

DECLARATION

My name is (REDACTED) and I am an employee of the United States Department of Agriculture's Food Safety and Inspection Service (USDA/FSIS). I am submitting this statement to the Government Accountability Project. I am doing so without any threats, inducements or coercion. I authorize the publication of this statement contingent upon the redaction of my name, and the name and specific location of the federal establishments to which I refer.

Since I began as an inspector, I have worked in plants under traditional inspection as well as plants under HIMP inspection. I was working in the plant where I currently work when it became part of the HIMP program. The Agency says that its proposal to make HIMP the primary inspection system is based on food safety objectives. However, from what I have seen, I do not know how they can make that claim.

Under HIMP, the plant is supposed to be responsible for producing a safe and wholesome product. In my opinion, we are not holding them to that standard. There are a number of problems with the HIMP program. First, the company employees are not well trained. The higher management employees, those who are responsible for directing the program in the plant, cannot even identify the poultry diseases that affect the carcasses that we see every day on the slaughter line. So it is not a surprise that the company sorters, those who are responsible for looking at every carcass to determine if it is safe and wholesome, often overlook things. What is worse, it often seems like the sorters are not even trying to inspect the birds and remove those that violate the regulations.

Even when it appears they are trying, they just cannot keep up because the line speeds are now so high. The line speeds also make it very difficult for us inspectors to inspect the birds. In a traditional plant, an inspector examines about 35 birds per minute. In the HIMP plant, when I am inspecting carcasses at the end of the slaughter line, in the

"Carcass Inspector" (CI) position, I am expected to "inspect" over 150 birds per minute. It just cannot be done.

In the (CI) position, I am stationed at a fixed location near the end of the slaughter line, and I observe the carcasses as they pass by. At this point, the carcasses have passed by most of the establishment's "critical control points" (CCPs) where company "sorters" are supposed to remove any carcasses that should not be sold to consumers. As a CI, I am supposed to have any remaining birds that exhibit "Food Safety" defects removed from the line. These include septicemia or toxemia ("sept/tox), which can make consumers sick, and fecal contamination, which can carry pathogens such as Salmonella and Campylobacter.

Inspectors working in a traditional plant are trained to be sure to look inside the bird, as well as the front and the back, and also look at the organs in order to make a determination that the carcass is not carrying dangerous disease conditions or fecal contamination. Inspectors in a traditional plant condemn, and remove from the line, those carcasses that exhibit signs of disease or fecal contamination. As a CI in a HIMP plant, however, I do not look inside the bird, and only see the back of it as it goes down the line. Also, the plant separates the organs from the bird before the bird gets to the CI station.

With these limitations, and at the line speeds I mentioned above, I know I cannot detect all of the carcasses with Food Safety defects, and it is reasonable to assume that some are going out to the public. Additionally, from what I have seen, the agency has adopted several policies that make it even easier for companies to produce poultry products that could be dangerous for consumers.

When HIMP first began, if a carcass with sept/tox or fecal contamination passed the company's CCPs and reached the CI station, we would issue the plant a Noncompliance Record (NR). This is documentation that a plant's CCPs did not prevent a violation of USDA regulations. Multiple NRs for a particular issue can lead to increased enforcement action against the plant and, therefore, the threat of an NR provides a good incentive for the plant to produce safe product.

When the HIMP program was first implemented at the plant where I work, we were issuing the plant a lot of NRs because fecal contamination was passing their CCPs and reaching the CI station. I heard from inspectors under the HIMP system at other plants that it was the same in their plants. Then, plant managers were worried they would be subject to enforcement action and some of them started thinking about leaving the HIMP program.

Soon after that, FSIS allowed the plants to move the CCP to a point after the CI position. So now, if the CI finds birds with fecal contamination, no NR is written. It is not that the plant prevented any of that fecal contamination; we just stopped issuing NRs for it.

Each hour, a government inspector doing "Verification Inspection" (VI) takes 10 birds from the line and closely examines them. If one of the birds in this 10-bird sample is found with a Food Safety defect, we issue the plant an NR. Any birds that violate the standards we use, would have to be reworked by the plant or thrown away. But with 10,000 or more birds going down the line in an hour, there is not much of a chance that the VI will find such defects even if many birds violate the regulations.

The agency has also limited what the VI can determine is fecal contamination. If it is pasty, it's fecal; if it has grain, it's not fecal. If it smells, it is fecal; if it does not smell, it is not fecal. The plant managers will argue about these distinctions and I believe that, often, we are not writing NRs for contamination that is, in fact, fecal contamination.

Finally, if the fecal contamination is not touching the bird's skin, it is not considered fecal contamination. We often see birds going down the line with intestines still attached, which are full of fecal contamination. If there is no fecal contamination on the bird's skin, however, we can do nothing to stop that bird from going down that line. It is more than reasonable to assume that once the bird gets into the chill tank (a large vat of cold water), that contamination will enter the water and contaminate all of the other carcasses in the chiller. That's why it is sometimes called "fecal soup." I think we should be able to prevent birds with intestines full of feces from continuing down the line toward the chiller.

If the CI sees many birds with fecal contamination, we can tell the VI, who can then take an additional 10 bird sample, or inform the supervisory veterinarian, who is authorized to take certain actions like slowing the line. However, I've seen a veterinarian decide not to slow the line or write an NR even when more than 18 carcasses with fecal contamination passed through the CI station in one hour.

The plant has strong bird washing machines on the line prior to the CI position. So if fecal contamination remains on the bird by the time it gets to us (after having gone through that wash) that bird became contaminated with quite a bit of feces earlier in the process. Part of the reason the agency gives for not allowing us to write NRs for fecal contamination at the CI position is that the plant has installed another "wash" after the CI position, and they put their CCP beyond that. However, this new washer is so much weaker than the first wash that I do not believe it is able to remove fecal contamination that could not be removed by the first wash. There is no government inspection of the bird after this point – they just go into the chiller.

In addition to FS defects, there are many other defects which make the product unwholesome. In a traditional plant, inspectors can have these removed from the line. In a HIMP plant, however, these are now considered "Other Consumer Protections" (OCPs) and CIs can do nothing to prevent these from going out to the consumer. These include bruises, scabs, sores, blisters, intestines, tumors, infections, and more. There are some limitations, but it is only when the 10 bird sample indicates that the plant has violated the limit ("performance standard") for a number of days that they receive an NR and have to take action to correct the problem. For example, more than 20.8% of the birds would have to have intestines still attached, for 6 days within a 25-day moving window, for their system to be deemed out of control. Otherwise, we do nothing.

I (REDACTED), have reviewed this statement of \_\_\_ pages and hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Dated this \_28\_ day of March, 2012.

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(Signature)