

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. I am making this statement because I believe that the Food Safety and Inspection Service's plan to implement a new poultry inspection system based on the HIMP piloted system is a very serious mistake. The proposed "Modernization of Poultry Inspection" rule is not consumer oriented and if most consumers knew about how HIMP functions, they would not want it implemented either. As an inspector in a HIMP plant, I know the kinds of unwholesome, mutilated, and diseased chickens that are processed and shipped out for sale and I feel it is important to share this information with consumers and taxpayers.

I have worked as a poultry inspector for over 15 years, including many years under the piloted HIMP inspection system. Under the HIMP piloted system, many inspection duties previously carried out by USDA inspectors are handled by plant employees. Under HIMP, USDA inspectors who are extensively trained in the disposition of poultry disease and adulteration are explicitly instructed to be "hands off" and to "monitor" the plant's activities instead. In my experience, this is tantamount to having the wolves watch the proverbial henhouse, but these chickens are real and they could very likely hurt or kill someone.

Under traditional inspection, two, three, or four inspectors on each production line inspect and observe the carcasses and look for signs of disease or adulteration and then they have trimmers remove any suspicious-looking carcasses. The birds go down the production line at 35 birds per minute and inspectors can view every angle, including the inside and viscera, of the birds. However, in a HIMP plant, one inspector is stationed at the end of the each production line during Carcass Inspection (CI) duty with the carcasses flying by at between 165-175 birds per minute and plant employees known as "sorters" must pull off suspicious-looking birds. We cannot stop the line if we are concerned and have been admonished by our supervisors if we do. If sorters find a carcass that

doesn't look right, they have to hang it back and cannot do anything with it until their supervisor approves. By contrast, in a traditional plant, USDA inspectors have the ability to have birds that appear as though they may pose a threat to consumers removed from the line. Additionally, in most plants the evisceration line is constructed so that USDA inspectors cannot see inside the carcasses or the entire front of the birds (where breast blisters and tumors can develop) and possibly have fecal matter on them. This is a huge concern because fecal matter, for which FSIS has a zero tolerance policy, and can lead to salmonella, campylobacter, or e-coli contamination, is often found inside of the bird carcasses. The ability to write NRs is a crucial enforcement mechanism because there is an official record of a plant's non-compliance with applicable standards and the plant must take immediate corrective action. However, at carcass inspection we do not have the ability to write NRs for fecal contamination. The plant has Critical Control Points (CCPs) along the evisceration line where they must administer tests for food safety issues. We can only write NRs for fecal contamination at verification inspection (when we pull 10 bird samples from the line every hour), even though we know it is likely that contaminated birds head into the chiller at carcass inspection because we cannot see the inside or front parts of the birds. The chiller is a cold water bath that is supposed to lower the temperature of the carcasses before being cut into pieces and shipped out to consumers. After the chiller station, there is no USDA procedure to inspect those carcasses. Allowing those birds to go into the chiller caked in fecal matter makes about as much sense as being covered in dirt and taking a mud bath. Consumers wouldn't like it and I wouldn't eat it.

When we are on CI duty, it is difficult to determine the wholesomeness of birds because they are going by so fast and even if we could see every bird at that speed and we detect problems, we are not permitted to stop the line. These characteristics include Other Consumer Protection defects (OCPs). OCPs include things like ingesta, crops, excessive feathers, tumors, bruises, blisters, and other items found on carcasses. When I am at a CI station, I can observe the final trim station where plant employees known as "trimmers" are supposed to look for OCP characteristics and trim them off the birds. There is no way that these employees can catch all of the birds with OCPs when the production line is going that fast. OCPs are not considered a food safety issue by

the Agency, but I have seen bruises that exhibit signs of advanced bacterial development. For example, bruises often ooze slime when the trimmers cut them off. I have seen bruises that, when cut off, ooze red, green, brown, and, when very old, black slime. These carcasses move swiftly down the production line into the chiller and out to various major wholesalers that stake their reputations on good and wholesome quality products.

We rotate between various inspection duties including: carcass, sanitation, pre-op, production, and verification inspections. During verification inspection or VI, we randomly pull eight, ten bird samples out of the thousands from the production line and test for food safety and OCP issues. At verification inspection, we can write NRs for food safety issues like fecal contamination and we often find many more birds with fecal contamination at VI than at CI. We find many OCP issues but cannot write NRs for these findings unless the plant exceeds its allowable limit or “performance standard” for a specific OCP in a 25-day period. For example, we would not be able to write an NR for blisters unless 52.5% of the birds during VI had blisters for seven days within a 25-day period. We find other OCP issues like feathers or other unidentified matter and we cannot force the plant to take action until their process is out of control. This seems counterintuitive because many OCP problems are caused by faulty or defective machinery, such as a broken scalding or cropping machine, along the evisceration line that might cause mutilation of the carcasses which could be easily prevented if the plant was forced to take corrective action early in the process.

The agency has been short-staffed for many years at various plants and there have been times we have had to delay certain inspection duties until late into the shift, the next shift or even the following day. I have heard of other plants so short-staffed that they cannot complete sanitation inspection. This is a concern because, depending on the plant’s commitment to sanitation, mold, debris from the slaughter process, or even rodent issues may be present. On many occasions, we have had to monitor production either late in shift or until the next shift arrives. This worries me greatly because much of the cutting is done on the production-side the plant. When we are present, we have seen many plant employees accidentally drop product and utensils like knives and scissors

on the floor and neglect to sanitize the equipment or rinse the meat before it is returned to the production line.

It is my experience that plants are mostly concerned with production and the maintenance of the production line at high speeds. They are not stewards of the public interest and their goals differ from the Food Safety Inspection Service and the USDA. I have yet to see a plant properly train their employees in poultry sorting, and I have seen plant leadership fire those who bring food safety or quality assurance issues to their attention. The Poultry Inspection Act states that each carcass should be inspected by a trained USDA inspector and yet in HIMP plants carcasses are sorted by poorly trained plant employees. The piloting of the HIMP system was useful in that it made it very clear that plants do not care about protecting consumers and should not be trusted to come up with their own inspection plans.

I, (REDACTED), have reviewed this statement of 4 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 16 day of May, 2012.

(Signature)