District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK3117 101505G	05OCT2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Thursday, October 5, 2017 at 1300 Attendees: USDA Establishment (b) (6) (b) (6) (b) (6) (b) (6) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c)

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK1517 105605G	05OCT2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Tuesday, October 3, 2017 at 0955 Attendees: USDA Establishment (b) (6) (b) (6) This meeting was necessitated by an observation made in the live bird holding area while performing a Good Commercial Practices task this morning. Two full trailer loads of hens (trucks #81 and 82) and a partial trailer load of hens (truck #80) were held over yesterday to this morning. 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 and (b) (4) According to (b) (6) the cause of the holdover was a delay in evisceration yesterday which didn't allow for slaughter of all hens delivered. If stated that when birds are held over, the plant manager and the scheduling department are aware of the situation so adjustments can be made to the evisceration schedule. Also, according to (b) (6) production schedules require toms to be slaughtered before hens every day because of staggered start times and the need for certain birds to begin production in the departments following slaughter and chilling. Therefore, hens which are held over cannot be slaughtered first as was the case this morning. (b) (6) and I discussed what constitutes an "unscheduled" holdover. Their program cites breakdowns and shutdowns as potential causes of unscheduled holdovers. A holdover in which the scheduling department continues to deliver birds which cannot be slaughtered on a particular day would be difficult to regard as unscheduled. (b) (6) will discuss with the plant manager and scheduling department today to hopefully prevent that scenario from occurring. As was discussed, it is not a good practice nor is it in the establishment's interest to leave birds in public view outside the plant at night. A previous complaint was filed earlier this year by an observer that concern

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK4810 103913G	130CT2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, October 13, 2017 at 0900 Attendees: USDA Establishment (b) (6) This meeting was necessitated by an observation made in the live bird holding area while performing a Good Commercial Practices task this morning. A partial trailer load of hens (truck #81) was held over yesterday to this morning. 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 and (b) (4) According to (b) (6) , the cause of the holdover was the delay in evisceration Thursday. QA personnel delayed the start of operations Thursday to correct deficiencies they found at preoperational inspection. The birds held over were examined this morning, and no abnormalities were noted. As was discussed previously, it is not a good practice nor is it in the establishment's interest to leave birds in public view outside the plant at night. 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 MOI may be linked to the most recent concerning live birds held over at this establishment which was dated October 5, 2017. 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)

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK0712 101524G	240CT2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 This MOI serves to document a live bird hold over from 10/23/17 to 10/24/17. The details of the holdover were communicated via electronic mail from (b) (6) to USDA IPP (b) (6) and (b) (6) Two partial trailer loads of hens (trucks #11 and 80) were held over yesterday to this morning. 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 and (b) (4) According to (b) (6) , the holdover was "due to our inability to properly run today due to the high amount of unplanned absences by employees." The birds were inspected on the morning of 10/24. Three dead birds were noted on trailer #11 but the birds were otherwise in good condition. According to the flock processing schedule provided to FSIS on 10/23, trailer #80 arrived at 12:20 and trailer #11 arrived at 12:43. These birds were processed after lunch (1100-1200) on 10/24, very near or at 24 hours after arriving. In an MOI dated 10/3/17, (b) (6) documented a discussion with (b) (6) concerning what constitutes an unscheduled holdover. Their SOP #307 cites breakdowns or shutdowns as deviations to their standard protocol which could potentially lead to an unscheduled holdover. Staffing issues dictating slower line speeds is difficult to justify as an unscheduled deviation. Additional MOI concerning live birds held over at this establishment were documented on October 3rd, 5th and 13th. This memorandum serves to document what was discussed via email 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.

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK0108 101425G	25OCT2017	MOI Regarding Live Birds Entering Scalder Establishment P-1049 October 24th, 2017, 13:15 hours. In attendance: (b) (6) (b) (6) (b) (6) (b) (6) (c) (b) (6) (c) (b) (6) (c) (c) (b) (6) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c
15	M751	Norbest, LLC (Moroni)	MMK3616 104527G	27OCT2017	At approximately 1525 hours, I(b) (6) ) was called out to the inspectors station to examine two cadaver hens in the condemn barrel to confirm that there had been no bleeding cut made to the birds. One cadaver was condemned by(b) (6) and one by(b) (6) . I notified (b) (6) and he was shown the cadavers and the lack of a bleeding cut on the necks. He stated that he would document this and that he would talk with the back-up killer. I returned to the evisceration line approximately 10 minutes later to follow up and there had been no further instances. I observed the killing machine and back-up killer as well and deemed their process to be in control. However, at approximately 16:20 the inspectors retained three more cadavers with no bleeding cuts. At this time, slaughter had ended for the day. (b) (6) also discussed the issue with the back up killer. This MOI serves as a reminder that the PPIA and agency regulations require that live poultry be handled in a manner that is consistent with Good Commercial Practices and that they do not die from causes other than slaughter. A copy of this MOI will be provided to the establishment and a second copy will be kept on file in the USDA office. MOI MMK11071007251 for the same issue was documented on 10/25. Respectfully,

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK3909 103228G	280CT2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 This MOI serves to document live bird hold overs occurring every day for the week of October 23rd through 28th. The details of the holdovers were communicated via electronic mail from (b) (6) to USDA IPP (b) (6) (b) (6) and (b) (6) and were also discussed at the weekly meeting. 1-2 trailers of hens were held over every evening this week. The hold over from Monday to Tuesday has been documented in a previous MOI. 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 (b) (4) The reasons provided by the establishment for the holdovers are as follows: 10/24 to 10/25 – Quality of birds for processing, high wash needed. Also the initial holdover yesterday was noted as a contributing factor. 550 hens 10/25 to 10/26 – Ammonia leak causing plant evacuation. 4,500 hens 10/26 to 10/27 – Late start due to maintenance related issues, bird quality issues with Toms. 2,500 hens 10/27 to 10/28 – No official notice or reason given. 2 trailers of hens The holdover birds were found to be in acceptable condition upon antemortem inspection each day. In an MOI dated 10/3/17, (b) (6) documented a discussion with (b) (6) concerning what constitutes an unscheduled holdover. Their SOP #307 cites breakdowns or shutdowns as deviations to their standard protocol which could potentially lead to an unscheduled holdover. According to this definition, the ammonia leak and evacuation causing a shutdown of approximately 1 hour in evisceration on Wednesday meet the criteria for an unscheduled hold over. The reasons given for the remaining days are more difficult to justify as unscheduled deviations. Furthermore, the occurrence of hold overs every day this week is proving to be common practice rather than an occasional deviation. Additional MOI concerning live birds held over at this establishment were document what was discussed vi

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK2418 102231G	310CT2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Tuesday, October 31, 2017 at 1555 Attendees: USDA Establishment (b) (6) This meeting was necessitated by an observation made in the live bird holding area while performing a Good Commercial Practices task this morning. Two trailer loads of hens (trucks #79 and #82) were held over yesterday to this morning. 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 and (b) (4) The cause of the holdover was a mechanical breakdown in the pickers yesterday which caused a stoppage of approximately one hour in the evisceration department. The birds held over were examined this morning, and no dead birds were noted. According to (b) (6) , the slaughter schedule for the rest of the week was adjusted to absorb the holdovers into today's production so there would be no additional holdover birds today. As was discussed previously, it is not a good practice nor is it in the establishment's interest to leave birds in public view outside the plant at night. 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)

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK4614 114407G	07NOV2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Tuesday, November 7, 2017 at 0715 Attendees: USDA Establishment ( <b>b</b> ) ( <b>6</b> ) ( <b>b</b> ) ( <b>6</b> ) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of October 30, 2017. 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 and ( <b>b</b> ) ( <b>4</b> ) Wednesday Holdover (approx. 3,000 birds) Two trailer loads of hens (trucks #71 and #78) were held over from Wednesday morning to Thursday afternoon. According to ( <b>b</b> ) ( <b>6</b> ) the deviation that caused the holdover was the quality of birds in several trailers. Due to the quality issues, the line speed planned and anticipated was required to be lowered for a period of time by management to process the birds. A review of line speeds from yesterday indicates that the amount of production lost due to a temporary decrease of line speed could only account for some of the birds held over. Thursday Holdover (approx. 3,000 birds) Two trailer loads of hens (trucks #72 and #81) were held over from Thursday to Friday. According to ( <b>b</b> ) ( <b>6</b> ), the holdover was due to the unscheduled downtime deviation which has made it impossible to fully slaughter and process all birds scheduled for processing today. A withholding of inspection action accounted for approximately one hour of the lost production time. Friday Holdover (approx. 6,300 birds) Three trailer loads of hens (trucks #71, #79 and #82) were held over from Friday to Saturday. According to ( <b>b</b> ) ( <b>6</b> ) the holdover was due to lowered line speeds due to several factors, including fecal failures, process control and mechanical problems. Two zero tolerance failures found by USDA personnel did occur on Friday. As was discussed previously documented for the cadavers being presented to the inspectors. An MOI was previ

District	EstNbr	EstName	MOI#	Date	Description
					provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK2216 114107G	07NOV2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Tuesday, November 7, 2017 at 0715 Attendees: USDA Establishment (b) (6) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of October 30, 2017. 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 and (b) (4) Wednesday Holdover (approx. 3,000 birds) Two trailer loads of hens (trucks #71 and #78) were held over from Wednesday morning to Thursday afternoon. According to (b) (6) the deviation that caused the holdover was the quality of birds in several trailers. Due to the quality issues, the line speed planned and anticipated was required to be lowered for a period of time by management to process the birds. A review of line speeds from yesterday indicates that the amount of production lost due to a temporary decrease of line speed could only account for some of the birds held over. Thursday Holdover (approx. 3,000 birds) Two trailer loads of hens (trucks #72 and #81) were held over from Thursday to Friday. According to (b) (6) the lods production time. Friday Holdover (approx. 6,300 birds) Three trailer loads of hens (trucks #71, #79 and #82) were held over from Friday to Saturday. According to (b) (6) the holdover was due to lowered line speeds due to several factors, including fecal failures, process control and mechanical problems. Two zero tolerance failures found by USDA personnel did occur on Friday. As was discussed previously, it is not a good practice nor is it in the establishment's interest to leave birds in public view outside the plant at night. A previous complaint was filed with the district office by an observer that concerned holdover firds. As was discussed previously, it is not a good practice nor is it in the establishment's interest to leave birds in publ

District	EstNbr	EstName	MOI#	Date	Description
					provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK2516 114107G	07NOV2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Tuesday, November 7, 2017 at 0715 Attendees: USDA Establishment (b) (6) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of October 30, 2017. 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 in (b) (4) Wednesday Holdover (approx. 3,000 birds) Two trailer loads of hens (trucks #71 and #78) were held over from Wednesday morning to Thursday afternoon. According to (b) (6) the deviation that caused the holdover was the quality of birds in several trailers. Due to the quality issues, the line speed planned and anticipated was required to be lowered for a period of time by management to process the birds. A review of line speeds from yesterday indicates that the amount of production lost due to a temporary decrease of line speed could only account for some of the birds held over. Thursday Holdover (approx. 3,000 birds) Two trailer loads of hens (trucks #72 and #81) were held over from Thursday to Friday. According to (b) (6) the lost production time. Friday Holdover (approx. 6,300 birds) Three trailer loads of hens (trucks #71, #79 and #82) were held over from Friday to Saturday. According to (b) (6) the holdover was due to lowered line speeds due to several factors, including fecal failures, process control and mechanical problems. Two zero tolerance failures found by USDA personnel did occur on Friday. As was discussed previously, it is not a good practice nor is it in the establishment's interest to leave birds in public view outside the plant at night. A previous complaint was filed with the district office by an observer that concerned holdover firds. As was discussed previously, it is not a good practice nor is it in the establishment's interest to leave birds in publi

District	EstNbr	EstName	MOI#	Date	Description
					provided to establishment management, and the signed original will be placed in the USDA files. (b) (6)
15	M751	Norbest, LLC (Moroni)	MMK4014 110010G	10NOV2017	Memorandum of Interview to Discuss Broken Wings / Bird Crushed by Truck Norbest Turkey / Est# P01049 Meeting Time: Friday, November 10, 2017 at 1255 Attendees: USDA Establishment (b) (6) (b) (6) (b) (6) This meeting was necessitated by observations made while performing a Good Commercial Practices task on the morning of November 10, 2017. Inspection personnel noticed a higher than normal incidence of broken wings evident on the birds being presented for inspection. At approximately 0650, I observed a sample of 100 birds pass between the pickers and the rehang area and counted 14 birds with broken wings (14%). Pathology suggested the breaks had occurred prior to death of the birds. (b) (6) (b) (6) , was notified and shown birds with broken wings. Enrique observed several broken wings and concurred the breaks were not consistent with ones caused in machinery. (b) (6) , was notified and shown birds with broken wings. Enrique observed several broken wings within a run of approximately 40 birds in the shackles between the trucks and the stunner. Employees unloading trucks in the hanging bay were observed grasping the lower legs of the birds and not handling any birds by the wings. Findings suggest the birds were mishandled when loaded onto the trucks at the farm. Approximately one hour later, I checked additional birds to assess whether the findings were limited to one truck or were consistent on multiple trucks which came from the same producer this morning. At 0751 while observing birds in the shackles in the hanging bay, I observed a bird on the ground get crushed when the truck moved forward while unloading. The only other employees I could see in the hanging bay at that time were the individuals doing the actual truck unloading. I went to the evisceration office to have(b) (6) summoned to the hanging bay. (b) (6) had been outside with other employees when the bird was crushed. (b) (6) had been outside with other employees when the bird was crushed. (c) (6) had been outside with other employees when the bird wa

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK0909 111216G	16NOV2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Thursday, November 16, 2017 at 0530 Attendees: USDA Establishment (b) (c) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of November 6, 2017. 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) " " Tuesday Holdover (approx. 1,000 birds) A trailer load of hens (truck #82) was held over from Tuesday to Wednesday afternoon. According to (b) (6) , the deviation in production was due to downtime associated with Tuesday's zero tolerance failure. Wednesday Holdover (approx. 2,300 birds) Two trailer loads of hens (trucks #74 and #78) were held over from Wednesday to Thursday. According to (b) (6) , the holdover was due to several issues (zero tolerance failure, bird quality, etc.) which caused a necessity in the lowering of programmed line speeds, making it impossible to process what was scheduled. Thursday Holdover (approx. 1,700 birds) A partial trailer load of hens (truck #85) was held over from Thursday morning to Friday afternoon. According to (b) (6) , the holdover was because it became necessary to run line speeds at rates lower from Friday to Saturday. According to (b) (c) to run line speeds at rates lower from Friday to Saturday. According to (b) (c) the holdover was due to unscheduled deviation of lower lines speeds than scheduled. (b) (c) considers all holdovers "unscheduled." Issues outside of mechanical breakdowns (a trend of lower line speeds due to quality of birds, zero tolerance failures, etc.) may represent anticipated aspects of a 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 establishmen

District	EstNbr	EstName	MOI#	Date	Description
15	M751	Norbest, LLC (Moroni)	MMK3608 111018G	18NOV2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Saturday, November 18, 2017 at 0620 Attendees: USDA Establishment (b) (6) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of November 13, 2017. 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) Monday Holdover (approx. 2,000 birds) A trailer load of hens (truck #91) was held over from Monday morning to Tuesday afternoon. According to (b) (6) the deviation in production was due to an equipment malfunction and an equipment breakdown (b) (4) Monday Holdover (approx. 2000 birds) A partial trailer load of heavy toms (truck #82) was held over from Tuesday morning to Wednesday morning. FSIS provided inspection beyond 10 hours to accommodate the extra birds, however, not all were slaughtered. Evisceration employees failed to communicate the holdover to "Unscheduled." Issues outside of mechanical breakdowns (a trend of lower line speeds due to quality of birds, zero tolerance failures, etc) may represent anticipated aspects of a 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 leave birds in public view outside the plant at night. A previous complaint was filed with the district office by an observer that concerned holdover birds. If understood, therefore, that FSIS will continue to issue MOI for this matter. In addition, there has been an increase in the number of cadavers being presented to the inspectors. MOI documented for the cadaver issue began October 25 and continued through last week. Cadavers presented on line this week include Monday (1), Tuesday (1) and Wednesday (2). A s

District	EstNbr	EstName	MOI#	Date	Description
	EstNbr	EstName Norbest, LLC (Moroni)	MOI# MMK4817 124622G	Date 22DEC2017	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, December 22, 2017 at 1245 Attendees: USDA Establishment (b) (6) (b) (6) (b) (6) (b) (6) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of December 17, 2017. 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) Norbest CEO, Matt Cook, is a member of the National Turkey Federation Executive Committee and should be familiar with those particular practices. Wednesday Holdover (approx. 3,000 birds) A trailer load of hens (truck #11) was held over from Wednesday morning to Thursday afternoon. According to (b) (6) , the deviations in production causing the holdover were a late start with the chillers due to cleaning issues and lack of
					sufficient staff to run at designated and scheduled speeds. In addition, "birds for the next two (2) days are scheduled to be modified in accordance with this holdover." In addition, I observed several live birds in the hanging bay after slaughter ended on Wednesday afternoon. As discussed in a previous MOI dated December 15, company policy is hanging bay employees are supposed to visually check the bay at the end of each day so loose birds do not remain overnight. Employees obviously failed to monitor for them on Wednesday afternoon. Thursday Holdover (approx. 600 birds) A partial trailer load of hens (truck #71) was held over from Thursday morning to Friday afternoon. According to (b) (6) , the holdover occurred due to unscheduled downtime which made it impossible to process the birds scheduled. The trailer was parked outside but not parked under the shelter which can
					accommodate approximately 12 trailers. The temperature last night dipped below 10 degrees and was noted to be 8 degrees this morning at 0845. No loose birds were observed in the hanging bay after slaughter ended yesterday or this morning. According to SOP #307 Live Bird Holdover, birds will be held in one of two locations, the live hang room (hanging bay) or the live haul trailer storage. The location chosen to park last night's holdover birds was next to the storage structure but not under the roof. According to (b) (6) , next to the roofed storage structure is still the storage area. (b) (6) had no explanation as to why the live hang room which is an enclosed structure that provides relative warmth and shelter from the weather and wind was not chosen. In addition, their program states, (b) (4) Birds held over at this facility, including last night, are routinely held for more than 24 hours because

District	EstNbr	EstName	MOI#	Date	Description
					get killed until the following afternoon even though they had arrived early morning on the previous day. Other issues At approximately 0945, I observed the backup bleeder cutting necks in the bleed room. Most birds missing the cutter were hung by one leg thereby not properly hung to be cut by the bleed machine. I notified (b) (6) (b) (6) (a) (b) (b) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c
25	P579	Jennie-O Turkey Store Sales, Inc.	UIO471210 2005G	05OCT2017	I spoke tc(b) (6) at approximately 1215 regarding two cadaver carcasses presented to USDA inspection at approximately 1045 and 1200 hours. Both carcasses had a purplish-reddish head, neck, and underside of the wings. One carcass had no cut at all, and one had a 1" cut in the neck skin that did not cut the underlying muscle. This has been a cadaver trend at 579P, and has been documented in MOIs and weekly discussions June 11, 2017/ MOI#UI02811070119G, July 25, 2017/UI05412081607I, August 8, 2017/ UI04509072125I, and August 10, 2017/ UI03407085210I, September 7, 2017/UI05406093307I, September 8, 2017/UI04014091918G), and September 25, 2017/ UI02710090921I (b) (6) informed me that the establishment will be replacing its autokiller machine, which has been in use for decades. They are hoping this will solve this trend.

EstNbr	EstName	NR#	Date	Task	Regs	Description
M751	(Moroni)	MMK32 111218 29N	12/29/2017	04C05	381.65(b)	While performing a Good Commercial Practices task for a partial lot of birds which had been held overnight from the previous day's production, I (b) (c) ) observed the following noncompliance. A partial lot of medium hens (705 birds) entered slaughter at approximately 1530 on Friday afternoon, December 22, 2017. It was observed that 42 dead birds were discarded at unloading, another 26 were condemned for septox and at least one additional barrel of carcasses that had passed inspection but required trimming of lesions was discarded at the salvage station but not accounted for in the plant numbers. In comparison, the rest of that same lot of medium hens (b) (d) birds) which had been slaughtered on the previous day (Thursday, December 21, 2017) yielded 30 dead birds and 17 condemned for septox. The numbers, which were confirmed earlier this week, indicate the discards for dead and septox did significantly increase as a result of the holdover. According to plant records, the birds slaughtered late Friday, December 22, 2017, had arrived at the facility at 0102 on Thursday morning, December 21, 2017, and had thus been held on site for approximately 38 hours. In addition, the birds had been held overnight on the truck without shelter in temperatures that dipped below 10 degrees Fahrenheit and was noted to be 8 degrees Friday morning at 0845. The trailer was parked outside but not parked under the shelter which can accommodate approximately 12 trailers. According to (b) (6) holding birds next to the roofed storage structure but not under it is still within the designated storage area. (b) (6) holding birds next to the roofed storage structure but not under it so the hirds to approve relative warmth and shelter from the weather and wind was not used to hold the trailer of birds. These findings constitute a failure to comply with 9 CFR 381.65(b). In addition, these particular findings and the trend of holding birds overnight and longer than 24 hours are contrary to the establishment's own SOP #307 Live Bird Holdover and

EstNbr	EstName	NR#	Date	Task	Regs	Description
						29, 2017) and notified (b) (6) (b) (6), shortly thereafter that a noncompliance record was forthcoming for this incident. Although MOI have been previously documented for live bird holdovers, there is no previous noncompliance record to associate with this noncompliance.
P9332	Diestel Turkey Ranch	TBA271 712550 4N	12/04/2017	04C05	381.65(b)	On 12/4/17 at approximately 0845 hours I, (b) (6) , and the Alameda DO DVMS, (b) (6) observed a conscious and breathing shackled turkey enter the scalder while performing Good Commercial Practice verification at the entrance to the scalder. The turkey was much smaller than the ones hanging from the shackles on either side. Once this bird came out of the picker, the skin was bright red, and the neck did not have a bleeding cut. The DVMS notified (b) (6) for (6) for the noncompliance. (b) (6) for the noncompliance. (b) (6) for the noncompliance. (b) (6) for the establishment failed to thoroughly bleed out the turkey prior to entering the scalder. This observation is a noncompliance with 9 CFR 381.65(b), which states in part; Poultry shall be slaughtered in accordance with good commercial practices in a manner that will result in thorough bleeding of the carcasses and assure that breathing has stopped prior to scalding.

Dist rict	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	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, March 16, 2018 at 0945 Attendees: USDA Establishment (b) (6) (b) (6) 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

trailer load of toms (truck ii74) from the same producer was held over from Wednesday morning to Thursday afternoon. According to [10] "the holdover twas necessitated by a picket breakdown and subsequent lower line speeds." Another PPS failure and reduced line speeds occurred during the processing of those toms on Thursday afternoon. During the weekly meeting on Thursday afternoon. During the weekly meeting on Thursday afternoon. And the failure of an IPS cheek and a 21 check and lower fine speeds during the processing of those toms on the dad occurs on the holdover 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 dad occurs on the holdover trailers Wednesday afternoon, and the failure of an IPS check and a 21 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 [50] toms plas 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 toms were delivered for slaughter. Colby Later informed F35 there would be an additional holdover of toms on Thursday sleughter. Colby Later informed F35 there would be an additional holdover toms on Thursday sleughter. Colby Later informed F35 there would be an additional holdover toms on Thursday sleughter. Colby Later informed F35 there would be an additional holdover toms on Thursday sleughter. Colby Later informed F35 there would be an additional holdover toms on the additional toms held over from Thursday to Finday sternoon. According to The baddition toms held over from Thursday to Finday sternoon. According the baddition toms held to adver this anticipated line speeds needed for the condition of the bids." Bids held over at this facility, induring this week, are routinely held for more than 24 hours because production begins with hens and endition the toms o	Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
held over didn't get killed until the following afternoon even though they had arrived the									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 flohover (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

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								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) (f) 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)

Dist rict	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	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, March 23, 2018 at 1245 Attendees: USDA Establishment (b) (6) 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 aus 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

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								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) (c) 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) (c) 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)

Dist rict	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	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, April 20, 2018 at 1600 Attendees: USDA Establishment (b) (6) (b) (6) 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) 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 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) went back out and collected the loose

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								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. (a) (6)

EstNbr	EstName	Task_Code	MOI#	Date	Description
M751	Pitman Farms Inc. (Moroni Turkey Processing)	04C05	MMK1218 053525G	25MAY2018	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, May 25, 2018 at 1230 Attendees: USDA Establishment ( ) (6) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day during the week of May 21, 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 (c) (4) Wednesday Holdover (approx. 400 toms) A partial trailer load of toms (trucks #98) was held over from Wednesday morning to Thursday afternoon, a period of time that exceeded 24 hours. According to (b) (6) (a) (b) (c) " The QA release of evisceration for preoperational inspection was delayed approx. 1 hour Wednesday morning due to sanitation deficiencies. The start of operations in evisceration was further delayed on Wednesday morning due to deficiencies found during the USDA preoperational inspection. Line speed reductions were due to the poor condition of the toms (airsacculitis, breast blisters and fecal contamination). 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. did not know if historical ata concerning the condition of the birds from a particular producer is considered 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. understood, therefore, that FSIS will continue to issue MOI

# Table:Memorandums of Interview (MOIs) in response to FOIA-2019-18

EstNbr	EstName	Task_Code	MOI#	Date	Description
					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)

EstNbr	EstName	Task_Code	MOI#	Date	Description
M751	Pitman Farms Inc. (Moroni Turkey Processing)	04C05	MMK3114 073119G	19JUL2018	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Thursday, July 19, 2018 at 1320 Attendees: USDA Establishment (b) (b) (6) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day during the week of July 16, 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." Wednesday Holdover (approx. 750 toms) A partial trailer load of toms (truck #72) was held over from Wednesday morning to Thursday morning. According to Mr Freeman, the deviation in production causing the holdover was (b) (4) ." Line speed reductions were due to the poor condition of the toms (airsacculitis) and related failures of FPS checks. 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] 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 USD

# Table:Memorandums of Interview (MOIs) in response to FOIA-2019-18

EstNbr	EstName	Task_Code	MOI#	Date	Description
M751	Pitman Farms Inc. (Moroni Turkey Processing)	04C05	MMK3414 085324G	24AUG2018	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, August 24, 2018 at 1320 Attendees: USDA Establishment (b) (b) (c) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c

# Table:Memorandums of Interview (MOIs) in response to FOIA-2019-18

EstNbr	EstName	Task_Code	MOI#	Date	Description
					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)

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M751+P10 49	Pitman Farms Inc. (Moroni Turkey Processing)	MMK1615 094604G	04SEP2019	04C05	Poultry Good Commercial Practices	Finalized	On August 29, 2019 at approximately 1000 hours (b)(6) and (b)(6) and (b)(6) and (b)(6) were directly observing conditions of live birds in cages on trailers. There were two trailers staged at the live receiving unloading dock with cages that were overcrowded (there were so many birds in the cage sthat there was not enough space within the cage for the birds to lie down without lying on top of each other), approximately 90% of the birds (toms) on the trailers were displaying signs of heat stress by open mouth breathing/panting and the trailers did not have any fans, misters or any source of ventilation for the birds as required per the establishments written Standard Operating Procedures (SOP). In the trailer holding shed area there were two trailers that were completely out of the shed without any shade, fans, misters or ventilation source. There was a third trailer that had half of it directly exposed and facing the sun, without shade, fans, or misters. Several other trailers in the holding shed only had one side exposed to fans or misters. All the trailers were overcrowded with approximately 90% of the birds showing signs of heat stress, panting/open mouth breathing. At that time of these observations it was approximately 90 degrees outside with the sun shining fully and no clouds in the sky. There were multiple trailers that contained birds with injured, hemorrhagic wings, some that were trapped in cage bars that were injured and could not be retracted. On August 30, 2019 at approximately 0550 hours I, (b)(6) observed the seven (7) trailers of live toms held over from August 29, 2019. The establishment put the trailers in the trailer shed overnight and left the fans and misters running. It was

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
								approximately 55 degrees when I performed good commercial practice observations. The toms on the outer edges of the trailers with the misters were dripping wet and shivering. I observed one dead tom on trailer number 79 with a bloody wing. I observed an increased amount of diarrhea from the toms. Four trailers of hens had already arrived on the morning of August 30th, 2019. The hens appeared overcrowded (as the birds were stacked in multiple layers on top of each other without enough space to lie down in a single layer) on trailer numbers 91 and 11. Two of the hen trailers (91 and 11) were parked at the end of the trailer shed where there are no fans or misters, these two trailers are scheduled to be processed last today. I informed (b)(6) and Jaime Rodriguez of my observations and concerns regarding the live birds at the weekly meeting held at 9 am on August 30th, 2019.

Dist rict	EstNbr	EstName	MOINbr	Date	Task Code	TaskName	Status	MOI Agenda
15	M751+P10 49	Pitman Farms Inc. (Moroni Turkey Processing)	MMK1314 115101G	01NOV2019	04C05	Poultry Good Commercial Practices	Finalized	Memorandum of Interview to Discuss Birds Held Over for Slaughter Norbest Turkey / Est# P01049 Meeting Time: Friday, November 1, 2019 at 1245 Attendees: USDA Establishment (h)(6) This meeting was necessitated by observations made while performing a Good Commercial Practices task each day for the week of October 28, 2019. 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 and "is in conjunction with applicable best industry practices, notably National Turkey Federation (NTF) Animal Care Best management Practices, 2012." Monday Holdover (approx. 1,000 birds) A partial trailer load of hens (truck #80) was held over from Monday afternoon to Tuesday morning. According to Mr Freeman, the holdover was attributed to both to mechanical issues (stuck shackle issue and head conveyor) as well as line speed reductions due to feed. As was discussed previously in other MOI to document birds held over, it is not a good practice nor is it in the establishment's interest to leave birds in public view outside the plant at night. 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. (h)(6)