



Food Safety and
Inspection
Service

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

From: Fabulous Vet
Date: 12/4/2023
Subject: Livestock Humane Handling / PMB0000123604I
Meeting Date: 12/4/2023
Meeting Time: 3:00 PM
Establishment: M0000+P0000 - Noname, LLC.

Reason Code:

**Other Reason
Code:**

Comments:

At 1500 hours on December 4, 2023, I, Dr. Fabulous Vet, held a meeting with FSQA Manager Ms. Jill Jonas and VP of Operations Mr. Nick Jonas and other Plant Management to discuss the establishment's Robust Systematic Approach to Humane Handling of Livestock, as part of the Weekly USDA-Establishment Meeting.

After reviewing records and programs as well as observing Humane Handling practices over the past few weeks, I concluded that the current implementation of the Animal Welfare Program is not considered "robust". As written, the plan shows excellent potential in being Robust when implemented properly; however, Humane Handling records demonstrate a lack in the implementation and verification of the program.

Here are the following issues observed in the program and records:

1. There was no reassessment of the Animal Welfare Program, or NoName's specific addendum since the NOIE began on February 27, 2023 or when it was lifted in June, 2023. The only changes seen were in the Training SOP (SOP-HH-000). While not required, FSIS would expect a prudent establishment to have done some type of evaluation after an enforcement action. The last reassessment for the NoName's-specific addendum was February 26, 2022.

2. The Transportation Audit does not take the truck waiting time outside the gate into consideration. The wait time starts once the trucks/trailers enter the gate. Trucks have been observed waiting in line prior to entering the gate for 60+ minutes. When held in line for such a long duration of time, the establishment should be taking water accessibility and protection from inclement weather into consideration as well. Additionally, FSIS Directive 6900.2, Ch. 2, I. Livestock on Transportation Vehicles, states,

a. "Once a vehicle carrying livestock enters, or is in line to enter, an official slaughter establishment's premises, the vehicle is considered to be a part of that establishment's premises. The animals within that vehicle are to be handled in accordance with 9 CFR 313.2."

b. The Animal Welfare Program also states that drivers are encouraged to keep their vehicles moving until they can be unloaded to facilitate air flow and ventilation, but this is not being observed or communicated to the drivers as evident by the long line of trucks/trailers.

3. Continuing with the Transportation Audit records, the "Final Scoring" system completed by QA's show lack of understanding of how to accurately record findings on the scoring sheet. Final scoring percentages are documented as below the passing score, but then marked as acceptable. This observation demonstrates a lack of understanding and the concern of whether the personnel performing the audit knows how to correctly perform the audit and accurately document their findings and



verify compliance with the Humane Handling Regulations.

4. In regard to euthanizing animals in the barn, whether as non-ambulatory disabled animals, CNS, or any other condemnation condition, the use of head restraint, whether it be a head catch or halter, is mention in the AW program and the establishment-specific addendum. However, in the Barn Stunning Log over the past few months, several “downer” animals were documented as having no head restraint used.

a. The establishment-specific addendum does state that in the event an animal in not able to be restrained with a rope halter barn management or member of humane handling committee will be notified. In all instances observed during my record review, there was no explanation as to why a head restraint was not used nor who was notified.

5. Finally, in regards to the Pen Audit portion of recordkeeping, establishment plans, as well as the Pen Audit form, state that every pen is to be audited at a minimum once per month. When reviewing these records for the past few months, several pens were not indicated as being audited on the document. Pens repeatedly to not being audited according to records include Pens 6, 7, 13, USDA, and Holding. According to Daily Line-ups, these pens are used regularly.

a. Ms. Jonas did state in a brief follow-up discussion that a new Pen Audit form began being implemented in November to allow for a more thorough inspection of each pen, not just during Ante-mortem inspection. This is an excellent addition to the Program in ensuring compliance with the Humane Handling Regulations.

It is advised that Establishment Management review FSIS Directive 6900.2, especially Attachment 3 which discusses the elements of a Robust Humane Handling System. Once the establishment again believes their Humane Handling Program is robust, they can request another assessment to the IIC at that time.