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House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

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MEMORANDUM

To: Majority Members of the Domestic Policy Subcommittee

From: Majority Staff, Domestic Policy Subcommittee

Date: April 15, 2008

Re: Severe gaps in USDA oversight of Westland/Hallmark plant

In press briefings following the public release of video documenting animal handling abuses at the Westland/Hallmark slaughterhouse in Chino, California, USDA officials have repeatedly affirmed that the incidents at Westland/Hallmark represented an aberration in the meat industry.¹

Prior to the public release of undercover video, however, USDA had judged Westland/Hallmark's practices to be in compliance with federal laws. In its 2007 audit, USDA noted no infractions and gave Westland/Hallmark a faultless report.² The USDA audit is attached.

USDA audit findings are at odds with the documented instances of animal cruelty and food safety violations. Following public release of the video evidence, USDA oversaw the largest voluntary beef recall in U.S. history.

In an interview with Subcommittee staff,³ the undercover investigator who documented the abuses at Westland/Hallmark revealed instances of collusion by Westland/Hallmark plant management to violate animal handling and food safety laws and to conceal plant practices from USDA auditors. This undercover investigator also recounted the virtual absence of USDA

¹ See e.g., Transcript of Press Briefing on Humane Handling Procedures of Hallmark/Westfield Company, 5-6 (February 8, 2008); USDA Questions and Answers Regarding the Humane Society of the United States' Handling Allegations, at 4 (February 6, 2008); Transcript: USDA Officials Hold Technical Briefing Regarding Inhumane Handling Allegations, 11-12 (January 31, 2008).

² See FSIS Report of Human Handling Verification Visit of Hallmark/Westland Meat Packing Company FSIS Form 6000-31 (May 18, 2005). (Hereinafter *USDA Audit May 2007*)

³ Phone Conversation with Humane Society undercover investigator, Monday April 14, 2008.

inspectors in the plant, and the inability of USDA inspectors at the Westland/Hallmark to monitor the large plant.

Collusion by Management to evade law

When he began working at Westland/Hallmark, the undercover investigator asserted that he did not receive any formal training. Instead, a plant manager gave him an employee handbook and an informal run through the materials which lasted “about five minutes.” On the other hand, the USDA audit notes that “per establishment managers, all employees who handle livestock get humane training at least monthly.”⁴ The Audit goes on to say that employees must sign off on attendance sheets to verify their training as well as issues covered in their training.

The investigator described an incident, not depicted in the video, where an animal with untrimmed horns could not get through a chute. Rather than stop operations to pull the animal out and trim its horns, employees electrically stunned the animal in its anus repeatedly to force it to move. The manager present encouraged this practice despite the animal’s bellows and obvious discomfort. The investigator noted that the electric prods were used systematically rather than exceptionally on animals while they were on the chute. Despite this practice, the USDA Audit notes that “per establishment managers, a number of changes have been made to address the noncompliance and concerns [regarding excessive prodding] identified during the previous verification visit.”⁵

The investigator also reported that on the eve before a November 13th and 14th audit, management had a meeting with the employees and explained that they should not engage in inhumane animal handling practices in front of the inspectors.

The investigator also reported that plant managers would routinely fail to inform the USDA inspector if local farmers brought cattle to be slaughtered throughout the day i.e., after the conclusion of the 6:30 a.m. inspection and the 12:30 p.m. inspection. The plant manager would not inform the inspector and the inspector, who remained in his office, was never aware of the practice.

USDA invisibility

The undercover investigator explained that employees did not fear getting caught committing animal handling abuses because the inspector never showed up unannounced. The investigator described how one employee concealed an electric prodder that he used on the animals even while the inspector was present.

The investigator reported that the USDA inspector was rarely present. The investigator commented that “to the USDA inspector, the cattle was invisible unless they were about to be slaughtered.”

The investigator explained that had the inspector’s office had windows and been located next to the loading pen, “that alone would help curb bad behavior.”

⁴ USDA Audit May 2007 at 6.

⁵ *Id.* at 5.

Large plant size is an obstacle to inspection

The investigator relayed how the large size of the Westland/Hallmark plant, the volume of cows at the plant, and the limitation of USDA inspectors was an obstacle to inspection. The investigator explained that there were often 1,000 cows at the plant at any given time. He also described how the sprawling layout of the Westland/Hallmark plant made it impossible to observe animal handling practices at all times. In addition to 14 pens to hold the animals, there was also a crowd pen, an ante-mortem pen, and a chute where animals were held.

The investigator commented that the plant needed at least two inspectors, if not more. He explained that with only one inspector present, no one was available to oversee the unloading of cows from the livestock trailer. The investigator explained that in many instances, the downer cows were stacked on one side of the truck that were dragged off the truck rather than euthanized. In contrast to his observations, the USDA audit reports that “per establishment managers, if a non-ambulatory cow is on a trailer that arrives at night, it is euthanized in situ by an establishment employee.”⁶

⁶ USDA Audit May 2007 at 2.

U.S. DEPARTMENT OF AGRICULTURE
 FOOD SAFETY AND INSPECTION SERVICE
 OFFICE OF FIELD OPERATIONS

EST. NO.
 00336 M

DATES DVMS VISITED EST.
 FROM: 05/18/2007 TO: 05/18/2007

REPORT OF HUMANE HANDLING VERIFICATION VISIT

DISTRIBUTION INSTRUCTIONS:
 Submit this report to your Deputy District Manager and the Front-Line Field Supervisor via email.

NAME AND ADDRESS OF ESTABLISHMENT
 Hallmark/Westland Meat Packing
 13677 Yorba Ave.
 Chino, CA 91710

NAME OF DVMS: Dr. Pat Knox NAME OF PHV: Dr. Gabriel Gurango

DISTRICT: 05 (Alameda) CIRCUIT VISITED: 25 (Riverside)

PLANT SIZE:
 Large

VOLUME/ SPEED:
 60/hour
 450-500/day

SPECIES SLAUGHTERED:
 BOVINE OVINE EQUINE
 PORCINE CAPRINE OTHER

CORRELATED WITH: Dr. Gabriel Gurango, SPHV IIC; Mr. Robert Malinoski, CSI

STUNNING METHOD: Portable penetrating captive bolt

REASON FOR VISIT (Check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> A. District Office Direction | <input type="checkbox"/> E. Data Driven Visit |
| <input checked="" type="checkbox"/> B. Routine Assessment | <input type="checkbox"/> F. Suspicion of Violations |
| <input type="checkbox"/> C. Repetitive Non-Compliance | <input type="checkbox"/> G. Religious Exemption |
| <input type="checkbox"/> D. Egregious Violation | <input type="checkbox"/> H. Special Correlation/Other |

SUMMARY OF DATA ASSESSMENT PRIOR TO VISIT:

HAT data: a review of the data indicates that the amount of humane handling verification performed is sufficient for the number of animals slaughtered.
 Noncompliance Records (NR): no humane handling noncompliances have been documented since the previous DVMS visit.
 DVMS visits: the most recent DVMS visit occurred on December 8, 2005. Noncompliances with facilities, lack of access to water, excessive prodding, A concern with the stunning effectiveness was documented.

Systematic Approach: Does the establishment use a proactive systematic approach to humane handling, perform audits, and record their findings?
 Yes

Comments: The establishment has written programs in place to address maintenance of stunning equipment; handling of non-ambulatory and escaped animals; on-going training in humane handling for all those employees who have livestock handling responsibilities; and humane handling audits. The establishment Quality Assurance (QA) department conducts random humane handling audits of pen conditions, water availability, prod use, vocalization, stunning and sensibility on the rail. A monthly graph is maintained of stunning efficiency, vocalization, and insensibility audits. A customer performed audit of humane handling in the establishment is conducted monthly.

RECOMMENDATIONS (Check only one):

- | | |
|--|---|
| <input checked="" type="checkbox"/> A. No action | <input type="checkbox"/> D. Suspension/Withdrawal |
| <input type="checkbox"/> B. NR by IIC | <input type="checkbox"/> E. Other |
| <input type="checkbox"/> C. NOIE | |

Summary of reason(s) for recommendation:
 No noncompliances were observed during the verification visit.

FINDINGS / Narrative Report

Hallmark/Westland Meat Company is a large facility that exclusively slaughters and processes cattle, primarily dairy cows. Slaughter typically occurs five days per week. Animals are brought to the facility

from California, Arizona, Idaho, New Mexico and Nevada. On the day of the verification visit, approximately 600 animals were scheduled for slaughter. The visit began at approximately 0700 hours. Present for the visit were Dr. Pat Knox, DVMS, Dr. Gabriel Gurango, SPHV IIC, Dr. Syed Ali, FLS and Mr. Pablo Salas, Plant Manager Harvesting.

Truck Unloading:

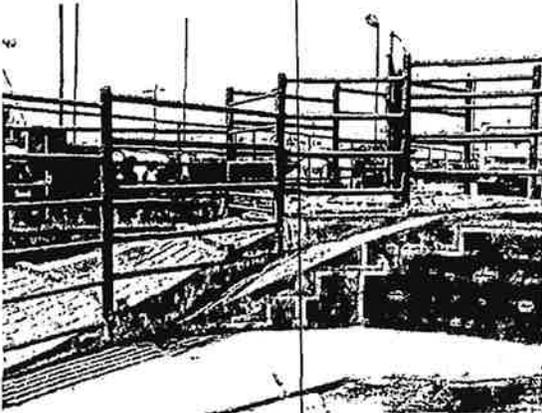
Animals are brought to the facility throughout the day, in both double deck livestock trailers and in low set livestock trailers hitched to a pickup truck. Depending on the style of livestock trailer, animals are offloaded in different places. There is a posted policy for truck unloading. Per establishment manager, some livestock trailers arrive at night and unloading is monitored by establishment employees. All livestock trailer drivers have to read and sign the unloading policy before driving onto establishment property. Per establishment managers, if a non-ambulatory cow is on a trailer that arrives at night, it is euthanized in situ by an establishment employee.

A total of approximately 100 animals were observed being unloaded from livestock trailers.

Animals on the low set trailers hitched to a pickup truck were offloaded directly into a pen. The trailer gate was opened and the animals walked out of the trailer into the pen. If needed, a rattle paddle was used to tap the floor behind the animals to get them to move. The animals were moved quietly and at a walk.

Animals in double deck livestock trailers were offloaded onto a slightly sloped cement offloading ramp with raised cement treads leading to a ground level drive alley. Animals were moved out of the livestock trailers using hands, voice and rattle paddles.

Since the previous verification visit, and in response to the concerns discussed at that time, the raised incline offloading chute has been completely revamped. The slope is shallower and the orientation has been changed so livestock trucks can back up to the ramp without leaving a gap (see photo below).



Raised off-loading ramp

There was significantly less balking and slipping observed when cattle were being off-loaded onto this ramp than was seen with the original ramp. In-plant Agency personnel did not express concern about handling during truck unloading.

Procedures for handling non-ambulatory / disabled:

In accordance with Agency requirements, non-ambulatory cattle are not accepted at this facility. There is an established policy addressing animals which become non-ambulatory in the livestock trailers or pens. Those animals which become non-ambulatory in the livestock trailer or holding pens are segregated from other animals, euthanized in situ using a penetrating captive bolt stunner then removed for BSE testing. For those animals that become non-ambulatory in the single file chute, the SPHV is informed. After an

antemortem disposition is made, the animal is euthanized in situ then removed for rendering and BSE testing or taken to the bleed pit.

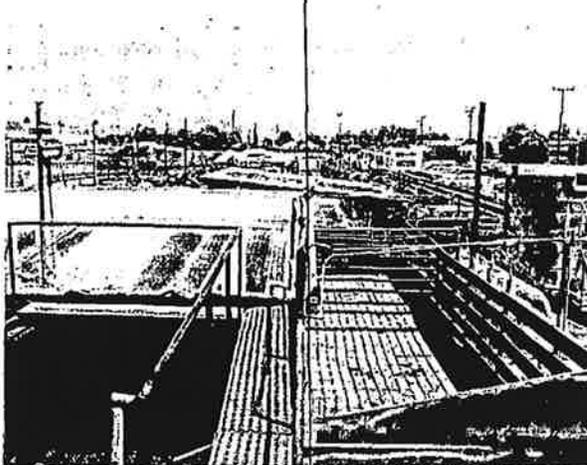
One cow was observed to become non-ambulatory in a holding pen. One livestock handler moved the rest of the cattle out of the pen while another handler kept the ambulatory cattle from walking on the non-ambulatory cow. The cow was euthanized in situ using a penetrating captive bolt stunner then removed to the deadstock area for disposal. In-plant Agency personnel did not express concern about handling non-ambulatory or disabled animals.

Suspect / Handling facilities:

There is a designated USDA Suspect pen (Pen #5) that is not covered, therefore does not meet regulatory requirements. Establishment managers were notified at the exit meeting that the designated pen did not meet requirements; however, there are other pens at the facility that can be used as U.S. Suspect pens and do meet regulatory requirements.

Facilities Conditions:

Holding pens and most of the drive alley fences are made of tubular or flat metal bars attached to tubular metal uprights set into a concrete floor. A section of the drive alley and back fences are made of wooden planks attached to wooden uprights and set into concrete or dirt (see photo below). The majority of the holding pens are uncovered, but the pens nearest the single file chute are covered with corrugated metal roofing (see photo below). The floors are impressed and scored cement in a variety of patterns. The single file chute is made with cement blocks and has a cement floor that has deep treads to facilitate good footing (see photo below). The stunning box has metal sides with a scored cement floor, a metal flip gate giving access to the bleed pit and a metal guillotine gate leading from the single file chute.



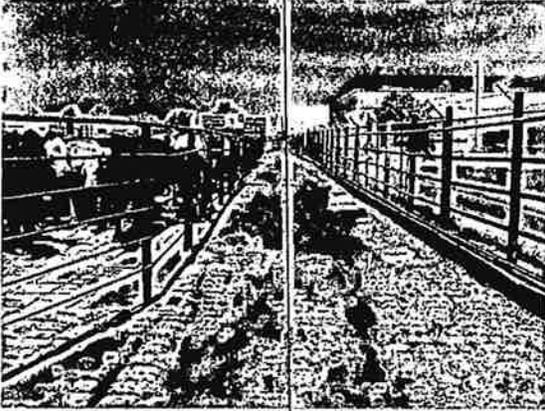
Holding pens and drive alleys



single file chute

No facilities-based noncompliances were observed during the verification visit. Since the previous verification visit, and in response to the facilities-based noncompliances documented at that time, about 90% of the wooden plank walls have been replaced with tubular metal fencing, the back drive alley has been resurfaced and the broken curbing has been replaced (see photo below).

In-plant Agency personnel did not express concern about the condition of the facilities.



Back drive alley and holding pens

Pen Stocking:

Observation of the filled pens during the humane handling verification visit showed that the animal density met regulatory requirements. The animals were able to easily move around the pens and reach the water troughs. In-plant Agency personnel did not express concern about pen stocking density.

Feed / Water Availability:

Water is supplied in large cement or metal troughs having an automatic float system. When the water in the trough dips to a certain level, the water line opens and replenishes the trough.

Water was observed to be available in all holding pens. Since the previous verification visit, and in response to the lack of access to water in pen 15, a water line has been extended to that pen and an automatic float system has been installed in the water trough. In-plant personnel did not express concern about the availability of water.

Food is supplied to animals that are kept for longer than 24 hours. Hay was observed to be present in feed troughs during the verification visit. At the end of the day's slaughter, additional hay was observed to be provided to animals held overnight. In-plant personnel did not express concern about the availability of feed for animals kept longer than 24 hours.

Flooring non-slip:

The floors are roughened concrete with deep grooves cut into the surface in a variety of patterns (rectangles, crosses, horizontal and vertical lines) to facilitate footing. It appeared to be sufficiently slip-resistant to meet regulatory requirements.

Evaluation of slips/ falls:

- **in crowd pen, truck unloading, and barn area:**

Approximately 100 animals were observed to be moved out of livestock trailers, through the main drive alleys, the holding pens, and crowd pen. No animals were observed to slip or fall in any of these areas.

- **at single file chute and stunning box:**

Approximately 100 animals were observed to be moved through the single file chute and into the stunning box. Two cows were observed to slip in the single file chute. No animals were observed to fall in these areas.

In-plant Agency personnel did not express concern about slips and falls.

Evaluation of prod / alternative implement use:

Rattle paddles, hands and voices are used to move animals from the livestock trailers through the drive alleys and holding pens. In addition, a hand-held commercially made electrified prod (HotShot®) can be used in the area just prior to the stunning box.

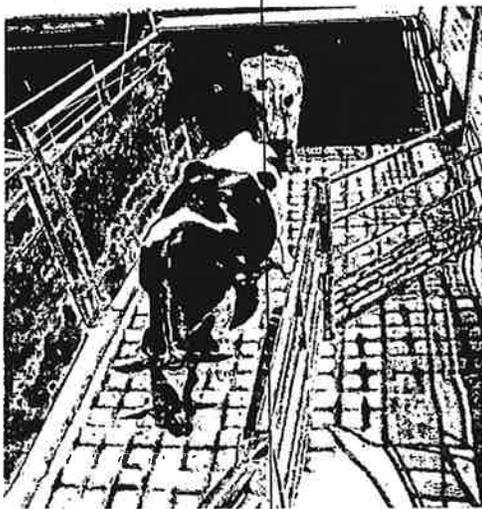
• **in stunning area:**

Rattle paddles and hand held commercially made electrically charged prods (HotShot®) are used in the area just prior to where the animals enter the stunning area.

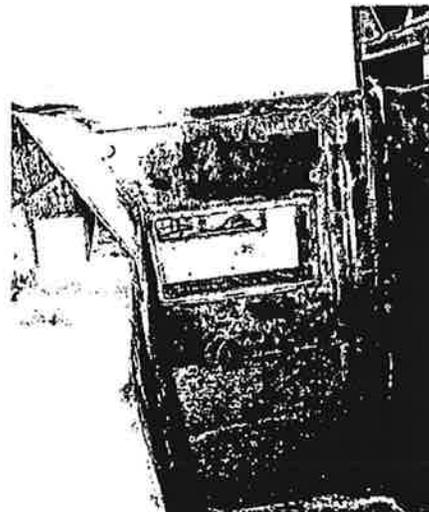
Approximately one hundred animals were observed for prod and alternative implement use in this area. Of the 100 animals, nine were observed to have been prodded with the electric prod. One of the nine cows was observed to be prodded twice.

The amount of prod use observed during this verification visit was significantly less than was observed during the previous verification visit. Per establishment managers, a number of changes have been made to address the noncompliance and concerns identified during the previous verification visit. The changes include:

- Narrowing the entrance to the single file chute so cattle couldn't turn around as easily (see photo below).
- A skylight has been added over the stunning box to increase the ambient light in that area.
- Two large overhead lights have been mounted above the stunning box to decrease the light difference between inside and outside.
- holes have been opened at the end of the stunning box and the outside wall in line with the hole in the stunning box so cattle don't think they're walking into a dead end (see photo below).



Entrance to single file chute

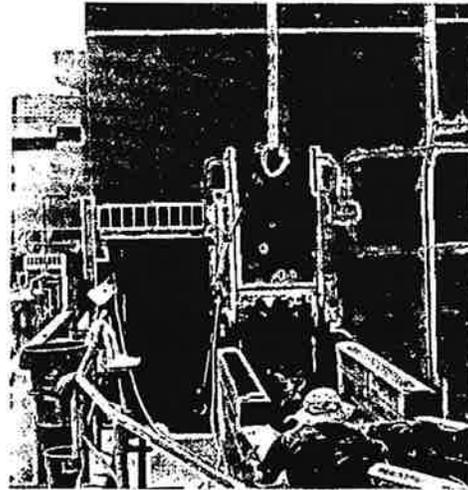


opening at the end of the stunning box

- To increase the size of the stunning box, a second hydraulic door was added to the outside wall. This adds seven inches to the size of the stunning box when the inside door is left open. The inside door is used to restrain smaller cattle and can also be used to keep the larger cattle from moving around as much in the stunning box.



inside stunning box door



outside stunning box door

- **in other areas:**

Approximately 100 animals were for prod and alternative implement use in this area. Hands, voices and rattle paddles were used in truck unloading and to move the animals to and from the holding pens. The animals were moved slowly and quietly, with the rattle paddles used to tap the floor behind the animals or shaken in the air to induce movement.

In-plant Agency personnel did not express concern about prod and alternative object use.

Evaluation of vocalizing:

Vocalization was heard at a normal level for the species and number of animals present in the facility.

Verification of stunning efficacy:

Stunning is accomplished using a Koch Magnum 25 portable penetrating captive bolt stunning device and .25 caliber charges. Two additional stunning devices are present in the stunning box area as back-up devices. The stunning devices are maintained, including cleaning and replacing worn parts as needed, during the lunch break and at the end of the slaughter day. Maintenance records are kept.

One hundred animals were observed during the stunning procedure and to determine stunning efficacy. The stunning device operator was observed to be careful and deliberate about positioning the stunning device to get an effective stun. Five of the 100 animals were observed to be re-stunned by the stunning device operator. Three of the five were re-stunned because of poor aim on the initial application of the stunning device. Although the cattle appeared to be insensible to pain, the poor aim was recognized immediately by the stunning device operator. Two of the five were re-stunned by the stunning device operator while the cattle were in the shackle area. The re-stunning appeared to be more of a precaution on the part of the stunning device operator.

Establishment Quality Assurance personnel were observed to be monitoring and documenting stunning effectiveness and unconsciousness by checking menace response and breathing through the nose immediately after stunning and prior to shackling. Per establishment managers, these audits are performed at least twice weekly or more frequently at the request of establishment managers or USDA personnel. When Dr. Knox checked the records for this activity, it was noticed that all the monitoring checks are documented in the morning. Per establishment managers, monitoring is done randomly throughout the day, but only documented in the morning.

Per establishment managers, all employees who handle livestock get humane handling training at least monthly. Employees are required to sign off on attendance sheets for that training. Some of the topics

included signs of sensibility, how to properly position the stunning device, and the importance of reporting defective stunning equipment.

In-plant Agency personnel did not express concern about stunning effectiveness.

The regulatory and statutory requirements for effective stunning were discussed with establishment management during the verification visit and at the exit meeting.

Verification of unconsciousness:

One hundred animals were observed for signs of consciousness on the rail after stunning. No animals were observed to show signs of returning to consciousness at any of those points. While at the bleeding station, the establishment employee was observed to be checking the animals for signs of insensibility. The establishment employee who performs the bleed-out cut had a Koch 25 Magnum portable penetrating captive bolt device available for use should an animal show signs of return to consciousness. Three animals were observed to be re-stunned by the establishment employee performing the bleed-out cut. The re-stuns appeared to be precautionary, as no signs of a return to consciousness were observed.

In-plant Agency personnel did not express concern about conscious animals on the bleed rail.

Per establishment management, the establishment employee performing the bleed-out cut is given five captive bolt charges per day. If that person uses all five charges, he/she must contact the area supervisor. The stunning device operator get immediate retraining on effective stunning techniques, including aim, correct positioning, not being in a hurry, etc.

Ritual Slaughter:

Ritual slaughter is not performed at this facility.

An exit meeting was begun at approximately 1645 hours. Present were Dr. Pat Knox, Dr. Gabriel Gurango, Mr. Bob Malinowski, CSI, Mr. Pablo Salas, Plant Manager Harvest, Mr. Gustavo Manzo, Harvesting Supervisor, Mr. Mike Sayers, Supervisor, and Quality Assurance personnel Ms. Nancy Ugante and Mr. Martin Laguna. The findings of the humane handling verification visit were discussed. The statutory and regulatory requirements for humane handling and slaughter of livestock were discussed, as were the changes made by establishment managers to meet those regulatory requirements.

Both establishment management and in-plant Agency personnel were provided with copies of the following documents:

- o Title 9 Code of Federal Regulation Part 313
- o The Humane Methods of Slaughter Act of 1978
- o FSIS Directive 6900.1, Revision 1 "Humane Handling of Disabled Livestock"
- o FSIS Directive 6900.2, Revision 2 "Humane Handling and Slaughter of Livestock"
- o FSIS Notice 12-05 "Documentation of Humane Handling Activities"
- o Federal Register Notice on a Systematic Approach to Humane Handling, September 2004
- o PHV training information on assessing consciousness
- o PHV training information on ritual slaughter
- o Information on preventing a return to sensibility
- o Information on egregious humane handling violations

The exit conference ended at approximately 1715 hours.

| | | |
|--|----------------|---------------------|
| U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE REPORT OF HUMANE HANDLING VERIFICATION VISIT | 1. CASE NUMBER | PAGE 1 OF |
| | 2. EST. NUMBER | 3. EST. ID |

4a. EST. NAME

4b. EST. ADDRESS/P.O. BOX

4c. CITY, STATE, ZIPCODE

5a. NAME OF DVMS (last, first) 5b. NAME OF PHV (last, first) 5c. NAME OF IIC (last, first - if not PHV)

6. DATES(S) OF VISIT (MM/DD/YY) 7. CIRCUIT VISITED (4-digit no.) 8. PLANT SIZE

FROM: _____ TO: _____

Large Small Very Small

9. SPECIES SLAUGHTERED (Check all species observed) 10a. VOLUME SPEED (Head/Day)

Bovine Caprine Ovine
 Porcine Equine Other (specify): _____

10b. (Head/Hour)

11. STUNNING METHOD (Check all that apply)

Electrical - head only Captive-bolt - pneumatic Firearm - rifle/shotgun Controlled atmosphere
 Electrical - head/thorax Captive-bolt - hand-held Firearm - pistol None -RitualSlaughter

12. REASON FOR VISIT (Check all that apply)

District Office Direction Egregious Violation Religious Exemption
 Routine Assessment Data Driven Visit Special Correlation/Other (specify): _____
 Repetitive Non-Compliance Suspicion of Violations

13. SYSTEMATIC APPROACH (Federal Register Notice dated September 9, 2004 - "Systematic Approach to Humane Handling and Slaughter")

DOES THE ESTABLISHMENT USE A PROACTIVE SYSTEMATIC APPROACH TO HUMANE HANDLING, PERFORM AUDITS, AND RECORD THEIR FINDINGS?

Yes NO IMPLEMENTATION NOT ASSESSED PER THIS DATE

IF YES, CHECK ITEMS BELOW THAT HAVE BEEN IMPLEMENTED; NUMBERS CORRESPOND TO THE FOUR STEPS OF THE SYSTEMATIC APPROACH:

- 1. Initial assessment performed.
- 2. Facilities' design and handling practices minimize excitement, discomfort and injury to livestock.
- 3. Periodic evaluations performed on handling methods and, if applicable, stunning methods.
- 4. Handling practices and facilities modified when necessary.

14. RECOMMENDATIONS (Check only one):

No Action NR by IIC NOIE Suspension/Withdrawal Other (specify): _____

FOR ALL RESPONSES, OTHER THAN "NO ACTION", CHECK ALL CATEGORIES BELOW THAT ARE RELEVANT TO THE ABOVE RECOMMENDATION:

Inclement Weather Ante-mortem Slips/Falls Facilities
 Truck Unloading Suspect/Disabled Stunning Effectiveness
 Water/Feed Prod Use Return to Consciousness