

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 have worked as a USDA poultry inspector for almost 15 years and I have worked in plants under the model "HIMP" inspection system, as well as a line inspector under traditional poultry inspection. In addition, prior to my employment as a USDA inspector, I worked for poultry plants in a variety of capacities. I am making this statement because I am concerned that the USDA's proposed rule, the "Modernization of Poultry Slaughter Inspection," which is based on the HIMP piloted inspection program, creates the opportunity for serious threats to public health and safety.

The proposed system, to be implemented on a national scale, places the majority of inspection duties into the hands of the plants themselves and reduces the number of critically trained USDA inspectors on slaughter and processing floors. In my experience, this does not make sense: the proposed rule gives poultry plants that are concerned primarily with production and profit the ability to self-inspect and tailor their inspection systems to their goals. By reducing our ranks, the rule (as in the model HIMP system) spreads the few remaining inspectors too thin and without our enforcement capabilities, unable to protect consumers and taxpayers to the fullest extent.

In the plant where I normally work (which is under the model HIMP system), there are few (between 3 or 4) inspectors per shift and we rotate between several different inspection duties, whereas under the traditional system there would be several USDA inspectors on each production line in addition to performing other inspection duties. We are stretched far too thin and as a result, many times are unable to complete the inspection tasks that we are supposed to complete or even have a bathroom break. It bothers me that we do not have the manpower to be able to do our jobs, and I know that because we are unable to ensure against it, the plant probably skirts many sanitation and other standards. I know this because when I worked for poultry plants we were continually told

to let things like routine sanitation and cleanliness slide for the sake of the continual operation of the production line. We were told to keep the line going almost at any cost, and even bird carcasses with fecal contamination (which may contain E. coli or other dangerous bacteria) were passed down the production line, potentially infecting wash stations and chillers. When I worked in poultry production, where things like chicken nuggets and fingers were produced dirty grease was left to stay on many surfaces. When I and some other workers tried to clean it off properly, we were admonished by our supervisor.

Under traditional inspection, there are several inspectors on the evisceration lines, and inspectors can see all angles as well as the insides of the bird carcasses, with each inspector observing approximately 35 birds per minute. During “Carcass Inspection” or the CI position in the HIMP plants, we sit at the end of the evisceration line for carcass inspection and observe the poultry carcasses as they fly by at speeds between 165 and 180 birds per minute. We are supposed to be able to spot Food Safety issues like fecal contamination, septicemia, or toxemia and then tell plant employees to pull and hang back those suspicious birds from the line. Sorters that work for the plant have replaced the inspectors that used to pull suspicious looking birds from the line.

I have heard from other inspectors that when HIMP was first implemented, we could write Non-compliance Records or NRs for fecal contamination at Carcass Inspection. This would record the plant’s failure to meet a Food Safety standard for which FSIS has zero tolerance and requires immediate corrective action by the plant. However, now we are not permitted to write NRs for fecal contamination at CI and I have had one supervisor tell me that we are only there to “monitor” the birds. The definition of fecal contamination has also changed and narrowed, I have been told that “if it’s not smearing” it’s not fecal contamination and must be classified as ingesta (or stomach contents) for which FSIS has a greater tolerance and is an Other Consumer Protection or OCP issue. OCPs include things like blisters, tumors, excessive feathers. Under HIMP, plants are permitted to have a certain percentage of OCP violations. Several times I have spotted what I know smells like fecal contamination and have had to let it go because it does not smear. In the HIMP plant where I normally work, I am able to partially see inside the carcass and can see some of the

front halves of the carcasses. However, the HIMP model is flexible enough that the plant can decide how much of the carcass they want the remaining inspectors to see. Other HIMP plants in my area are also short-staffed and I have worked overtime in different HIMP plants. I learned just how much flexibility the Agency gives to plants under the new system when I visited one location where the production line was set up so that the carcass inspector was completely unable to see inside the bird. This is a huge concern, because fecal contamination is often found inside the carcass.

Having worked for plants, I know that the sorters are under extreme pressure to keep the production line moving and to understand that most of the carcass should be for consumption, and they are most likely not properly trained in what diseases to look for. As a result, suspicious looking birds are “reworked” instead of discarded like in the traditional system, even though their carcasses may have signs of disease that could be harmful if not distasteful to consumers. During “Verification Inspection” or VI inspectors collect a 10- bird random sample and test it for Food Safety and OCP issues. If an inspector finds a Food Safety issue during VI, like fecal contamination, septicemia or toxemia the inspector then writes an NR. If the sample exceeds the allowable limit for OCPs the plant food safety employees must begin the “re-testing” procedure. The plant employees have two and a half hours to have the hundreds of birds rewashed or trimmed. When the process is complete, the reworked birds (with identifiable tags) are placed back on the production line for carcass inspection. I often find reworked birds with fecal contamination because the plant workers do not have enough time to correctly process the birds and are missing many things. With between 165-180 birds going by per minute, I am sure that there are many more I am unable to catch that may be going out to consumers.

When the bird carcasses or gizzards are at the end of the production line, they are then bathed in their respective “chillers.” The chillers sometimes have so much chlorine in them that the inspectors and workers know that the allowable limit for chlorine must be exceeded because we have eye irritations¹ and breathing problems whenever we smell the chlorine. Under HIMP, plants are supposed to devise their own “corrective action plans” to deal with problems throughout the plant instead of following guidelines from the Food Safety Inspection Service or FSIS. The plant’s HACCP

coordinator (or the coordinator who is supposed to come up with the corrective action plans and also needs to know the FSIS regulations) is not even trained in the allowable limits for chlorine and has no plan to address the issue of excessive chlorine use in the chiller.

Knowledge of the carcass viscera is crucial to understanding what diseases might infect an entire flock, like leukosis. One day I was on carcass inspection duty when I noticed that the plant placed a woman without any training on the viscera inspection station. The plant does not care; they will put anyone on the line with no concern for public safety. USDA FSIS Administrator Al Almanza says that he has almost 35 years of experience in food safety, but it has been a long time since he has been a front line USDA inspector and a lot has changed. Before deciding that HIMP is the right system for consumers, he should come and learn how it is actually implemented on the floor.

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 14__ day of May, 2012.

(Signature)