

AFFIDAVIT

My name is [REDACTED]. I have been an inspector for the United States Department of Agriculture (USDA) Food Safety Inspection Service (FSIS) for almost [REDACTED] years. I am submitting this affidavit freely and voluntarily to Alyssa Doom, who has identified herself to me as the investigator for the Food Integrity Campaign of 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 location of the establishment to which I refer. I am making this statement to share information about my experience working under USDA's new inspection system for market hogs, the HACCP-based Inspection Models Project (HIMP), and to voice my disapproval for the program.

I currently work as an inspector at one of five HIMP pilot plants in the U.S. I have been at this plant since it began operating under the HIMP program [REDACTED]. Over the years, I have identified a number of critical problems with the program, including the flawed data upon which the program is based, the inability of plant personnel to adequately take over USDA inspectors' duties, and a decrease in food safety and quality that comes along with this switch to company inspection.

A Program Based upon Flawed Data

I recognized the program was flawed from the beginning. [REDACTED]
[REDACTED] who played a key role in HIMP's implementation, came to the plant to explain the program to USDA inspectors before it began. I found out that [REDACTED] hadn't been on a kill floor in 20 years and that he had never been on a red meat kill floor in his life— only poultry. It's hard to understand the ins and outs of inspection without having worked in the field so it made me nervous that a person with a key role in the program's implementation – who was sent to educate us about the model— didn't have this type of experience. When FSIS told us that company process controllers would be taking over USDA inspectors' jobs, I asked what they would do about the problem of high turnover rates. [REDACTED] said this wouldn't be an issue. It made me nervous that he and the rest of the team didn't seem to have addressed turnover rates which, because of the industry's historical inability to keep trained employees on staff, should have been a key consideration in a

program that relies on these staff members to do critical food safety tasks. Both of these incidents were warning signs to me.

The results collected by the research institute doing the HIMP baseline study were flawed. At the time they were collecting data for the study, the USDA inspectors that were in this particular plant were less invested in the plant's outcomes than they would be normally. Many of the inspectors were on the verge of retiring and would not be affected by the implementation of the new system. Some of the other inspectors were intermittent employees, who only came to the plant occasionally and did not care about the outcome because they would be losing their jobs. The plant also had relief inspectors who were not as concerned with outcomes because they were not normally stationed in the plant. The whole thing was a complete joke because it was so biased.

Over the years it has become clear that USDA does not care about collecting scientifically sound data to justify HIMP. For example, under the program the agency has decreased the number of incisions that need to be made on a carcass's lymph nodes to check for tuberculosis (TB). They based this decision on one study completed in the early 1990's which determined the disease had been eradicated in the [REDACTED] population. This hardly seems to justify doing away with what the agency had previously determined to be an important part of inspection. In the beginning stages of HIMP, the agency said that every time the line sped up they would reevaluate the program entirely. They also said they would increase audits each time the line got faster to ensure an adequate sample was attained. The line first increased in [REDACTED] and has increased several times since then. The number of hogs processed per shift has gone up by 200. During this time, the plant never increased the number of process control employees (those plant workers who took over many of the duties of USDA inspectors) on the lines. But still the number of carcasses sampled has not increased and no reevaluation of the program has ever been completed.

To remain in the HIMP program, pilot plants are supposed to exceed or at least meet the USDA's standards for food safety and quality. I can say without a doubt that this plant is not meeting, and certainly is not exceeding these standards. The only way this plant could possibly be meeting these standards is by manipulating plant employees, USDA inspectors, and their own records and processes. I have personally witnessed all three.

Company Manipulation

Because the plant to which I refer is one of the [REDACTED] HIMP pilot plants, the owners want to make sure that no negative data (specifically noncompliance reports or “NRs”) about their operations are released, as these might suggest the program is not working. To ensure this, they have convinced plant employees to do all they can to keep defective products out of sight for federal inspectors. For example, I have witnessed company employees personally condemn the plant’s products and then attempt to sneak the condemned carcasses past me when I turned away. The company threatens plant employees with terminations if they see them condemning too many carcasses or carcass parts.

The company also threatens and retaliates against USDA inspectors who actually make efforts to do their jobs to the best of their abilities. I know this because it has happened to me. In fact, the company has made it extremely difficult for me to do my job each and every day. They have also managed to push out veterinarians and other inspectors who performed high quality inspection. Basically, if you do your job – meaning that you identify and remove contamination and defects on carcasses— they don’t want you in there. I have personally seen the agency falsify its own records. They have also moved critical control points (CCPs) – points at which food safety problems are supposed to be detected – to a point further down the line and *after* USDA’s inspection station. This has made it much harder for federal inspectors to write NRs and show system failures that would force the plant to stop and reevaluate their operations. When they moved the CCPs, they got what they wanted and expected. The plant’s fecal failure NRs decreased dramatically.

USDA’s Support for HIMP

It seems like the USDA is doing all it can to make sure the HIMP program succeeds in this plant, even if it means betraying consumers by hiding the truth about their food. My USDA supervisor tells me not to be hard on the plant. He makes comments like, “[REDACTED],” and “[REDACTED].”

[REDACTED] They were helpful because we could warn one another when contamination on carcasses increased or other various system failures we would run into. The company didn’t like us communicating because it meant it was easier for us to inspect and

Initials [REDACTED]

criticize the product. [REDACTED]

[REDACTED] Our supervisors told us the agency had decided they were a waste of money.

Under HIMP, inspectors keep track of both food safety and food quality defects. When a product has a food safety defect, it is not safe for human consumption and is to be condemned. Defects that aren't necessarily unsafe for consumption but would be unappetizing for consumers, such as toenails or hair, are considered Other Consumer Protections (OCPs). These OCP "dressing" defects are tolerable in certain amounts, depending on which of the three OCP categories the USDA has determined them to be in. Using the OCP system, the agency continues to make it easier and easier for the company to let products with dressing defects get past federal inspectors. For example, they have increased the amount of hair that is allowed to go through the inspection system and into the cooler by altering the OCP-3 "Miscellaneous" category. Additionally, the agency has made the determination that abscesses are only an OCP-1s, which means they are safe for human consumption. They used to be considered a food safety issue. If consumers knew what these looked like and that the agency was allowing them to go out to the public they would freak out. USDA and the company are working together to make it harder for federal inspectors to condemn anything. In my opinion, if USDA inspectors were allowed to do their jobs we would be condemning products all of the time under HIMP in this plant.

The USDA supervisor in this plant changes product standards constantly. It's obvious that there is no longer any agency standard by which plants must abide. It's no longer meaningful for consumers to see that mark indicating that their product has been USDA-inspected. We don't even use agency-issued forms anymore. Instead we use bootleg forms that are only used in this particular plant. Regulations should not be plant-specific. The industry should have to meet some sort of standards set by USDA!

Food Safety

Food safety has gone down the drain under HIMP. Even though fecal contamination has increased under the program (though the company does a good job of hiding it), USDA inspectors are encouraged not to stop the line for fecal contamination. The company's lab that tests for foodborne illness can't be trusted either. They bake

Initials [REDACTED]

the products to be tested for much longer than a consumer ever would. Of course their results are ending up negative!

The carcasses USDA inspectors sample for food safety or dressing defects are supposed to be randomly selected. But the company employees go behind our backs and look in our USDA cabinet where we keep a form to track times for when carcasses are going to be sampled. They know when we're going to collect samples so they have the opportunity to choose the carcasses that will be inspected at these times. The whole idea of a random sample is a joke.

Wholesomeness

Food quality has also gone down under HIMP. At this plant, the mentality is "if it isn't shit, just let it go through and it will get washed off." Adulterants like grease and hair are not supposed to go through this wash, but they always do. The company is even reworking products that contain grease, abscesses, and fecal contamination to sell later.

HIMP was initially designed for the kill of young, healthy animals. This hasn't always been the case. A lot of the animals the plant has killed were too old. Some also had different diseases. They didn't even slow down the line for the diseased carcasses. If they have a lot of hogs coming in with diamond skin or erysipelas does the plant slow down the line? No way. Consumers are being fooled into thinking that the HIMP program is going to produce safer, higher quality pork.

Employee Training

Because the plant takes over so many of USDA's duties under HIMP, it is important for them to be trained and qualified to complete their new tasks. However, a lack of training and knowledge among the plant's own employees has proven to be a major problem with HIMP. The plant's own supervisors do not know their HACCP plan. The only thing they seemed to really be concerned about is their Safe Quality Food (SQF) audits by the companies who buy their product—they can barely pass these.

Not only are plant supervisors not trained, the employees taking over USDA's inspection duties have no idea what they are doing. Most of them come into the plant with no knowledge of pathology or the industry in

Initials [REDACTED]

general. One of the tasks they are failing to do correctly is incise the animals' lymph nodes. During lymph node incision, they are supposed to be looking for different diseases, such as tuberculosis (TB). I see them miss TB all of the time. When a carcass has TB it is supposed to be either condemned or passed only to sell in cooked products, not sold raw. I am almost certain products with TB are being sold raw on a regular basis. The company inspectors also fail to detect thyroid conditions in hogs all of the time. This is dangerous because when someone with a thyroid condition consumes thyroid from a hog it can trigger serious health problems.

Company inspectors don't do presentation (the act of presenting the carcass and its parts for inspection) the same way in a HIMP plant as they do under traditional inspection because the agency has determined it's no longer a concern. They now drop the viscera in a pan and it's a complete mess. A lot of times the plant inspector is getting contamination on him or herself and doesn't have a place to wash up. This means contamination can easily spread from them to the following carcasses. Using this new presentation system there are often residual contaminants from one pan to the next because the company is not rinsing these pans well. A couple of years ago there was a huge problem with residual ingesta in pans, but inspectors weren't allowed to stop the line because "HIMP is hands off". In fact, it has been made clear to us that we can't stop the line for the company to fix things because we can be sued for "impeding their right to do business". The way I see it, now they're threatening to sue us for doing our jobs!

During this new presentation system under HIMP, the company employees are basically only looking at the heart for defects or contamination. They don't even have to look at the animal's liver, spleen, or mesentery nodes. Under traditional inspection, USDA inspectors would palpate all or most of the animal's organs to check for different pathology that would make a carcass unfit for human consumption. [REDACTED]

[REDACTED] Under this new presentation system, it's impossible for USDA inspectors to correct plant inspectors because we can't see the product from where we are stationed, which is high up on an elevated stand. It usually doesn't matter if the USDA inspectors in this plant tell the plant employees to fix something because they don't want to argue with us. If we tell them to stamp something out to be condemned, they'll tell us that they don't have to. We've lost all authority.

Initials [REDACTED]

The company is also responsible for taking over the disposition process, which involves checking carcasses for different diseases that would make them unfit for human consumption. Under traditional inspection, this is the responsibility of the USDA veterinarian. Under HIMP, a poorly trained plant employee takes over. Compared to the extensive schooling a USDA vet receives, the plant disposition person is trained using just a little booklet provided by the plant. I've seen firsthand that the people they have in this role don't know pathology and are easily manipulated into passing carcasses that should realistically be condemned.

The Future of HIMP

Most of the USDA inspectors in this plant are getting ready to retire. It will be sad when we're gone because there will be nobody left in this plant with experience working under traditional inspection. It's sad to say, but the USDA inspection crews continue to get worse and worse. They do not care about fecal matter and they don't understand pathology. I think this is because the new people that the Agency is hiring are given little training and have discovered that if they do their job, they'll be the biggest problem in the world. Some of them have also seen other inspectors get in trouble for actually doing their job, so they have learned to stay out of the way and let the company control things.

Veterinarians aren't doing a good job either. They are never on the kill floor and never want to make themselves available to help out the inspectors when we have a question. Most of the time they don't even know what's going on in the process because they never leave their offices. They are working for the industry—not for consumers.

Products coming out of this plant are sold to huge restaurant chains nationwide. But most people don't know that their meat is being inspected in this way. If they purchased HIMP-inspected product from this plant in the store they wouldn't know either because USDA does not require the product to be labeled as such. But I continue to ask myself, "If HIMP inspection is as great as they claim, why don't companies *choose* to volunteer that information to their customers?" I think it's because if the American public really knew what this company was getting away with under HIMP, they would not be happy. Even if the public wanted to fight against the

program, it might not make a difference because these plants will be grandfathered in. For the sake of consumers across the country, I hope that others will speak out to prevent the program from expanding nationwide.

I, [REDACTED] have reviewed this statement of 8 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 22 day of October, 2014.

[REDACTED]

Sworn and subscribed before me this 22 day of October, 2014.

[REDACTED]

[REDACTED]

[REDACTED]