

EXHIBIT D –
November 2021
Inspection Report



United States Department of Agriculture
Animal and Plant Health Inspection Service

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Inspection Report

Envigo RMS LLC

8520 Allison Pointe Blvd., Suite 400
Indianapolis, IN 46250

Customer ID: **506554**

Certificate: **32-A-0774**

Site: 005

ENVIGO RMS LLC

Type: ROUTINE INSPECTION

Date: 16-NOV-2021

2.40(a)(2)

Direct

Repeat

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

The facility is not ensuring that the attending veterinarian has appropriate authority over medical care and euthanasia of dogs performed by staff members. Staff members that are trained and authorized to conduct euthanasia are not following approved procedures, resulting in the euthanasia of animals using methods that cause pain and discomfort.

***The facility uses an injectable drug (pentobarbital combination) as the primary method of euthanasia. The facility has a written program of veterinary care (PVC) and an SOP (#6014) "Euthanasia of Colony and Research Animals," both approved by the AV which the AV confirmed that staff performing euthanasia are trained on. These documents state that staff may only use methods deemed acceptable for dogs by the current AVMA Panel on Euthanasia and that all dogs must be unconscious when performing intracardiac euthanasia achieved by using a dissociative medication + sedative as anesthesia and includes instructions for assessing consciousness and providing additional anesthetic medication if needed.

Inspectors reviewed 171 medical records documenting euthanasia of 196 dogs and puppies and found that many young puppies are not receiving anesthesia prior to being euthanatized via intracardiac injection as required by the SOP.

***In addition, employees have failed to follow the AV's direction regarding treatment of other animals at the facility.

Veterinarians instructed staff to euthanize two adult dogs in early October. As of the inspection neither dog had been

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ethanized and there is no indication the veterinarian reversed their decision.

Weak or moribund dogs are not necessarily unconscious and can still experience pain and discomfort. Intracardiac injections have been found to be painful, stressful, and uncomfortable. To meet the regulatory requirements of euthanasia, death must be induced without evidence of pain or distress. Failure to provide veterinary care as directed by the attending veterinarian undermines their authority and frequently causes unnecessary pain and distress.

Correct by ensuring that the AV has adequate authority to ensure the provision of veterinary care and to oversee all other aspects of animal care and use.

2.40(b)(2) Direct Repeat

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

A total of 30 dogs present on inspection had severe dental disease and had not received adequate care to address this issue. Additionally, 12 of these dogs had concurrent issues which similarly had not received adequate veterinary care.

These additional issues included severe medical conditions of the ears, eyes, feet, skin, haircoat, and poor body condition.

***Dental disease: Thirty adult beagles ranging from 2 to 7 years old were found with signs of severe dental disease including: loose teeth which moved with light pressure, exposed roots of teeth, pus along the gumlines, bleeding gums, hair and foreign material embedded in the gumlines, severe recession of the gums, severely reddened and inflamed gums, missing teeth, and significant accumulations of dark colored hard material (calculus) along the teeth. Treatment for these dogs (dental cleanings / extractions) had not been provided despite observation as early as Aug-2021.

***Poor body condition (1 dog): One nursing female dog had extremely prominent bones in the shoulders, ribs, hips, and back and had been underweight since Aug 2021. No treatment was provided for either condition.

***Foot Medical Conditions (7 dogs): The majority of these dogs had masses occurring between their toes that were reddened / inflamed and often oozing discharge consistent with interdigital cysts. One dog had toenails which were

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overgrown to the point that the nails had a severe curve and caused abnormal toe position when the dog was placed on a solid surface.

*** Ear Medical Conditions (2 dogs): . One dog's ear canals and surrounding skin was bright pink and inflamed and had significant accumulations of dark brown waxy material in the ear canals, consistent with an ear infection. The other had wounds on the external ear and significant thickening of the ear pinna.

*** Eye Medical Conditions (1 dog): This dog had a small mass on the lower right eyelid.

*** Skin Medical Conditions (1 dog): This dog had large areas of hair loss along the entire length of its back from neck to hips and across the shoulders and rib cage. Skin is reddened in some areas.

Failure to provide adequate veterinary care to the animals listed above can result in worsening of the conditions and unnecessary discomfort and suffering. Each of the dogs and conditions listed above were identified to the facility while inspectors were on-site (11/16 to 11/19) and provided again during the exit briefing. Correct by assuring all dogs with medical conditions are evaluated by a veterinarian for an accurate diagnosis and to develop an effective treatment plan and then following through with the treatment plan. Each dealer shall use appropriate methods to prevent, treat, diagnose, and control diseases and injuries.

2.40(b)(3) Direct Repeat

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

A total of 34 dogs (in addition to those listed above) had medical conditions that were not identified or treated by the facility prior to the inspection.

***Dental disease (7 dogs): Severe dental disease (similar to those described above).

***Generalized weakness (3 dogs): One adult beagle and two puppies were identified by inspectors with serious medical conditions resulting in weakness. Weakness, lethargy, and the other signs presented by dogs are indicators of serious underlying health conditions.

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***Wounds (8 dogs): Eight dogs and puppies had traumatic wounds that were not identified by the facility prior to inspection. These wounds ranged in severity and included wounds to the legs, chest, abdomen, neck, ears, and tails of these dogs. Many of these wounds had dark brown dried material consistent with blood on the surrounding fur.

***Lameness / Foot Medical Conditions (8 dogs): Injuries included bright, red masses, digits that popped/cracked when manipulated, swollen toes, refusal to bear weight.

***Masses (2 dogs): One puppy had a large soft, fluid filled, swelling on the top of its head. The other, an adult female beagle, had a ½ inch blue colored mass present on her abdomen near her teat.

*** Reproductive Medical Conditions (2 dogs): One dog was present in the kennel with his penis exposed and dry during examination. Another dog was identified in facility records as found dead on 11/1/21. On necropsy she was diagnosed with a ruptured uterus. There was no record of abdominal pain, vaginal discharge, difficulty whelping, or similar sign that preceded the facility finding this dog dead.

*** Eye Medical Conditions (6 dogs): Eye medical conditions observed included cloudy eyes with discharge, pea-sized masses at the corner of the eye, and corneal discoloration with a pigmented mass.

*** Ear Medical Conditions (2 dogs): Two dogs had severe medical conditions of the ears. One had significant redness and inflammation in both ears. The dog was observed shaking its head and scratching its left ear. An additional dog had discharge present at the opening of the ear canal and the skin of the ear canal was reddened with brown debris present and sticking to the skin. A large laceration was also present on this ear.

*** Skin Medical Conditions (3 dogs): Three dogs had significant skin medical conditions characterized by hair loss, peeling skin, crusts, flakes, and dull fur.

Failure to identify animals presenting with abnormal medical conditions can delay necessary veterinary intervention which could prolong any potential suffering and may even result in the animal's death. Daily observations of animals to identify

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medical problems is essential for animal health and welfare. Correct by observing all animals at least daily to identify physical, medical, or behavioral problems. Additionally, ensure that all findings are communicated in a timely manner to the attending veterinarian so that they can examine animals and ensure that appropriate treatment is provided.

2.75(a)(1) Repeat

Records: Dealers and exhibitors.

The facility's acquisition, disposition, and animal on hand records are incomplete and inaccurate for at least 937 dogs and puppies.

- At least 5 dogs (1 adult CFLCTK and 4 puppies) had no acquisition information, no disposition information, and were missing entirely from the record of animals on hand.
- Disposition Information was present, but inaccurate for one adult dog (CLLCUV). This dog was documented as having been sold on 4/7/2021. This animal was present during the inspection and was undergoing medical treatment. Facility representatives confirmed the identification for this dog.
- Records were missing required information (color and gender) for 832 puppies. This includes: 126 puppies which listed sex and description as "unknown" and 706 puppies that have gender recorded but listed color and distinctive markings as "TBD".
- The facility self-identified approximately an additional 99 dogs and puppies with inaccurate disposition records that were recorded as no longer active but had no disposition records. Accurate and complete recordkeeping of all acquisitions and dispositions is important for animal identification, traceability, and investigation of disease outbreaks or animal theft. The facility must ensure that all required acquisition and disposition information is maintained at all times.

2.131(b)(1) Direct Repeat

Handling of animals.

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On 11/16/21, 21 puppies were found to be handled in a manner that they were damp, shivering, and cold in building G3. According to facility records, 25 additional puppies had been found dead with cause of death attributed to cold exposure in building G3 over the last 8 weeks.

***Bldg G3 Room 1 enclosures #54, 55, & 56 housed nursing female beagles and their 4- to 5-week-old puppies. Building G3 Room 2 enclosures #43, 54, & 72 housed 5- to 7-week-old puppies without dams. The enclosures had all recently been cleaned with cold water and kennels were not dried prior to replacing puppies. These enclosures were on the side of the room opposite the radiant heater. None of these enclosures had any solid resting surface or bedding. No heat lamps were present in room 1. Enclosures in room 2 had heat lamps which were present, but not plugged in at the time of inspection. On 11/19/21 Bldg G3, Room 1 was re-checked and there were still no heat lamps installed. Again, several puppies were observed shivering.

All handling of animals, including cleaning activities and housing, must be done as carefully and expeditiously as possible and in a manner that does not cause excessive cooling. Allowing puppies to become wet and chilled during / following cleaning or not providing sufficient heating/bedding causes discomfort and may result in illness or death. Correct by ensuring that all animals are handled as carefully and expeditiously as possible and in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.

3.1(a) Direct

Housing facilities, general.

Numerous construction and maintenance issues were identified during the inspection.

***Flooring Gaps: Approximately 75% of enclosures have flooring which is not cut to the same size and shape as the enclosure walls resulting in large gaps between the floor and the fencing. Gaps measured up to 2 inches wide and inspectors saw dogs fall or step into the gaps alongside the flooring. Facility medical records document at least 10 additional dogs and puppies that were significantly injured by improperly constructed and maintained enclosures during

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the period from 9/2/21 to 11/2/21.

***Chain-link Fencing Gaps: Gaps were present in fencing where chain link had become detached from the fence frame. Gaps range from only a few inches wide to the entire section of chain link forming the barrier between enclosures no longer being attached to the metal frame. Housing facilities that have not been kept in good repair with numerous areas of unsecured fencing, may injure dogs by entrapping limbs or may fail to adequately contain the dogs.

***Access Doors: Approximately 30% of the enclosures have access doors with structural damage to the metal frames and swinging mechanisms (such as broken hinges, doors that won't stay shut, doors where the plastic flap is stuck and can't move, and damaged door frames which bend outward and leave up to 6-inch gap between the frame and the wall). Inspectors observed dogs attempting to squeeze through the gap with the guillotine doors locked while others attempted to squeeze through space between the metal flashing of the door frame and wall.

***Sharp Points: Approximately 50% of enclosures have sharp points and edges. There are multiple areas with sharp points from broken chain link sticking directly into the enclosure where the dogs would walk, drink water, and jump up around the feeders.

***Enclosure Walls: Approximately 20% of the enclosures in G1 and G2 do not have enclosure side panels properly secured to the back wall or to adjacent fencing. Inspectors observed the unsecured panels rock back and forth as the dogs jumped up and put their forelegs on them.

***Broken Waterers and Self-Feeders: Numerous automatic waterers are leaking water onto the flooring of the cement walkway and beneath the enclosures. The leaking water is pooling beneath the metal self-feeders where it is mixing with spilled food creating a wet, moldy environment that is a breeding ground for insects. There are several broken metal self-feeders that are spilling food onto the cement floor.

***Unsecured Flooring: Several enclosures have flooring that is not secured to the framework beneath it or lacks support

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from underneath. In these enclosures, the floors bounce up and down, shift, tilt, or sink under the weight of the dogs as they move about the enclosure. Flooring that is not properly secured to the framework can cause injury to the dogs and should unsupported flooring collapse, the animal could be seriously injured or escape the enclosure.

Housing facilities for dogs must be constructed and designed so they are structurally sound, kept in good repair and protect the animals from injury. Correct by repairing or replacing damaged or broken facilities and ensure that all aspects of the enclosures are maintained in good repair and are safe for the dogs at all times. To be corrected by: 11 Feb 2022.

3.1(c)(1) Repeat

Housing facilities, general.

The facility continues to have widespread lack of maintenance of the primary enclosures, dog toys, and surfaces in contact with dogs. These issues include chewed plastic dog door flaps, chewed guillotine-style doors, lixit lines chewed to the point the outer pipe is completely missing, chewed plastic boards used to fill gaps along the flooring, excessive rust, and areas of flaking paint and chipped, broken, pitted, unsealed, cracked, and crumbling concrete. Severely rusted metal or damaged concrete can comprise the structural integrity of the object, leading to increased risk of injury in the dogs. Excessive chew damage and issues with concrete can prevent proper cleaning and sanitization. The surfaces of housing facilities and objects within the facility must be constructed in a manner and made of materials that allows them to be readily cleaned and sanitized or removed and replaced when worn or soiled. The dealer must repair or replace damaged surfaces so that they are free from excessive rust and sharp points and able to be cleaned and sanitized effectively.

3.1(c)(3) Repeat

Housing facilities, general.

The facility continues to have surfaces in contact with dogs that are not being cleaned adequately enough to prevent the build-up of dirt and grime. Numerous enclosures have an excessive accumulation of organic material covering on multiple surfaces.

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According to the facility the enclosures receive a "rough hosing" once per day with either a pressure washer or a standard hose. The amount of organic material accumulated on enclosure surfaces indicates the current cleaning frequencies and methods are not adequate. Buildups of organic material increase the risk of disease towards the dogs. Correct by ensuring that all hard surfaces which dogs come in contact with are adequately cleaned in a manner which prevents the accumulation of excreta and reduces disease hazards.

3.1(e)

Housing facilities, general.

Food and bedding supplies are not being stored properly to protect them from spoilage, contamination and vermin infestation. In 96 room 6 there is an open bag of shavings sitting on the floor and 97 room 8 there is an open bag of shavings stored in a trash can with no lid.

Open bags of shavings and food can become contaminated by pests such as insects and rodents which could have a negative impact on the health and well-being of the dogs. All open supplies of food and bedding must be kept in leakproof containers with tightly fitted lids. The licensee must move the open bags of food and shavings into leakproof containers with tightly fitted lids. The licensee must ensure that all food and bedding is properly stored at all times. To be corrected by: 11 Feb 2022.

3.2(d)

Indoor housing facilities.

The indoor housing areas which house whelping dogs are not completely impervious to moisture. In building G3 rooms 1 and 2 the concrete walls and center aisleway are not sealed or painted, and the kennel had been recently washed when the inspection was started. The back wall of the enclosures and center aisleways appeared wet in patches indicating that any prior sealing of the concrete has likely worn and the concrete is no longer impervious to moisture. Some walls have large cracks running down the length of them for several feet which create another avenue for moisture to penetrate the

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concrete.

Surfaces that are not impervious to moisture cannot be properly cleaned and sanitized which could increase the risk of disease hazards towards the dogs. Absorption of water could also undermine a surface's structural integrity causing it to fail and potentially injure an animal. Surfaces of indoor housing facilities, including floors and walls, must be impervious to moisture. The licensee must ensure that the affected surfaces are sealed or painted in a manner that makes them impervious to moisture and that they are maintained appropriately to support the health and well-being of the animals. To be corrected by: 1 April 2022.

3.3(d)

Sheltered housing facilities.

Multiple dogs do not have adequate protection from the elements within their shelter due to missing access door flaps. Enclosure in G1 & G2 are constructed with openings in the back wall to allow the dogs to move between the indoor and outdoor portions of the enclosure. Several enclosures are missing the flap which covers this egress opening. This allows extreme weather, such as frigid temperatures, to enter the sheltered portion. While a guillotine type door is present, this door is only closed during cleaning and is left open overnight and most of the day providing no break from wind. Numerous other enclosures have flaps severely damaged by chewing; in those enclosures, 50-75% of the flap is missing leaving it similarly ineffective at providing shelter. During the week of the inspection, overnight temperatures fell to the low 20s and 30s Fahrenheit. Enclosures with missing flaps housed at least 9 dogs while those with severely damaged flaps housed many more. Dogs in adjacent enclosures were likely exposed to drafts as well.

Failure to fully protect the sheltered portion of the enclosure may not allow the dogs to completely escape extreme weather conditions which can result in discomfort or illness. The licensee must repair or replace these flaps in order to provide adequate shelter from the elements including protection from freezing temperatures. To be corrected by: 11 Feb 2022.

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3.6(a)(2)(ii) **Direct** **Repeat**

Primary enclosures.

The enclosures at this facility continue to fail to protect the dogs from injury. There are numerous examples of body parts being pulled into adjacent enclosures by neighboring dogs causing injuries to the dogs involved. On 11/19/21, APHIS inspectors observed a neighboring dog from an adjacent enclosure reach through the dividing bars and grab the right ear of dog ???-CCE. Dog ???-CCE vocalized loudly indicating pain while the other dog continuously pulled his ear. Two additional dogs (CLDCXC and CLCCMT) were identified in facility mortality logs from Nov-2021 with similar severe ear injuries described as “severe damage to R ear” and “missing part of R & L ears.” The openings in the dividers between enclosures are large enough that feet, tails, and ears of dogs can be pulled through to an adjacent enclosure. While this type of enclosure would often be suitable for group-housed dogs, the widespread compatibility problems also identified at this facility make this enclosure style inadequate to protect dogs from injury by those in adjacent enclosures.

Enclosures which are constructed in a manner that do not protect animals can lead to injuries caused either by the enclosure itself or animals in adjacent enclosure. This leads to unnecessary pain, suffering, and even death for animals that are injured. Correct by ensuring that all enclosures are constructed and maintained in a manner that prevents injury.

3.6(a)(2)(x) **Direct** **Repeat**

Primary enclosures.

The facility continues to house nearly all the dogs on raised slatted floor identified on previous inspections as especially dangerous to the dogs. On this inspection, 6 dogs were found actively stuck in the flooring, requiring facility representatives to manually remove them. Based on records, at least nine other dogs were entrapped in the floor between 8/1/21 and 11/3/21. Several of these dogs were injured and required treatment for lameness and wounds. The 6 dogs found with feet/toes trapped between slats of the flooring were present in both buildings G1 and G2.

-Weaned puppies as young as 6-7 weeks of age also continue to be housed on the same slatted flooring. Inspectors

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witnessed the toes and feet of several puppies pass through the openings of the floor. Butcher paper laid over the existing flooring is not a sufficient correction. Puppies were observed urinating on and playing with the paper by tearing it, resulting in exposure of the dangerous flooring within minutes of paper being put into the enclosure.

The facility has not implemented any effective corrections to eliminate the risk of entrapment to older dogs or to stop the ability of a puppy's feet and legs to pass through the floor openings. After each of the dogs found stuck was released from the floor, the animal was returned to an enclosure with the same flooring.

The risk of serious injury is particularly elevated if dogs are entrapped while no staff is present to help release them from the floor. Openings in the floor that are large enough to allow the feet and legs to pass through can lead to entrapment of a dog which can be painful, distressful, and may result in serious injury to the animal. The licensee must ensure that all floors are constructed in a manner that protects the dogs' feet and legs from injury and that slatted floors do not allow feet and legs to pass through any openings.

3.6(c)(1)(i) **Direct**

Primary enclosures.

A total of 742 young dogs and weaned puppies were not provided with the minimum space required by the Animal Welfare Act. Representative animals and enclosures were measured in several rooms in buildings G2 and G3. In each case, the Manager of Operations and/or Director of Operations confirmed that the enclosures and animals measured were consistently sized and representative of the those in the room.

- Building G3 Room 2 contained 7 enclosures housing a total of 53 recently weaned puppies. Enclosures measured 47 inches x 49 inches (16 square feet) and average-sized co-housed puppies required 2.4 sq ft each. Enclosures housed as many as 9 puppies (requiring 21.8 sq. feet).

- Building G2 Room 1 contained 4 enclosures with 6 six-month-old beagles each (24 dogs total). Enclosures in this room measured a total of 38.9 sq. feet per enclosure (including both the indoor and outdoor portions). Six average-sized co-

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housed dogs collectively required 39.8 sq feet per enclosure.

- Building G2 Room 6 contained fifteen enclosures (housing a total of 126 four- to five-month-old dogs). Enclosures in this room measured a total 39.7 sq. feet and co-housed dogs required a minimum of 6 sq. feet each. Enclosures housed as many as 10 dogs each (requiring 60.4 sq. feet per enclosure).

- Building G2 Room 7 contained 60 enclosures (housing a total of 539 young dogs). Enclosures measured a total of 39.5 to 39.7 sq. feet and average-sized co-housed dogs required a minimum of 5.35 sq. feet each. Enclosures housed 11 dogs each (requiring 58.9 sq. feet per enclosure).

Failing to provide adequate space can cause discomfort, crowding, distress, poor sanitation, increased incidence of illness, and aggression. Prolonged overcrowding can also lead to engrained and long-lasting negative behaviors (such as increased aggression and future incompatibly, as is seen at this facility) as dogs age. Correct by ensuring that all animals at this facility are provided with at least the minimum space required by the Animal Welfare Act. This issue was identified to facility representatives each day as the rooms were inspected (16, 18, and 19 of November). To be corrected by: 11 Feb 2022.

3.7 **Direct** **Repeat**

Compatible grouping.

The facility continues to have severe compatibility problems amongst the adult dogs and puppies. Inspectors witnessed numerous serious dog fights during the inspection, found dogs with injuries from recent fights, and observed dogs aggressively guarding food from cage mates. On multiple occasions the inspection had to be temporarily stopped in order to remove incompatible dogs Facility records documented dogs that have been injured due to fighting outside of the inspection process..

Housing incompatible dogs together or allowing incompatible dogs to have access to each other can result in serious injury or even the death of an animal. Even though this facility continues to have compatibility problems in their group

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housed animals, there has been no action taken by the facility to proactively identify and separate dogs that are incompatible. Currently the facility only responds after a fight occurs and then only by moving one of the dogs if the fight was deemed severe enough to warrant moving the animal. Correct by ensuring that all animals housed together are compatible.

3.9(a) **Direct** **Repeat**

Feeding

Food being fed to nursing female dogs and their puppies was not wholesome or palatable. On 11/16/21 inspectors checked a random sample of food receptacles in two rooms housing a total of 85 adult dogs and 488 puppies. Every feeder checked contained food that was wet, caked, and/or moldy. The food in two feeders was also contaminated with large numbers of live maggots. Inspectors requested the feeders be cleaned and food be replaced as soon as possible and representatives stated that they would. On 11/19/21, the inspectors returned to this area and conducted another sampling of food receptacles for nursing dogs and puppies. The feeders checked still had either moldy and/or caked feed inside them.

Food that is caked, moldy, and/or infested with insects is not considered wholesome and palatable and may lead to reduced feed consumption, poor nutrition and body condition. Food must be uncontaminated, wholesome, palatable, and of sufficient quantity and nutritive value. The licensee must remove any contaminated or caked food from the feeders and ensure that all food items remain uncontaminated and wholesome at all times.

3.9(b) **Direct**

Feeding

The self-feeders at this facility are not accessible to all animals, are located in a manner that fails to minimize contamination and they are not being cleaned and sanitized adequately.

In most feeders the opening is circular and accommodates only one adult dog's head at a time. Some enclosures have a

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wider rectangular opening that usually still accommodates only one dog to access feed at a time. The following concerns were noted by inspectors:

- The facility's self-feeders are not accessible to all adults and puppies at the facility due to an inadequate number of feeders and food guarding behaviors which were exhibited by many animals. There is one feeder available for each enclosure of dogs (often 4-11 animals). In building G3 (housing nursing female dogs), access to the food for nursing mother dogs was frequently blocked by 1 or more young puppies sleeping inside this feeder.
- The facility's self-feeders are located in a manner that fails to minimize contamination and grossly contaminated feed was observed in all feeders that were checked in building G3. The feeders in all buildings are mounted with the opening dogs use to access food only 1-2 inches from the floor of the enclosure. This placement allows back splashed water mixed with feces to be sprayed into the feeder during pressure washing of the enclosure. Additionally, the feeders are so low that young puppies are able to fully crawl inside the feeder openings and were frequently found sleeping directly on the food.
- The facility's self-feeders are not currently being cleaned frequently enough. Numerous feeders throughout the facility had an excessive layer of grime covering the interior metal walls

Correct by ensuring food receptacles are readily accessible to all dogs, are located so as to minimize contamination by excreta and pests and are kept clean and sanitized in accordance with 3.11(b). To be corrected by: 11 Feb 2022.

3.11(a) Repeat Cleaning, sanitization, housekeeping, and pest control.

The facility continues to have a general sanitation problem with cleaning waste from under primary enclosures as often as necessary to prevent the accumulation of feces and food waste to reduce disease hazards, odors, and insect pests.

Many rooms had white, moldy accumulations of spilled feed and excreta in the pits that were several inches high and created areas of standing liquid. The majority of rooms in buildings G1 & G2 have significant accumulations of dropped

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feed and excreta on the ledges just underneath the suspended flooring. The food waste and organic material build-up has been present long enough that in many rooms it is either white, brown, or black with mold and numerous small pit/sewer flies were observed congregating on the wastes. In several rooms, standing water in the aisleway was cloudy and mixed with large amounts of food debris and contained numerous white thread-like 'worms'.

Buildup of feces, urine, food waste, and wastewater provide breeding grounds for pests and insects. Additionally, they expose dogs to unnecessary disease hazards and noxious odors. Correct by ensuring that excreta and food waste is removed from under primary enclosures and feeders as often as necessary to prevent accumulation and reduce pests and odors.

3.11(b)(2)

Repeat

Cleaning, sanitization, housekeeping, and pest control.

The facility is not sanitizing the enclosures or water receptacles at the minimum frequency of every 2 weeks and frequently enough to prevent the accumulation of dirt, debris and other disease hazards.

- Facility records from October and November showed many rooms are sanitized as infrequently as every 3-4 weeks while some have no documentation of being sanitized at all during October and November.

- Many of the automatic waterers (lixit pipes) and metal nipples are covered in an orange-colored film and there is rust-colored debris stuck on the inside surfaces of the metal nipple. Many also have a black mold-like substance forming on top of the spout. The portions of the metal enclosure directly adjacent to the nipple are frequently covered with rust and/or flaking white particles, hair, dirt and other grime.

Routine sanitization of enclosures and water receptacles for dogs is important to prevent the accumulation of disease hazards towards dogs. Correct by sanitizing primary enclosures and water receptacles for dogs at least once every 2 weeks or as often as necessary to prevent the accumulation of dirt, debris, food waste, excreta, and other disease hazards.

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3.11(c)

Cleaning, sanitization, housekeeping, and pest control.

Buildings on the facility's property are not being kept clean and free of accumulations of trash, junk, waste products, and discarded matter.

-- Ventilation fans in buildings G1 and G2 are covered in a thick layer of dust, grime and debris with numerous dead bugs and spider webs forming inside the fan housings.

-The drainage pit covers (which are outside of any primary enclosure) in buildings G1, G2, and G3 are covered with an excessive layer of accumulated hair, dirt, debris, and other waste products.

-- The facility has a separate building used for storage of feed, supplies, and equipment and cleaning of shipping crates. This building is excessively cluttered and contains excessive trash, junk, dusty unused caging material and equipment.

There is also a large store of rusty metal feeders that the facility representative stated they weren't sure which were broken versus which were able to be used. Excessive accumulations of waste such as hair, dirt, and other debris can provide breeding grounds for pests and contribute to odors. Large amounts of clutter provide breeding areas for rodents and other pests. Additionally, the amount of disorganized broken equipment makes it difficult to locate functional equipment when needed.

Correct by ensuring premises, including buildings and surrounding grounds, are kept clean and in good repair and reduce or eliminate breeding and living areas for rodents and other pests and vermin. Also ensure that premises are kept free of accumulations of trash, junk, waste products, and discarded matter. To be corrected by: 1 April 2022.

3.11(d)

Direct

Repeat

Cleaning, sanitization, housekeeping, and pest control.

The facility's plan to control pests is not effective and insect infestations were found in multiple buildings.

Large numbers of small gnat-sized black flies were seen throughout the facility on the wall dividers, feeders, and on

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organic material in the pits beneath the enclosures. Larger flies (house-fly type) were seen throughout the facility in several rooms on walls, feeders, aisleways, and in enclosures of the animals. Large numbers of small white fly larvae or maggots are present in spilled feed under enclosures and many areas of wet flooring appear to be almost completely covered in maggots. Large numbers of small, white, thread-like "worms" were seen in several rooms throughout the facility where there is pooled water.

Failure to control insects may result in discomfort to the dogs as well as cause contamination of the food and environment which could have a negative impact on the dogs' health and well-being. The licensee must establish an effective plan to control the many species of insects infesting the buildings. Additionally, ensure that the plan remains effective at controlling insect, avian, and mammalian pests all times in order to ensure the health and well-being of the dogs.

3.12 **Direct** **Repeat**
Employees

The facility continues to have an insufficient number of employees to provide care and husbandry practices required by the Animal Welfare Act. The facility currently employs only 21 full-time and 3 part-time employees who are responsible for all husbandry and daily observations for 4,652 dogs and puppies. The current staff level is not adequate to perform the tasks required such as daily observations, medical treatments, cleaning and sanitization, and facility maintenance as documented on this and previous reports.

The continued lack of an adequate number of employees needed to carryout basic husbandry practices and care for the animals is having a severe adverse impact to the well-being of these animals by delaying necessary medical treatments and basic husbandry. Correct by ensuring that the dealer employs an adequate number of appropriately trained and supervised employees as needed to carry out the required provisions of the Animal Welfare Act.

3.13(a)

Veterinary care for dogs.

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The facility's written Program of Veterinary Care (PVC) for dogs is missing required elements. The PVC does not specify the frequency of regularly scheduled visits and is not signed as required by 3.13(a)(1).

A written PVC is important to ensure clear communication of expectations. The written PVC must address the frequency with which the AV will conduct regularly scheduled visits to all premises in order to assess the animals and other aspects of veterinary care, even when the AV is full time. In addition, the PVC allows the full time AV to specify how long they may be away from a facility without needing routine coverage from a relief veterinarian. Failing to address the frequency and/or timing of regularly scheduled visits may lead to excessive intervals between visits or gaps in the assessment of care being provided to animals. In addition, a signature is required on the PVC to document the involvement of the AV in the development of the written plan. Correct by ensuring that a frequency of visits to the areas where animals are housed (in order to assess the adequacy of animal care and use) is specified and further by ensuring that the written PVC is signed by the attending veterinarian. To be corrected by: 10 Feb 2022.

3.13(a)(2) Direct

Veterinary care for dogs.

A complete hands-on physical examination has not been completed within the last 12 months for approximately 10% of the dogs over a year old for which records were evaluated. This dealer only acquires dogs through on-site breeding, so all dogs have been on-site since birth.

. Failure to have dogs examined by a veterinarian at least annually can result in delays in the proper diagnosis and treatment of underlying medical conditions. Correct by ensuring that a complete physical examination from head to tail of each dog is completed by the attending veterinarian not less than once every 12 months. To be corrected by: 11 Feb 2022.

3.13(b)(1)

Veterinary care for dogs.

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The facility does not have all the required components of the identity of each animal on their different medical record documents. The facility currently maintains medical records filed by the type of record and date of procedure rather than by individual animal. Specific types of medical records are missing required information such as breed, age, sex and individual identification on some or all of the medical records. Affected forms include clinical treatment forms, inventory change notices, mortality records, post wean mastitis treatment forms, annual USDA beagle treatment and physical exam forms, and controlled substance administration records.

According to the Manager of Operations, the facility did not realize that each of these documents constitutes a medical record for the dog listed and therefore are subject to 3.13(b)(1). Without these required components, a specific medical record cannot be consistently and accurately linked to an individual animal. Additionally, information such as age, breed, and gender can play a significant role in the proper diagnosis and treatment of medical conditions.

Accurate medical records are crucial for ensuring appropriate veterinary care is being provided to every animal. Correct by ensuring every medical record for dog's includes the identity of the animal, including identifying marks, tattoos, or tags on the animal and the animal's breed, sex, and age. To be corrected by: 11 Feb 2022.

3.13(b)(2) Repeat

Veterinary care for dogs.

The facility does not have complete or accurate medical records for their dogs. The medical records created when problems have been identified (such as disease, injury, or illness) are missing critical components such as complete descriptions of the problem, treatments administered, and procedures performed in order to provide care or diagnose the condition. Additionally, the medical records for several animals contain gross inaccuracies such as one dog (CFLCTK) which stated that it had been euthanized when it had not been.

Approximately 59% of all euthanasia records evaluated (Aug-Nov 2021) were missing the route of administration for euthanasia drugs.

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Incomplete or inaccurate medical records do not allow the attending veterinarian to adequately assess the adherence of employees to specific protocols, ensure humane handling, or assess the needs of individual animals or the colony as a whole. Correct by ensuring that when a problem is identified in a dog (such as disease, injury, or illness), the date and description of the problem, examination findings, test results, plan for treatment and care, and treatment procedures performed are recorded in the medical records.

This inspection was conducted on site November 16-19 with the Manager of Operations, Director of Operations, Attending Veterinarian, and numerous other employees. Records and paperwork were examined remotely for the remainder of the inspection.

The exit briefing was conducted on 12/17/21 with the Manager of Operations, Attending Veterinarian, Direct of Operations, Senior Vice President for Veterinary Services, and the Vice President for North American Operations.

Additional Inspectors:

KELLY MAXWELL, ANIMAL CARE INSPECTOR

Rachel Perez-Baum, Veterinary Medical Officer

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Customer: 506554
 Inspection Date: 16-Nov-2021

Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
506554	32-A-0774	005	ENVIGO RMS LLC	16-NOV-2021

Count	Scientific Name	Common Name
002719	<i>Canis lupus familiaris</i>	DOG ADULT
001933	<i>Canis lupus familiaris</i>	DOG PUPPY
004652	Total	