secure the bird’s neck for the auto cutter. The loose screws hollowed out the roller drive shaft, causing a jumping motion. (b) (6) stated that maintenance had secured the roller so that it would not move. Maintenance later raised up the blade in the auto killer. (b) (6) explained that when the auto killer is not working properly, the back-up cutters have a very challenging job to determine which birds need a second cut. (b) (6) stated that the auto killer is monitored for 10 min at the start of the shift. Plant management discussed that checking the auto killer a second time 30 minutes into the shift, to ensure that the initial adjustments were effective, would be beneficial. Plant management discussed that in the future, if the auto killer is not functioning properly, it should be taken out of the production line immediately due to the critical nature of this piece of equipment. The back-up killers should resume their position as the primary killer.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>Maintenance will assess repairs and re-implement the auto killer once fixed after a plant break or lunch. The back-up killers need to communicate with (b) (6) if anything abnormal appears to be occurring with the stunner and auto killer, so that the issue can be addressed immediately. (b) (6) stated that parts have been ordered for the auto killer, and extra parts were also ordered to assist with rapid repairs in the future. I advised plant management that an MOI would be written and forwarded to the District Office for the (b) (6) and (b) (6) to review and they will contact us should additional follow-up be needed. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
50	P44826	Case Farms Processing, Inc	JOD010201 0708G	2018-01-08	04C05	Poultry Good Commercial Practices	Finalized	<p>On 01/06/2018 at approximately 0545 hours, while conducting a routine walkthrough of the live-hang department (b) (6) did note the following deviation from accepted good commercial practices (GCP's): While inspecting birds in the DOA barrels, (b) (6) noted that the plant was not performing cervical dislocation of DOA birds as is their normal procedure. Upon checking the DOA barrels, (b) (6) noted motion from inside the barrel. On investigation, (b) (6) pulled one bird that was still shallowly breathing from underneath two to three DOA birds. Checking the rest of the DOA barrels in live hang, a total of 6 birds that were shallowly breathing and covered to various degrees by other DOA cadavers were retrieved from the DOA barrels. (b) (6) explained that live-hang had been short staffed, and with the cold weather bringing an increase in DOA's they had been unable to keep up with the practice of cervical dislocation. I notified (b) (6) and Assistant Plant Manager Jeff Ragan of this deviation from accepted GCP's and that I would be documenting a memorandum of interview (MOI) (b) (6) stated that they would be returning to the practice of cervical dislocation for DOA's. On discussion with Assistant Plant Manager Jeff Ragan, he stated that as a further preventative measure the plant was looking into additional methods besides the plastic paneling currently in use on the trucks to keep the cold air off the birds during transit and decrease the number of DOA's the plant receives during cold weather.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P45910	SANDERSON FARMS, INC	GRI130603 4323G	2018-03-23	04C05	Poultry Good Commercial Practices	Finalized	<p>This MOI is to document a meeting that was held at approximately 7:00AM in the USDA Office with (b) (6) and (b) (6). At approximately 6:55 AM, I had been monitoring the plant employees hanging live birds on the shackles when I notice that there were three birds lying on the floor at the end of the conveyer belt. Two birds were DOA and lying on top of one bird that was on its back and was seen struggling to breathe, and moving its legs. I immediately retrieved this bird and I observed it raise its head. After placing the bird on the floor it was able breathe, to remain in a sitting position and move its head and wings. Had this bird remained in the condition it was found in it would have been smothered to death and therefore died my means other than by slaughter. I tried to find a supervisor in the area but none was present until I was able to communicate my concerns to (b) (6) on the Evisceration Floor and I notified him that I would be issuing an MOI for failure to follow Good Commercial Practices.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P45910	SANDERSON FARMS, INC	GRI311204 0517G	2018-04-17	04C05	Poultry Good Commercial Practices	Finalized	<p>MOI for establishment P-45910, Sanderson Farms, Inc., April 17, 2018 at 08:36 hours. In attendance: (b) (6) and (b) (6).</p> <p>At approximately 08:06 hours, while observing conditions in the live hang area, I saw a bird that was still breathing and moving its wings in the DOA (dead on arrival) cart. I notified personnel in the live hang area about the live bird. While the bird was removed from the cart and checked, the supervisor had (b) (6) summoned to the area. I notified (b) (6) that live birds should not be in the DOA cart as they could be smothered by other birds. Shortly after this, he came to my office and gave corrective actions to prevent a repeat incident of poultry mistreatment. He stated that a mechanical neck breaker would be reattached to the wall in the live hang area (the neck breaker had been removed from the wall and was not being used at that time.) Birds would then have their necks broken (cervical dislocation) and heads removed before being placed in the DOA cart. Until all personnel could be trained, the live receiving supervisors on 1st and 2nd shift would be the only ones ensuring that birds were dead before putting the birds in the DOA cart. I verified that the bird was deceased when it was returned to the DOA cart. Later, at approximately 12:25 hours, I discussed this incident with Dane Beall, Plant Manager. A copy of this MOI will be sent to Raleigh District Office.</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P46897	IHSAN FARMS, IIC	SVH11060 25728G	2018-02-28	04C05	Poultry Good Commercial Practices	Finalized	At 1000, while performing a poultry good commercial practices check in the slaughter area, the following was observed: The male employee who was transferring birds from the live hang belt to the moving cone line picked up two birds by their necks (not their feet/legs) and placed them into the cones. Mr. Fernando Wong was immediately notified and I observed him speaking with the employee who was mishandling the birds. Similar mishandling (though picking up birds by their wings, not necks) has been documented previously in MOIs.
80	P46897	IHSAN FARMS, IIC	SVH37120 44605G	2018-04-05	04C05	Poultry Good Commercial Practices	Finalized	At 1001, while performing a poultry good commercial practices check in the kill room / dressing department, the following poultry welfare concern was observed: There were 3 live birds on the ground beneath the feet of the workers in this area. The workers were transferring birds from the live hang belt to the slaughter cone line or transferring birds from the slaughter cones to the production line leading to the scalding. One male worker was observed to pick up a bird from the ground by grabbing its tail. The worker did not pick up a single leg, only the tail of the bird. The bird was placed into a slaughter cone. Immediately, I contacted Mr. Fernando Wong (plant manager) and told him about my observation and that handling birds by their tails was a poultry welfare concern. (b) (6) was also present during this conversation. Mr. Wong immediately went to speak with the workers involved in handling the birds. This is not the first time that workers at this plant have been observed handling birds by means other than by their legs. In the past, they have been documented (in MOIs) to pick up birds by their wing(s) and necks. My concern is that this trend continues to be a problem.

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
85	P476	Pilgrim's Pride	ODA39060 10922G	2018-01-22	04C05	Poultry Good Commercial Practices	Finalized	<p>To: Dan Shaw, Plant Manager From: (b) (6) Pilgrim's Pride Carrollton, GA P-476 Re: Good Commercial Practices Violation On 01/20/2018 at approximately 0530, I, (b) (6) while performing Poultry Good Commercial Practices (GCP) task observed the following: In the live hang area, birds were on the conveyor belt piled up close to the top of the rail and were so tightly compacted in the front (close to the fence) that there were several legs caught under the fence and moving. There was an employee pushing birds in several locations along the belt to try and spread the birds out. At approximately 0535 the hangers came in to start up and found several birds that were dead toward the front of the belt and removed. I observed and counted the birds. There were a dozen birds removed, 11 that were dead and one that was still breathing. I informed an employee of the issue and the live bird was placed on the line. The other birds were decapitated and placed in the DOA bin. The rest of the birds in the flock appeared in good condition. I informed (b) (6) and (b) (6) of the issue. I, (b) (6), met with (b) (6) and Plant Manager Dan Shaw to discuss the above event. (b) (6) said that he reviewed the plant footage and the person operating the cage dump tied the lever for the live hang belt to advance the birds continuously while he was dumping the cages. This person could be seen on the video running in to stop the belt when the birds advanced further than anticipated. This person then began to try and spread the birds out evenly across the table before they were hung at startup. I voiced with (b) (6) my concern that the birds were not spread out quickly or evenly enough to prevent some of the birds at the end of the belt from being smothered. Agency</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>regulations do require that live poultry be handled in a manner that is consistent with good commercial practices, and do not die from causes other than slaughter. This MOI has been forwarded to the District Office and the District Veterinary Specialist (DVMS) in case additional follow-up is recommended. Your response is requested. (b) (6)</p>
85	P476	Pilgrim's Pride	ODA27190 21209G	2018-02-09	04C05	Poultry Good Commercial Practices	Finalized	<p>On Thursday, February 8, 2017 at approximately 9:15 pm; while performing the Good Commercial Practice, I observed multiple birds exit the stunner on line 1 with large lacerations on the left side of the abdomen and flank. Not all birds were affected, the laceration appeared intermittently varying from thorax to abdomen and others from abdomen to thigh. I examined the birds entering the stunning tunnel and observed they were unaffected. I notified (b) (6). He stopped the hangers from hanging and called maintenance. Once all the birds cleared the stunning cabinet a wire grate was observed to be standing at a perpendicular angle to the floor of the stunner and in the path of the birds entering the stunner. This MOI will be forwarded to the DVMS (District Veterinary Medical Specialist) for further follow up as needed. I look forward to you response. (b) (6), second shift p 476</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
35	P481	Tyson Foods, Inc.	VHF15040 20313G	2018-02-13	04C05	Poultry Good Commercial Practices	Finalized	<p>On 2/13/18 at approximately 0356 hours the night shift (b) (6), observed the following good commercial practice failure. The cull basket affixed to the end of the livehang belt was piled up with numerous small birds. The chickens in the basket were primarily small and or sick birds that were piled two to three deep. The basket was filled with culled birds and the mesh at the bottom was not visible. One plant employee was stationed at the basket to cervically dislocate birds, but was unable to keep up with the workload. During observation multiple gasping birds were seen pressed to the bottom of the pile. I notified (b) (6) of the issue. (b) (6) immediately started culling the birds via the cervical dislocation and placing their carcasses in the condemn barrels located at the end of the line, as is normal for this establishment. I observed multiple dyspneic birds, but none that appeared to have died by suffocation. FSIS observation continued until all the birds were euthanized and placed in condemn barrels. I then left the live hang area and spoke with (b) (6), and (b) (6). I explained the condition I observed and the corrective actions taken by (b) (6). It was stressed to the livehang employees by plant management if they observe a large volume of birds in the cull basket they are to drop a shackle and assist with cervical dislocation until the process is back in control. It is not within the standards of good commercial practice to let birds asphyxiate, as was the potential outcome of this incident, and as such is concerning to the USDA.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P509	Koch Foods LLC	IPG062101 0318G	2018-01-18	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2140, while performing my GCP task, I entered the live hang room. I found a pile of birds on the floor under the belt. This pile was very wide and it reached up to the belt. There was one associate trying to take care of the pile. There was one spot of the pile that moved. I shone my flashlight on it and the associate found a live bird under others and hung it on the line. There were several almost dead birds that he was euthanizing by disarticulating the head and neck. However, the pile was growing almost as quickly as he was removing carcasses from it. I went to the evis floor and had someone radio for the live hang supervisor to meet me in the live hang room. I returned to live hang and at that time the associate called for 2 more people to help him with the pile of birds on the floor. (b) (6) came in shortly after me and removed more associates from the line to help with the pile of birds. (b) (6) also came in. I informed (b) (6) and (b) (6) that a prudent establishment would know that their numbers of DOAs would be high with these freezing temperatures and would have more people available to sort through the birds coming off the end of the live hang belt. This would allow any live birds that made their way off the belt to be picked up before they were covered, and possibly smothered, by dead carcasses and any birds that needed euthanasia could be taken care of quickly and not covered with dead carcasses. The establishment failed to implement any interventions to prevent this situation and failed to implement any to quickly address the growing mound of carcasses allowing live birds and dying birds to be covered with dead carcasses. I informed (b) (6) that I would be writing a MOI.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P510	House Of Raeford Farms	RHB02080 43824G	2018-04-24	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 5:52am on 04/24/2018 while conducting a Good Commercial Practices Verification Task I observed a bird on the evisceration line with neck cuts that was breathing and headed toward the first scald. I immediately stopped the line before the bird reached the scald. (b) (6) removed the bird from the line. The bird was large, had visible cuts on it's neck but was still breathing. I discussed the issue with (b) (6), and reminded him that good commercial practices require that birds must have stopped breathing before they enter the scald, and that this bird would have entered the scald still breathing if I had not observed it and stopped the line. The bird was decapitated with a knife. (b) (6) had maintenance working on the issue and it was mentioned that the stunner was thought to be involved. (b) (6) and I then both monitored the line. He indicated he was concerned about a bird farther up the line that had not yet reached the area where I was standing by the scald. I stopped the line so he could remove the bird before it reached the scald. It had neck cuts but it was breathing at the time. Cervical disarticulation was performed on the bird. A break was put in the line by the plant to allow maintenance to work on the issue (b) (6) reported they identified and resolved an issue with the neck cutter blade. I continued monitoring the birds on the line prior to the scald and saw no further issues. I also discussed the issue later in the morning with (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
40	P51179	Sanderson Farms, Inc.	RQE46050 34608G	2018-03-08	04C05	Poultry Good Commercial Practices	Finalized	<p>On 03-07-18 at approximately 0836 hours while performing GCP in the live hang area I, (b) (6) observed multiple Dead On Arrival (DOA) birds on the floor at the end of the live hang belt located on the north side of the room. I observed a production employee placing a live bird into a red inedible barrel, upon further observation I found four DOA birds on top of one live bird in the same red barrel labeled "inedible". I notified (b) (6) (b) (6) and shown him the noncompliance. (b) (6) pulled both live birds from the red (DOA) barrel and placed them back on the production line. The piling of DOA birds on top of live birds is an unacceptable practice as it could lead to the smothering of the live birds. The establishment has failed to handle the birds properly and dispose of DOA's according to GCP regulations.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO17000 12906G	2018-01-06	04C05	Poultry Good Commercial Practices	Finalized	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 Mr. Monroe, At approximately 2146 hours on January 3, 2018, the following less than Good Commercial Practices in Poultry (GCIPL) incident was observed at P517, Mar-Jac Poultry, MS, Hattiesburg, MS. One (1) live young chicken with uplifted head, rhythmic breathing, pupillary reflexes, and no cut to the neck from an approximate 500 bird random subgroup sample entered the scald tank on the north picking line which feeds evisceration line #1. A carcass with head attached consistent with a cadaver, exhibiting ventral pooling of blood to the neck and head and a reddish hue exited the 1st picker on the north picking line at approximately 2150 hours. The cadaver entered the evisceration department and was removed at approximately 2151 hours by a plant employee on the rehang table at the request of (b) (6). The associated paws were rejected. (b) (6) was notified at approximately 2155 hours and was given an opportunity to examine the cadaver. A second verification check of an approximate 500 birds random subgroup sample on the north picking line at approximately 2156 hours had no live bird(s) entering the scald tank. A Dead on Arrival (DOA) bird was observed entering the scald tank during the second verification. The DOA was removed at the rehang table and the paws were rejected. (b) (6) was notified. This incident was determined to be isolated event and not a loss of process control or a systemic event. Allowing bird(s) to enter the scald tank while still breathing is a less than GCIPL and causes needless suffering and death resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>on the official premises are treated in a humane manner, subjected to minimal excitement, discomfort, and injury, or death by means other than slaughter. Mr. Jeff Monroe, Plant Manager and (b) (6) met in the USDA office at approximately 0600 hours on January 5, 2018 to discuss the less than GCPIP incident. No response to the less than GCPIP incident was given at this time. Mr. Monroe was advised a GCPIP Memorandum of Interview would be issued to management pending review by (b) (6) [REDACTED]. As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6) [REDACTED] Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM Dr. David Thompson, DDM Dr. Loraine Dozier, acting DDM (b) (6) [REDACTED] (b) (6) [REDACTED]</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO39060 14224G	2018-01-24	04C05	Poultry Good Commercial Practices	Finalized	<p>Mr. Jeff Monroe Plant Manager Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 Mr. Monroe, At approximately 2132 hours on January 22, 2018, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at Mar-Jac Poultry, MS, Hattiesburg, MS. One (1) live young chicken with uplifted head, rhythmic breathing, pupillary reflexes, and no cut to the neck from an approximate 500 bird random subgroup sample entered the scald tank on the north picking line which feeds evisceration line #1. A carcass with head attached consistent with a cadaver exhibiting ventral pooling of blood to the neck and head and a reddish hue exited the 1st picker on the north picking line at approximately 2136 hours. The carcass, with feet attached, was removed from the evisceration line at approximately 2137 hours by (b) (6) [REDACTED] (b) (6) [REDACTED] was notified and given an opportunity to examine the cadaver. A second verification check of an approximate 500 bird random subgroup sample on the north picking line at approximately 2138 hours did not have any live bird(s) entering the scald tank. This incident was determined to be an isolated event and not a loss of process control or systemic event. Allowing bird(s) to enter the scald tank while still breathing is a less than GCPIP and causes needless suffering and death and resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control on the official premises are treated in a humane manner, subjected to minimal excitement, discomfort, and injury, or death by means other than slaughter. (b) (6) [REDACTED] and (b) (6) [REDACTED] met at approximately 0600 hours on January 24,2018 to discuss the less than GCPIP. No response to the incident was given at</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>this time. (b) (6) was advised a GCPIP Memorandum of Interview would be issued to management pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM Dr. David Thompson, DDM Dr. Loraine Dozier, acting DDM (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO18130 21202G	2018-02-02	04C05	Poultry Good Commercial Practices	Finalized	<p>On February 2, 2018 @ approximately 1212 hours, I observed a less than good commercial practice while performing an Ante-mortem and Good Commercial Practices (GCP) check at Mar-Jac Poultry (P-517). While performing the GCP, I noticed two moribund birds, one of which was partially covered with other DOAs, within a large number of birds piled in a large plastic vat of DOAs on the back dock. After freeing the partially covered bird for further examination, I observe a wing tip of third bird move that was buried underneath several DOAs in this pile of DOAs. The two of birds appeared to be in distress, being unable to ambulate and sparse breathing. The third bird was observed with rhythmic chest movements and open, alert, blinking eyes and uplifted head. The (b) (6) was notified and the birds were humanely euthanized by rapid cervical disarticulation which is a practice consistent with Good Commercial Practices. Comingling live bird(s) with DOAs can lead to suffocation and death by means other than normal slaughter methods. (b) (6), and (b) (6), were informed of this unacceptable practice. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6) CC: (b) (6) (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO38150 23713G	2018-02-13	04C05	Poultry Good Commercial Practices	Open	<p>Good Commercial Practices MOI: On February 13, 2018 @ approximately 1040 hours, I observed a less than good commercial practice while performing an Ante-mortem and Good Commercial Practices (GCP) check at Mar-Jac Poultry (P-517). While performing the GCP, I noticed one moribund bird in a grey vat of denatured DOA carcasses. The vat was located on the side of the unloading dock next to the staged live haul trailers. The carcass' head was buried within the pile of DOAs, as its red stained body exhibited shallow breathing. (b) (6)</p> <p>(b) (6) was immediately notified of this finding. He freed the head of the bird, which revealed the bird exhibiting shallow open-mouthed breathing. He then removed the bird from the vat and humanely euthanized it by rapid cervical disarticulation. (b) (6)</p> <p>(b) (6) was also informed of this unacceptable finding. Comingling live birds with DOAs can lead to suffocation and death by means other than normal slaughter methods. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully,</p> <p>(b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO49120 21727G	2018-02-27	04C05	Poultry Good Commercial Practices	Finalized	<p>Good Commercial Practices MOI: On February 26, 2018 @ approximately 0556 hours, I observed a less than good commercial practice while performing an Ante-mortem and Good Commercial Practices (GCP) check at Mar-Jac Poultry (P-517). While performing the GCP, I noticed a live bird in the fecal material/chicken feather collection vat at the end of the DOA conveyor. Rain water had collected in this vat resulting in this bird setting in approximately 8 inches of water up to its head. (b) (6) and (b) (6), were informed of this unacceptable practice. (b) (6) removed the bird from the vat. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. At approximately 1050 hours, a meeting was in the USDA office with (b) (6) and (b) (6). The incident was discussed regarding the treatment of a live bird in the debris vat and preventative measures for preventing future incidences. (b) (6), indicated that the conveyor opening will be modified to prevent live birds from entering the debris vat. Respectfully, (b) (6) CC: (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO28050 23828G	2018-02-28	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6) Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 (b) (6), At approximately 2205 hours on February 26, 2018, the following less than Good Commercial Practices in Poultry (GCPiP) incidences were observed at P517, Mar-Jac Poultry, MS, Hattiesburg, MS. One (1) live young chicken with uplifted head, rhythmic breathing, pupillary reflexes, and no cut to the neck from an approximate 500 bird random subgroup sample entered the scald tank on the north picking line which feeds evisceration line #1. A carcass with head attached consistent with a cadaver exhibiting ventral pooling of blood to the neck and head and a reddish hue exited the 1st picker on the north picking line at approximately 2209 hours. The carcass, with feet attached, was removed from the evisceration line at approximately 2210 by a plant employee. The plant employee rejected the paws at rehang. (b) (6) was notified at approximately 2212 hours and given an opportunity to examine the cadaver. A second verification check of an approximate 500 bird random subgroup sample on the north picking line at approximately 2215 hours had one live bird with uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck enter the scald tank. At the exit of the first picker 3 cadavers exited the picker prior to bird entering the scald tank at approximately 2215 hours. This bird observed on the second verification exited at approximately 2219 hours. No cadavers observed at the exit of the first picker entered the evisceration department. (b) (6) and (b) (6) were notified and advised of the cadavers observed during the second verification on the north picking line. A third verification on the north picking line of an approximate 500 bird random</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>sample was performed at approximately 2228 hours, and no live bird(s) entered the scald tank during this observation. These incidences were determined to be an isolated events and not a loss of process control or systemic event. Allowing bird(s) to enter the scald tank while still breathing is a less than GCPIP and causes needless suffering and death and resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control on the official premises are treated in a humane manner, subjected to minimal excitement, discomfort, and injury, or death by means other than slaughter. (b) (6) and (b) (6) met in the Quality Assurance office at approximately 2220 hours. The second observation at the entrance of the scalding, the cadavers exiting the first picker, and no cadavers entering the evisceration department were discussed. All cadavers exiting the first picker were properly shackled. No response to the incident was given at this time. (b) (6) was advised a GCPIP Memorandum of Interview would be issued to management pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6), Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM Dr. David Thompson, DDM (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO22090 30805G	2018-03-05	04C05	Poultry Good Commercial Practices	Finalized	<p>Good Commercial Practices MOI: On March 5, 2018 at approximately 0755 hours, I observed a less than good commercial practice while performing an Ante-mortem and Good Commercial Practices (GCP) check at Mar-Jac Poultry (P-517). While performing the GCP, I noticed multiple birds had legs protruding through the sides of their cages, leaving them unable to ambulate. Just before 0600 hours, live haul trailer #377 was placed in an open area away from the holding shed. Once released from the hitch of the truck, trailer fell over on its side into a large puddle of mud. After the cages were removed from the trailer and placed upright onto the ground, several birds were left wedged in between dead birds due to their legs being stuck in the dried mud. (b) (6) was informed of this finding. Comingling live birds with DOAs can lead to suffocation and death by means other than normal slaughter methods. In accordance with FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, live poultry must be handled in a manner that is consistent with good commercial practices. In order for this to occur, poultry must be treated in a manner that will minimize excitement, discomfort and accidental injury throughout processing. A copy of this Memorandum of Interview will be sent to the Jackson District Office for further review. Thanks for your attention to this matter. Respectfully, (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO53040 35306G	2018-03-06	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6) Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 (b) (6), At approximately 2055 hours on March 4, 2018, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at P517, Mar-Jac Poultry, MS, Hattiesburg, MS. One (1) live young chicken with uplifted head, rhythmic breathing, pupillary reflexes, and no cut to the neck from an approximate 500 bird random subgroup sample entered the scald tank on the north picking line which feeds evisceration line #1. A second verification of the north picking line from an approximate 500 bird random sample had 1 live bird enter the scald tank at approximately 2105 hours. The bird was observed with uplifted head, pupillary reflexes, rhythmic breathing, and no cut to the neck. A third verification of the north picking line at approximately 2110 hours from an approximate 500 bird random sample had no live bird(s) entering the scald tank. (b) (6) was notified of the less than GCPIP incidences at approximately 2115 hours. (b) (6) was notified shortly thereafter. These incidences were determined to be isolated events and not a loss of process control or systemic event. Allowing bird(s) to enter the scald tank while still breathing is a less than GCPIP and causes needless suffering and death and resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control on the official premises are treated in a humane manner, subjected to minimal excitement, discomfort, and injury, or death by means other than slaughter. (b) (6) and (b) (6) met in the USDA office at approximately 0505 hours on March 6, 2018. The less than GCPIP incidences were discussed. No response to</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>the incident was given at this time. (b) (6) was advised a GCPIP Memorandum of Interview would be issued to management pending review by (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6) Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM Dr. David Thompson, DDM (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO02090 40505G	2018-04-05	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0946 hours on March 30, 2018, while verifying Good Commercial Practices (GCP) at P517, Mar-Jac Poultry, MS, the following less than GCP was observed. (b) (6) and (b) (6) observed on the back dock in the live hang area one live bird with rhythmic breathing under a pile of Dead on Arrival (DOAs) located at the end of the conveyor for the South picking line. The bird was removed from the pile placed on the concrete floor of the live hang dock in preparation for decapitation before being placed in the DOA bin. (b) (6) observed this breathing bird and was informed of the pending GCP MOI. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial (GCPs) as described by industry guidelines. Respectfully, (b) (6) CC: (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P517	Mar-Jac Poultry-MS	QOO01150 42618G	2018-04-18	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6) Mar-Jac Poultry, MS 1301 James Street Hattiesburg, MS 39401 (b) (6) At approximately 0600 hours on April 18, 2018, the following less than Good Commercial Practices in Poultry (GCPIP) incidences were observed at P517, Mar-Jac Poultry, MS, Hattiesburg, MS. while performing ante mortem inspection and the PHIS Poultry Good Commercial Practices task. Trailer #395 and trailer #1161 has open compartments with live chickens sitting between the cages. A number of cages were observed with missing compartment doors or missing spring loaded hinges. Chickens were also observed in compartments with no doors. One live chicken was sitting on the ground between the 2 trailers. Three live chickens were observed loose under the cage dumper, and one live chicken was observed on the ground at live receiving with heavy equipment traffic in the area. At approximately 0627, one (1) live young chicken with uplifted head, rhythmic breathing, pupillary reflexes, and no cut to the neck from an approximate 500 bird random subgroup sample entered the scald tank on the north picking line which feeds evisceration line #1. A carcass with head attached consistent with a cadaver, exhibiting ventral pooling of blood to the neck and head and a reddish hue exited the 1st picker on the north picking line at approximately 0632 hours. The cadaver carcass entered the evisceration department at approximately 0633 hours. (b) (6) requested the hot rehang employee to remove the bird from the table at approximately 0634 hours. The associated paws were dumped by the rehang employee. (b) (6) and (b) (6) were notified at approximately 0636 hours and given an opportunity to examine the cadaver. A second</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>verification check of an approximate 500 bird random subgroup sample on the north picking at approximately 0638 had no live birds entering the scalders. These incidences were determined to be isolated events and not a loss of process control or a systemic event. Allowing bird(s) to enter the scald tank while still breathing is a less than GCPIP and causes needless suffering and death and resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control on the official premises are treated in a humane manner, subjected to minimal excitement, discomfort, and injury, or death by means other than slaughter. (b) (6) and (b) (b) (6) (b) (6) met at approximately 0700 hours and surveyed the live holding area and the live receiving area. The loose birds on the trailers, the loose birds on the premises, the missing cage doors on the transport cages, the general disrepair of the cages, and the live bird entering the scalders were discussed. No corrective action was given at this time. (b) (6) was advised a GCPIP Memorandum of Interview would be issued to management pending review by (b) (6) (b) (6). As per Federal Notice Vol. 70, No. 187, Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry Prior to Slaughter", the Food Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices (GCPs) as described in industry guidelines. Respectfully, (b) (6) (b) (6) Canton, MS 9024 1039 W. Fulton St. Canton, MS 39046 cc: Dr. Larry Davis, DM Dr. David Thompson, DDM Dr. Gregory Brookhouser, DDM (b) (6) (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P519	Wayne Farms LLC	KMH02030 10708G	2018-01-08	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6) Wayne Farms LLC (b) (6) 525 Wayne Drive Laurel, MS 39440 (b) (6), At approximately 0340 hours on January 6, 2018, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at 00519-P, Wayne Farms LLC, Laurel,Ms. One cage in the repair set-off area by the fence adjacent to live unloading was found to contain six birds, four of which were expired; the remaining two were exhibiting signs of distress ie, labored breathing and an inability to remain upright. A discussion with (b) (6) who had been operating the forklift all night revealed he had not placed any cages in this area; this was evidenced by two cages setting at the corner of the hanging pen area with malfunctioning doors. This incident was determined to be an isolated event and not a loss of control or systemic event. Allowing birds to remain unprotected in frigid temperatures for extended period of time causes needless suffering and death. Poultry slaughter establishments should take every precaution to ensure poultry under their control on official premises are treated in a humane manner, subjected to minimal excitement, discomfort, injury, or death by means other than slaughter. (b) (6) and (b) (6) met in the USDA office at approximately 0430 hours on January 6, 2018 to discuss the less than GCPIP incident. (b) (6) did advise USDA that he would have the remaining birds euthanized by rapid cervical dearticulation. No response was given as to how or when the cage in this incident was placed in area. (b) (6) was notified that a GCPIP Memorandum of Interview would be issued to management pending review by (b) (6). As per Federal Notice Vol 70, No. 187, Docket No. 04-037N dated September 28,2005, "Treatment of Live Poultry Prior to Slaughter", the Food</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>Safety and Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by Good Commercial Practices(GCPs) as described in industry guidelines. Respectfully, (b) (6) [REDACTED] 00519-P, Wayne Farms, Laurel, Ms. 39440 cc; Dr. Larry Davis, DM Dr. David Thompson, DDM Dr. Loraine Dozier, acting DDM (b) (6) [REDACTED]</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P519	Wayne Farms LLC	KMH15060 12419G	2018-01-19	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1250 hours on January 18, 2018 while performing the Good Commercial Practices verification task, the following was observed at the entrance to the scald tank. The first young chicken was seen entering the scald tank with an uplifted head, pupillary reflexes, rhythmic breathing, controlled movements and a cut across the base of the beak (did not penetrate any vasculature). (b) (6) was present at the scald tank as well and the bird was pointed out to him. He attempted to stop the line to remove the bird but was unsuccessful. Additional birds that appeared in the exact same manner as the one described above were unable to be removed from the line and entered the scald tank live at 1253 and 1254. During this time period (b) (6) had called for maintenance to come work on the equipment. Between 1254-1259 an additional six birds that all appeared the same physically as those previously described were pointed out by USDA to Supervision and two establishment employees just prior to entering the scald tank live. The establishment employees manually decapitated these six birds prior to them entering the scald system. At 1300 an additional live bird with an uplifted head, that was looking around, blinking, had pupillary reflexes, controlled movements, rhythmic breathing and a superficial abrasion that just removed the top layer of skin over the center of the throat was just about to enter the scald vat live. USDA pointed this bird out to the establishment workers and they manually decapitated this bird as well. (b) (6) was informed that this would be documented as a GCP MOI. He was also informed that the establishment had already gotten one GCP NR earlier this week and FSIS takes live birds entering the scald system very seriously. This cannot continue to occur, please provide USDA with more</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>effective corrective actions to prevent live birds from entering the scald system in the future. Past similar NR KMH5112010417N / 1 dated January 16, 2018 in which previous preventative measures either were not implemented or were ineffective. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on January 18, 2018 (b) (6)</p> <p>(b) (6) Cc: Dr. David Thompson, DDM (b) (6) (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P519	Wayne Farms LLC	KMH26050 15720G	2018-01-20	04C05	Poultry Good Commercial Practices	Finalized	<p>(b) (6) Wayne Farms, MS, LLC 525 Wayne Drive Laurel, MS 39440 (b) (6), At approximately 0301 hours on January 18, 2018, the following less than Good Commercial Practices in Poultry (GCPIP) incident was observed at P519 Wayne Farms, MS, LLC, Laurel, MS. Five live birds were observed by (b) (6) sitting on a pile of birds at the end of the live hang conveyor belt in the live hang pen. A plant employee was requested to remove the live birds from the top of the pile. An additional 7 live birds were uncovered by the plant employee in the process along with 2 Dead on Arrival (DOA) s. The live birds were not able to be observed until the live birds on top of the pile were removed. The live birds were returned to production. (b) (6) was notified of the incident at approximately 0315 hours. This incident was determined to be an isolated event and not a loss of process control or systemic event. Allowing live bird(s) to become entrapped under other live birds and DOAs is a less than GCPIP and can cause needless suffering and death from suffocation resulting in adulterated product. Poultry slaughter establishments must take every precaution to ensure poultry under their control on the official premises are treated in a humane manner, subjected to minimal excitement, discomfort, and injury, or death by means other than slaughter. (b) (6) and (b) (6) met at approximately 0330 hours on January 18, 2018 to discuss the less than GCPIP. No response to the incident was given at this time, other than the employee responsible for removing the DOAs and live birds from the hanging pen floor would be disciplined. (b) (6) was advised a GCPIP Memorandum of Interview would be issued to management pending review by (b) (6). As per Federal</p>

Table: MOIs in Response to FOIA2018-328

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

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P519	Wayne Farms LLC	KMH33220 15421G	2018-01-21	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 0735 hours on January 20, 2018 while performing the Good Commercial Practices verification task, the following was observed at the entrance to the scald tank. The first young chicken was seen entering the scald tank with an uplifted head, pupillary reflexes, rhythmic breathing, controlled movements and a cut towards the back of the head that did not penetrate any of the major vasculature effectively. This bird was hanging in the shackle by one leg. (b) (6) was in the area and immediately informed of my observations and that documentation would occur. Additional live birds entered the scald vat at 0736, 0737 and 0745. All appeared physically the same as the first bird described and were hanging in the shackle via one leg except the bird that entered the scald system at 0736. The only physical difference in this bird was that it was in the shackle hanging by two legs instead of one. Past similar NR KMH5112010417N / 1 dated January 16, 2018 in which previous preventative measures either were not implemented or were ineffective. Also, past similar GCP MOI KMH3816013518I dated January 18, 2018 for similar conditions in which live birds entered the scald vat. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P522	Sanderson Farms, Inc. (Processing Div)	IKB281804 4926G	2018-04-26	04C05	Poultry Good Commercial Practices	Finalized	<p>April 26th, 2018 To: (b) (6) Sanderson Farms, P-522 Today, April 26th, 2018, the following was observed by me, (b) (6) at P-522, Sanderson Farms, in Collins, Mississippi: At approximately 1400 hours, I was informed by USDA IPP that one of the picking lines (the "outside" picking line) was not running due to a mechanical issue. At approximately 1450 hours I proceeded to the live hang area to conduct a Good Commercial Practices task. In the live hang area I observed that the picking line in question was not running and there were no birds hanging in the shackles on this line in the live hang area. I proceeded to the stunner entrance and observed five (5) live birds hanging in shackles at the entrance to the stunner. The stunner was full of birds and appeared to be turned "off" and drained. I could not tell if the birds in the stunner were alive or not. The five birds at the stunner entrance were alive, and were breathing rhythmically, moving their bodies and heads, and opening and closing their eyes. I informed (b) (6) of my findings. (b) (6) removed four of the live birds from the line at 1452 hours. I stated that there was still one live bird hanging in the shackles at the stunner entrance. (b) (6) said that the bird could not be removed from the shackles. I asked how long the line had been stopped. (b) (6) stated that the line had been down for approximately one hour. I located (b) (6), and informed him of my findings and stated that this incident would be documented in a Good Commercial Practices MOI. (b) (6) proceeded to the stunner entrance and we observed the remaining live bird together. (b) (6) said that the bird could not be removed from the shackles. Mr. Barry Sparks, Plant</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>Manager, also observed the bird at this time. At approximately 1503 hours the picking line began to run and 8 live birds immediately emerged from the scalding exit. Establishment employees removed the birds from the line and euthanized them. The picking line was run further, and approximately 10 dead birds emerged from the stunner, followed by two more live birds. Establishment employees removed the dead birds from the line and disposed of them, and then removed the live birds from the line and euthanized them. At 1505 all of the affected birds had been removed from the line and disposed of. On April 25th, 2017, a similar incident occurred in which birds were left suspended in shackles in or near the stunner during a prolonged line stoppage. This was documented in GCP MOI #IKB5818050025I. On July 25th, 2017, a similar incident occurred in which birds were left suspended in shackles in or near the stunner during a prolonged line stoppage. This was documented in GCP noncompliance record #IKB3219072625N/1. The treatment of live birds before slaughter is an important animal welfare concern. Live birds left suspended upside down in the shackles for a prolonged period of time in the event of a line stoppage may suffer and/or die. A prudent establishment would operate equipment that permits removal of live birds from the production line in the event of a line stoppage. Stunning is not a regulatory requirement in poultry but is commonly used in poultry slaughter to render the birds immobile and insensitive to pain. If the stunner is left "on" during a line stoppage, birds left in the stunner may die of means other than slaughter (eg. drowning or electrocution), although a properly functioning stunner quickly renders the birds unconscious. If the stunner is turned "off", drained, and the birds are allowed to recover consciousness, the</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>subsequent welfare of these birds should be given consideration. The aforementioned incident and concerns were discussed today at 1600 hours at the Weekly Meeting with Establishment. (b) (6)</p> <p>(b) (6), stated that the establishment follows its written protocol in the event of a line stoppage. I am familiar with the establishment's written animal welfare protocol for line stoppages and I am of the opinion that it fails to adequately address the welfare of birds left in or near the stunner, as evidenced today by the fact that numerous live birds were left hanging in shackles for over an hour and the presence of approximately 10 dead birds in the stunner. Establishment management is encouraged to review Federal Register Notice Docket No. 04-037N (dated September 28, 2005) for FSIS recommendations concerning treatment of live poultry before slaughter. The establishment is strongly encouraged to abide by Good Commercial Practices. Respectfully, (b) (6)</p> <p>CC: (b) (6)</p> <p>(b) (6) Dr. Gregory Brookhouser, Deputy District Manager</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P529	Pilgrim's Pride Corporation	ODE19000 20009G	2018-02-09	04C05	Poultry Good Commercial Practices	Finalized	<p>On February 4, 2018 at approximately 9:30 PM, while performing a Good Commercial Practices Verification Task, (b) (6) asked (b) (6) to report to the Live Hang Area. (b) (6) reported that the plant was experiencing a higher than normal amount of Dead on Arrival (DOAs) birds in the first load of the shift (Table 1. Inspection results for lot 36A, Poultry Cadaver Summary for District 25(not attached)). The floor by the dead bird augur from the Live Transfer System was strewn with approximately 50 dead chickens and more were being delivered to the augur every minute. Approximately 5 establishment employees were disposing of the dead carcasses. Gross examination of these birds revealed no remarkable pathology indicating a flock disease. The dead chickens I examined were cold to the touch and stiff. The breast temperature of four dead chickens was taken with a calibrated thermometer and ranged from 38 to 67 degrees F. The live birds I observed in the crates were slow moving and their heads were tucked back. Many appeared to be dead, as they were not moving or breathing. Post-mortem pathology observed in live slaughtered birds from this lot was unremarkable. Rates of Sep/Tox, Air Sacculitis, and Inflammatory Process etc., did not indicate any abnormal flock disease(s) (Table 1. Inspection results for lot 36A). The outside temperature was less than 0 degrees F (reported by www.weather.com) in Arcadia, WI and the plant reported that the birds had come from a grower close to (b) (4). (b) (4) is approximately (b) (4) miles from Arcadia, WI (reported by www.googlemaps.com). The mean temperature for the day in (b) (4) (reported by www.weather.com) was -6 degrees F with a maximum high of 2 degrees F. The maximum cold weather protective panels on livestock haulers were in place during transport</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>and holding of the birds. The plant ensured all dead birds were properly disposed of and the load was finished with no further incident. The plant subsequently reported that of the (b) (4) birds in lot 36A, 6,093 were DOA, a rate of (b) (4) (Table 1. Inspection results for lot 36A). This is above their normal rate of (b) (4) over the last year and the (b) (4) from the month of January, 2018 (Poultry Cadaver summary for District 25(not attached)). (b) (6) discussed this situation during the weekly meeting on February 6, 2018 with establishment management, Mr. Bruce Ford, Plant Manager at 10:00 am. The plant informed him they were investigating the incident to ascertain the cause and prevent it from happening again. (b) (6) informed Mr. Ford that this incident was concerning to him and he asked Mr. Ford what corrective actions and/or preventive measures the plant would be taking (or had taken) to ensure that this incident wouldn't happen in the future. Mr. Ford explained that the plant was investigating the incident further but provided that they had brought birds over from (b) (4) in the past when the temperature was around 0 degrees F with no notable incident. He said that they were planning on bringing over another lot next week from (b) (4) but they decided to cancel this lot until they could investigate this situation more thoroughly. Finally, Mr. Ford said that the establishment documented the animal welfare incident in their animal welfare plan. The establishment must employ humane methods of handling and slaughtering consistent with Good Commercial Practices in a way that minimizes injury to poultry. Poultry are to be handled in a manner that prevents needless injury and suffering. Employing humane methods of handling and slaughtering that are consistent with Good Commercial Practices increases the</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>likelihood of producing unadulterated product.</p> <p>Table 1. Inspection results for lot 36A. 1. DATE INSPECTED 02/04/2018 2. PLANT NO. P-529V-529 3. CLASS OF POULTRY Young Chicken 4. NO. HEAD IN LOT* 43015 5. LOT NO(S) (As stated by plant management) 36A ANTE-MORTEM INSPECTION CONDEMNED ON ANTE-MORTEM INSPECTION DEAD ON ARRIVAL 6. NO. HEAD * (b) (4) 7. WEIGHT * lbs. 8. NO. HEAD * (b) (4) 9. WEIGHT * (b) (4) lbs. POST-MORTEM INSPECTION CONDEMNED ON POST-MORTEM INSPECTION 10. CARCASSES (NYD) * (b) (4) . 11. PARTS * (b) (4) 12. TOTAL NO. HEAD CONDEMNED/DISPOSED OF ** 1030 CONDEMNATION CAUSE NO. HEAD CONDEMNED CONDEMNATION CAUSE NO. HEAD CONDEMNED CONDEMNATION CAUSE NO. HEAD CONDEMNED Tuberculosis 0 Bruises 0 Inflammatory Process (IP) 0 Leukosis 0 Cadavers 28 No Viscera (NV) 0 Septicaemia and Toxemia 37 Contamination 0 Plant Rejects 963 Synovitis 0 Overscald 0 Miscellaneous 0 Tumors 1 Airsacculitis 1</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	P533	Hain Pure Protein Corporation - FreeBird East	AKB072002 3526G	2018-02-26	04C05	Poultry Good Commercial Practices	Finalized	<p>On February 19 at 0430 at P533 Hain Pure Protein Inc., the online inspector at inspection stand number 3 called me, (b) (6), to examine a suspected Cadaver that was removed from the evisceration line. When I arrived, the (b) (6), was present. Upon examination the carcass was diffusely hyperemic and congested, especially the head. In addition, the carcass was intact including the head and there was no evidence of a ventral cervical incision or exsanguination. The lack of exsanguination and condition of the carcass are evidence that the bird was not properly exsanguinated and entered the scalding area alive. I condemned the carcass and proceeded to the kill area. I observed the back-up killer and noted that he was incising an increased number of birds. I examined the stunner and kill machine. Several birds exiting the stunner lacked an arched neck and tucked wings and gave the appearance of an ineffective stun. (b) (6) was present in the kill area and stated that he had checked the water level and salt concentration in the stunner. He also stated that he had verified the height of the blade in the kill machine. I asked him to check and verify the proper voltage supplying the stunner. As I was leaving the kill area a plant employee was removing a grey inedible barrel from the hot rehang area that contained additional cadavers. At the time of my inspection the kill machine and back up killer appeared to be resulting in birds exiting the blood tunnel that appeared to be appropriately exsanguinated and not breathing so regulatory control action was not taken. Birds dying by means other than slaughter is evidence of a process out of control and represents noncompliance with 9 CFR 381.65(b).</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
60	P533	Hain Pure Protein Corporation - FreeBird East	AKB5021054301G	2018-05-01	04C05	Poultry Good Commercial Practices	Finalized	<p>On 5/1/18 at establishment P533 Hain Pure Protein at approximately 2015 hours, I, (b) (6) went to live receiving to investigate after one of the food inspectors found a DOA on the line. I noticed that the DOA table was full and there were approximately 10 DOAs that had fallen onto the floor. (b) (6) went out to the holding area to look at the trucks and informed me that the side panels were still in place, despite the warm temperature of approximately 75 degrees. The fans were also on in the holding area. I went out to inspect the trucks and (b) (6) and I saw that many of the birds were panting or lying on their backs, and we could see a larger than normal number that were dead. At 2030 hours we spoke with Tom Cazee, Assistant Plant Manager, about why the panels were still on the trucks, and we were told that the panels are not put on and taken off in response to fluctuations in temperature, but instead are put on in the fall and taken off in the spring. Tom said that because the weather forecast for this week shows the temperature increasing to mid-80s, they would begin the process of removing the side panels from the cages. (b) (6) requested that a plant employee add up the DOA numbers for lot #1, which totaled 317. At approximately 0330 hours, I went to live receiving to do a Good Commercial Practices check and found that a single live bird had been placed in the auger. I immediately notified (b) (6) and he removed the bird from the auger. I also notified Tom Cazee that I would be documenting this incident; he later stated that the employees working in the live hang area had been re-trained.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P544	Jennie-O Turkey Store Sales	KXJ220401 3904G	2018-01-04	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 4:00 AM on the night of January 3, 2018 I was observing the live hang operation, verifying Good Commercial Practices and observed a live hang employee toss a DOA carcass down the stairs toward the "USDA Condemned" barrel for condemnation. Upon closer observation of that carcass I saw that the skin had been peeled off the entire back of the bird. I showed (b) (6) and said that it looked like that bird had been abused. I then went upstairs and summoned (b) (6) who also wanted to see the carcass. He met me downstairs and I showed him the carcass. He took some photographs of it to send to the live hang foreman. He explained that he thought it looked like a loader issue. I asked if a loader machine can snag the skin of a bird, and he replied that it probably could. He told me that he would call the loading crew's management and discuss this finding with him to launch an investigation and develop a plan for preventive action. The investigation at the loading crew's level yielded the following. The loader head had jolted and gotten stuck in a cage on the truck. Maintenance personnel were called out to the farm to remove the loader head from the cage, and upon its removal there were two damaged turkey carcasses discovered and removed from the cage. It is believed that the one that arrived at the plant as a DOA was a third one that also was damaged in the incident, but was not discovered out at the farm. This incident appears to be the result of an isolated, mechanical malfunction.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P544	Jennie-O Turkey Store Sales	KXJ520301 5711G	2018-01-11	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 23:00 on the night of January 7, 2018 I was called to the inside inspection line, where (b) (6) had retained two birds for my examination. He had retained them in order to alert me that they both were seriously bruised. Each of them was bruised on one entire side of its body. Concerned about the possibility that the loading crew may have been abusing birds, I summoned (b) (6) to look at them as well. He did so and took some photographs. He also said that he would contact the loading crew's management to initiate an investigation. During follow up conversation with him, (b) (6) informed me that the loading crew management reported that their loader machine's head belt was not functioning properly for two nights. This problem did not get reported until the second night, and when it did get reported, the head belt was replaced. I asked how such a malfunction could create the evidence that we were seeing in the birds and was told that a malfunctioning head belt could create a pinch point that may have affected the two birds we saw. It was further reported to me that the loading crew's management briefed the loader operator regarding the procedure he is to follow. That is, when something is malfunctioning in any way it is to be written up for correction right away.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P544	Jennie-O Turkey Store Sales	KXJ580701 0317G	2018-01-17	04C05	Poultry Good Commercial Practices	Finalized	<p>P544-Jennie-O Turkey Store, Melrose, MN Good Commercial Practice (GCP) Poultry Mistreatment Memorandum of Interview (MOI): The following is a documentation of observations and discussions with 00544P/Jennie-O Turkey Store, Melrose, MN establishment personnel regarding the observation of a live bird run over by a trailer in the live haul area, and the carcass allowed into part of the processing flow: During GCP verification on the 17th of January around 07:00am, I observed in the live hang area the live haul lead checking under trailer 0706M and collecting a live bird picked up underneath. As the trailer left the bay, I observed a live bird on the trailer lift flopping around on the ground, unable to right itself, with blood stained feathers along its neck. The neck skin was ruptured and the skull abnormally shaped. I was unable to assess the bird, as (b) (6) retrieved the bird and handed it to a live hang employee, who hung it on the shackle line. The bird demonstrated an agonal flapping pattern when hung on the shackle line and the wings went flaccid. The bird did not move going around the shackle line turns or hold up its head, and appeared unresponsive going through the water stunner. The bird was observed flaccid going through the cut machine and was manually decapitated after the neck cut machine. (b) (6) informed me that he would remove the carcass from the shackles after going through the scalding and pickers and check the carcass for bruising. I advised that a bird being run over by a trailer was not part of the slaughter process; a carcass that didn't die by means of slaughter should not be knowingly allowed into the slaughter process. The identified carcass came through the pickers at 7:13am, was removed and condemned by (b) (6). Correlation with (b) (6) on the 18th of January included review of corporate</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>policy regarding humane handling and slaughter of injured birds. (b) (6) discussed the practice of hanging injured birds on the shackle line to be electrically stunned then slaughter cut to be humanely slaughtered. I asked if there was any policy regarding moribund and birds hung on the shackles that die before they can be electrically stunned and slaughter cut, as observed yesterday. I also asked about corporate policy definition for injured birds eligible for this style of slaughter or assessment for consciousness to identify injuries rendering birds who died by means other than slaughter. The corporate policy includes other approved methods for humane slaughter, and does not include definitions or parameters for injured birds entering the shackle process for humane slaughter. With respect, (b) (6) P544</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P548	JCG Foods of Alabama, LLC	WYI431702 4623G	2018-02-23	04C05	Poultry Good Commercial Practices	Finalized	<p>On the date of February 23, 2018 at approximately 1728 hours, I observed less than Good Commercial Practices while performing an Ante-Mortem Inspection and Good Commercial Practices verification task at P-548, a NPIS poultry establishment. I observed a live, uncut bird at approximately 1728 hours as it was approximately 8 inches from entering the scald vat on Line 2. The bird was holding its head up vertically against its body, exhibiting normal eye movements, and displaying an increased breathing pattern. After observing the bird I employed the available stop button after all other plant interventions had been surpassed, and it is reasonable to conclude that had I not intervened, the bird's entrance into the scald vat was imminent. (b) (6) [REDACTED] walked over to address the issue, and then I restarted the line after corrective action had been taken and the bird was removed from the line. I examined the bird closely and a cut had not been made on the bird. I also notified Plant Manager, Amy Patterson and (b) (6) [REDACTED], of the observed deficiency, and the establishment immediately initiated further corrective actions. It is pertinent to add, as of May, 2013, JCG Foods of Alabama provided the additional process forethought to provide a process for personnel to intervene and prevent birds entering the scald vat alive and dying by means other than slaughter. Line stoppage devices were installed on both lines to accommodate these circumstances. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations (9 CFR 381.65 (b)), live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental injury throughout processing. Additionally, the Poultry and Poultry Product Inspection Act states within (21 USC 10 453 (g) (5)), "For purposes of this chapter... The term "adulterated" shall apply to any poultry under one or more of the following circumstances (5) if it is, in whole or in part, the product of any poultry which has died otherwise than by slaughter." A copy of this Memorandum of Interview will be forwarded to the appropriate personnel in the District Office. Respectfully submitted on February 23, 2018. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO072002 4206G	2018-02-06	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1830 hours in the Evisceration Department I observed large gaps of empty shackles, and I discovered the cause to be a breakdown in the live-hang area. I observed two carcasses in the blood tunnel area with signs of ante mortem injury, including torn skin, hemorrhage and muscle mutilation. One turkey's skin was torn to reveal the entirety of both underlying breasts, both of which were superficially mutilated. Another turkey was missing a 4 x 6 inch patch of skin over its left breast with bright red blood staining the surrounding feathers. The underlying exposed muscle tissue in both turkeys was moist. After speaking with (b) (6), I learned that the injuries were caused by a faulty conveyor belt in the CO2 stunning system that caused a blockage and pile-up of birds within the tunnel. I spoke with (b) (6) who informed me that this was not the same belt that broke on 2/2/2018 as is documented in GCP MOI UIO3819022406G. He said that an establishment employee noticed the break and was able to shut the system off relatively quickly. The conveyor belts on the affected side of the system were left off for the remainder of the shift; after the shift was complete, (b) (6) had the maintenance crews examine every aspect of the rest of the system. I did not observe any additional injuries.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO381902 2406G	2018-02-06	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1600 while performing a Good Commercial Practices Task in the live hang area, I observed a number of carcasses with signs of ante mortem injury. I observed the carcasses as they passed through the blood tunnel area. There were 12 carcasses over an approximately 15 minute observation window with varying degrees of injury, which included freshly torn skin, hemorrhage, and muscle mutilation. All 12 had freshly torn skin. The less-affected carcasses had patches of torn skin, primarily on the backside of the carcass, which covered an area approximately 4 x 4 inches. The underlying exposed tissue was moist with varying amounts of bright red blood staining the surrounding feathers. One carcass had an approximately 4 x 4 inch skin tear over its left breast. One carcass had torn skin from the entire dorsal surface of the tail and extending cranially up the lower back approximately 6-8 inches. Two carcasses had torn skin from the dorsal tail extending laterally to include the lateral surface of the proximal halves of both thighs, and extending cranially up the lower back; in addition to the torn skin on these two carcasses, the exposed underlying muscle tissue of the thighs and back was mutilated. After speaking with (b) (6) and (b) (6), I learned that the injuries were likely caused by a faulty conveyor belt in the CO2 stunning system which caused a blockage and pile-up of birds within the tunnel. This belt had been broken down for much of 1st shift and the beginning of second shift. (b) (6) said he would have maintenance adjust the belt as soon as possible. (b) (6) said he would ensure that all employees are reminded that if a blockage occurs, they are to shut the conveyors down immediately. I did not observe any further injuries outside of that approximately 15 minute window at 1600.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO511502 0921G	2018-02-21	04C05	Poultry Good Commercial Practices	Finalized	<p>On 2/19/2018 while performing a Good Commercial Practices task in the blood tunnel area, I observed 12 turkeys with torn-skin injuries between approximately 16:46 hours and 17:08 hours. These injuries ranged in size from approximately 1 x 2 inches up to approximately 8 x 6 inches, with most somewhere in between. For most of the injuries, the exposed tissues were moist, and the surrounding feathers were blood-stained. There was clotted blood present adhered to some of the injuries, and some of the exposed tissue in at least two injuries was beginning to dry. These injuries were all located on the turkeys' backsides and included the dorsal surface of the tail, over the hips and over the shoulders. One turkey had a large tear over its hips and a separate tear over its shoulders. I observed one additional turkey with a 1 x 2 inch skin tear over the dorsal surface of the tail at approximately 18:26 hours. (b) (6) and (b) (6) inspected conveyor belts of the CO2 stunning system and did not find any probable cause for the injuries. Most of these turkeys came from the same trailer, #5186, and (b) (6) and (b) (6) did not find any probable cause for the injuries there either. As part of his investigation, (b) (6) instructed the establishment employees who were unloading the turkeys from the trucks to set aside any turkeys with skin-tear injuries; none were found.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO192102 0926G	2018-02-26	04C05	Poultry Good Commercial Practices	Finalized	<p>On 02/21/2018, during the second shift at P579, I observed three issues relating to Poultry Good Commercial Practices. Four turkeys were observed in the blood tunnel with recent injuries, the packing densities in multiple coops of one trailer were such that turkeys were standing over top of each other, and there were many turkeys that were dead-on-arrival (DOA). All turkeys run on this shift were from the same grower and lot. At approximately 14:06, I observed three turkeys with torn-skin injuries on their backsides. Two of the injured turkeys had torn skin of approximately 4 x 4 inches on their mid-back over the cranial hip. The third turkey's torn skin extended from the dorsal aspect of the tail to the mid-back, with a total area of exposed underlying tissue approximately 6 x 8 inches. The exposed tissue on all three turkeys was moist, and the surrounding feathers were stained with blood. At 14:14, I observed one turkey with an approximately 6 inch long laceration of skin and underlying tissues running parallel and just lateral to the spine over the right hip. The wound was moist and the surrounding tissues were stained with blood. I documented similar injuries in GCP MOI UIO4114020519I from 02/19/2018. I observed trailer #5578 as it was parked in the staging shed outside. I observed three coops in the trailer that were so densely packed that the turkeys were essentially in two layers, standing over top of each other. The back half of this trailer was empty. (b) (6) said that with the cold weather and with many of the old breeder hens missing so many feathers, it is important to pack them into the coops so they are tight enough to keep each other warm. (b) (6) and (b) (6) will discuss packing densities with the crew responsible for loading the trailers. While observing in the live-hang area, I noticed that the</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>DOA bin was already full very early in the shift. Following up on this observation, I found a percent DOA for that lot was 2.76%. There was a lot run earlier on first shift from the same grower, and the percent DOA for this lot was 3.21%. Treating the two lots as one population, the percent DOA was 2.86%. To put this percentage in context, I analyzed PHIS slaughter data from the past year. From 02/01/2017 through 02/21/2018 there were 273 slaughter days. During this period, there were 14 days in which the percent DOA exceeded 1%. Of these 14 days, there were 9 days in which the percent DOA also exceeded 2%, and 3 days in which the percent DOA also exceeded 3%. As on 02/21/2018, "old breeder turkeys" represent thirteen of the fourteen >1% DOA days, eight of the nine >2% DOA days, and two of the three >3% DOA days. While the age of these turkeys may have contributed to the high DOA rate seen on 02/21/2018, of the 64 days in which old breeder turkeys were run between 02/01/2017 and 02/21/2018, there were 51 days in which the DOA rate was less than 1%. I am concerned that packing density also contributed to the high percent DOA and the observed injuries.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO081902 5428G	2018-02-28	04C05	Poultry Good Commercial Practices	Finalized	<p>Between approximately 14:35 and 14:42, I observed 5 turkeys in the blood tunnel area with various injuries including torn skin and muscle mutilation. All injuries appeared to be relatively fresh. After 14:42 I did not observe any additional injuries. The first turkey had an approximately 2 x 6 inch patch of exposed muscle on the lateral aspect of the right drum, extending from the hock to the knee. There was blood around the margins of this injury and the exposed muscle tissue was moist. The second turkey had an approximately 6 x 6 inch patch of exposed muscle on the right thigh that was also moist and ringed by a small amount of blood. In addition, this second turkey was missing skin and muscle tissue from the entire medial aspect of the left drum; the bone of the drum was exposed on this medial surface for its entire length. The third turkey had an approximately 6 x 6 inch patch of exposed muscle tissue on the right thigh with additional muscle mutilation and associated hemorrhage. The fourth turkey had an approximately 4 x 6 inch patch of torn skin and exposed tissue extending from its mid-back to its shoulders; some of the underlying muscle near the shoulders was mutilated with associated hemorrhage. The fifth turkey had an approximately 4 x 5 inch patch of exposed muscle of its left thigh with muscle mutilation and associated hemorrhage. (b) (6)</p> <p>reported that a group of turkeys became plugged in the CO2 stunning conveyor system at approximately 14:25. It is possible that the injuries I observed resulted from this incident, as all the injuries appeared to have occurred relatively recently, and the torn skin and mutilated muscle tissue would be expected if turkeys were pinned down against a moving conveyor belt. (b) (6)</p> <p>will review surveillance footage from around this time.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO072003 2216G	2018-03-16	04C05	Poultry Good Commercial Practices	Finalized	<p>Between approximately 16:05 and 16:40, I observed 11 turkeys in the blood tunnel area with torn skin in various locations. One turkey had three separate tears on its backside extending from the dorsal surface of its tail up to the base of the neck. The injury that included the tail extended cranially approximately 8 inches and was approximately 5 inches wide. There was another discrete, approximately 4 x 3 inch patch of torn skin just cranial to the previously mentioned injury, and a third approximately 1 x 2 inch patch of torn skin near the base of the neck on the dorsal midline. I observed three turkeys with skin torn from the dorsal surface of their tails, and four turkeys with torn skin from over their dorsal vertebrae and/or synsacrum on their dorsal midline. The sizes of these injuries ranged from approximately 3 x 3 inches to approximately 4 x 5 inches. There were three turkeys with skin torn from a breast. One of these injuries was approximately 3 x 3 inches, and the other two left nearly the entire underlying breast muscle exposed, and one of these was mutilated. The exposed tissues on all injuries described above were still moist, so the injuries were relatively fresh. (b) (6) and (b) (6) were notified, and they observed some of the injuries with me. I later spoke with (b) (6) about the CO2 stunning system because I wondered if it was playing a role in the observed injuries. There was a component of the delivery system that was not functioning properly, so to ensure that the turkeys came out of the system unconscious, the concentration of CO2 being pumped into the system was held at a higher level than normal. We observed turkeys through windows into the CO2 system: all were unconscious and still. The readout of CO2 levels over time showed that the concentration had not dipped below effective</p>

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District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								stunning concentrations. Therefore, It is unlikely that the CO2 delivery system played a role in the observed injuries. I observed turkeys in the blood tunnel with (b) (6) and (b) (6) around 19:30 and did not observe any fresh injuries like those observed at 16:05.

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO312104 5103G	2018-04-03	04C05	Poultry Good Commercial Practices	Finalized	<p>On 04/03/2018 beginning at approximately 2:00pm while performing a Poultry Good Commercial Practices Task in the blood tunnel area, I observed 4 turkeys with torn-skin injuries on their backsides. Two of these turkeys had small patches of torn skin, approximately 1 x 2 inches, on the dorsal aspects of their tails. The exposed tissue was moist, and the feathers bordering the torn skin were stained with blood. One turkey had an approximately 12 x 12 inch patch of torn skin over its mid-back; an approximately 2 x 2 inch patch of exposed muscle was mutilated; all exposed tissues were moist, and the surrounding feathers were stained with blood. The fourth turkey had 2 discrete torn-skin injuries: an approximately 2 x 3 inch patch over the right hip, and an approximately 6 x 4 inch patch over its mid-back to the left of midline; the exposed underlying tissue was moist and the surrounding feathers were blood-stained. The total observation time was approximately 20 minutes. I removed the turkey with the 12 x 12 inch injury from the line for the establishment to inspect. I spoke about this bird and observed for others with (b) (6) and (b) (6) explained that he thought the injuries were the result of old injuries or scabs that were made worse somewhere in the process. I examined the margins of the injury on the bird I pulled off the line, and I could not find any evidence of an old injury; the margins were fresh without scabs, and it did not appear that any part of the skin flap was missing or dried out. I have observed the kinds of old injuries described by (b) (6), and oftentimes a portion of the scab is freshly missing, and sometimes there is a tear in the skin extending from the scab. However, none of the injuries reported in this MOI or in previous GCP MOIs I have written would fit into that category.</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>My primary concern and focus is with fresh injuries. Plant Manager Jody Long reported that an investigative team would be observing the load-out operations at a barn tomorrow, and they will also observe unloading and hanging here at the establishment. The producer will be the same source of turkeys as today's birds.</p>
15	P6164A	Foster Poultry Farms	OIJ152004 0923G	2018-04-23	04C05	Poultry Good Commercial Practices	Finalized	<p>This establishment utilizes both a "back-up cutter (live person)" and a "head-puller (machine) as back up methods to prevent live birds from entering the scalders. On 4/5/18 at approximately 1658 hours while performing the daily GCP task, I observed a live, conscious bird which had not been stunned or cut, approaching the head-puller, after being missed by the back-up cutter. I observed that the bird was very small, and was holding its head too high to be reached by the head puller apparatus. I motioned to the back-up cutter, and pointed to the live bird. He walked over and removed it just after it had passed over the head-puller without consequence. Without FSIS intervention, it is reasonable to conclude this bird would have entered the scalders alive. I immediately addressed the concern with (b) (6)</p> <p>This was topic discussed during the weekly meeting with establishment management which took place on 4/19/18.</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6616	Peco Foods of Mississippi	IRE041302 5020G	2018-02-20	04C05	Poultry Good Commercial Practices	Finalized	<p>On February 20, 2018 at 1250 hours while verifying the Plant's Good Commercial Practices in Picking Room # 2 I, (b) (6) observed one of the five hundred birds enter the scalders while conscious. The Plant otherwise exercised good control over their slaughter process. I notified (b) (6) of the issue. FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act and Agency regulations, live poultry must be handled in a manner consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner consistent with good commercial practices, poultry should be treated in a way as to minimize excitement, discomfort, and accidental injury throughout the process. A copy of this memorandum of interview will be forwarded to the appropriate personnel in the Jackson District Office.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6638	Pilgrims Pride Corporation	UDG04210 13703G	2018-01-03	04C05	Poultry Good Commercial Practices	Finalized	<p>Establishment P6638, Pilgrim’s Pride, January 2, 2018 at ~11:50am At approximately 11:50am, while observing conditions during Ante mortem inspection and Poultry Good Commercial practice task, my supervisor and I observed ~10 or more birds live and weakened lying under a pile of approximately 1 to 2 feet of debris and dead birds in the Live Hang area. Upon inspection of the birds, there was one plant person clearing out the pile of birds inside the holding bin, but it wasn’t sufficient enough to keep up with the constant moving of birds on the conveyor belt pushing more loose birds into the holding bin/hopper. I took regulatory action by instructing all live hanging personnel to stop hanging immediately until the live birds were removed from the holding bin/hopper located at the end of the conveyor belt. I informed the (b) (6) and told him that the incident of finding live birds cluttered and suffering in discomfort with such conditions was not acceptable and the area should be monitored frequently to prevent birds from dying by any means other than slaughter; I informed him that this will be documented in a MOI. (b) (6) indicated to us that Pilgrim’s Pride would be assigning additional personnel to the live hang area to address high numbers of DOAs whenever there is an expectancy of higher numbers of DOAs. (b) (6) also said that he thought the high number of DOAs was related to the extreme cold weather. Later in the day, plant management and I discussed protocols of animal welfare and procedures of what can or cannot be allowed when handling poultry animals from the time the birds arrive from live receiving on toward the live hang room.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6638	Pilgrims Pride Corporation	UDG19180 15110G	2018-01-10	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 10, 2018, at approximately 1642 hours I observed Less Than Good Commercial Practice at establishment P-6638 Pilgrim’s in Enterprise, AL. While performing a Good Commercial Practice verification task, I observed two trailers loads of live birds open mouth breathing. The trailer numbers were 220893 and 294 located under the live holding shed. The birds had their necks stretched and were rapidly breathing with their mouths open which are symptoms consistent with heat stress. The trailers had sides present on the cages which had been installed due to cooler temperatures in December 2017. The sides on these cages restrict air flow during transport and holding. There was minimal wind movement and the fans installed in the holding shed were not turned on. The air temperature at the time of my observation was 68 degrees. The stocking density to the cages based on lot information provided by the establishment was ^{(b) (4)}birds per cage. I informed (b) (6) of my findings as he approached me in the outdoor holding shed while I was performing my verification task. At the time, I asked (b) (6) what actions would be taken for the birds in distress and he stated they would turn the fans on to increase air movement. I informed (b) (6) and (b) (6) of the documentation of this Memorandum of Information (MOI) due to my findings. I reminded both members of management that the PPIA and Agency guidelines require live poultry to be handled in a manner consistent with Good Commercial Practices (GCPs) by making every effort to treat poultry humanely. I strongly encourage the establishment to review Federal Register Notice Docket No. 04-037N dated September 28, 2005, “Treatment of Live Poultry before Slaughter” for recommendations</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>concerning treatment of live poultry before slaughter. A copy of this MOI will be forwarded to the Jackson District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>Respectfully submitted, (b) (6) cc. (b) (6); (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6638	Pilgrims Pride Corporation	UDG54220 30002G	2018-03-02	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 2225 hour, I entered the picking room to monitor the head puller at line 2 as part of a random Good Commercial Practices check. After monitoring for approximately 1 minute, I saw a live bird bypass the head puller. The bird was hung by one leg, eyes were blinking, the chest area was moving up and down and blood was visible. When I stopped the line, I immediately notified (b) (6) who was around the corner from where I was standing. (b) (6) came immediately looked at the bird and left. (b) (6) did not remove the bird from the line so I did and when he returned I handed the live bird to him. The bird was cut across the dorsal surface of the neck, not the ventral surface. Had the bird been cut on the ventral surface, the carotid arteries and jugular veins would have been severed, leading to the bird bleeding out prior to entering the scalders. The line was stopped after the head puller but prior to the bird entering the scald tank that was filled with water. The first scald tank is no longer maintained at scalding temperatures but is filled with water which would have led to the bird dying by means other than slaughter causing the bird to be a cadaver. I informed (b) (6) and (b) (6) of the documentation of the Less than Good Commercial Practice Memorandum of Information (MOI). FSIS Docket No. 04-037N, Treatment of Live Poultry before Slaughter, states that under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices. In order to ensure that poultry is handled and slaughtered in a manner that is consistent with good commercial practices, poultry should be treated in such a manner as to minimize excitement, discomfort, and accidental</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>injury throughout processing. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the Jackson District Office. Respectfully Submitted, (b) (6)</p> <p>CC: Jackson District Office, (b) (6)</p> <p>Local file</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6666	Koch Foods of Gadsden, LLC	GQH18220 10208G	2018-01-08	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 8, 2018 at approximately 2028 hours while performing the Good Commercial Practices and Ante Mortem task, the following was observed in live hang. At the end of the belt that feeds evisceration line three on the ground there was a pile of approximately 60 DOAs with feathers and filth. I used my flashlight to observe the pile closer due to movement seen within the pile. At least ten live birds were observed throughout the pile of DOAs. I asked an establishment employee if he could please get a supervisor for me. (b) (6) arrived to see the pile of birds and was notified that live birds were amongst the DOAs and that these findings would be documented in a GCP MOI. Some of the birds were placed back into production and the weaker ones were humanely euthanized. At approximately 2033 I arrived at the belt in live hang that feeds evisceration lines one and two. At the end of this belt there were approximately 40 DOAs with 4 live birds intermingled in the pile. The same establishment employee that was present and working with (b) (6) arrived to retrieve the live birds once they were notified and place them back into production. These birds were in imminent danger of becoming crushed/suffocating/death by means other than slaughter. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>industry guidelines. My observations are consistent with less than Good Commercial Practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on January 8, 2018 (b) (6))</p> <p>█ Cc: (b) (6) Dr. David Thompson, DDM (b) (6)</p> <p>█</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6666	Koch Foods of Gadsden, LLC	GQH05040 12911G	2018-01-11	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 10, 2018 shortly after production resumed following the official USDA dinner break at approximately 0240 seven cadavers were observed hanging off to the side of the rehang belt that feeds evisceration line (b) (4). Due to these observations I went to the entrance of the scald vat that feeds that evisceration line. At approximately 0249 the first live bird entered the scald vat. This bird was much smaller than the other birds in the lot (approximately ½ the size), it had no cut to the neck, was blinking, had an uplifted head, pupillary reflexes, rhythmic breathing and controlled movements. I asked an establishment employee in live hang if he could please get a supervisor for me as I could not locate one in the area. Once (b) (6) arrived he was informed of my observations and that documentation would occur. Verification of a 500 bird sample set was started immediately following notification and at approximately 0252 a second live bird entered the scald vat. This bird had a superficial abrasion to the side of the neck that did not penetrate any major vasculature; otherwise it appeared the same as the first bird described above. The third and fourth live birds entered the scald vat at approximately 0257 and 0259. These birds appeared physically just as the second live bird did. The fifth live bird entered the scald vat at approximately 0304. This bird was average size compared to the remainder of the birds in the lot, but had been hung by one leg in the shackle. The side of its neck had a superficial piece of skin missing, no vasculature was penetrated, it was blinking, breathing rhythmically and had controlled movements. After this bird entered the scald vat verification of 500 birds was completed with no additional birds entering alive. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than Good Commercial Practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on January 10, 2018 (b) (6)</p> <p>(b) (6) Cc: Dr. David Thompson, DDM</p> <p>(b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6666	Koch Foods of Gadsden, LLC	GQH55080 14831G	2018-01-31	04C05	Poultry Good Commercial Practices	Finalized	<p>On January 31, 2018 at approximately 0656 hours while performing the Good Commercial Practices and Ante Mortem task, the following was observed in live hang. At the end of the belt that feeds evisceration line (b) (4) there was a pile of approximately 20 DOAs with feathers and filth. I used my flashlight to observe the pile closer due to movement seen within the pile. There were two live birds observed throughout the pile of DOAs. I remained in the area for several minutes with my light on the pile looking for an establishment employee to come to the area to separate the birds, there were also approximately 15 loose birds on the floor, up the stairs and three other live birds sitting on top of a pile of dead birds in another area of the belt. After approximately three minutes an employee came to the area and began separating the birds and returned the live birds to production. No Supervisor could be found anywhere in live hang. I went to an office where Supervisors are often at and found an establishment employee in there and asked him to please get the Live Receiving / Live Hang Supervisor for me. At approximately 0705 (b) (6) arrived and was notified of the issues observed in live hang and that a Good Commercial Practice MOI would be issued due to the live birds comingling with DOAs and those birds were in imminent danger of becoming crushed/suffocating/death by means other than slaughter. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all</p>

Table: MOIs in Response to FOIA2018-328

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than Good Commercial Practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on January 31, 2018 (b) (6)</p> <p>██████████ Cc: (b) (6) ██████████ ██████████ Dr. David Thompson, DDM Dr. Lorraine Dozier, acting DDM (b) (6) ██████████ ██████████</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P6666	Koch Foods of Gadsden, LLC	GQH55000 23706G	2018-02-06	04C05	Poultry Good Commercial Practices	Finalized	<p>On February 5, 2018 at approximately 2353 while performing the Good Commercial Practice Task the following was observed at the entrance to the scald vat that feeds evisceration line (b) (4). A live bird was seen entering the scald vat that was hung by one leg, had an abrasion only penetrating the skin to the right side of the neck. The bird was blinking, had an uplifted head, pupillary reflexes, rhythmic breathing and controlled movements. Verification of a 500 bird sample set was started immediately following this observation with no additional birds entering alive. (b) (6) and (b) (6) were notified of the above findings and that they would be documented in a GCP MOI. Live bird(s) entering the scald system live is a less than Good Commercial Practices and results in adulterated product. The establishment is responsible for ensuring that birds under their control on the official premises are treated in a humane manner that will minimize excitement, discomfort, injury and/or death by means other than slaughter. As per Federal Register Notice Docket No. 04-037N dated September 28, 2005, "Treatment of Live Poultry before Slaughter," the Food Safety Inspection Service (FSIS) strongly encourages all establishments engaged in the slaughter of poultry to make every effort to treat poultry humanely and abide by the Good Commercial Practices (GCPs) as described by industry guidelines. My observations are consistent with less than Good Commercial Practices. A copy of this Memorandum of Interview will be forwarded to appropriate personnel in the District Office. Respectfully submitted on February 6, 2018 (b) (6) Cc: Dr. David Thompson, DDM Dr. Loraine Dozier, acting DDM (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
85	P687	House of Raeford	XRA511302 0328G	2018-02-28	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 12 PM on 2/20/18, I met with Plant Manager – Randy Crapps regarding recent, recurrent GCP concerns. I discussed the fact that kill cuts were being seen occasionally through the head rather than the neck and that some birds were entering Evisceration with heads completely attached. There were associated times when birds were seen that did not bleed out properly. Some of the birds had macerations of the heads to no kill cuts. Later, at approximately 15:15 hour, I observed a bird that had not been properly bled out on the Evisceration Line at the (b) (4) (evisceration) machine before the sorters. During further system check, I observed 10 birds that had not been properly bled out in the picking room after the pickers, head puller, and before entering Evisceration. There was an employee standing in the picking room at the entry into evisceration removing birds that had not been properly bled out and throwing them into the open drain underneath the head puller instead of placing them in condemn barrels to be counted per customary practice. I followed the line backwards towards live hang and kill area. It was in that area I notified (b) (6) and (b) (6). They immediately went to the backup cutting/blood tunnel area. I resumed my system check in the picking room, where I found six (6) more birds that had not bled out properly. My examination of the six birds revealed the cuts were variable in locations and depth: from no neck cut to poor or superficial neck cuts to macerations. I observed other birds that had not bled out properly with heads attached past the head puller. I observed one larger size than usual bird that was a very dark red to purple bird that had not bled out properly and it had superficial maceration to the (dorsum) back of attached head and did not have a neck cut. This one was shown</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								<p>to (b) (6) In total, I observed 15 to 16 birds that had not bled out properly within 15 minutes time. Subsequently I conveyed to Plant Manager – Randy Crapps the findings would be documented and forwarded to the Atlanta District Office and the District Veterinary Specialist (DVMS) in case additional follow-up is recommended. Additionally, on 2/21/2018 at approximately 12:30, the plant was stopping and starting the picking line due to re-hanger issues. When production resumed as usual at approximately 13:00, I observed several birds that had not bled out properly in a condemn barrel. The birds had no neck cuts to poor or superficial neck cuts to macerations. I physically showed my findings to Plant Manager – Randy Crapps. The corrective actions and preventative measures of plant management are not preventing reoccurrence of the GCP findings.</p>
35	P7101	Tyson Foods, Inc.	LUC532201 2631G	2018-01-31	04C05	Poultry Good Commercial Practices	Open	<p>Birds are being slaughtered in accordance with good commercial practices. Although no birds were observed being harmed unintentionally or dying from means other than slaughter at this time, the current system setup would allow that to occur. Approximately 15-20 live birds were on the floor in the live hang area under the conveyer belt that moves the birds into the live hang area. These birds are left here during plant breaks as well and not gathered and hung until the end of the shift to kill out. Given the amount of birds on the floor, there is the possibility of stepping on the birds, injuring or killing them. Albeit small, there is also the possibility for the birds to wander back into the other area of the live hang and outside to where the conveyor belt enters the building. I discussed this with the (b) (6) and he stated that he would begin working on a solution. (b) (6)</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
90	P7487	Koch Foods, LLC	SPG470704 3111G	2018-04-11	04C05	Poultry Good Commercial Practices	Open	<p>On Tuesday, April 10, 2018, (b) (6) Jackson District, and (b) (6) visited the P-7487 Koch Foods of Chattanooga facility. At approximately 11:55 A.M., (b) (6) accompanied (b) (6) and (b) (6) as we performed the good commercial practices check and observed the following in the live hanging area: There were an estimated amount of more than one hundred birds piled up on the floor between 140 picking line carousel and wall. We observed three live birds in and around the pile up. For several minutes, we observed as the number of live and dead birds accumulating on the floor continued to increase, with no establishment personnel visibly observed addressing the deficiencies. When the live (b) (6) entered into live hanging area, he started picking the DOAs off the floor. We asked the (b) (6) (b) (6) to stop hanging the birds. They Quit hanging the birds at 12:02 P.M., to 12:10 P.M., and resume hanging the birds after the process got under control. We had an exit meeting with the plant manager Mr. Gary Tallent, (b) (6), and (b) (6), and explained to them about the finding. As per Federal Register Notice docket No 04-037N, dated September 28, 2005, "Treatment of live poultry before slaughter" the USDA food safety inspection service strongly encourages all establishments engaged in slaughter of poultry to make every effort to treat poultry humanely abide by good commercial practices. Sincerely, (b) (6) P7487 Koch Foods of Chattanooga cc: (b) (6), Jackson District (b) (6), Jackson District Dr. Thompson David, DDM, Jackson District</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P764	Perdue Foods, LLC	CUA08130 14706G	2018-01-06	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1228 hours, while touring the receiving department and live hang area, I observed an enormous pile of chickens, both dead and alive, at the DOA sorting tank for kill line number two. The pile of carcasses was so high that the birds could no longer fall off of the end of the five-foot-high conveyor. The stack of birds numbered in the hundreds and estimated to be around five-hundred or so. There were live birds observed gasping for breath and attempting to free themselves from the pile of dead birds on top of them. The slaughter operations were halted until the live birds could be freed from pile the dead birds. I immediately informed and showed (b) (6) of these conditions. I reminded (b) (6) that the PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with Good Commercial Practices (GCPs), and that they not die from causes other than slaughter. I spoke to (b) (6) concerning this issue. He indicated that the conditions that existed were unacceptable and that the persons responsible would be counseled and disciplined, as per company policy. I printed a copy of the Federal Register entry on Treatment of Live Poultry Before Slaughter, published September 2005, and attached it to this MOI. 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,</p> <p>(b) (6) P-764, Salisbury, MD</p>

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P764	Perdue Foods, LLC	CUA53120 13431G	2018-01-31	04C05	Poultry Good Commercial Practices	Finalized	<p>At 1329, while performing a poultry good commercial practices check in the receiving area, there was a flapping and kicking bird observed on top of the bird pile in the DOA dumpster bin. The bin was 90% full of birds (approximately 200 birds) and they were all denatured with blue dye, including the bird exhibiting signs of life. (b) (6)</p> <p>_____ was immediately notified (since she had been accompanying me during the check) and addressed the live bird immediately. (b) (6)</p> <p>_____ was also notified shortly thereafter.</p>
80	P764	Perdue Foods, LLC	CUA30060 20907G	2018-02-07	04C05	Poultry Good Commercial Practices	Finalized	<p>At 0643, while conducting a poultry good commercial practices check in the receiving area, the following observations were made: While inspecting the large metal dumpster of DOA birds, there were some birds which were denatured and others which had yet to be denatured (b) (6)</p> <p>_____, was in the process of transferring dead birds from the sorting bins to the dumpster and would denature upon finishing the transfer). Amidst the birds in the dumpster which were not denatured was a small bird that was observed to be moving on occasion. Its leg would move, observed multiple times within a minute or two. (b) (6)</p> <p>_____, who was accompanying me during the inspection, removed the bird from the bin and we observed it separately on a flat surface. Slow breathing could be observed in the flank region, and its leg would move from time to time. This bird was obviously still alive. The bird was observed for several minutes, and I had to request it be euthanized. The bird's wings were flapping after the euthanasia (cervical dislocation method). (b) (6)</p> <p>_____ was also notified of this finding, about 10 minutes later when I found him on the production floor.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA031203 0427G	2018-03-27	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 0905 hours, one of the Food inspectors on Evisceration Line#1 identified a cadaver. She held that carcass for Veterinary disposition and immediately notified me. Upon arriving at her station I observed that head of the carcass was intact with no bleeding cut on neck. The facial area was swollen; skin around the neck area was purple in color while rest of the carcass was bright red in color. (b) (6)</p> <p>(b) (6) and (b) (6) were notified of USDA findings. I reminded (b) (6) that the PPIA and Agency regulations do require that live poultry be handled in a manner that is consistent with good commercial practices (GCPs), and that they not die from causes other than slaughter. I recommended that (b) (6) review the Federal Register on Treatment of Live Poultry before Slaughter, published September 2005 for FSIS recommendations concerning treatment of live poultry before slaughter, and provided her a copy of this document. I notified (b) (6) that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>(b) (6) P-935 Allen Harim Foods, LLC</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA361803 3930G	2018-03-30	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 1723 hours while performing ante-mortem and Good Commercial Practice verification I observed a bird’s neck caught between the side edge of the closed cage door and the cage frame. Upon further investigation, the bird’s head was limp and hanging with saliva hanging from its mouth. (b) (6) was notified of the observation of a bird dying other by slaughter. (b) (6) and (b) (6) stated that a picture was taken and was forwarded to (b) (6) and that live haul would be notified of the observation. It is recommended that establishment management review the Federal Register on “Treatment of Live Poultry before Slaughter”, published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. (b) (6) and (b) (6) were notified that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>Respectfully, (b) (6) Allen Harem Foods, LLC. P-935 Harbeson, DE. 19951</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA261804 1906G	2018-04-06	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 1630 hours as I was traveling between Evisceration Lines 2 and (b) (6) and inspector called for me and had 2 carcasses hanging on the Veterinary disposition shackles behind line (b) (6), station 4. Both carcass bodies and necks were red in color, and the viscera were blood engorged. At approximately 1710 hours I was notified and observed a cadaver hung on the Veterinary disposition shackle behind line (b) (6) station 1. This carcass's head and neck were dark red to purple and had not received a cut to the neck. At approximately 1715 hours I observed line (b) (6) station 2 inspector hang a carcass on the Veterinary disposition shackle. This carcass body and neck were red in color and the viscera were blood engorged. At each occurrence (b) (6) was notified of the cadavers and he contacted the live hang supervisor of each observation of cadavers on line (b) (6) I then performed Good Commercial Practice verification by observing 200 carcasses enter the scalding, and 200 carcasses at the kill blade. There were no live birds observed entering the scalding and the back-up kill performed a cut to the neck of all birds not cut by the kill blade. (b) (6) was notified of the observation of bird dying other than by slaughter. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. (b) (6) was notified that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p> <p>Respectfully, (b) (6) Allen Harim Foods, LLC. P-935 Harbeson, DE. 19951</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA141704 4926G	2018-04-26	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1734 hours, while verifying Good Commercial Practice verification I observed both establishment back-up kill personnel on the same side of the medium bird line just past the kill blade. I then walked around to the area where a second back-up kill employee is usually stationed and observed 1 bird with its head up, looking around and breathing. I then traveled to the entrance end of the scalding and observe 1 live bird with its head up, looking around enter the scalding. This bird had a small nick to the left side of the neck. (b) (6)</p> <p>(b) (6) and Evisceration Supervisor were notified of the observation of a bird dying other than by slaughter. (b) (6) stated that the employee would receive disciplinary action. I then observed 200 carcasses enter the scalding, and 200 hundred carcasses at the kill blade. There were no live birds observed entering the scalding and the back-up kill performed a cut to the neck of all birds not cut by the kill blade. It is recommended that the establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. (b) (6) and (b) (6) were notified that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended.</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA221804 3727G	2018-04-27	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1703 hours while traveling between Evisceration lines 2 and (b) (6) an inspector called for me and had 1 carcass hanging on the Veterinary disposition shackle behind line (b) (6) station 1. The carcass had the head intact which was red to purple in color and had not received a cut to the neck. (b) (6) was notified of the cadaver (b) (6) notified (b) (6) of the observation of a bird dying other than by slaughter. I then performed Good Commercial Practice verification by observing 200 carcasses enter the scald, and 200 carcasses at the kill blade. There were no live birds observed entering the scald and the back-up kill performed a cut to the neck of all birds not cut by the kill blade. (b) (6) was notified of the observation of a bird dying other than by slaughter. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. (b) (6) was notified that this MOI will be forwarded to the District Office and The District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6) Allen Harim Foods, LLC. P-935 Harbeson, DE. 19951</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA401804 3030G	2018-04-30	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 1509 hours on April 27, 2018 while performing antemortem and GCP verification I observed 1 loose live bird on trailer #62 located in the cooling shed. At approximately 1521 hours I observed 1 loose live bird on trailer #6886 and 1 loose live bird on trailer #5780 (3 cage doors were open). These trailers were located just outside the dumping area in a high traffic area for trucks and forklifts. As I was waiting for the live hang supervisor I observed a forklift come around the 2 trailers at a very high speed. As he rounded the trailers a cage door flew open and 2 live birds were thrown to the concrete approximately 6 feet below. (b) (6)</p> <p>(b) (6) and (b) (6) were notified the observation in which poultry may have experienced excitement, discomfort or accidental injury while being handled in connection with slaughter. (b) (6)</p> <p>(b) (6) addressed driving speed with the fork lift drivers especially when making sharp turns. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. (b) (6) was notified that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>(b) (6) Allen Harim Foods, LLC P-935 Harbeson, DE. 19951</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA352105 4601G	2018-05-01	04C05	Poultry Good Commercial Practices	Finalized	<p>At approximately 1600 hours while traveling between Evisceration lines 2 and 3 I observed 1 carcass hanging on the Veterinary disposition shackle behind line 3 station 3. The carcass had the head intact which was red to purple in color and had not received a cut to the neck. I also observed 3 carcasses hanging on the Veterinary disposition shackles behind line 4 station 4. The necks of these carcasses were bright red, the viscera were blood engorged and was petichiation was observed on the breast meat. I was informed by the inspector that, at approximately 1507 hours, he had hung back a bird with the head intact, red to purple in color and had not received a cut to the neck. (b) (6) confirmed this observation and stated that he had taken the bird to the Live Hang Supervisor so that action could be taken. At approximately 1655 hours, I performed Good Commercial Practice verification by observing 200 carcasses enter the scalding, and 200 carcasses at the kill blade. There were no live birds observed entering the scalding and the back-up kill performed a cut to the neck of all birds not cut by the kill blade. (b) (6) was notified of the observation of birds dying other than by slaughter. (b) (6) stated that as a preventive he placed a second back-up killer on line 4 for the rest of the week. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. (b) (6) was notified that this MOI will be forwarded to the District Office and The District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6) Allen Harim Foods, LLC. P-935 Harbeson, DE. 19951</p>

District	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
80	P935	Allen Harim Foods, LLC.	YXA122105 0514G	2018-05-14	04C05	Poultry Good Commercial Practices	Open	<p>At approximately 2136 hours while performing Good Commercial Practice verification I observed the back up killer for medium birds miss a cut to the neck of a bird that was not cut by the kill blade. The establishment employee then attempted to pull the stunned bird's head off which failed. He then removed the bird from the line and threw it into a condemn barrel used to put heads into. Upon further investigation, I observed two live birds in this condemn barrel that was approximately one quarter full of heads.</p> <p>(b) (6) and (b) (6) were notified of the observation in which poultry may have experienced excitement, discomfort or accidental injury while being handled in connection with slaughter. (b) (6) stated that the employee will be coached and the condemn barrel will be removed from the area. It is recommended that establishment management review the Federal Register on "Treatment of Live Poultry before Slaughter", published September 2005 for FSIS recommendations concerning treatment of live poultry prior to slaughter. (b) (6) was notified that this MOI will be forwarded to the District Office and the District Veterinary Medical Specialist (DVMS) in case additional follow-up is recommended. Respectfully, (b) (6)</p> <p>Allen Harim Foods, LLC. P-935 Harbeson, DE. 19951</p>