



Food Safety and  
Inspection Service

March 27, 2014

Alameda District  
620 Central Avenue,  
Bldg. 2C  
Alameda, CA 94501

Phone: (510) 769-5712  
Fax: (510) 337-5081

(b) (6)  
Redwood Meat Company  
Est. M6066  
3114 Moore Avenue  
Eureka, CA 95501

**CERTIFIED RETURN  
RECEIPT REQUESTED**

Facsimile: 707-442-3798  
Email: (b) (6) @aol.com

## NOTICE OF SUSPENSION HELD IN ABEYANCE

Dear (b) (6)

On March 24, 2014, the Food Safety Inspection Service (FSIS), Alameda District Office, verbally notified your establishment of the suspension of the assignment of inspectors at your establishment and the withholding of the marks of inspection for the slaughter operations, in accordance with 21 U.S.C. 603 and Title 9 Code of Federal Regulations (CFR) Part 500.3 (b). This action was initiated due to your firm's failure to maintain or implement required controls to prevent the inhumane handling and slaughtering of livestock at your establishment and to appropriately handle animals in accordance with Title 9 CFR 313.15(a) (1), Title 9 CFR 313.15(a)(3), and Title 9 CFR 313.15 (b) (ii), (iii) and (iv). This is in violation of 21 U.S.C. 603 (b) of the Federal Meat Inspection Act, and the Humane Methods of Slaughter Act of 1978, and the regulations promulgated thereunder.

On March 24, 2014, you submitted your first response to the Notice of Suspension (NOS) dated March 25, 2014. The submittals indicated that your establishment reviewed the knocker maintenance logs, the self-evaluation form for humane handling of livestock, and the annual employee training records and identified "no problems" from those records. Your establishment proffered to assess the sensibility of each animal. In addition, your establishment had a meeting with the key employees and determined that "only one veal calf, hog, or goat will be knocked at a time, rather than 5 to 10 at a time. In addition two people will be doing the knocking of the sheep, hogs, goats and veal calves. The second will be helping the restraining of the animals. The animals will be knocked, stuck, and hung up one at a time." After a thorough review and evaluation of your written response, we found several concerns that required further information and/or clarification before we were able to make a determination that you were in compliance with the regulatory requirements. On March 25, 2014, the FSIS Alameda District Office sent you a letter requesting additional information on the identified cause of the noncompliance. FSIS requested clarification on your proffered corrective actions, including the number(s) of animals held in the pen while stunning is occurring and if this will be incorporated officially into your current written Animal Welfare Programs. FSIS requested you submit all procedures for review. FSIS also requested you provide

documentation of additional training conducted and/or maintenance conducted on your equipment to ensure effective stunning at your establishment.

On March 25, 2014, you submitted your second response to NOS. The submittals stated the cause of this noncompliance was a lack of animal constraint. You also indicated the employee did not determine if the knock was successful immediately after the first knock, but instead moved to the next animal in the pen and left the missed knocked animal unattended. In addition, you clarified that the knock was in the wrong location. Your response indicated that your establishment will begin having the hand held back up knocker available for small animals, construct a restraining knock box for small animals and implement interim procedures until the restraining box is constructed. You indicated that your establishment held an animal handling and welfare training for all slaughter employees. You also provided the Kocker Maintenance Log, Sample Self-Evaluation Form for Humane Handling of Livestock, and Annual Employee animal welfare training records for review. On March 25, 2014, you provided an addendum to your second submittal. Your submittal included an Animal Welfare Plan and revised Sample Self-Evaluation Form for Humane Handling of Livestock. The form included the monitoring of the backup knocker. On March 26, 2014, FSIS Alameda District Office held a conference call with your plant management to discuss the remaining issues. FSIS requested additional clarification how you will verify your corrective actions to ensure that one small animal is being stunned at a time and two employees will be performing stunning procedures until the knock box is constructed.

On March 26, 2014, you provided your third submittal which included a revised Sample Self-Evaluation Form for Humane Handling of Livestock that included procedures to verify that one small animal is being stunned at a time and two employees will be performing stunning procedures.

Based on all the commitments you submitted from March 24, 2014 through March 26, 2014, FSIS has decided to hold in Abeyance the NOS to afford you the opportunity to implement your proposed action plan. This letter confirms the verbal notification given to your establishment on March 26, 2014, by the FSIS Alameda District Office management team.

During this Abeyance period, FSIS will continue to verify, assess and evaluate the efficacy of the corrective and preventive actions you have implemented to assure that all procedures are followed, and corrective actions are taken. An FSIS Verification Plan is designed to verify that your establishment fully implements all the corrective actions and preventive measures proffered in your March 24, 2014 through March 26, 2014, responses. This verification plan identifies your corrective action, the regulatory requirements under which FSIS inspection personnel will verify implementation and effectiveness of your corrective actions. A copy of the FSIS Verification Plan will be provided to assist you in understanding the nature and importance of the agency's verification activities.

We expect that upon resuming operations under Federal inspection, your establishment will implement all the further planned actions that you provided in response to the NOS. Please be advised that only FSIS can amend the verification plan and should your establishment make any modifications to your food safety programs during the Abeyance period, these changes should be submitted in writing to FSIS for verification of compliance prior to implementation by your establishment.

You are reminded that as an operator of a federally inspected facility, you are expected to comply with the Federal Meat Inspection Act (FMIA) and the regulations promulgated thereunder to ensure that livestock at your establishment are handled and slaughtered humanely. The regulations require establishments to take appropriate action(s) when either the establishment or FSIS determines that the establishment's system controls for humane handling requirements are ineffective. It is also important for you to understand that FSIS has the responsibility to initiate actions if your establishment fails to operate in accordance with FSIS regulations.

Please be aware that your failure to comply with FSIS regulatory requirements or to effectively implement your commitments, agreements with FSIS, or your proposed actions that were the basis for holding the Suspension in Abeyance, may result in the immediate reinstatement of the suspension of inspection at your establishment or further administrative enforcement action.

In accordance with Title 9 CFR 500.5(a)(5), you may appeal this action by contacting:

Dr. Hany Sidrak  
Executive Associate for Regulatory Operations  
1400 Independence Avenue, SW  
Room 3157-S  
Washington, DC 20250  
Phone: 202-205-4208

If you have any questions, please call the Alameda District Office at 510-769-5712.

Sincerely,

*/s/ Virginia Felix, DVM  
(for)*

Abdalla Amin  
Deputy District Manager

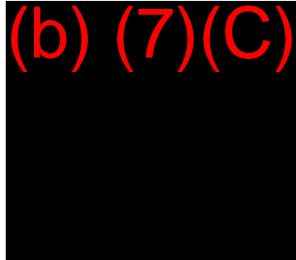
cc:

Y. Sharma, DM

V. Felix, DDM

F. Gillis, DDM

(b) (7)(C)

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A. Khroustalev, IEA, RD

USDA IIC, Est. M6066

FO/QR

**Redwood Meat Company**  
**Est. 6066 M**  
**Eureka, CA 95501**  
**Notice of Suspension Held in Abeyance Verification Plan**  
**March 27, 2014**

On March 24, 2014, the Food Safety Inspection Service (FSIS), Alameda District Office, verbally notified the establishment of the suspension of the assignment of inspectors at the establishment and the withholding of the marks of inspection for the slaughter operations, in accordance with 21 U.S.C. 603 and Title 9 Code of Federal Regulations (CFR) Part 500.3 (b). This action was initiated due to the firm's failure to maintain or implement required controls to prevent the inhumane handling and slaughtering of livestock at the establishment and to appropriately handle animals in accordance with Title 9 CFR 313.15(a) (1), Title 9 CFR 313.15(a)(3), and Title 9 CFR 313.15 (b) (ii), (iii) and (iv). This is in violation of 21 U.S.C. 603 (b) of the Federal Meat Inspection Act, and the Humane Methods of Slaughter Act of 1978, and the regulations promulgated thereunder.

Verification is defined as those activities, other than monitoring, that determine the validity of the in-plant control system and that the system is operating according to the plan. This Verification Plan includes the commitments and corrective actions that the establishment proffered in response to the Notice of Suspension (NOS) dated March 24, 2014. This verification plan is designed to verify the commitments made by the establishment from March 24, 2014, through March 26, 2014.

Establishment's Action Plan	Regulation	PHIS Task	Frequency
<p>1)The establishment revised their Animal Welfare Plan on March 25, 2014. The program states that <i>"Stunning will be performed to produce unconsciousness in a rapid and effective manner. One small animal will be stunned at a time. Back up knockers will be immediately available during operations. Two employees will perform the stunning task for small animals until a restraining box is constructed (Target Date 4/17/14). Backup Knocker will be included on our weekly humane handling audit form."</i></p> <p><i>FSIS inspection personnel will verify once that the Animal Welfare Plan has been revised.</i></p> <p><i>FSIS inspection personnel will verify through direct observation and/or record review that the establishment is following their procedure in the Animal Welfare Plan.</i></p>	<p>MOI</p>	<p>Livestock Humane Handling</p>	<p>Once</p> <p>Weekly to verify record review</p> <p>Daily to verify direct</p>

Redwood Meat Company  
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 Notice of Suspension Held in Abeyance Verification Plan  
 March 27, 2014

				observation
<p>2) The establishment will document the weekly monitoring of these procedures on the "Sample Self-Evaluation Form for Humane Handling of Livestock". The monitoring will include the following:</p> <ul style="list-style-type: none"> <li>• "Is a back-up knocker immediately available?"</li> <li>• "2 employees are performing the stunning procedures until knock box is constructed."</li> </ul> <p><i>FSIS inspection personnel will verify through direct observation and/or record review that the establishment is following their procedure in the Animal Welfare Plan.</i></p>		MOI	Livestock Humane Handling	<p>Weekly to verify record review</p> <p>Daily to verify direct observation</p>
<p>3) The establishment proffered to assess the sensibility of each animal. This procedure will be incorporated into the Animal Welfare plan.</p> <p><i>FSIS inspection personnel will verify through direct observations that the establishment is assessing the sensibility of each animal being knocked.</i></p>		313.15(a)(1) 313.15(a)(3)	Livestock Humane Handling	Daily
<p>4) The establishment will construct a restraining knock box by April 17, 2014, to address the regulatory requirement of Title 9 CFR 313.15(b)(ii).</p> <p><i>FSIS inspection personnel will verify through direct observation that the establishment has implemented a restraining knock box by April 17, 2014.</i></p>		313.15(b) (iii)	Livestock Humane Handling	Once

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Notice of Suspension Held in Abeyance Verification Plan  
March 27, 2014

5) On March 25, 2014, the establishment held an animal handling and welfare training for all slaughter employees.  <i>FSIS inspection personnel will verify through record review that the establishment has conducted this meeting.</i>	MOI	MOI	Once
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These procedures will be performed at the frequency establishment above during the duration of the Abeyance period. Some of the items on this list need verification only once or as it occurs.

(b) (7)(C) [redacted] @fsis.usda.gov; 510-769-[redacted] (b) (7)(C)