



Food Safety and
Inspection Service

July 14, 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
E-mail: (b) (6) @aol.com

REINSTATEMENT OF NOTICE OF SUSPENSION HELD IN ABEYANCE

Dear (b) (6)

On July 2, 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)(1)(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 July 3, 2014, you submitted your first response to the Reinstatement of Notice of Suspension (RNOS) dated July 3, 2014. The submittals included your updated "*Animal Welfare Plan*" and you indicated that your establishment performed training for signs of sensibility. Your establishment proffered that your establishment will perform stunning to produce unconsciousness in a rapid and effective manner and "*if an animal is showing signs of sensibility, a second knock will be administered as soon as an effective knock can be made.*"

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 July 3, 2014, the FSIS Alameda District Office conducted a conference call with your plant management and requested clarification on your proffered corrective actions. FSIS requested clarification on how your management intends to monitor activities to assure you are immediately rendering the animals unconscious and if you will incorporate these activities into your current written Animal Welfare Programs. FSIS requested clarification on how your management would assure that the stunners remain ready for

use to ensure animals are rendered unconscious. FSIS requested a copy of your weekly humane handling audit form and additional information on your establishment's monitoring activities to determine insensibility prior to hoisting. FSIS requested clarification on how you intended to assure that the second knock is administered to produce immediate unconsciousness as required by Title 9 CFR 313.15(a)(1). FSIS requested you submit all documents and written forms for review. FSIS also requested you provide documentation of additional training conducted. On July 3, 2014, FSIS provided you a response letter outlining the concerns with your first submittal.

On July 3, 2014, you submitted your second response to RNOS. The submittals included your revised "*Animal Welfare Plan*" that indicates the second knock will be administered "*immediately*." Additionally, you stated that your establishment will monitor 100% of beef knocks and management will review this activity four times per day. Your establishment provided the "*Knocking Effectiveness Log*" for review. Your response also included a copy of your Self Evaluation Form for Humane Handling of Livestock. You indicated that you will post a copy of the immediate stunning sign in your knock box, and you provided the names of the individuals who attended the signs of sensibility training. You indicate that you will use a second knocker immediately as backup when a rifle is not available. The establishment management will assure that secondary stunners remain ready for use by observation and documenting into the "*Knocking Effectiveness Log*." Your establishment updated their weekly "*Sample Self Evaluation form for Humane Handling of Livestock*" to include documentation of the maintenance of the knocking effectiveness that includes: stunning observations, number of stunned animals observed, and the number performed correctly.

On July 3, 2014, FSIS Alameda District Office held a conference call with your plant management to discuss the remaining issues with your response. In your response you specified that your establishment will monitor beef knocks on your "*Knocking Effectiveness Log*." FSIS requested additional clarification on if you also intended to monitor the stunning procedure for bob veal calves and other species. Your management indicated that you will include the bob veal calves in your monitoring log and that all other species already have a two employee stunning procedure in place and there have been no concerns. Additionally, FSIS requested clarification on how you intended to document the six signs of sensibility that you included in your response. Your management stated that you will include on the monitoring log a list of the signs that your establishment will monitor for sensibility.

Based on all the written and verbal commitments you submitted on July 3, 2014, FSIS has decided to hold in Abeyance the RNOS to afford you the opportunity to implement your proposed action plan. This letter confirms the verbal notification given to your establishment on July 3, 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 July 3, 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 RNOS. 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 Reinstatement of 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. Ronald Jones
Deputy Assistant Administrator
1400 Independence Ave, SW
Room 344-E JWB
Washington, DC 20250
Main Office (202) 720-8803
Voicemail (202) 720-2442
Fax (202) 720-5439

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

Sincerely,

/S/

Abdalla Amin
Deputy District Manager

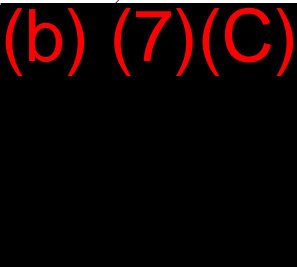
cc:

Y. Sharma, DM

V. Felix, DDM

F. Gillis, DDM

(b) (7)(C)

A large black rectangular redaction box covers the text in this block. The text "(b) (7)(C)" is printed in red at the top left of the redacted area.

USDA IIC, Est. M6066
A. Khroustaley, IEA, RD
FO/QR

Redwood Meat Co., Inc.
Est. 6066 M
Eureka, CA 95501

Reinstatement of Notice of Suspension Held in Abeyance Verification Plan
July 14, 2014

On July 2, 2014, the Food Safety Inspection Service (FSIS), Alameda District Office, verbally notified the establishment of the reinstatement of 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)(1)(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 Reinstatement of Notice of Suspension (RNOS) dated July 3, 2014. This verification plan is designed to verify the commitments made by the establishment on July 3, 2014.

Establishment Action Plan	Regulation	PHIS Task	Frequency
<p>Slaughter HACCP plan</p> <p>1) The establishment revised their Animal Welfare Plan on July 3, 2014. The program states that <i>"If an animal is showing signs of sensibility, a second knock will be administered immediately."</i> The <i>"Knocking Effectiveness Log"</i> will be maintained. 100% of beef and bob veal calves will be monitored. Management will verify this log 4 times per day.</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 record review and direct observation that the establishment is verifying and documenting 100% of beef and bob veal knocking effectiveness and that they are following their animal welfare plan.</i></p>	MOI	Livestock Humane Handling	Once Twice Daily
<p>2) The establishment stated that a second knocker will be immediately used as backup when a rifle</p>		Livestock	

<p>is not available. The stunner shall be applied so as to produce immediate unconsciousness as required by Title 9 CFR 313.15(a)(1).</p> <p><i>FSIS inspection personnel will verify through direct observation that the second knocker is used immediately as backup when a rifle is not available.</i></p>	<p>313.15(a)(1)</p>	<p>Humane Handling</p>	<p>Twice Daily</p>
<p>3) The establishment management will assure that secondary stunners remain ready for use by observation and documenting into the "Knocking Effectiveness Log."</p> <p><i>FSIS inspection personnel will verify through direct observation and record review management observation and initials into the log.</i></p>	<p>MOI</p>	<p>Livestock Humane Handling</p>	<p>Twice Weekly</p>
<p>4) The establishment updated their weekly "Sample Self Evaluation form for Humane Handling of Livestock" to include documentation of the maintenance of the knocking effectiveness that includes stunning observations, number of stunned animals observed, and the number performed correctly. The small livestock monitoring includes the statement "2 employees are performing the stunning procedures until knock box constructed."</p> <p><i>FSIS inspection personnel will verify through record review that the establishment updated this humane handling form.</i></p> <p><i>FSIS inspection personnel will verify through record review and direct observation that the establishment is implementing this program and documenting this evaluation.</i></p>	<p>MOI</p>	<p>Livestock Humane Handling</p>	<p>Once Daily</p>
<p>5) On July 3, 2014, the establishment conducted a humane handling "Signs of Sensibility" training.</p> <p><i>FSIS inspection personnel will verify through record review that this training was conducted.</i></p>	<p>MOI</p>	<p>MOI</p>	<p>Once</p>
<p>6) The establishment posted a copy of the immediate stunning sign in their knock box, and provided the names of the individuals who attended the signs of sensibility training.</p> <p><i>FSIS inspection personnel will verify through direct observation that the establishment posted the signage in the knock box.</i></p>	<p>MOI</p>	<p>MOI</p>	<p>Once</p>
<p>7) The establishment will assess the six signs of sensibility of each animal. This procedure is incorporated into the Animal Welfare Plan.</p> <p><i>FSIS inspection personnel will verify through direct observation that the establishment is assessing the sensibility of each animal being knocked.</i></p>	<p>313.15(a)(1) 313.15(a)(3)</p>	<p>Livestock Humane Handling</p>	<p>Daily</p>

These procedures will be performed at the frequency established above during the duration for the Abeyance period. Some items on this list only need verification once or as needed. For each item, please include a date that the verification procedure was completed.

Case Officer: (b) (7)(C) [REDACTED]