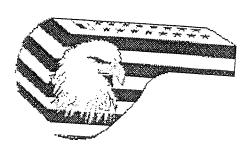
# Fighting Filth on the Kill Floor: A Matter of Life and Death for American Families



A Government Accountability Project White Paper

Arming U.S.D.A.'s food inspectors with science for the 21st Century

November 9, 1995

Government Accountability Project 810 First Street, NE • Suite 630 Washington, DC 20002-3633 Email: gap@igc.apc.org

## ABOUT THE GOVERNMENT ACCOUNTABILITY PROJECT

The mission of the Government Accountability Project is to protect the public interest and promote government and corporate accountability by advancing occupational free speech, defending whistleblowers, and empowering citizen activists. Since 1983 GAP has represented over 230 government and corporate whistleblowers challenging public health hazards from contamination of meat and poultry subject to the U.S. Department of Agriculture's inspection system.

## FIGHTING FILTH ON THE KILL FLOORS:

# A MATTER OF LIFE AND DEATH FOR AMERICA'S FAMILIES

Arming America's food safety inspectors with science for the 21st Century

### INTRODUCTION

Law enforcement in meat processing plants is as important to American families as law enforcement on our streets. But food safety has not changed appreciably since Upton Sinclair's The Jungle led Teddy Roosevelt to introduce carcass-by-carcass inspection. With this reform, only meat that passed inspection would receive a United States Department of Agriculture (USDA) seal of approval. In the 1960's poultry was added. At the time these were genuine breakthroughs, and America enjoyed the safest food supply in the world.

A technological revolution to increase productivity that began in the 1970's has neutralized the reforms. Line speeds have doubled and may triple. Inspectors have some two seconds to examine a poultry carcass and 30 seconds to look over a 500-1,000 pound beef carcass. Simultaneously, the new technologies are creating and spreading filth at unprecedented levels -- ripping open intestines, grinding in the feces that accumulate on poultry feathers, and spreading all the contaminants through sprays and common baths. The bottom line is that consumers today pay for USDA-approved fecal soup and other filth, when they think they are buying food stamped as wholesome.

The result is an increasing threat to public health. The magnitude of this food safety crisis first became clear after the West Coast Jack-in-the-Box food poisoning outbreak in January 1993 that led to 5 deaths and 500 hospitalizations. Currently, USDA estimates that 4,000 deaths, over 500,000 hospitalizations and some nine million illnesses annually are attributable to contaminated meat and poultry. Many victims are children and the elderly. The United States Department of Agriculture (USDA) and

the Centers for Disease Control and Prevention ("CDC") also maintain that the incidence of *E. coli 0157:H7* bacterial contamination is on the rise. Cases informally reported to volunteers at Safe Tables Our Priority (S.T.O.P.), the support organization of families victimized by contaminated food, have risen dramatically -- from approximately 230 in 1993 to almost 400 in 1994. CDC projects a significant rise in officially-reported cases during 1995.

These cases reflect far more than a statistical increase: each can represent a tragedy, such as a young child rushed to a hospital from a day care center to await an agonizing death, a Boy Scout stricken after grilling at a campout, or a person who lost a kidney from eating a government-approved hamburger. Americans will not accept the steady rise in food poisoning tragedies as a way of death.

#### THE CHOICE

Food safety is at a crossroads. The time is long past for a scientific revolution in food safety. Both the Administration and Congress must rise to this challenge. USDA's Food Safety and Inspection Service (FSIS) already is hampered by a slaughter vacancy rate of almost 13%, and some 1250 inspectors overall. It is not uncommon for a processing inspector to be responsible for six plants, and on occasion up to 12. Even worse, Administration budget officials are restricting USDA from even trying to fill the vacancies. The proposed solution to vacancies? Erase the jobs.

At the same time, a hopelessly bloated USDA bureaucracy is undercutting Acting USDA Undersecretary and FSIS Administrator Michael Taylor, and Associate FSIS Administrator Thomas Billy, the first FSIS leaders in over a decade to earn the trust and respect of consumer advocates. A recent "top to bottom" review was dominated by the same staff who developed proposals in the 1980's for inspectors to check paperwork instead of food. Congress sharply rejected those plans -- "discretionary inspection" (DI) to eliminate daily inspection of processed plants; and the "Streamlined Inspection System," (SIS) to restrict inspectors during examinations of beef carcasses. SIS was nicknamed the "Streamlined Infection System" because of the sharp rise in salmonella contamination after the program was implemented in poultry plants.

The recent USDA review cost taxpayers hundreds of thousands of dollars to produce a 600 page "reform" vision from architects of the status quo. The bottom line was simple: respond to congressional budget cuts by eliminating field inspector and supervisor positions, while preserving jobs for the corps of paper pushers in Washington headquarters.

Meanwhile, Taylor and Billy are pressing ahead with a Hazard Analysis Critical Control Points (HACCP) proposal to introduce modern science, public health performance standards and increased industry responsibility for its products — all thrice recommended by the National Academy of Sciences since 1985. The jury is still out on HACCP, an acronym that could translate into almost anything. Only a properly validated and verified HACCP system will adequately control microbial hazards in food. But even the best HACCP system does not replace the need for federal inspection.

The current law provides for carcass-by-carcass inspection in the slaughter plants and continuous inspection in the processing plants. Federal inspectors assure that sick animals are separated from healthy ones prior to slaughter; and that tumors, abscesses and fecal contamination is removed from meat and poultry after it is slaughtered. These jobs are critically important to assure the safety of meat and poultry that reaches consumers, marked with USDA's seal of approval.

There are proposals circulating in Congress that would turn these jobs over to industry employees. The National Association of State Departments of Agriculture has submitted legislation that would eliminate continuous federal inspection of meat and poultry once HACCP is implemented. But this report demonstrates that the meat and poultry industry cannot be trusted with these important jobs. The sanitation violations documented here all passed "industry" inspection. The law only was enforced, because federal inspectors were in the plants.

There is no basis for American consumers to trust an industry honor system for meat and poultry inspection. Industry workers often are untrained, unqualified and can be fired at will if they interfere with production. For years, federal inspectors have pressed for more ambitious

training. By comparison, however, they are far better trained and more qualified than their industry counterparts. Further, they are protected by state-of-the-art job rights. Most significant, they are free of conflict-of-interest.

Until the right partnership of federal and corporate food safety is proven to be the most effective model available, federal inspectors must provide continuous, comprehensive coverage to vouch for USDA's seal of approval. The Government Accountability Project's public comments on the proposed HACCP rule are enclosed as an appendix. The comments are consistent with those of the Washington, D.C.-based Safe Food Coalition and the grass roots organization, S.T.O.P.

The challenge applies equally to Congress. This year Congress provided billions more than the Pentagon says it needs for national defense abroad. But to defend consumers at home, Congress barely appropriated enough to maintain the current skeletal inspection force. The challenge for Congress next year is to restore America's food safety cops to the beat, armed with the science to detect microbial contamination — the invisible threat that is deadly to our children and our elderly.

#### **FINDINGS**

The list below was refined and documented at the request of meat industry trade association representatives to October 1995 public HACCP hearings. It summarizes recent violations of law caught by federal meat and poultry inspectors. Through law enforcement actions, affected food was appropriately retained or condemned, plants were stopped from completing attempted violations, and/or corrective action was imposed for unsanitary practices, building surfaces or equipment. Without inspectors' continuous presence and vigilance, plants would have accepted these conditions as consistent with USDA's seal of wholesomeness.

The examples are illustrative, not exhaustive, of conditions reported by 75 whistleblowing inspectors since September 1995, and in USDA

records. Relevant supporting records are cited as exhibits.1

It would be irresponsible to generalize based on these examples. Due to the scope, severity and frequency of the violations, it also would be irresponsible to conclude that these findings are aberrations reflecting the exception rather than the rule. Evidence directly supporting these findings is drawn from 22 states.<sup>2</sup> The record for this report primarily reflects conditions in the nation's largest poultry and beef plants, although small processing operations also are included in this record.

## I. GENERAL UNSANITARY CONDITIONS

- 1. Filthy mixtures accumulate on equipment and surfaces such as plant floors, including human and animal excrement, blood, oil, grease, machine parts, glass, plastic, wood chips, rust, paint, cement, dust, insecticides, insects and their eggs, maggots and rodent droppings. (Exhibits 1 at 3, 7, 8-9, and 13; 2 at 6; 3 at 3; 4 at 7, 9 and 13; 9; 14; 20; 23; 24; 27; 28; 52)<sup>3</sup>
- 2. Water and plumbing sources malfunction, and condensation accumulates, often spilling water onto the plant floor from drains backed up in sinks or on the floor; spray from broken hoses or their nozzles; toilets backed up; or condensation dripping from coolers or dirty pipes

<sup>&</sup>lt;sup>1</sup> The first four exhibits are whistleblower affidavits or interview reports on specific facilities. GAP will release those exhibits to responsible USDA officials for any further investigation, in connection with any confidentiality agreements required by the inspectors. GAP's investigation is ongoing. Currently interviews are scheduled with 14 additional whistleblowers.

<sup>&</sup>lt;sup>2</sup> States covered by the record in this report include -- Alabama, Arkansas, California, Colorado, Iowa, Florida, Georgia, Kentucky, Illinois, Indiana, Massachusetts, Missouri, Nebraska, Minnesota, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, Rhode Island, Texas and Washington.

<sup>&</sup>lt;sup>3</sup> For clarity of citation format, Exhibit 1 at 3 refers to page 3 of the first exhibit

- overhead. This water mixes with the previously mentioned contaminants on the floor to create a filthy "soup." (Exhibits 1 at 5 and 13-14; 6; 7; 9; 10; 12; 13; 14; 15; 16; 17; 19; 20; 21; 22; 28; 30; 31; 33; 50; 55)
- 3. Plants fail to honor preoperational building sanitation requirements, resulting in an accumulation of mold and bacteria-ridden residues on in coolers, and on walls, floors and equipment that comes in direct contact with product. Company inspectors, required by law to check the plant for sanitation before production begins, repeatedly fail to spot and have surfaces cleaned which are encrusted with potentially deadly residues. These include fat, blood, charcoal, ingesta, and fecal material. (Exhibits 1 at 3-5; 2 at 6; 4 at 7; 9; 11; 12; 16; 17; 18; 20; 21; 22; 23; 24; 25; 26; 30; 31; 32; 42)
- 4. Facilities violate preoperational sanitation rules for their production equipment, such as knives, scabbards, or clipboards which the law requires to be kept sanitary at all times. Plant management fails to check that employee equipment, such as rubber belts, rubber aprons, mesh gloves, and leather belly guards, is maintained. These items then foster bacteria growth and disintegrate into product. (Exhibits 1 at 5-6 and 8; 4 at 14; 8; 13; 18; 26; 29; 30; 32; 33; 48; 55)
- 5. Facilities carelessly hose down equipment, ceilings, walls or floors, and splash filthy water onto product or contact surfaces. Red meat plants fail to maintain sanitizing water at 180 degrees, and poultry plants fail to maintain chlorine levels to 20 ppm's as required. As a result, rather than killing bacteria, the splash water spreads it over a larger area. (Exhibits 1 at 5-6; 8; 9; 10; 16; 17; 20; 23; 25; 29; 31; 32; 33; 38; 49)
- 6. Product falls into this "soup" on the floor and is returned to the line without being rinsed. This condition affects literally hundreds of pounds of meat that pile up on the floor. (Exhibits 3 at 3; 25; 34; 43; 45; 46; 47; 54; 57)
- 7. Uncapped product transport hoses, left unprotected overnight, are found lying in puddles containing oil and filth, insects, rodents, dirt and dust. Hoses left on the floor are used to rinse product. Employees use plant equipment that was stored on the floor, or that has become

unsanitary for working with product. (Exhibits 10; 12; 16; 20; 23; 24; 25; 26; 31)

- 8. Flies and other insects gain easy access through large open doors. Maggots and other larvae breed in storage and transport tubs and boxes, on the floor, in processing equipment and packaging, and drop onto the conveyer belt from meat splattered on the ceiling above. (Exhibits 1 at 7; 4 at 4 and 7-8; 22; 24; 30; 53)
- 9. Needed repairs of employee bathrooms are avoided until most toilets are unusable. Toilets back up and leak onto the floor. Employees must wade through sewage to use the toilet, and then track the filth out onto the plant floor. Soap and towels often run out. Supervisors have instructed inspectors not to report conditions in employee bathrooms, because to do so would "harass" management. (Exhibits 1 at 9; 4 at 9; 6; 7; 8; 17; 51; 56)

## II. DIRECT PRODUCT CONTAMINATION

- 1. Abscesses and digestive organs are punctured during slaughter, releasing pus, fecal material and ingesta all over carcasses, onto conveyers, workers and the floor. Because these substances may contain dangerous bacteria, the law requires that affected meat and poultry be trimmed rather than rinsed. Plants repeatedly skip trimming and merely rinse the meat, which can force bacteria into the porous flesh. Up to 25% of slaughtered chickens on the inspection line are covered with feces, bile and feed. (Exhibits 1 at 9-10; 4 at 6-7 and 13-14; 5 at 3; 9; 21; 22; 25; 29; 43)
- 2. Employees fail to sanitize their equipment or hands, as required by law, after specific incidents in which pus or fecal material contaminate these surfaces. As a result, employees become personalized sources of cross-contamination. (Exhibit 1 at 5, 6, and 10; 4 at 14)
- 3. Facilities fail to trim abscesses from meat on its way to consumers and throw them into the lot to be processed. Plant employees also miss hide, hair, ear canals, and teeth in product approved by the facility. By

failing to discover these defects, company inspectors who are required to check samples approve up to 4 times more product for consumer use. (Exhibits 1 at 10; 3 at 6; 4 at 14; 5; 37; 43; 49)

- 4. Diseased (cancerous and tuberculoid) animals condemned during ante-mortem inspection are sent to slaughter in violation of the law. (Exhibit 5)
- 5. Red meat animals and poultry that are dead on arrival or die in the yard while awaiting slaughter are hidden from inspectors doing antemortem inspections and hung up to be butchered. Severed heads from "cancer eye" cattle are switched to smaller carcasses, or fore- and hind-quarters are switched before post-mortem inspection, so less meat will be condemned. (Exhibits 3 at 4; 4 at 11-12; 5)
- 6. Rancid, outdated and contaminated meat is accepted for further processing or packaged for shipment. For example, in one enforcement action at a single facility, inspectors retained six tons of ground pork with rust which was bound for a school lunch program in Indiana, 14,000 pounds of chicken speckled with metal flakes, 5,000 pounds of rancid chicken necks, and 721 pounds of green chicken that made employees gag from the smell. (Exhibits 2 at 3-5; 3 at 6-7; 4 at 7; 5; 35; 43)
- 7. Rancid meat is smoked to cover foul odor, or marinated and breaded to disguise slime and smell. (Exhibit 5)
- 8. "Warm" meat (not stored at legally-required temperatures to prevent rapid bacteria growth), or obviously "sour" product is added to acceptable meat and then processed. (Exhibit 5)
- 9. Chickens and hams are soaked in chlorine baths to remove slime and odor, and red dye is added to beef to make it appear fresh. (Exhibit 5)
- 10. In an example summarized at the Secretary's public hearings on HACCP, six percent of dried apricots added to chicken apricot sausages were infested with insects and larva.

## III. REPETITIVE VIOLATIONS

- 1. Facilities repeatedly fail to respect personal hygiene rules such as adequate bathroom breaks. Consequences include failure to wash hands, urinating in a carcass cooler, urinating on the floor while working the line, and dropping toilet paper covered with human feces on the bathroom floor. (Exhibits 1 at 9; 4 at 9; 5;)
- 2. Plants repeatedly fail to adequately enforce the rule requiring employees to change sanitary uniforms and wash their hands when they switch from working with raw product to working with ready-to-eat product. Consequences include ready-to-eat food coming into contact with filth such as blood, meat scraps and germs that encrust the coats employees use while working with raw product. Employees also fail to wash their hands after working with unsanitary product or equipment. (Exhibits 2 at 4-5; 5; 25; 27; 36; 39; 40)
- 3. Facilities repeatedly fail to send home employees who are sick. As a result, employees sneeze on product, sneeze into their hands and wipe them off on passing carcasses, and cough up phlegm onto product or the floor. (Exhibits 3 at 3; 5)
- 4. Plants repeatedly violate transportation standards. To illustrate, large plastic tubs used to transport quantities of rancid or abscessed meat are not sanitized before transporting clean product. (Exhibits 4 at 5; 5; 11; 16; 23; 25; 41)
- 5. Plant managers repeatedly argue with inspectors over the most basic standards of wholesomeness. Examples include fighting to allow "some" contamination, because "just a little" won't hurt anyone. Relevant contamination has included feces, grease, hydraulic oil, maggots, metal, floor residue and rancid meat. One argued that ground meat, returned while on its way to a school lunch program, couldn't have fallen on the floor, although it was mixed with cement, gravel and wood chips. Another plant manager argued that the floor did not need to be rinsed with 180 degree sanitizing water after an employee urinated on it. Plant managers make comments such as. "Who cares, this [product] is going to New York." (Exhibits 3 at 7; 4 at 7; 5)

6. Repeatedly, adulterants such as ice are introduced into lunchmeat product, typically in proportions of 200 - 300 pounds of ice per 1000 pounds of meat. Chicken skin, heads, hearts, tongue and unacceptably high levels of ground bone are also used to boost volume. (Exhibits 2 at 6-8; 5)

#### IV. RECORDS FALSIFICATION

- 1. Plants circumvent freshness requirements by switching the date when meat or poultry is processed in a product with the date it was slaughtered, which is much earlier. Employees sneak "guaranteed product," returned because it wasn't purchased in the required time, into production without having it inspected as required. (Exhibits 2 at 6; 5)
- 2. A quantity of known acceptable product is kept at the sampling center. When product fails a sampling test, a quantity of the known product is substituted for the retest so the tainted batch will "pass." (Exhibit 5)
- 3. Numerous plants have omitted the testing procedure altogether and simply created acceptable results for tests that were not performed. (Exhibits 1 at 11-12; 5)
- 4. Employees are fired for alerting inspectors about violations in the plants; company inspectors are pressured to ignore defects. (Exhibit 3 at 7-8; 5)

#### **RECOMMENDATIONS**

No matter how impressive the law enforcement technology, there is no substitute for police officers on the beat in America's neighborhoods. This same basic truth applies to meat and poultry plants. Modern scientific food inspection requires a microscope and a badge. The recommendations below have three goals: 1) prompt USDA leadership in requiring the meat and poultry industry to assume its public health responsibilities to consumers; 2) USDA leadership so that taxpayers can get more food safety

bang for their buck from a restored federal inspection force; and 3) congressional budgetary support and statutory reform to make Administration leadership possible. Specifically, this report recommends --

- 1. Prompt USDA implementation of a genuine HACCP plan, consistent with comments of the Safe Food Coalition.
- 2. USDA implementation of a rule requiring facilities to correspondingly increase HACCP and other relevant staff proportionate to increases in line speeds.
- 3. Empowerment of federal inspectors for continuous, comprehensive inspection by --
- a. broadening their mandate for consumer protection, with farm to table duties for currently neglected areas such as transportation;
- b. giving inspectors the training and tools to be pioneers of the scientific revolution, with the responsibility to take their own random samples for microbial testing and authority to act when results are inconsistent with industry laboratory testing; and
- c. assigning them responsibility to defend corporate whistleblowers who serve as their eyes and ears to keep HACCP plans honest, with the same authority to act against retaliation by taking enforcement action as they would against direct public health hazards or other HACCP violations.
- 4. Commitment by the Administration and Congress to fill the current 1250 inspector vacancies.
- 5. Congressional passage of the proposed Family Food Protection Act to modernize federal statutory protection for consumers.

#### PUBLIC EXHIBIT LIST

1 - 4.	These exhibits are not included.	Please see footnote 1 in the report.
5.	Affidavit of Dave Carney	
6.	Sanitation Report	7/24/95
7.	Sanitation Report	7/25/95
8.	Sanitation Report	7/27/95
9.	Sanitation Report	8/2/95
10.	Sanitation Report	8/3/95
11.	Sanitation Report	8/11/95
12.	Sanitation Report	8/14/95
13.	Sanitation Report	8/17/95
14.	Sanitation Report	8/18/95
15.	Sanitation Report	8/21/95
16.	Sanitation Report	8/25/95
17.	Sanitation Report	8/28/95
18.	Sanitation Report	8/29/95
19.	Sanitation Report	8/30/95
20.	Sanitation Report	8/31/95
21.	Accelerated Deficiency Notice	Review Date: 4/15/94
22.	Accelerated Deficiency Notice	Review Date: 4/18/94
23.	Accelerated Deficiency Notice	Review Date: 4/19/94
24.	Accelerated Deficiency Notice	Review Date: 5/17/94
25.	Accelerated Deficiency Notice	Review Date: 6/2/94
26.	Accelerated Deficiency Notice	Review Date: 6/15/94
27.	Accelerated Deficiency Notice	Review Date: 9/14/94
28.	Accelerated Deficiency Notice	Review Date: 10/18/94
29.	Accelerated Deficiency Notice	Review Date: 11/9/94

30 Accelerated D.C.	
<ul><li>30. Accelerated Deficiency Notice</li><li>31. Accelerated Deficiency Notice</li></ul>	Review Date: 11/15/94
Defletency Tyource	Review Date: 12/08/94
32. Accelerated Deficiency Notice	Review Date: 2/28/95
33. Accelerated Deficiency Notice	Review Date: 3/9/95
34. Accelerated Deficiency Notice	Review Date: 5/1/95
35. Process Deficiency Record	Date: 4/17/95
36. Process Deficiency Record	Date: 4/17/95(A)
37. Process Deficiency Record	Date: 4/18/95
38. Process Deficiency Record	Date: 4/18/94(A)
39. Process Deficiency Record	Date: 4/19/95
40. Process Deficiency Record	Date: 4/20/95
41. Process Deficiency Record	Date: 4/20/95(A)
42. Process Deficiency Record	Date: 4/20/95(B)
43. Process Deficiency Record	Date: 4/20/95(C)
44. Process Deficiency Record	Date: 4/21/95
45. Process Deficiency Record	Date: 4/22/95
46. Process Deficiency Record	Date: 4/25/95
47. Process Deficiency Record	Date: 4/26/95
48. Process Deficiency Record	Date: 4/27/95
49. Process Deficiency Record	Date: 4/28/95
50. Process Deficiency Record	Date: 7/28/95
51. Process Deficiency Record	Date: 7/28/95(A)
52. Process Deficiency Record	Date: 8/3/95
53. Process Deficiency Record	Date: 8/4/95
54. Process Deficiency Record	Date: 8/7/95
55. Process Deficiency Record	Date: 8/15/95
56. Process Deficiency Record	Date: 8/18/95
57. Process Deficiency Record	
	Date: 8/21/95

AFFIDAVIT

My name is David Carney. I am submitting this statement, without any threats, inducements or coercion to Felicia Nestor, who has identified herself to me as an investigator with the Government Accountability Project.

I am making this statement on behalf of countless other inspectors who choose not to go public at this time, and based on my 18 years of experience.

I have read the November 9, 1995 Government Accountability Project White Paper, FIGHTING FILTH ON THE KILL FLOORS: A MATTER OF LIFE AND DEATH FOR AMERICA'S FAMILIES. I can bear personal witness to all practices described in the findings. To inspectors knowledgeable about the meat and poultry industry, none of the findings are even close questions. They represent a way of life in the meat industry -- not at all plants, but at all too many.

In particular, I'd like to share an open letter, sent to me on October 28, 1995, by one of my members. It is enclosed with this statement as an attachment.

The following is a list of routine practices which violate USDA regulations as well as some individual experiences of some FSIS inspectors which were relayed to me:

- . Plants still maintain production even when the raw production area becomes contaminated with chicken feathers that are a known conduit for carrying foodborne pathogens.
- . At plants located at a refinery there are substantial accumulations of water and oil on the ground. Edible product



transport lines and hoses lie in these puddles. These uncapped transport lines also lie exposed in the railroad yard and come into contact with other contaminants such as air, dirt, dust, insects, and rodents.

- Plants have used unprotected glass bulbs where regulations prohibited it. Occasionally, the glass breaks into ice, later used in fluid for injecting brine into turkey breast, until the inspectors find the glass shards and condemn the product.
- . Inspectors have condemned product adulterated with screws and plastic wrap.
- Drains backing up is a common problem.
- . Quantities of condensation collect on the ceiling, which is a host to a bacteria that could lead to listeria. This condensation then drips onto the floor.
- . Inspectors have found oil and water leaking from overhead pipes onto the production floor.
- . Inspectors have had to repeatedly take action at facilities where, periodically, product would fall under the equipment.
- Product falling or dragging on the floor is a common problem. Inspectors have had to argue with plant management to take care of the beef carcasses lying on the floor at facilities where plant employees routinely leave them. Company managers demand that inspectors get the line back in production and worry about the carcasses later. Inspectors have caught employees trying to move carcasses using rusty combs.
- . Plant employees will pick equipment or product directly off the floor and continuing using it without taking the necessary



sanitizing or corrective actions.

- . Employees will walk or sit on meat, or try to move large carcasses by pushing it with their shoes.
- . Inspectors find employees sitting on the conveyer belt with their feet in buckets of edible product.
- . An inspector found workers standing in meat and water, six inches deep, while working at the de-boning table with breast meat. The inspectors had to condemn hundreds of pounds of product.
- . Inspectors are accused by plant managers of not doing enough to stop the fly problem, but the same managers refuse to cooperate when they do take action.
- . Inspectors condemn product which has been packaged in packing material infected with maggots.
- . An inspector stopped production and condemned affected product when seeing maggots on the floor under the conveyer belt, which seemed to be falling from the conveyer belt which was carrying product. After stopping production, he learned that the source of the maggots was meat scraps, stuck overhead on the ceiling, previously blown there by the stuffer days earlier.
- . Inspectors have tagged bathrooms because toilet paper was piling up on the sides of the toilets and there weren't any company employees to fix the problem. Plants will allow operations to continue, although the employee bathrooms are filthy and employees are tracking the mess out onto the floor.
- . Employee argue with inspectors that they had been told abscesses were edible, should not have to be trimmed off.



- . Company foremen have quickly tried to wash fecal contamination off a carcass before it can get to the inspectors down the line, so that employees don't have to spend time trimming it off the carcass as required by law.
- . Inspectors have required that plants trim meat which have been contaminated by milk, which on occasion, gushes from mastitis-infected udders.
- Plant management have tried to pass off "bug-eyed cattle with T.B." as good, clean product.
- . Plant employees have tried to trim tumors from carcasses before inspection, so that the whole carcass would not be condemned.
- . Some plants will do almost anything to get a carcass through. They will switch cow heads or shuffle carcass identification tags in order to prevent detection of "cancer eye" lesions. Other deceptive practices include trimming evidence of cancer from the carcass and poking out the eye of a "cancer eye" cow.
- . Sometimes when animals are condemned during ante mortem, employees will try to slip them through, into slaughter, with healthy animals.
- Inspectors have rejected groups of dead hogs which had been hung on the slaughter line. Examples include rejecting a sow which had been hung on the kill line and had previously died by bleeding to death from the rectum.
- . Inspectors have retained tons of ground pork with rust which was bound for the school lunch program. Others examples include thousands of pounds of chicken speckled with metal flakes and

5,000 pounds of rancid necks.

- . Inspectors have stopped plants from making, or retained product made from, processing meat that is green as grass and rancid and sour.
- . Plants fail to thoroughly thaw product before processing it, which would be necessary in order to check for off-conditions.
- . Product that is awaiting processing is not always stored in a sanitary condition. Inspectors have found thawed bacon in a vat of water covered with flies.
- . When a carcass wash drain was plugged, a beef carcass lay in the water for thirty minutes. When the inspector shut the line down to take care of the problem, management first argued about the down time and then said "that carcass just needed to soak for awhile".
- . Plants have shipped product out that was retained by the inspector. Plants use equipment previously rejected by inspectors because it was unsanitary to process products, which are later condemned because of contamination with grease.
- . Plants move product into processing, without reconditioning it, although it has previously been identified for "reconditioning.
- . Employees try to sneak adulterated and condemned product back on the line for "reworking".
- . Product is supposed to be sanitary and wholesome before it is stored in the chiller, but an inspectors have found intestines both in and out of the chickens in the chiller. Intestines are the source of foodborne microbiological pathogens.

- . Inspectors condemn hundreds of pounds of veal trim due to contamination with gross amounts of rodent feces, which plants repack without notifying the FSIS inspector.
- The industry practices deception by smoking rancid meat to cover foul odor, or they marinate product and disguise slime and smell by coating with bread crumbs.
- Another industry tactic is to use a solution of red dye to restore "bloom," which means restoring a red color to the meat to make it appear wholesome.
- . "Warm" meat, which is meat that has not been stored at legally-required temperatures to prevent rapid bacteria growth, or obviously "sour" product is added to acceptable meat and then processed.
- . Chlorinated water or vinegar is used by industry as a soaking solution to take slime off products. This is tactic to camouflage unwholesome meat or poultry. Slime is an indication of the first stages of rancidity or decay.
- Quite often plants are insensitive to employees by not providing adequate relief breaks for employees' personal needs. This has often resulted in employees discreetly urinating at production lines and in product holding coolers. Sometimes after employees urinate onto the cut floor, managers object to washing the floor down with 180 degree water.
- Plants repeatedly fail to adequately supervise the rule requiring employees to change sanitary uniforms and wash hands when they switch from working with raw product to working with ready-to-eat product. Blood, meat scraps and germs can encrust

employees' coats after they have been working with raw product, and this can easily contaminate equipment and other product.

- . Inspectors have seen employees sneeze and wipe off their hands on passing carcass. Others have seen employees blowing their noses in their hands and then touching product, sneezing onto and spitting up phlegm onto product.
- . Plants use containers which have carried unsanitary product, to carry raw product before the containers are cleaned and sanitized.
- . Veal carcasses have been transported for boning in boxes that previously were used to store chemicals. Even when the boxes were clearly marked with a warning against ingestion or inhalation of the chemical, they have been used to store three thousand pounds of meat.
- . Plant managers repeatedly argue with inspectors' insistence that regulations be followed, and appealed decisions higher and higher up the chain of command. If federal inspectors were not present, there would be no one to insist that the law was followed.
- . Plant managers have argued that a little contamination doesn't hurt anyone, with respect to feces, grease, oil, metal, residue from floors, or off-condition meat and stated that they would eat it.
- . Plants have tens of thousands of pounds of turkey breast contaminated, after incidences like power shortages causing the vacuum lines to reverse, blowing waste all over product. Plants have tried to process product anyway, by keeping incidents

from inspectors although they are required to notify USDA immediately, vacuuming the product, rinsing it, and finally trying to intimidate inspectors. If not for the inspector's judgement, this type of product would reach the consumer's table.

- . When one inspector pointed out fecal contamination on hocks, plant management responded, "So what. . . Seriously, have you ever heard of someone dying from dirty hock?"
- . When a maintenance employee dropped equipment through the roof, company inspectors argued vigorously that carcasses, covered with dust and roofing which fell through, didn't need to be trimmed as required, but would be cleaned well enough by a final shower they received before being stored in the cooler.
- An inspector was accused by plant management of harassment when he required them to sanitize equipment which had been contaminated by pus. Management at this same plant screamed repeatedly at the inspector when he retained a bucket of sausage casings because of what appeared to be crank case oil contamination.
- . An inspector found chicken skin, backs and vertebral ribs being added to make reconstituted breast meat.
- · Plants will use a new kill date after product has been processed to extend the shelf life.
- One inspector found that a quantity of known acceptable product was kept at the QC sampling center. When product failed a sampling test, a quantity of the known product would be substituted for the retest so the tainted batch would "pass."



- . Thermometers used to check the cooking temperature of sausage have been off by as much as ten degrees. When meat and poultry products are undercooked they become a health hazard. This is an industry tactic to increase profits the sausage shrinks less and therefore creates more tonnage.
- . An inspector found that a poultry processing plant was not cooking its poultry product to 160 degrees as established in their procedures and as required for a "fully cooked" label. Records were being falsified so that the plant appeared to be in compliance. Plants attempt to benefit from lower final cooking temperatures because they can process more product for less energy expenditure, and process more product because it takes less time when it doesn't have to reach the higher temperature, because the product does not dehydrate as much and there is increased weight from water.
- A QC inspector at a company which has been preparing for HACCP for a year put a HOLD tag across the door entering the processing room, when the drains had backed up and two inches of raw sewage water was covering the floor. Production had not stopped, however, and employees were walking through the water, and product was being transported through it. The inspector stopped production and retained approximately 300 pounds of ingredients and meat products. When asked why he hadn't stopped production the QC inspector replied that he didn't think he could. These type practices occur at facilities manufacturing child nutrition products for the school lunch program.
- . Subordinate QC employees are not well trained and an



inspector finds himself in the position of having to educate them. Further, they are intimidated by management and do not demand that problems they observe are taken care of.

FSIS inspectors have been subjected to directed reassignment in retaliation for enforcing regulations.

It is a routine practice to terminate employees that alert inspectors of contaminated product or deceptive tactics, or other violations of USDA regulations.

. A male inspector reports that a female inspector is intimidated by plant management who follow her around and write down everything she does.

Inspectors have been physically barred from inspecting product

. Inspectors are expected to cover too many assignments.

I have read the above ten page affidavit, and it is true, accurate and complete, to the best of my knowledge and belief.

11/8/95

Mary a. Walter 11/8/95 Stary Commission efficie, 10 3/98 David Carney

10

October 28, 1995

An open letter to: United States Department of Agriculture Food Safety and Inspection Service Meat and Poultry Inspection Operations

In particular:

Mr. Michael Taylor, Administrator

Mr. Thomas Billy, Associate Administrator

Dr. Craig Reed, Deputy Administrator, Inspection Operations

I have chosen this (public) forum to address a growing concern not only for myself, but for inspectors across the country. The concern is the increased antagonistic attitude of plant management towards their local inspectors.

We are well aware that their main objective is to reduce, or eliminate meat inspection. Their rationale being that to meet safe meat requirements is too costly and too prohibitive. I understand their desire to want to do away with inspectors. What I have a problem understanding is the method they (industry) have gotten so comfortable using: personal attacks on inspectors.

Current (industry) management believes - in increasing numbers - that the best way to combat process deficiency records (PRD's) being written is to take nearly every issue to a personal - even vicious - attack level. The significance of the PDR is quickly supplanted by the inspector having to respond to fabricated issues. In the process of fabricating a non-existing issue, they openly brag about their easy access to any one of your offices.

Since inspectors do not have the privilege of accessibility to your offices, there are a few things which I feel you should know. It is our hope that the next time you provide instant

Page two

availability to an industry representative, you will bear in mind some - if not all - of the following:

We do not become liars and deceivers everytime a plant cannot meet their production quotas;

We do not become liars and deceivers everytime we document deficiencies as required by regulation;

We do not become liars and deceivers when we refuse to "play supervisor" and just point it out;

We do not become liars and deceivers everytime a plant doesn't like the "level of inspection" they receive;

We do not become liars and deceivers everytime one plant is not inspected the same as another. (An impossible task for any regulatory agency to accomplish;)

We do not become liars and deceivers whenever management cannot meet their own stated commitments to problem resolutions; We do not become liars and deceivers when management cannot exhibit the ability to reduce repetitive deficiencies; As a matter of fact, we do not become liars and deceivers when management simply does not have the ability;

We do not become liars and deceivers when we refuse to release suspect or contaminated product without further examination; We do not become liars and deceivers when we discover blatant disregard for the regulations as it relates to good manufacturing practices;

We do not become liars and deceivers when we go about our jobs without fear of our accuser's "position" on an issue;
We do not become liars and deceivers simply on the basis that they know each one of you personally;

We do not become liars and deceivers simply on the basis that they also have instant access to their congressman or senator; We do not become liars and deceivers when management/industry has a problem relaying the truth, the whole truth, and nothing but the truth;

U S D A . Page three

We do not become liars and deceivers whenever management/industry decides to take personal attacks on individual inspectors; We do not become liars and deceivers for standing firm for what we know to be right;

we do not become liars and deceivers when we base our findings on product wholesomeness as opposed to economic impact; we do not become liars and deceivers when we stay within the parameters of our job guidelines, as opposed to passing questionable product;

We do not become liars and deceivers when we refuse to turn our heads to plant conditions which do not meet minimum requirements.

By that same token, we do not become liars and deceivers when we insist plants operate their establishments to (at least) meet the minimum standards.

We do not become liars and deceivers simply because the political climate makes it feasible to attack inspectors with whatever industry perceives to be accurate.

We were not hired as liars and deceivers. Nor did we hang our integrity in a closet when we accepted the positions; We do not become liars and deceivers simply because they have (at times) been able to create an illusion of dissent between inspectors;

Last, but certainly not least, we do not become liars and deceivers because we don't have the "political clout" or lobbying access to lawmakers that the industry has achieved.

What we do become are dedicated and loyal employees who are committed to carrying out their sworn duty of assuring the consuming public of a sound, wholesome, properly labeled product produced in a clean and sanitary environment.

While we agree that there could be differences in the way plants are inspected, it is only because the plants themselves, are

USDA

Page four

different. When all plants produce the same products, using the same equipment, the same formulation and the same operating (production) concept, making the same judgment country-wide, then, and only then, can all the regulations be applied the same in all the plants.

No regulation was ever written to put any plant out of business. However, the regulations are (presumably) written to assure the public that we have not reverted back to "The Jungle."

Inspectors are already held to some very rigid guidelines under which we perform our jobs. My final comment is this: the "level of inspection" applied to a given plant is reflected only in the plant's ability to operate their facility under established guidelines.

Walker J. (Toe) Duff

5360 E. 36th St.

Indianapolis, IN 46218

[H] (317) 549 - 3248

[W] (317) 264 - 8256

cc: N J C - A F G E; courtesy copies to addressees

7-24-95

#### SANITATION REPORT

- Charles	Exhibit	6	
			<b>^</b>

		p	(A)	SEL	ECT	ANE	REC	ORE	PREOF								NA.	red	AR	EAS									
							r			INSP	ARE		IIT (I	U) NI	JMBE	RS	Δ ±±				40	EA #	**************************************						
		ARE	A #				ARE	A #			ARE	~ #					- 3 TF												
Initial S	Sample																												
Expanded	Sample																												
Reinspo													· C 1			4	(DD 5		,	1		1		I.T					
(B) RECO from Sect $(A - Q) f$	tion $(A)$ al	ove,	or w	ith a	lette	er (A	-Q	fron	DEFICI n Refere	enci nce L	ist on	ldent: back	ify a : pag	eficie e. Id	encie. Ientif	y dej	PKE ficier	ıcies	co in '	iumn 'OPE	n with Area and Unit No ER" column with a lette								
PRE-OP	OPER.			0	<u> </u>	antic	N 601	uipme tified,	DEFICIE nt, nature Inspector	and e	extent.	name ant's r	of p espor	lant ise.)	Control of the Contro	egane essegar eper		(F re	l Rejec insp	NSPE ct, resi ection	CTOF trict, c	R'S AG delaye alts, do	cTioi ed cor own t	i(S) rectio me (1	n, DT).)				
TEXT CONTENTS OF THE STATE OF T	040-042001-04000-04000-0400-0400-0400-04	<u> </u>					Ki A	//	F 56.7	100 17	· /																		
	an estruturas de directiones cons		Cooker unit leaking water  Intermed maintenance Foreman he  Informed rounds men t  Sink by boneless meat inspettion table at end of head table had  no soap dispensar t  Brisket I saw I blades have black marker line on them & knife room put it an there																angan (caledo)	1 1		A ~		- Commence of the Commence of	7)				
	E																	r	وخ	207	ea		ر ک	<u>'41</u>	<u> </u>				
the special control of																			Z,	for	~ 100 .		7						
	(																												
																		Informed											
																		1		Lor	_ m	ect							
	C			CIS	N								/	/	77	1				42			_ _ _						
	0		Wa 6 V	, te		d	ا ا	Fl.	ing ?	Cr.	'm	do x	UP:	r bi	nch M	d	Ô-	+	_h:	fοι ρεί	îng-	do	<u>.</u> Wi	1	~*************************************				
	13	5	Kin	[4		<u> </u>	90		hase	)	SP	<u> [                                   </u>	9	10	K			ļ			ernomeriski († 1860)	92)110)991000000000000000000000000000000		ang day makasa ka					
					hapen grows and the second			<u></u>								·					0.400				nominisco (				
										mu managa ang ang ang ang ang ang ang ang an							o de la compansión de l	ļ	enentsivit	MANAGEM AND SECTION AND SECTION ASSESSMENT				120 (WATER COLUMN)					
		**********		Qui de l'actività de l'activit	<u> Jangan pungungan</u>	······			A STATE OF THE PARTY OF THE PAR			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,																	
Commence of the Commence of th								41,000,000				en e					***************************************			<del></del>		e-week to the second							
		ļ																											
Silvenijiirjaansekeensistii (1				o de la constantia de l			en e			- CONTRACTOR OF THE PARTY OF TH		ę dę powskie karako		amata (Salahan da anada						nggy (saatemenn).		<del>yalandada, ya</del>	guungánallá slátfi						
		-	***************************************		······································			and the second s																<u></u>					
400 Million (Control of Control o		I.V		1/0		,1	1 3		L 13 -:	j	1 . 1 6	,,,	. /	 ' 5	) <u>k</u>		0.00024540		·	<del>open armin</del>	ergegenelle kanadassinan	***************************************	17071001111111111	ang map de 1920					
		<del>X</del>	-4	ve grij	eCt LP		70	r e	Lan	<u>'M</u>		2./	, / 1	2 0 p/a	ا المال	ng	/	-											
	l	1.2	1 d	v /	5.	CA	D	<u>C</u> t	' 15 <u>A</u> E	NB	<u> </u>	> <u>'</u>	<u> </u>	<u> </u>				PA	GΕ	NUME /	BER	OF	40.400000000	1					
																	400	<u> </u>	and the same	and marketing	manutainin palitid	eprocein de la company	nosolympuseisinnikniki	Market Course	MATERIAL PROPERTY.				

## U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE MEAT AND POULTRY INSPECTION OPERATIONS

SANITATION REPORT

rane	Exhibit	7
------	---------	---

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

•	Exhibit	7	-
	_	44.	

INSPECTION UNIT (IU) NUMBERS

DAIL	
7-25	-95

		ARE	A #				AREA #					AREA # AR						:A #				AREA #					
Initial	Sample							T									<b> </b>			1					<u> </u>	1	
Expanded	d Sample																									<u> </u>	
Reinsp	ection					_																					
,	ORD PRE tion (A) al from Refer	ove,	or wi	ere a	i ie i ie	$I \cup I$	- 01	IVE fron	DEF 1 Rej	ICIE feren	NCI ce L	E5: l ist on	dent back	ify de	eficiei e. Ide	ncie. entif	in " y dej	PRE licier	PRE-OP" column with Area and Uniciencies in "OPER" column with a								
PRE-OP	OPER.		Terror Paragraphic Control of the Co		(Lo	catio	on, equ nel not	iiomei	nt. na	CIEN ture a	ınd e:	ctent.	name nt's re	of ple espon	ant se.)	***************************************	······································		(R rei	IN eject, inspec	SPEC restr	TOR' ict, de result	S AC clayed s, dou	TION   corre	(S) ection ne (D'	; T).)	
						_/	4°	11 5h	, <i>f</i>	/-/c 	20/																
			several sinks on kill Floor without soap Paily from hle																	11 t	61	m c	d	50	1 10h	in	
	<u>C</u>																Sec	4							***************************************		
	B		pan condensation															ų	J.,	pр	, '	do	<u>ω</u>	1			
																		**********				************					
				mana arabiyay			Magazini (magazini	water or the same of the same	CONTROL STREET, AND ADDRESS OF THE PARTY OF	***********	6 and the Marketonian land														- Angele processor		
	Ī	**************************************	Gringe and a second			· · · · · · · · · · · · · · · · · · ·																					
																				- 6)////careg	*************					********	
																************											
		PONE SERVICE	***************************************			***************************************			······································		***************************************		THE PROPERTY OF THE PROPERTY O						· · · · · · · · · · · · · · · · · · ·					***************************************			
																			***************************************			***************************************	Olivanian, programa				
							720038686751451																				
				and the state of t	West Control of the C		10001100AZ/244/66Z			# 2000 Marie Committee					- Warren and American						***************************************	The Contraction of the Contracti	***************************************			***************************************	
																							-		Oleanary a Black & Commercy	nampaninė)	
	_										······································																
ECENARDY	BY ESTABI	_ISHN	IENT	OF	FICIA	. <b>L</b>	I	NSPF	CTOF	R(S) S	IGN/	ATUR	E.	, ,			wpsidzeńciego	P	AGE	NUM /	BER			1		(2462266)	
SIS FORM	A 11040-1	(12/8	36)	***************************************	- American Color	<del>apaluu akeea</del>		<u> </u>		***************************************	delicanies man	Annonyori,	<del>катана маран</del> е		Processing (settlement)	<del>440)2200000</del>	and the state of t					- OF	*************				

DATE

INSPECTION	4 SERVICE	•	ES-															DAT				
		243			Exh	nibi	it	8					·	************		Occupation (Control of Control		フ	-2	7-9	75	
		TANI	DRE	con-	C. ree	ع-بن		,,,,	- 547	W £	. D T C	ж. <u>Э</u>	באו	311 X		ATT.	As					
						11	VSP			IIT (I	U) NU	JMB		- 15				T				
AREA #			ARE	A #				ARE	A #	·	r		ARE	A #F			·	ARE	. A #		<u> </u>	Ť
												ļ										
	-     -	_			-																	
bove, or i	with a le	etter (1	4 – Q	TIVE ) from	DEFI n Refe	cie: erenc	NCI ce L	ES: ist or	Ident 1 bac	ify d k pag	eficie e. Id	encie lentij	s in ' fy de	'PRE ficies	'-OP' icies	' coli in ''(	ımn OPE	with R"co	Area lumr	and 1 wit.	Unit h a le	No. tter
	rigger gran, a back transcent of		÷	uipme otified,	nt na	trira n	and e	rtent	, nam lant's	espoi	lant ise.)				(F re	IN Reject inspe	ispe , rest ction	ctor rict, d , resu	'5 AC lelaye lts, do	TION d corr wn ti	i (S) ection me (D	T).)
	Kill Floor AShift																					provident Approved the
9/4 9/4 /51 ne 57	stomach machine cold water pipes															n +	ror;	me	d F	) cl e		tenace 95
511	nles	/	( 6	ne	?	n	1	a eac one		**		,	ی مر ۵	+	100	Hor						
	COPERATOOVE, OT STREET LIST	AREA #  COPERATIVE A bove, or with a larence List on bar gluard stomace Area for the stomace	COPERATIVE AND OF Cove, or with a letter (A person)  Head table  Area #  Head table  Area for a stain such  Area f	COPERATIVE AND OPERATIONS  ON REPORT  (A) SELECT AND RECORD AREA # AREA	ON REPORT  (A) SELECT AND RECOMMENDATIONS  ON REPORT  AREA #  AREA #  OPERATIVE AND OPERATIVE to ove, or with a letter (A - Q) from the rence List on back page.  (Location, equipment personnel notified to the personnel notifie	ON REPORT  (A) SELECT AND RECONSTITE  AREA #  AREA #  COPERATIVE AND OPERATIVE DEFI Cove, or with a letter (A - Q) from Reference List on back page.  (Location, equipment, na personnel notified, Inspections and Link  A Shit  Headtable employaging and Link  A Shit  Stanceh machine  A Perlicer for flop  Wet end had  No soap dispense  Sinks one of	ON REPORT  (A) SELECT AND RECONSTRUCT  AREA #  AREA #  COPERATIVE AND OPERATIVE DEFICIE Cove, or with a letter (A - Q) from Reference Cover the control of t	ON REPORT  (A) SELECT AND RECOMBINED INSPECTION OPERATIONS  AREA #  COPERATIVE AND OPERATIVE DEFICIENCY bove, or with a letter (A - Q) from Reference L  rence List on back page.  (Location, equipment, nature and e personnel notified, Inspector's init  Kill Floor  A Shift  Headtable employees  arrows and wore  glyards  stomach machine cold  need insulation wi  Sterlizer for floor h  wet end had no  No soap dispensors  sinks (one on h	ON REPORT  (A) SELECT AND RECOMBINATIONS  ON REPORT  (A) SELECT AND RECOMBINATION INSPECTION  AREA # AREA # AREA  OPERATIVE AND OPERATIVE DEFICIENCIES: bove, or with a letter (A — Q) from Reference List on back page.  (Location, equipment, nature and extent personnel notified, Inspector's initial, pingerson in the personnel notified, Inspector's initial, pingerson and with a standards  ON Soap dispensors at Sindards  Sindards  Onle on head	ON REPORT  (A) SELECT AND RECOMMENTATIONS  INSPECTION UN  AREA # AREA # AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Ident bove, or with a letter (A - Q) from Reference List on back rence List on back page.  DEFICIENCIES  (Location, equipment, nature and extent, name personnel notified, Inspector's initial, plant's in  Kill Floor  A Shift  Headtable Purplayees have afrons and wore out guards  stomach machine cold wate need in Sulation wraf  Sterlizer for floor hag t wet end had no wa  No soap dispensors at Sinks one on head in	ON REPORT  (A) SELECT AND RECOMPRES ENABLE SAMPLE  INSPECTION UNIT (I  AREA # AREA # AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify of the second se	ON REPORT  (A) SELECT AND RECOMPTRES ENAMELY (IU) NI  AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiency of the selection of th	ON REPORT  (A) SELECT AND RECONSTRUCTION UNIT (IU) NUMBER AREA #  AREA #  AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies bove, or with a letter (A - Q) from Reference List on back page. Identify rence List on back page.  (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)  A Shift  Headtable employees have predaying allacted and water pipes of insulation when a traffy in set of the plant in sulation when a standard water pipes and water processed in sulation what after the plant in sulation when a standard water in west and had no water in the sun of the plant in sulation when a standard in sulation water and had no water in the sun of the plant in sulation water and had no water in the sun of the plant in sulation water and had no water in the sun of the plant in sulation water and had no water in the sun of the plant in sulation water and had no water in the sun of the plant in sulation water and had no water in the sun of the plant in sulation water and had no water in the sulation water in the sulation water and had no water in the sulation water and had no water in the sulation water in the sulation water and had no water in the sulation water and the sul	INSPECTION SERVICES  ON REPORT  (A) SELECT AND RECONSTRUCTION UNIT (IU) NUMBERS  AREA # AREA # AREA # AREA  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in bove, or with a letter (A - Q) from Reference List on back page. Identify derence List on back page.  (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)  Kill Floor  A Shift  Headtable employees have proling and works  Stamach machine celd water pipes  Need in Sulation wrap  Sterlizer for floor has trolly in wet end had no water in in  No soap dispensors at 2 handway sinks  Sinks one on head in proceed which is precised.	ON REPORT  (A) SELECT AND RECOMMENTATIONS  AREA # AREA # AREA # AREA # AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE bove, or with a letter (A - Q) from Reference List on back page. Identify deficience List on back page. Identify deficience rence List on back page.  (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)  **Theodrable Purplayees have peoling allocates stomach machine cold water pipes need in Salation was a stomach water in it was a stomach and had no water in it was a sinks only one on head in pinspect.	ON REPORT  (A) SELECT AND RECONSTITUTE JAMES STORMS AREA # INSPECTION UNIT (IIU) NUMBERS  AREA # AREA # AREA # AREA # AREA # AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" bove, or with a letter (A - Q) from Reference List on back page. Identify deficiencies rence List on back page.    (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)    (Inspection)	ON REPORT  (A) SELECT AND RECOMMENT OF Exhibit 8  INSPECTION UNIT (IU) NUMBERS  AREA # AREA # AREA # AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" cole bove, or with a letter (A - Q) from Reference List on back page. Identify deficiencies in "tenee List on back page.  (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)  (Rejection personnel notified, Inspector's initial, plant's response.)	ON REPORT  (A) SELECT AND RECONSTRUCTION UNIT (IU) NUMBERS  AREA # AREA # AREA # AREA # AREA # AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" column bove, or with a letter (A - Q) from Reference List on back page. Identify deficiencies in "OPERATIVE AND OPERATIVE DEFICIENCIES (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)    Clocation, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)    A Shift	SAREA # AREA # A	OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" column with Area bove, or with a letter (A - Q) from Reference List on back page. Identify deficiencies in "OPER" column rence List on back page. Identify deficiencies in "OPER" column rence List on back page. Identify deficiencies in "OPER" column rence List on back page. Identify deficiencies in "OPER" column rence List on back page. Identify deficiencies in "OPER" column rence List on back page.    (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)    Kill Floor	ON REPORT  (A) SELECT AND RECOMMENT OF Exhibit 8  INSPECTION UNIT (IU) NUMBERS  AREA #	ON REPORT  (A) SELECT AND RECOMMENTATIONS  INSPECTION UNIT (III) NUMBERS  AREA #  OPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" column with Area and Unit bove, or with a letter (A - Q) from Reference List on back page. Identify deficiencies in "OPER" column with a le rence List on back page.    DEFICIENCIES   (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)    A Shift

INSPECTOR(S) SIGNATURE

PAGE NUMBER

U.S.	DEPARTME	NT OF AGRICUL	YURE
FOOD	SAFETY AN	D INSPECTION S	ERVICE
MEAT AN	D POULTRY	INSPECTION OF	ERATIONS

EST,

DAIE	
8-2	-95

	SANITAT					3			Ex	hib:	it S	)										8	7 	7 - 9	75	
aldersjogen entersprontering of the second	·	~~~~	(A)	SEL	ECT	ANI	RE	CÒR	D PR	EOP	ERA	TIVI	E SA	MPL	ES F	OR 1	JEST	GNA	TED	C A A 1	AS	1	<i>Philippone</i>	<u> </u>		-
		<u></u>	-				***************************************				INSP	ECTIO	U NC	NIT (	IU) N	имв	ERS		······································					****	<del></del>	
		ARI	EA#				ARE	A #				ARE	A #				ARE	ΞA #				ARE	EA #	PRESENTED TO THE PROPERTY OF T	P-0000-1-0-1-0-1-0-1-0-1-0-1-0-1-0-1-0-1	***************************************
Initial :	Sample								Τ									T			T	-				
Expanded	d Sample															1	-							<u></u>		
Reinsp	ection																								*CO-springs	
(B) RECO from Sect (A - Q) f	$tion\left( A ight)$ at	ove,	or u	rith a	ı lette	er (A	-Q	rive fron	DEF n Re	FICIE feren	NCI ce L	ES: . ist on	Ideni I bac	ify d k pag	! eficie e. Id	encie lentij	s in ' fy de	'PRE ficies	-OP' acies	coli in "t	ımn OPEI	with .?" co	Area lumn	and l with	Init l a let	Vo. ter
PRE-OP	OPER.						on, equ nel no		nt, no		and e	xtent,					**************************************		(R re	leject	, resti	ctor ríct, de result	elayed	i corre	ction.	, (r).)
Age and the second seco							K,		56,	7	100	7 /											***************************************			
	F	( 	00 nd	·	٠ ٠	/ · ( ē		00		dro aec	a in	5_6	217	5	Oct.	+ 4			Ta	99	ed np	1 /4 c/4	£	COC	1/01	- L

		A Shift	
		Cooler I two drains on south	Tagged off cooler 1
	E	and were alread	I Unplugged & washe
to a management of the second		Informer. Handwash sink on headtable by	down released
	}	Handwash sink on headtable by	Informed,
. /	<u> </u>	Jaw preaker had no soap	
		Hand skinner on head inspect	Rejected,
		had fat and blood on it at start	Informed
		ot shift	cleaned + released
	_	trolly room had used empty combos	Informacl
	B	+ pallets stacked on top of blus at trally	
	1-	maintamine left nuts a bolt and other	Informed
		part on floor after working on	
		Itrally return chain that wight	
		Stomach stickler drain basket	P
		had no drain pasker	Intermy ( )
		had no drain plug Ingesta running onto floor	Hotel do la mace
		Sterlizler for floor hog trolly's	Hosed down moss
	,	not 180°	Kisad tomas 1500
	4		Rised temp 1500
		Sterlizer for head clinger not	Inform
	, [	Sterlizer for head clipper not 1800 at start up atter dinner	Kisad tomp 1900
		7	
		Inedible belt in front of final	7a/k to
l		rail has pieces missing in it	
	(-		
	,	Trally room outside air vent on east	
	$\mathcal{B}$	end looking rain water	

MEAT AND POULTRY INSPECTION OPERATIONS								— Exhibit 10 — \$-3-95																				
SANITATION REPORT								ND RECOR SOME TO TOU DESIGNATED ATTERS																				
	,000mmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmm	T	(A) S	ELI	LCT	AND	) KE	_ U H	na postolecia	11	NSP	ECTIO	N UN	IIT (	IU) NL	JMBE	RS											
		ARE	A #				PECTION UNIT (IU) NUMBERS  AREA # AREA #										AREA #											
		ARE										<u> </u>	<b>~</b>	·····				·		Υ		L	1		aan milii mii mia siid			
Initial S	Sample																											
Zeowenije (Wennomic vom	*	-			<u> </u>		<u> </u>					<u> </u>	<del> </del>	-	+		<b>-</b>				-					-		
Expanded	Sample																			-	-	<u> </u>						
Reinspe	ection	<b> </b>							-					-			<b> </b> —					_						
								<u> </u>		1 (	<u> </u>	<u>.</u> .,	(DD r	. 00	,, 1		1	1	1	Tanie	Na							
(B) RECO	ORDPRE	OPE	TAF	VE	AND	OP	ERA	rive :	DEF	ICIE	NCI	ES:	Ideni a hac	ify o	deficie ae Id	ncie	s in forde	PKE ficies	i-UP acies	cou in "l	imn OPE)	with ?"co	Area olumr	ana ( 1 with	i a le	tter		
from Sect (A – Q) fi	tion (A) a from Pafa	bove,	or wi	ith a	i lette	er (A naae	. – Q	) from	і кеј	етет	ce L	IST OF	· Oac	· pa	gc. iu		y uc	,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,									
. 21 — (2) ].	l Reje	Tenec	77101		AND DESCRIPTION OF THE PERSON		2,20,000		DEFI	CIEN	ICIE	S	d-46		, ,		***************************************	v.dinazoszer-vydar	INSPECTOR'S ACTION(S) (Reject, restrict, delayed correction, reinspection, results, down time (DT).									
PRE-OP	OPER.				(Le	ocatio erson	on, eq nel no	uipmer tified,	nt, na Inspe	ture c	and e s init	extent ial, pl	, nam ant's	espo	plant inse.)				r	einspe	ction	, resui	lts, do	wn tir	ne (L	T).)		
		OPER. (Location, equipment, install, plant's response.)													uspaguras enide													
	1						_/< ,	1/	-1	<u> </u>	01								<del> </del>									
		<u> </u>						<del></del>	5 b	rt	$\mathcal{I}_{-}$																	
																)	Shut line down											
		Sterlizer for head clipper not 1800														, 	124	10,7	-/-	<u>112</u>		800						
	1																	2 min devotime										
andicomreon organica ando-	L-	-	Head flush hose on flograting of															Tagged										
		776427 776427													╁	7 7	-	M e	1									
	( Stand															first time												
ppumb kiding padik Riji Halaki.			Sterlizer for trolleys in west end															In	tai	·w	- //			Manager				
		1-5	+ 1000																			•						
	1 ( thor hogs I no 1 180																											
<u>Questa productiva de la compansión de l</u>	-	Sterlizer for 1st brisket saw												Informed														
		-	drain tuh Dlugged																									
	1 2		11	411	J <i>I</i>	SA	<u> </u>	1	77	/							,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Milder teaching the				anjeonomen .		401077070707070707				
				uscomembia	Consequential In														_									
																								<u> </u>	wow.	THE REAL PROPERTY.		
							Normany in contribution	go transcription de la constitución de la constituc			procession and the second						egeneral medical (dec	garanta para	_		Q							
															-		,		-				LONG COMMISSION OF THE		-20			
		· ·		************************************								·			naradamin reter			<u></u>	-	alemanyeive-				premierini (Nema				
							(0.40)()				comment of the same		en e	<u>Acolinia anno</u>				ere			***************************************		<del></del>					
	1		X777	TOXAL PROPERTY			woman was to the same of the s			o-graphene en 17					uministra yezanista ida ili esti k				+	-core-gy-emmissi	<u> </u>		ageconius (SVV, Pire) P	www.oppont.com				
														*********	<i></i>				+		paparan de 1800	-0		-	www.combones	<u>onlocido</u>		
Contractions		_		andronous and a second second		p wow.man			<u></u>	<u> </u>			<del>n-s</del> uperioristativitati		oyement (Gantania		yundan ar	THE PARTY NAMED IN	<u> </u>	III AND			******************	Sec. 10.00	***************************************			
		-			ya								<u>,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>					,	$\top$	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,								
		-					<del></del>							-					$\top$	***************************************								
Special compression and distribute for		_	erede philosophic and the	to-promised		en e	union sociolomi.	***************************************	Department of the last of the	ppwell services		eren zampiolii		CONTRACTOR OF THE PARTY OF THE														
										·															a production of the second			
		-	***************************************																				daponer a manuscripto			<u> </u>		
			oggopalación de la constitución de																									
														neg par Janei di San														
RECEIVE	ED BY EST	rabli	SHME	ENT	OFFI	CIAL	-	INS	PECT	no R (	S) SI	GNA	TURE			,			P	AGE	MUMI	3 E. Ft			,			
1																					/		OF	***************************************		المرامع موسوس بديدي		
the same of the sa			10/-		- Activity							<del></del>	<del>,</del>										essentation (Care	See Section 1995				
~F315 FC	ORM 1104	4 U+ F (	12/8	0)	-	•																						

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE MEAT AND POULTRY INSPECTION OPERATIONS EST

DATE

		(A) SELECT AND RECOR INSPECTION UNIT (IU) NUMBERS														Valory musical library		Marie Street, Sept.											
***************************************		I				***********				<u>-</u>	NSP	CTIC	NIII	JIT (1	1 1) N	I INAD	EDC			7(1(1	-75		******		·	-			
		AREA	#			<del>7-0-0</del>	ARE	A #	<del></del>	ARE		4 (.	0, 10	ONB	ARE	A #		······································		AREA #									
Initial :	Sample																				Τ					<u> </u>			
Expanded	d Sample																								***************************************				
Reinsp												THE MEDICAL SERVICE SE		******					_										
from sect	ion (A) at	EOPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-control bove, or with a letter $(A-Q)$ from Reference List on back page. Identify deficience rence List on back page.															'-OP' icies	l coli in "(	ımn OPE	with . R" co	Area lumn	and ( with	Init I a let	No. ter					
PRE-OP	OPER.	DEFICIENCIES (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)														INSPECTOR'S ACTION(S) (Reject, restrict, delayed correction, reinspection, results, down time (DT).)													
става на пово на пред население то в ста от на ста		15,11 Floor 4 Sh.++																											
C		Hot brand used for edible livers																Informed Classed 2 released											
В	AND THE STREET STREET, STREET STREET,	loose chalking hanging from overhead on Kill Floor															9												
C		inedible parrels and their dollies not being cleaned at night														·5	15 19015 50												
	ر ا	(+   +e	eu, cki	în y	po	K O;	+. 	127 +		run	5	<i>G</i> 1	196	./e		cho	·'n		Informed Formon Wiped down										
																				/						<b>Barrani</b>			
						Fairteata-dactan																				message a			
		**************************************			atmenaum,	************															***************************************	der de la companione de		***************************************	W4W04W04W04W0				
								<u> </u>							24				700-200-mmg		Hell vidento ima					66antalleljapasje 66antalleljapasje			
		Total Control Control									29-02-20-20-20-2		7/0/3/0000							insonymusis.	······································	<u> </u>			444444				
	-												**************			***************************************								P-44P-2					
		desity-mynesessesses			Shired with the copy	***************************************			матана				Militaria de la composição de la composi		THE COLUMN		000 distribution di		odnienia razung <u>u</u>					-					
BECEIVED	ny ce	LICUA	87 R.1 T	· ^ 17 1		•	7	NCOC	· - ~~	G/61 6		A 7711 M	e e		/				PAGE	: מטא	MBE	R							
****	M 11010-1	(19/0			enskiedere	ovándožkovanja:	TO THE PROPERTY OF THE PROPERT	NA CONTRACTOR OF THE PARTY OF T	one have a state of the state o	material Marie Mar	n na programa (villa)	nto topo produce de la constanta de la constan	ESTERNO E CONTRACTO	e Constantivimus con		***************************************	and the second seco				/	0	F						

DATE

8-11-95

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE MEAT AND POULTRY INSPECTION OPERATIONS

SANITATION REPORT

ESTABL'

Exhibit ll

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE									ESTAP													DATE								
MEAT AND POULTRY INSPECTION OPERATIONS SANITATION REPORT								Exhibit 12														8-14-95								
(A) SELECT AN									AND RECO. INCRESTION UNIT (III) NUMBERS																					
				INSPECTION UNIT (IU) NUMBERS															AREA #											
AREA #									AREA # AREA #														AKEA #							
Initial S	ample																													
Expanded		_			•ao															<u> </u>										
Reinspe		-	_   _	-	*********		_																							
(B) RECO from Sect (A - Q) fi	ion(A) al	bove,	or	with	a	lette	er (A	. – Q	TIVI ) fro	m Re	FICIE feren	ice L	ES: ist or	Ideni 1 bac	ify a k pag	leficie ge. Id	ncie entij	s in ' fy de	'PRE ficie	i-OP ncies	" coli in "(	umn OPEI	with R"co	Area	and n wi	Unit thale	No. etter			
PRE-OP	OPER.		DEFICIENCIES (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)														INSPECTOR'S ACTION(5) (Reject, restrict, delayed correction, reinspection, results, down time (DT).)													
eggganggiftina ena ena serio cidad di tribuncili de subsejud	O CONTRACTOR CONTRACTO	Kill Floor																	**************************************	200										
			Cooler 1 drain Plugged on west															Tagged 6 rails												
		_5	Cooler / drain plugged on west															un plugged drain												
			Prain plugged in hollway leading															Shut chain off 4 min downtime												
	C		ŕ	OVY	7		10	ole		6	<u>+</u>	0		4.1										7		be				
			Chain hoist in wet end catch basket, broke letting chain fall out and hit hous being nicked up of													welded at dinner														
-			7e	no	novembr	10 C	<u> </u>	<u>سم</u>	1 4 S	400	+0	7	le '	<u>.</u>	عدا <i>ا</i> ص		10	100	<u>ts</u>	1-7	100	A	+	9/A	1 ec	1 u				
		$\frac{1}{b}$	<u>ب</u> لا	, ,	<u>.</u> 3.	→ - /5	0 1- 9	na 15		per	1000000			 CCN	<u> </u>	2011		panear	LEI	8-15-45 or table w							sed			
<u>_</u>			<u>a-1</u>	1	e r		p	o T roz	drie	+:	na on,		no Sa	tui		pan				Tagged brand										
					<u>h</u> -	to	r /w	10	ect /											// reanies F / F / F / F / F / F / F / F / F / F										
							uico de Name	<u> </u>																						
																						***************************************	200							
*Contract Confession de La Confession de Con															1044-144-144-144-144-144-144-144-144-144						anni de la constanti de la con									
													,	ang pada pada pada pada pada pada pada pad												and the second s				
					on the said											· ·				P,	AGE	IMUP	BER							
	- , _		_	-	_	_			<b>-</b> .				negy foods // rise	anistro polymente										OF			TOTAL			

ESTAP

DATE

U.S. DEPARTMENT OF AGRICULTURE	
FOOD SAFETY AND INSPECTION SERVICE	
MEAT AND POULTRY INSPECTION OPERATIO	P. IA

SANITATION REPORT (A) SELECT AND RECORD - LOPERATIVE SAMPLES FOR DESIGNATED AREAS

Exhibit 13

E:

ĺ	DATE
	17-17-95
1	' // (-)

		<u></u>								i	INSP	ECTIC	IU NC	I) TIV	U) NU	JMB	ERS									-			
		AREA# AREA# AREA												ARE	A #	***************************************	<del></del>		ARE	A #	-All-English	Marie Control (Mily) (Special Control	Removed						
Initial	Sample																	<u> </u>		T	<u> </u>					-			
Expande	d Sample															<u> </u>													
Reinsp	ection																							***********					
,	ORD PRE tion (A) ab from Refer	ove,	u wi	ulle	LELLP.	$I \cap A$	( ) )	IVE fron	DEF 1 Rej	ICIE ferend	NCII ce Li	ES: I st on	dent: back	ify de page	eficie: 2. Ide	ncie. entif	s in " y def	PRE- icien	OP'' cies	colu in "C	mn i PER	with 2	Area d lumn	and ( with	Init I a let	Vo.			
PRE-OP	OPER.				(Lo	catio	n. eau	uipmei tified,	nt. na	CIEN ture a ector's	nd er	ctent	name nt's re	of pla espons	ant se.)		***************************************	İ	(R rei	IN eject, nspec	SPEC restr	TOR'	S ACT clayed s, dou	rioni corre vn tin	S) ction, se (D)	, r).)			
							4 5	./ 562.	F	100 +		Additional and a second								~						enterproper			
	É	ا مر لد	Plastic hung in cooler 4 by emeratory light 13 wasn't changed t now plastic dripping Employees coming up to kill floor at start of day with dirty equipmen														<del>/</del>	c.l	Informed rounds										
0		E															; <del>f</del>	E	'nρ!	h	e/p.	rd che	es,	۶*	10.00m.com.co				
	Ĺ	ha	handwish sink on land line plugged															1	n fe	y'∤n	rd								
	-																	Theidding yn y e											
																	***************************************												
		<del>Managarana ya</del>					Distraction (sept.)							NA ARCHIOLOGICA															
<b>District in the state of the s</b>				***********																		<b>O</b>							
- Contractor (special contractor)																													
															***************************************					· · · · · · · · · · · · · · · · · · ·		مرسون مستورس							
				**************************************		Weresterness.											— to — ma		V		***************************************	and a succession of the succes	Cilifornia cons		2000 200 00 00 00 00 00 00 00 00 00 00 0	manuschij			
No Starturo de suscepcio de la companya de la comp							1	NCDF	റ്നു	ole) e	ICN/	T115	г	-		/.		þ	AGE	NUM	BER					nasiderrela Galeria			
SIS FORM	M 11040-1	(12/8	36)				elione di productura	nesiaa Wad	to the second	and the second s	<del>Xiloimpagaga</del> n		an, with a series may		·	~	<del></del>				<i>}</i>	. OF	*****************************	<u> </u>		-			

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
MEAT AND POULTRY INSPECTION OPERATIONS
SANITATION REPORT

ESTAB!

Exhibit 14

25	(Access	Scano.	2006	200000
i	$\Box$	А	т	E
I	_		-	

8-18-95

			(A) :	SEL	ECT	AND	REC	ORE	PRE	OPE	RA	TIVE	SAN	1PL	-S FC	JR D	E510	an A	LED	ARI	EAS_					Petrologica de la constanta de				
			A 11				ARE.	a #			NSP	ARE	NUN A#	111 (	IO) N	NMR <sub>F</sub>	ARE	A #				ARE	A #		***************************************	NAME OF TAXABLE PARTY.				
		ARE	ハ ボ				ARE	- TF									L			·			e anno montations			<del></del>				
Initial S	ample																													
Expanded	Sample																	-							es proposition A					
Reinspe					<u>-</u>																									
(B) RECO from Sect (A — Q) fi	ion(A) al	bove,	or w	rith a	ı lette	r(A	. – Q)	fron	DEFI n Refe	CIE eren	nci ce L	ES: ist or	Ident 1 back	ify a pag	leficie ge. Id	encie lentij	s in ' fy de	'PRE ficies	i-OP' ncies	' col in '	lumn 'OPEI	with R"co	Area olumr	and ( i with	Init . a le	No. tter				
PRE-OP	OPER.	l	11636		/ <b>T</b>			uipme tified,	DEFI nt, nat Inspec	hira i	and p	rtent	, name ant's r	of p	lant nse.)	9-14-0-18-0-18-0-18-0-18-0-18-0-18-0-18-0		grip cannot de l'alle l'	(F	l Rejec rinsp	NSPEC t, rest ection	rict, a , resu	e's AC lelaye lts, do	TION d corre wn tir	(S) ection ne (D	i, T).)				
							KI	. //	<i>F</i>	-/0	41	•																		
			I beam that runs along viscera  pan on North side has perling  paint  (cooler 4 North 3 cement  peams sticking out from wall  dripping water  (ondensation dripping from  several aiea on head table and  alon by stomach, strickler															nya ennis 40 Par												
0																		~~	I	. h7	orn	n o	<u>d</u>			<u> </u>				
B		7																							costruction and the second	angan arang				
	E																		1	,		,								
	6-																		Hung plastic											
	B	5																<del></del>	-											
			Fai	n ş	7	be c	ng		500	1	+	5	(0	nj	tra	1	2 1		•											
	B		se se	de	be	<u>वर्</u> >	102 112	<u> </u>	7,1	by	0/	a En	ישו שמי	100			/	<u>'o'</u>	-	rc	u	v < 10	7	pe i	- 17°	,				
		-	(a		955	2 (C)		900	de) T	<u>/</u> 	or	//	<u> </u>	70	m	2162	9													
	m					who control to have the			-Vonestickers	enganisis (d	en e	over-griding day days detective	er en	<b>200</b> 100 100 100 100 100 100 100 100 100																
										4										operandimie			wyo godinia W	uquuun oo	<u></u>	Questi de la compensació de				
times and commenced and commen						,						tan Nikati- ar																		
		<u>                                     </u>	e e especialista de la compansión de la co	and the second	CONTRACTOR OF THE STREET	<del>, ,</del>										······································														
			01 -											······································			· · · · · · · · · · · · · · · · · · ·	·····	-											
																				-quanters.	ere en	og-nisrettesilesile	maren essperationis							
																			İ											
					······································	ON PROPERTY OF THE PARTY OF THE		Name of Street or other Designation of the Street of the S			****************	and the second		onenegzepépek	***************************************	uputosta pristi	eseen minute		_	arawawa.	gija sa kata ka				nese constitution					
		-									,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,								+											
		-																			w				5800 MAN					
RECEIVE	D BY EST	ABLI	SHMI	ENT	OFFI	CIAL		IN:	SPECT	OR(	SISI	GNA.	TURE		/				PA	GE	NUME	3ER			1					
																							OF	***************************************						

ESTAB

Paragraph and Pa	
	DATE
SAME.	1-21.00
1000V	8 - 2/ - 73

SANITAT	ION	REP	ORT	a			Editor	**********	Exh	ibit	: 15	5							en con	entropy of the second	8	8-21-95				
		(A)	SEL	ECT	ANI	b к =	CUR	D PI	(EOF	ERA	TIV	E SA	MPL	ES F	OR F	) F S I	C N A	TED					***************************************			
												ON U					ONA	120	ARI	EAS		~~~~		-	United Street or 1917	
	ARE	A #				ARE	A #	**************************************			¥	EA#				-	EA #	<del></del>			ARE	EA #	Bite-philips		GRANDING THE	
Initial Sample																		7	Ţ	<b>******</b>						
Expanded Sample																	-									
Reinspection																**********		**************************************								
(B) RECORD PRE from Section $(A)$ ab $(A - Q)$ from Refer							IVE fron	DEF n Re	FICIE feren	NCI ce Li	ES: ist or	Ident Ident 1 back	ify di ify di pagi	l eficie e. Id	ncies entif	in ' y dej	PRE ficier	  -OP''  cies	colu in "C	ımn ı OPER	vith .	Area lumn	and l with	Init I a let	Vo. ter	
	-		-	***************************************		And the last of th					-									-	***************************************		Tankeye,	Salah Nagara Malaum	S. S. S. S. S. S. S. S. S. S. S. S. S. S	

· - </th <th>. VIII KEJE</th> <th>rence List on back page.</th> <th></th>	. VIII KEJE	rence List on back page.	
PRE-OP	OPER.	DEFICIENCIES (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)	INSPECTOR'S ACTION(S) (Reject, restrict, delayed correction, reinspection, results, down time (DT).)
B		Trollig room needs a good cleaning	to-be cleaned every other week end
C		Chain was out of container	a new container was made - to be
	B	Floor druin in front of tongue paper.  area - backed lip- (2 x s)	Post Esp between shy
	0	Plastic on tub not being pulled up	Plastic in tub was
	, and		
?~ e 1./e.a. /			PAGE NUMBER
		1	OF

Exhibit 16

Manne	DATE
	8-25-95

S	A	A	11	**	۸	~	1	_	8	4	Ю	C	D	_	C	-	۳
. ` `	4.3	Ю	. 1		23		ı			w	≺	₩.	~	1 1			

SAINIAII	ON						V.													لــــــــــــــــــــــــــــــــــــــ	Onderson Co.			***************************************	enterente de la constantia
	App. (6.10)	(A):	SEL	ECT	AND	REC	ORE	PR	EOP	ERA	TIVE	SAN	1PLE	S F C	RD	ESIG	NA	E.D	AKE	AS		تدائلت توريد المتعدد			von Moutoubeurg
		INSPECTION UNIT (IU) NUMBERS  AREA # AREA # AREA # AREA #															.,								
	ARE	A #		*****		ARE	A #				ARE	A #				ARE	A #				ARE	A #			
																						hamalagous stra			
Initial Sample																									
Expanded Sample																									
Reinspection																	**************************************					**************************************		~GLASSINA	***************************************
			_	Seconomies	descenses	<u> </u>			Section Sectio	diginal territoria	Accessory of the Control of the Cont			<del>*************************************</del>	and and					o green and our	. 1		7 7		

(B) RECORD PREOPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" column with Area and Unit No. from Section (A) above, or with a letter (A - Q) from Reference List on back page. Identify deficiencies in "OPER" column with a letter (A - Q) from Reference List on back page.

	1		PAGE NUMBER
		V C	
	C	was on the fear stationing -	
	populari de la la la la la la la la la la la la la	Hose aron for rensing out mouths	(treet the Kose.
	M	The state of the s	
		Clastic wasn't sulled upon 2 tures	Plastic warchances
	0	Relinety - some needs new agran	New samment check
O tronggide og gegigg grænning overlig kelleder		Some implowed had dirty clothing &	Sent to wash
Lucion		at start up	sterición untill 180°
1		Steringery - split saw-side hook wasn't 180°	Brought up to 180
		Maint	
	,	Sink on the land stand downt have	Rejected sink - relia
		1	Reected sink - relea
	E	(ice) on 4 hairs	wiped down tared
		Cooler# spray chill norme broken - wate	Lietta Grails until
	C	won't shut off	0
aning spirate and the spirate		Hose dran bekind the final rail leaks	elndomed -
()		scrubbing	
4		mest rack in palletying needed a good	Rejected meatrack
		CKascoal	
$_{\cap}$		Box carts needed scrubbed - blood 7	rejected carts
		track lift	got fork left back
		129 Compay in ineditale needs to be ran - Rendering said-mount took fork	contacted John A - render
			7 3 6) 1/ 2: -2
RE-OP	OPER.	DEFICIENCIES (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)	INSPECTOR'S ACTION(S) (Reject, restrict, delayed correction, reinspection, results, down time (DT).)

RECEIVED BY ESTABLISHMENT OFFICIAL

Reinspection

- Exhibit 17

DATE	Singa managa	TO LONG TO SERVICE STATE OF THE SERVICE STATE STATE OF THE SERVICE STATE STATE STATE OF THE SERVICE STATE ST	distribution co	i de la company
8-	-2	5	-9	5

SANITAT	SANITATION REPORT															William Company			**************************************	ı	8	-2	5-	-7:5	
	(A) SELECT A							D PR	EOP	ERA	TPV	E SA!	MPL	ES F	OR D	ESI	SNA	TED	ARI	EAS					DOM:
		~~~~	INSPECTION UNIT (IU) NUMBERS									***********			-	-									
	ARE	A #				ARE	A #				ARE					ARE	A #	<del>,</del>			ARE	EA #	·	- Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comment of the Comm	-
Initial Sample															<u> </u>	<u> </u>			T	Ī					<u></u>
xpanded Sample																									
																	1.	ļ							ı

(B) RECORD PREOPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" column with Area and Unit No. from Section (A) above, or with a letter (A - Q) from Reference List on back page. Identify deficiencies in "OPER" column with a letter (A - Q) from Reference List on back page.

White the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of	-		
PRE-OP	OPER.	DEFICIENCIES (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)	INSPECTOR'S ACTION(S) (Reject, restrict, delayed correction, reinspection, results, down time (DT).)
C		neran scrubbed. In polititizing fremework	Rejected 5 racks
C	A CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTO	Trolley room - ring tank near	
	E	Cooler #1 sorry chief noggles were broken off	Rejected 3 sails
	5	flush and dron wouldn't chase itself	Rejected men sextroon while fixed
	C.	Junch - I hand skinner and I hand sow needed scrubbed	Rejected until cleaning
	C	180° carons shower - nongles were seusge	Skower rejected until fight
	-		
	_		
		Commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of th	PAGE NUMBER

ESTAE

Exhibit 18

DATE 8-29-95

C	Δ	N	17	. Δ	T	1	n	P	ı	R	F	P	n	1	3.	T

SANITATI	ON R	EPO	RT			REC		$C_{i}$					C			15,000			7.	لـل		ometro processor			phonostrates
		(A) S	SEL	ECT	AND	REC	ORE	PR	EOPE	RA	TIVE	SAM	IPLE	SFO	RD	ESIG	NAT	ED.	ARE	AS					
									ı	NSPE	ECTIO	N UN	IT (II	U) NU	MBE	RS									
	ARE	A #				ARE	A #		ne Berneron B		ARE	A #				ARE.	A #				ARE	A #	,	مقد سست سندن ال	<b></b>
Initial Sample																									
Expanded Sample																									adsourced.
Reinspection							***************************************																		

(B) RECORD PREOPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" column with Area and Unit No. from Section (A) above, or with a letter (A - Q) from Reference List on back page. Identify deficiencies in "OPER" column with a letter

(A - Q) fi	rom Refer	ence List on back page.	
PRE-OP	OPER.	DEFICIENCIES  (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)	INSPECTOR'S ACTION(S) (Reject, restrict, delayed correction, reinspection, results, down time (DT).)
		Pill an lettering convince had meat some	recket off a cleaned
		Not the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contract of the contra	J-60 50 - 98
		on it - also wistil by equipment hanger Blue Hat	
		Deve year	( ) -1- ( ) -1- ( ) ( )
		Box carts in box shop were duty (2)	Rejected until cleaned
		Blue Hat	
		OC corres had dred blood on his hot	washed-Rat
$\bigcirc$		during sie on	
$\mathcal{O}$		told kim	
		Freezer - are to be cleaning metal spaces	
		the next 4 weeks - weekends -	
		MARCHAR TO THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STA	
		Teget shades one missing on lights in the	
H	1 B	Fill floor hudraulic toom -	
	P	- Mary Grand Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control	
		4 page on Alson in cooler 5 speckled	Tagged for tankage
	M	with black specks - Bohult hogs	1:)
	'''	on Almen 50°	
		The second discountry of the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s	PAGE NUMBER

EST

Exhibit 19

S-30-45

SAN	TA	MOITA	DEDO	D.T
OM14			P( P P ( )	L-( )

	.014		Oni																		1 "	• -	.7107	~ / -	/
		(A)	SEL	ECT.	ĀN	DRE	con	) H	CEOF	ERA	<del>(TIV</del> )	= 5A	MPL	ES FO	a GC	FSIC	3 N A	TED	3	7 0 0					
					***************************************	***************************************					ECTIO						- IVA	160	ARE	AS		***************************************			-
	ARE	A #				ARE	A #	**************************************			ARE					ARE	A #			<del></del>	ARE	EA #	NE CONTRACTOR OF		
Initial Sample				T		1		T	T	Τ	<u> </u>		<u> </u>		T		T	<u> </u>	Ι	]	<u> </u>	<u> </u>		<u> </u>	T
Expanded Sample			-	<u> </u>				-	-	-										<u> </u>					
Reinspection		_		_	_																	***************************************		**********	
IBI RECORD DE		internances To a work				1		l	· ·	nderson constitution of	<u> </u>	 ####################################				-	[		Name (Assessment						

(B) RECORD PREOPERATIVE AND OPERATIVE DEFICIENCIES: Identify deficiencies in "PRE-OP" column with Area and Unit No. from Section (A) above, or with a letter (A-Q) from Reference List on back page. Identify deficiencies in "OPER" column with a letter (A-Q) from Reference List on back page.

- Control of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the l	7		
PRE-OP	OPER.	DEFICIENCIES (Location, equipment, nature and extent, name of plant personnel notified, Inspector's initial, plant's response.)	INSPECTOR'S ACTION(S) (Reject, restrict, delayed correction, reinspection, results, down time (DT).)
8	and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s	Rost - outsien from cooler to them #5	to or unjed down, dails
	E	Cooler # nongie broken and I turned	2 rails regested don
Marie (Marie Marie M	C	Rock (4) still tagses polletigens tagger I more for Assuming	Robensed 1 today
	B	Overkead drip - Kend in Indragely	IT about 6 min
	R	Spray chill program - section & under plant test - say sway chill sistem is checked asily los prevention of Contamination. How	Rejected rock until
		come USAA find broken noglin water on rails and bears and Roundrain	
	, and		
	And a second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control of the second control o	THE TOPICS CICNATURE	PAGE NUMBER
		*	

F000 1	DEPARTMEN SAFETY AND	INSPE	CTIO	M SERV	ICE																	DA					
	ANITATI																					1	18.		3/-	95	·
				SEL	ECT	ANI			Exh	ibi	t 2	0		<b>/</b> -		, ţ				A.	EAS	<u></u>					
							<del></del>															1				en contract	
		ARE	A #	•			ARE	A #				ARE	А#				ARE	A #				I AF	REA	**			
			T	<u> </u>	1	T	<del> </del>	T	T	1	<u> </u>		T		T				<u> </u>	Υ	T	T	$\top$	T			
Initial S	ampie						<u> </u>	ļ		<u> </u>					-	-				-		-	-	$\dashv$			
Expanded	Sample																						+	$\dashv$		scounter-	
Reinspe			_	_																-   -							
(B) RECO from Sects (A - Q) fr	ion $(A)$ $al$	bove,	or 1	with a	ı letti	er (A	1 – Q	rive ) fron	DEF n Re	-ICIE feren	ce L	ES: ist or	Ident 1 back	ify o pag	leficie ge. Id	encie lentij	s in ' fy de	'PRE ficie	:-OP acie	" co s in	olumn ''OPE	wit R"	h Ar colu:	ea a mn	ind U with	Init . a le	No. tter
PRE-OP	OPER.				/ Y	ogati	on, eq	uipme tified	nt n	iciei ature ector	and e	xtent	, name ant's r	of p	olant nse.)	H	ggganden (Pilot Charles)		7	Rejo eins	INSPE ect, res pection	trict.	deia	νea	corre	ctior	1, (T).)
VIII.	odverste verste og men sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne sterne	-			(ACCOMPANIES	<del>and and the s</del>	17	//		Fla	c s		n-endote-originate					T-00/07-3		*********		***************************************					
			B 54, f+																					de-particione			
		sterlizers in stick pit not 1800																			7	•					
														2 C			TI	1101	m	-d							
	7	sterlizers in stick pit not 1800															<u> </u>										
karangi ngganakili kiryol Qoli (1888) karangi	6	Employee picking empty plastic												and the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of th	manda de la Constantina del Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Constantina de la Co		W	- 4/		<u> </u>		1/4	3	~*			
!															1	-	//·	40		· N		0/07		<u> </u>			
	m	-	table for head most trim												100	<u> </u>	+	<u>アド</u>	1120	7	<u> </u>	7					
<u> </u>	1771	++	ah E	1 / B		<u>to</u>		<u> 173</u>	h o	5 1 (2)	1 000 1 0	<u>'/ /</u>			1 07 07	. 1	001	127	-		<u> </u>						
	,,		$\frac{Cn}{6\sqrt{n}}$	ner	001	roj		3 / C				Cal		1	65		inc							-	~~~		
	B	5	Z	rai	05	(ح			90 V	_	<u> 10</u>	,++	100						-				Succession .			-	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
			20	er-	hea	d	<i>L'</i> ,	027	+,	yn	1,1	3_	<u> C/c</u>	n	<u>cl er</u>	150,	+ pd 1	19	⊬	L	2 60/	M					Communicative States
B		a	po	<u>ت ارا د</u>		100	d	+	1. 1	<u>e</u>				-					+								
			W	adamaminada citadas									wed was the control of the	wantay) laga	<u></u>			ogueannistanis			- Annahar sannaha	<del>(Maranani)</del>				military.	ENGINE PROPERTY.
													·												>4,4110000000000000000000000000000000000	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
								<del>oriental gama</del>	CO-pared library								emitanamanan										
			en and a second						***************************************				and we are	······································				rdry(A)Market	┿								
										······································		***************************************				n-commont des results			-								N
			Managaran and	sterson in the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the sta		iiistiik			d <sub>ucom</sub> nomika			· <u></u>					******************		-			<del>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</del>	gurosphala	***********			
		-		<b>444</b>			i annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual annual									******			$\dagger$						an a sauda canoni	oren	
							***************************************	, april 1000					·····	-	,	egygytenan ambo <del>rt</del>											
•				puntangan da da da da da da da da da da da da da	ogygompungungung									,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,													
																	~~~	outour take	_						**************************************		D73144444
<b>4</b>							way was constant				accorde 200	-		aysayyayildi		T. POSTANIA C. P. C. P.			-	9) Transporter	www.w	Separation District		y,,440-14103E			nie en en en en en en en en en en en en en
							······································												$\dashv$			<del></del>	***************************************				
		-				<del>,</del>								<del></del>	<del></del>				$\dagger$					-,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			20-11-10-10-10-10-10-10-10-10-10-10-10-10
					***************************************	, named to the		DANIE OF THE PARTY						annenditor			7,7,110 TO THE										
				<u> </u>																							
								aleast squares and																bypolynos			e de l'année de la company de l'année de l'année de l'année de l'année de l'année de l'année de l'année de l'a
Street organization of the second sec								1		יים חלייי	et el	CNA.	FIIDF		j				P	AGI	ENUM	JER.	<u>.</u> 0	F			Marie Control of the Party of t
																			,			-					-monresseement dist

NSS FORM 11040-1 (12/86)

### Exhibit

## ACCELLEASED DEFICIENCY BOTICE

7 A

REGION/AREA/CIRCUIT CODE REVIEW DATE: 4/15/94 ESTABLISHMENT NO. 532

PLANT NAME AND ADDRESS: Cosha, Nebraska 68107 COMEZ AVETULE Conters, Inc.

COVERACE: Full-time 03-04-22 (Omaha #1)

Kf. Bill Vallace, Operations Kanagez PLANT NANAGEMENT REPRESENTATIVE

Ma. Vilas J. Alley REVIEW OFFICER:

> AREA PERSONNEL CONTACTED: Dr. Ronald Kally, Area Supervisor

IO REPRESENTATIVE. Dr. Stanley Johnson. Circuic Supervisor

PLANT PROFILE: This is a medium-sized beef slaughter/processing plant that conducts breaking, boning, cucting, and grinding operacions

Kr. Lovell Kagganson, Plant Rapresentative, Hr. Bill Vallace, Operations Kanager, Mr. Janice Schamp, Quality Concrol Technician, Dr. L. M. Seldera, Inspector-in-Charge (IIC), and Dr. Stanley Johnson, Circuit Supervisor, who ware notified of the issuance of this report. Ms. Pam Ogessware, At the conclusion of the revism, an exit conference was held with Program Review Officer, was also present.

### Paga 1 of

Serious deficiencies observed and corrective actions taken during the COV. CY VOTO:

#### STADGATES PROCESS 3.

a

£ =

sporonimately 600 cercesses in the holding cooler (approximately 10 percent similar defacts, rail dust, and grease were observed on the asjority of the entering the processing room, contamination was also onserved on carcasses. foor dressing procedures observed in the slaughter department resulted in [ecal/ingesta contamination on bung, tail, rump, aidline, shank, brisker, Although minor trimming was being performed on carcagaes inadequate, allowing contaminated carteases to enter the final wash. and nack areas of the cattle carcasses. Subsequent tribusing vas examined).

processing area pending trimming and 100 percent reinspection. Operations in all departments were temporarily suspended at the direction of the Circuit Supervisor, to provide for crisming of concaminated carcasses. The plant employees in the slaughter department, at the direction of the Operations Nanager, washed their hands, washed and sanitized their When slaughter teady for boning. See Process 6. Corrective Action: The IIC retained all carreases in the cooler and equipment, and trimmed the effected areas of carcasses.

MOM

96

6 Ţ

ACCELERATED DEFICIENCY NOTICE (Esc. 532)

78ge 2 of 2

(Continued) PROCESS 3.

observed poor diessing procedures and also because of the lack of available rectained by the IIG at the direction of the Circuit Supervisor. Slaughter Those contaminated carcasses were storage space in the carcass cooler. Once again contaminated carcasses oberacions resumed, the line speed was slowed because of the praviously operations continued until 1430 hours until cooler space was filled. were observed entering the final wash.

# PROCESS 6. PRODUCT BARDLING AND PREPARATION

Facal/ingesta contamination, rail dust, grasse, and unidentified naterial Corrective Action: The Circuit Supervisor directed the 110 to retain all were observed on the midline, shank, and neck grees of approximately 10 percent of the 120 carcasses, ready for boning in the boning room. the carcasses in the boning area pending a 100 percent reinspection.

PROCESS 2. SABITATION OF FACILITIES AND EQUIPMENT/FERSONAL ATGIEGE

Corrective Action: The Circuit Supervisor directed the IIC to reject the area pending removel of the condensate. The raw product was moved from the Dripping and/or beaded condensate was observed on pipes directly above plastic covered coabo bins of raw product in the boning roce. affected area, and the plastic covers ware replaced.

Director, Program Review Division/Date

#### ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 9318

REVIEW DATE: 4/18/94

PLANT NAME AND ADDRESS: Vern's Moses Lake Meats 2721 W. Peninsula Drive REGION/AREA/CIRCUIT CODE: 02-10-25 (Spokane)

P . 10

Moses Lake, Washington 98837

COVERAGE: Full-time

PLANT MANAGEMENT REPRESENTATIVE: Mr. Larry Ellestad, Plant Manager REVIEW OFFICER: Dr. M. A. Cline

AREA PERSONNEL CONTACTED: Dr. Alan Knox, Assistant Area Supervisor IO REPRESENTATIVE: Dr. Dwight Olson, Circuit Supervisor

This plant was previously released from Stage I, Step 2 of the Progressive Enforcement Action (PEA) program on 1/10/94.

- At the conclusion of the review, an exit conference was held with Mr. Larry Ellestad, plant representative, Mr. Dan Mauer, Inspector-in-Charge (IIC), Dr. Jane Quinn, Multi-IPPS Supervisor, and Dr. Dwight Olson, Circuit Supervisor, who were notified of the issuance of this report.

#### Page 1 of 2

Serious deficiencies observed and corrective actions taken during the review were:

#### PROCESS 6. PRODUCT HANDLING AND PREPARATION

Fecal/ingesta contamination was observed on beef loins stored on a processing table. A contaminated cardboard box on top of another processing table was in direct contact with exposed meat product. The product on the tables represented the majority of processed product available for review in the only processing room.

Corrective Action: The IIC retained the affected product pending further disposition. The product remained under IO control at the conclusion of the review.

Two metal gondolas contaminated with residues from previous days' operations were in direct contact with the five beef quarters available in the processing cooler.

Cor.ective Action: The IIC retained the affected product pending further disposition. The product remained under IO control at the conclusion of the review.

Page 2 of 2

ACCELERATED DEFICIENCY NOTICE (Est. 9318)

#### PROCESS 4. RODENT AND PEST CONTROL PROGRAM

and the state of the state of the state of the state of the state of the state of the state of the state of the

Flies were observed in the slaughter department, processing department, and production-related areas. A large swarm of flies was observed outside a frequently used exit door, which was not equipped to preclude fly entry. Corrective Action: The IIC instructed the plant management official to eliminate the flies in the facility prior to resuming operations. At the conclusion of the review, plant officials were carrying out the IIC's instructions.

PROCESS 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

Dripping and heavily beaded condensate was observed above exposed-product trafficways in the processed products cooler.

Corrective Action: The IIC rejected the cooler, which remained rejected at the conclusion of the review.

Director, Program Review Division/Date

Robert E. Bartrett, DVM

# ACCELERATED DEFICIENCY BUTICE

40/2-5 STABLISHMENT NO

SECTION CLEATORNING 95474 Lambell Soup Company 2000 Franklin Soulavard PLANT WAKE AND ADDRESS

REGION/AREA/CIRCUIT CODE: 02-04-17 (Sacramento) 4/19/94 REYLEY DATE:

Full-cime

COVERACE:

John Stazzewski, Plant Manager PLANT NAMACEMENT REPRESENTATIVE: ţ,

Or. Bewerly Leads REVIEW OFFICER:

> WEA PERSORMEL CONTACTED: Acting Area Supervisor Jose Carcia,

٠,

Circuit Supervisor IO REFRESENTATIVE Mr. Vayra Batson

PLANT PROFILE: This large, multi-shift canning plant produces soups, spagnetti sauce, pasta products, and broths.

The plant was again placed on Stage I, Step 1 of PEA on February and removed from FEA on October This plant was placed on Stage I, Step I of the Progressive Enforcement Action (PEA) progress on August 23, 1993, and removed from PEA on October 10, 1993.

At the conclusion of the tewism, an exit conference was held with Mr. John At the conclusion of the review, an enterior controller, He. Sandy Statsewekt, Flant Sanicarlan, He. Sandy Statsewekt, Flant Sanicarlan, He. Sandy Sincaff, Quelify Control Technician, Mr. Greg Parks, Inspector-in-Charge Sincaff, Quelify Control Technic Sunervisor, who were notified of the issuance of this report.

s co cocceste cocceste coste cocceste cocceste cocceste cocceste cocceste cocceste contracte se cocceste cocces

Page 1 of 3

Serious deficienties observed and corrective actions taken during the TOVIDE WETG!

PROCESS 2. SABITATION OF PACILITIES AND EQUIPMENT/PERSONAL KYGIEDE

An employee sprayed water onto overhead structures directly above exposed product. The resulting overpres dripped from a dirty pape disectly into a cooking kettle of whey porder slurry used in amenable product. Also, suspended operations and directed plant Ranagement officials to condem the splash vacer was observed in two gondolas of dry ingredients in this area. Corrective Action: The IIC, at the direction of the Circuit Supervisor,

cose and flaking rust and paint ware present on overhead structures above exposed products and exposed product trafficuays in production areas throughout the plane.

ACCELERATED DEFICIENCY NOTICE (Est. 4C/P-5)

Page 2 of 1.

(Continued) PROCESS 2.

All affected areas ressined rejected at the conclusion of the relected the affected areas, suspended operations, and retained products corrective Action: The IIG, at the direction of the Circuit Supervisor, The first affected area was rajacted at ipproximately 1000 hours, with other areas rejected as the review pending further disposition. review at 1230 hours. Progressed.

Black particles were observed on a piece of masking tape loosely attached no the wall adjacent to exposed dry ingredients. The Plant Sanitarian Spiashed onto the tape duting cleamup operations.
Corrective Action: The Circuit Supervisor directed the IIC to remove the tape and recean the ingredients in the area pending further disposition. stars partitions for exposed dry ingredience. The Planc Sabitarian stated that chase particles were piaces of the floor covering that had

Froduct residues from previous days, operations were observed on a metal rack directly above exposed cooked chicken mant stored in plastic totas, on plastic lide of containers of dry ingredients, and on Vertie vent boods directly above exposed products in various production areas of the plant corrective Action: The Circuit Supervisor directed the IIC to reject affected equipment for cleaning, suspend operations, and retain effected products pending further disposition,

black grosse was observed on the lids of containers of dry ingredients used in amenable product in the bean blanching room. Also, the dry ingredient in one of these containers was contaminated with an unidentified foreign

Corrective Action: The IIC, at the direction of the Circuit Supervisor, retained the affected dry ingredient pending further disposition and rejected the lids for cleaning. stainless staal shovel, ready for use with exposed sirloin burgers, was A stainless strain auton. Stored directly on the floor. Corrective Action: The IIG rejected the shovel and directed plant management officials to provide an appropriate storage place. -<u>tr</u> -

seilings and walls, boxes were stored in disarray, and debris and dirt vere in the third-floor freezer, exposed bonaless hams in a box were contaminated with unidentified block particles. Also, boxes of best raviols were stored directly on the floor. In the second-floor freezer stored contained was stored in a dirty shipping contained both freezers contained heavy accumulations of ice and frost on the present throughout the treezens.

corrective Action: The Gircuit Supervisor rejected the freezers and cotanned the affected product pending further disposition.

67

 $\Sigma$  1

МОИ

96 15

ACCELERATED DEFICIENCY NOTICE (Est. 4C/P-5)

Page 3 of 3

#### PROCESS 6. PRODUCT HANDLING AND PREPARATION

Water splashed from the carrot hopper onto the top of a dirty light fixture and then dripped onto a conveyor belt that contained exposed carrots used in amenable product.

Corrective Action: The IIC, at the direction of the Circuit Supervisor, suspended operations and retained the affected product pending further disposition.

PROCESS 1. FACILITIES, EQUIPMENT, WATER SUPPLY, AND SEWAGE DISPOSAL

Loose pieces of a rubber gasket were observed on a motor housing directly above a vat of exposed tomato paste.

Corrective Action: The IIC, at the direction of the Circuit Supervisor, stopped operations and retained the product pending further disposition.

Director, Program Review Division/Date

Robert E. Bartlett DVA

## ACCELIZATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 5961

Pohlman's Mean Processing Plant PLANT MAME AND ADDRESS:

04-04-31 (Weshington, IM) REGION/ABEA/CIRCUIT CODE:

Factol

COVERACE:

76/11/5

REVIEW DATE:

Isrre Maute, Indiana 47802 6150 W. Svans Drive

PLANT MANAGEMENT REPRESENTATIVES: Mr. Thaodorm Pohlman, Ownsr

AREA PERSONNEL CONTACTED: Dr. Ted D. Bak.

Area Supervisor

Mr. Sceven D. Lalicker IO REPRESENTATIVE: REVIEW OFFICER:

Dr. Muhammed Goustman. Circuit Supervisor Purchar-processing activities PLANT PROFILE: This small, outli-species slaughter/processing plant slaughcers "ittle, swine, goate, and sheep. Further-proceseing ac includes br ixing, boning, grinding, curing, smoking, and conking

At the continsion of this revise, an exit conference was held with Mr. Theodore Poblash, plant representative, Dr. Muhammed Chummen, Circuit Supervisor, and Mr. Leslio Demiey, Rallof Inspector-in-Charge (11C), who were notified of the issuance of this report.

### Page 1 of 2

trateriates de server es do server de server de server de server de server de server de la server de server de

Serique deficiencies observed and corrective actions taken during the

# SABITATION OF PACILITIES AND EQUIFMENT/FERSONAL HTGIENG PROCESS 2.

observed on the hand-contact areas of sevings, bolse. Songrous, casely not use, and on the hand-contact areas of water hosse, rasky for use to yeah careases and barts in the lailing of all discorded hand-held corrective action: The Railief of rejented all affected hand-held Dried fecal material and/or residues from pravious days' operations were observed on the hard-contact areas of several beist controls, casdy for

equipment pending cleaning and sanitizing.

Residues from pravious days operations were observed no the product contact surfaces of a curting table and reays, ready for use with exposed product in the processing room.

Corrective Action: The Relief IIC rejected the table and crays pending cleaning and sanitizing. A heavy accumulation of loose and flaxing rust was observed on portable storage tarts used to store cooked vacuum-packaged products in the Ireezek Corrective Action: The Zelief IIC rejected the carts pending cleaning and sanitizing, and retained all affected product pending further disposition.

6 Ţ

96

ACCELERATED DEFICIENCY MOTICE (Egg. 6961)

7&80 2 OF 2

(Continued) PROCESS 2.

operacions Voidantifiad black particles and/or residuss\_from\_previous days' operations were observed on a staging table, <u>ready for use to package exposed proquer,</u> and on an electrical drop-cord in direct contact with product-contact

packaging macerial, ready for use. Corractiva Action: The Reliaf IIC rejected the equipment and retained the

affected packaging material pending further disposition.

Residues from Previous days operations were observed on a shelf where cooked vacuum-packaged products were scored in the holding cooker.
Corrective Artion: The Relief IIG rejected the shelves and retained the sifacted product pending further disposition.

PROCESS 4, RODENT AND PEST CONTROL PROCESM

ingredients and exposed product contact packaging material were stored in a dry storage area. In addition, rodent droppings and/or dead insects were observed along the floor/wall juncture in the dry storage area. Also, a door leading from the outside premises into the shipping area was not lodent droppings ware observed on a shelf where an open box of norment

sealed properly to exclude verain entry. Corrective Action: The Relief IIC rejected the areas and retained all affected ingredients and packaging material pending further disposition.

NOTE: Sum to the aforementioned serious definitionaies, the Circuit supervisor and Relief IIC temporarily suspended operations (at 0830 hours), which remained suspended at the conclusion of the review (at 1100 hours) pending appropriate corrective action.

Review Officer, Frogram Review Division/Dare

Director, Program Review Division/Date

Robert 2. Barriert, 3%

#### ACCELERATED DEFICIENCY MOTICE CANADIAN EXPORT CERTIFICATION REVIEW

ESTABLISHMENT NO. 3D

REVIEW DATE: 6/2/94

PLANT NAME AND ADDRESS:

ConAgra, Inc.

Schroeter Industrial Park

Cactus, Texas 79013

REGION/AREA/CIRCUIT CODE:

03-10-13 (Amarillo)

COVERAGE: Full-time

PLANT MANAGEMENT REPRESENTATIVE:

Mr. Jerry Porterfield

REVIEW OFFICER: Dr. Munsif Khan

AREA PERSONNEL CONTACTED:

Dr. V. E. Coiner, Area Supervisor

IO REPRESENTATIVE: Dr. Stavan Staphansan

PLANT PROFILE: This is a large, two-shift, red meat slaughter and processing plant that slaughters an average of 20,500 cattle per week and processes approximately 156,265,000 pounds of beef products per quarter. Processing activities include cutting, boning, grinding, and cooking.

This review was conducted under the requirements of the United States-Canadian Free Trade Agreement. A plan of action prepared by plant management officials addressed all the deficiencies and was acceptable to the IO representative. Accordingly, the plant was classified as "Marginally Acceptable" by agreed-upon Canadian criteria.

At the conclusion of the review, an exit conference was held with plant representative Mr. Jerry Porterfield and his staff, Dr. Steven Stephensen, Circuit Supervisor, and Dr. Donna Pottsgill, Inspector-In-Charge (IIC), who were notified of the issuance of this report.

\*

#### Page 1 of 3

Serious deficiencies observed and corrective actions taken during the review were:

PROCESS 1. FACILITIES, EQUIPMENT, WATER SUPPLY, AND SEWAGE DISPOSAL

Low hung beef forequarters at a cutting station were coming in contact with the floor. Furthermore, employees' work boots at this station were contacting slide bars that were also in direct contact with passing beef forequarters. Corrective Action: The IIC suspended operations for approximately 25 minutes until a temporary plastic sheet was installed. The affected forequarters were immediately trimmed of contamination.

#### PROCESS 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

Heat residues from previous days' operations, fat, unidentified black particles, and black grease were observed in exposed-product plastic tubs, ready for use in the processing area. An imbedded black residue from previous days' operations was observed in deeply scored meat tubs, ready for use and in use in the offal packaging area. In addition, black smears were observed on plastic tubs in use and nested in each other.

6-19-95 MON 9:47 8

Corrective Action: The IIC rejected the affected tubs pending washing and sanitizing and retained affected product pending further disposition.

Exposed boneless meat product was hanging from employees' work stations into overfilled combo bins. Employees working at these stations were contacting this product with unprotected areas of their work boots.

Corrective Action: The Circuit Supervisor condemned the contaminated product and plant management officials were instructed to have the combo bins replaced before they became overfilled.

A plant employee handled condemned product that had fallen onto the floor and then handled exposed product without first washing his hands.

Corrective Action: The IIC condemned the contaminated product and a plant management official instructed the employee regarding the proper procedure for handling product falling onto the floor.

An employee washing contaminated plastic tubs splashed wash water onto a conveyor line, in use with exposed boneless meat product.

Corrective Action: A plant official stopped operations and instructed the employee to wash dirty tubs in the designated wash area. The affected product was immediately trimmed and returned to production.

#### PROCESS 3. SLAUGHTER

Ingesta particles were observed on 1 of the 10 beef sides examined in a holding cooler (approximately 1,000 available) prior to processing. Rail dust particles were also observed on 7 of these same 10 sides.

Corrective Action: The IIC retained the carcasses pending further disposition.

#### PROCESS 5. RECEIVING AND CONTROL OF INCOMING PRODUCTS/MATERIALS

Plastic liners in combo bins, ready for use with exposed raw boneless meat, were in direct contact with contaminated foot surfaces of work stations in the processing room.

Corrective Action: The contaminated liners were discarded and the combo bins

were moved away from the foot surfaces of the work stations.

6-19-95 MON 9:48 0

Page 3 of 3

#### PROCESS 6. PRODUCT HANDLING AND PREPARATION

ACCELERATED DEFICIENCY NOTICE (Est. 3D)

Beef forequarters that had already passed the trim station were consistently rubbing against a contaminated work station in a cooler. Protection between employees' contaminated work boots and beef quarters was not available. Corrective Action: The IIC temporarily suspended operations in the cooler for approximately 20 minutes until temporary corrective devices were in place and affected product trimmed of contamination.

Review Officer, Program Review Division/Date

Munsif Khan, DVM

Director, Program Review Division/Date

Robert E. Bartlerr DVM

## ACCELERATED DEFICIENCY NOTICE

STABLISHMENT NO. 6444/P-6464

PLANT RAKE AND ADDRESS: Anglus Asste, Inc.

REGIOSA/AREA/CIRCUIT CODE:

02-10-25 (Spokens

Patrol

COVERAGE:

REVIEW DATE: 6/15/94

Spokens, Washington 99207

2810 HOKEL

Thomas Scachecki, Vice President PLANT MANACEMENT REPRESENTATIVE.

ASSISTANT ATES SUPERVISOR AREA PERSONNEL CONTACTED: Aleo Kroz

Ar, Steven D. Lalicker REVIEW OFFICER:

IO REPRESENTATIVE

Circuit Supervisor Deright Olson,

processing plant marufactures products for Botel/Restaurant/Institutional FLANT PROFILE: This small rad mean/poultry Total Quality Control (TDC) (HRI) distribution.

At the conclusion of the review, an exit conference was hald with Kr. Thomas Stachscki, plant representative, Dr. Dwight Olson, Gircuit Supervisor, and Kr. Dennia Howks, Inspector-in-Charge (IKC), who were notified of the issuance of this report.

### Paga 1 of 2

social se social de social

Serious deficiencies observed and corrective actions taken during the CBAIGH MBEG:

PROCESS 2. SAHITATION OF FACILITIES AND EQUIPMENT/PERSONAL, MIGIENE

another cracked and broken plastic containsr in use with exposed product at Also, a black, foreign residus was observed on the hand-contact surface of product into a plastic containsr at the suposed-product exit of the flaker surfaces of several plastic containers with cracked and/or broken corners, Residuas from previous days' operacions wats observed on product-concact in use or ready for use with exposed products in the processing room. A blood-sosked corrop apron was used to deflect the flaker machine.

Corrective Action: The IIC rejected the equippent and containers for removal or repair, and the affected product was placed in an inadible product container at the instruction of the plant representative

ICCRIZZATZD DRFICIKNOT MOTICE (Est. 6444/7-6444)

PROCESS 2. (Continued)

areas of a knife sharpening steel, ready for use, on a production table in tesidues from previous days' operations vers observed on the hand-contact the processing room.

The IIC rejected the steel pending cleaning and Corrective Action: semitizing.

several cliphoerds in use or ready for use by employees in the processing Residues from previous days' operations and/or rust were observed on

The IIC rejected the affected clipboards pending COTTRCTIVE Action: replacement.

PROCESS 5. EXCRIPING AND CONTROL OF INCOMING FROMFOTS/MATERIALS

mangarial ware observed on product-contact packmging materials in use or ready for use with exposed product in several areas of the processing room tasiduss from pravious days' operations and/or unidentified foreign and in the dry storage area.

Gorrective Action: The IIC rejected the affected packaging natarials pending reinspection, and retained affected product pending further disposition.

-

Supervisor and IIC temporarily suspended operations (1040 hours), which remained suspended at the conclusion of the review (1250 hours) pending WOTE: Due to the aforementioned serious dafferencies, the Circuit appropriate corrective action.

Review Officer. Program Review Division/Dace Steven D.

Program Raview Division/Date

Post-it\* Fax A

To ...

**\* 56-6** τ ном zs: **2** T

0

# CANADIAN ACCRIENATED DEFICIENCY NOTICE

9/18/96

REVIEW DATE:

ESTABLISHERYING. 1265/P-1265 FLANT NAKE AND ADDRESS. Valley Fresh, Inc.

68U D.Street.
Tägisekm.Cedifornifär91380.
PLABT HANAGENENT REFERSENTATIVE:
Mr. Cetald Parker, Plant Manager

AREA PERSONNEL CONTACTED: Dr. Alfred Aquino, Assistant Area Supervisor

REGIOW/AREA/CIRCUIT CODE:
02-04-09 (Modesto)
COVERACE: Pull-time
REVIEW OPFICER:
Dr. M. Dougles Parks

IO REPRESENTATIVE: Dr. Amir Khamis, Circule Supervisor This review was conducted under the requirements of the United States.

Canadian Free Trade Agreement and wes initially rated "Unacceptable."

A plan of action prepared by plant management officials addressed all the serious deficiencies and was approved by the 10 representative.

Accordingly, the plant was reclassified as "Marginelly Acceptable" by agreed-upon Canadian officials.

At the conclusion of this raview, an exit conference was held with Mr. Gerald Parker, Plant Manager, Mr. Mark Scott and two other plant representatives, Dr. M. G. Kamille, Inspector-in-Charge (IIC), and Dr. Kathy Scott, Agriculture Ganada representative (for raview correlation), who were notified of the issuance of this report.

Page 1 of 3

Serious defictencies observed and corrective actions taken during the review warm:

FROCESS 6. RODINT AND PEST CONTROL PROGRAM

Large accumilations of car, annue were observed in the dry storage area. where packaging materials were spread. This area had no direct access to production or production or production or production or production or consistence of areas. Corrective Action: In Gircuit Supervisor rejected the entire area pending cleaning and reinspection.

PROCESS 5. RECEIPING AND CONTROL OF INCOMING FRODUCTS/MATERIALS

Massive amounts of dirt and cobrebs were observed on packaging materials in the dry scorage area.

CAMADIAM ACCELERATED DEFICIENCY REFORT (Est. 1265/7-1265)

FROCESS 2. (Constanse)

The sleeves on street clothing of employees who handled fully-cooked product were not covered and were contacting exposed product. Corrective Antion: Plant officials instructed the employees to completely cover their street clething.

Review differ, Program Service Division/Date

Acting Director, Program Review Division/Date

Karen V. Morris, W.

Representatives of the emphathment who laves constantly the findings as this report may commande Program Renows
Division, 47(1) What 150 State, Leviness, NS 46044, se call 913441-5600. Betwee and Ameniment reports the resultable
the politic distances that the President of the Territory Act. If place impromentatives well to the works commande producting the
region the foot Safety and American Service will be about the communities with the foot Safety and improve the foot Safety and improve the resultable to remove the resultable to report the foot Safety and improve the foot Safety and improve the foot Safety and improve the foot Safety and improve the foot Safety and improve the foot Safety and improve the foot Safety and improve the foot Safety and Improve the Safety

## ACCRIMATED DEFICING NOTICE

RSTABLISHMENT NO. 13348/P-13348

AT AT 12081 Judgenia Packing Company PLANT HAME AND ADDRESS Highway 367 N

PLANT HANAGEMENT EXPRESENTATIVE: Mr. Rick Harris

Jos Zurborg, Area Supervisor Assistant Area Supervisor) AREA PERSONNEL CONTACTED: Chrough Dr. Perry Page.

76/81/01 REVIEW DATE: REGIOS/AREA/CIRCUIT CODE:

03-02-02 (Batemville)

COVERAGE: Full-time

REVIEW OFFICER:

Mrs. Wilms J. Allay

10 REPRESENTATIVE: Dr. K. A. Khan. Accing Circuic Supervisor

PLANT PROFILE: This small slaughter/processing plant has halted slaughter sound of the sound operations at this time. The plant is now starting a poultry deboning operation. Boneless hams will also be samifactured on a limited basis. At the conclusion of this review, an exit conference was held with Kr. Rick Marris and Mr. James Gude, plant representatives, Kr. Donald Finch, Inspector-in-Charge (IIC), and Dr. K. A. Khan, Acting Circuit Supervisor, who were notified of the issuance of this report. rocker and the companies of the companie

### Page 1 of 2

Serious deficiencies observed and corrective actions caken during the review were:

# PROCESS 4. RODINT AND PIST CONTROL PROGRAM

Rodent droppings were observed on shelves containing work gloves, ham netting, and pickesing mareries, and were in close proximity to clean work fracks. More droppings were observed on other shelves in this day stores roce and on the floor along the valls. Also, droppings were observed on the floor in the bolker room. COXTRACTIVE ACTION: The IIC rejected this area and retained all affected packaging materials and supplies pending corrective action as outlined in the Mamual of Procedures for cleanup and inspection requirements. This ires remained rejected at the conclusion of the review

# SAMITATION OF PACILITIES AND SQUIPMENT/PERSONAL EXCITES PROCESS 2.

Condensate was blowing qut of an overhead retrigeration unit into a partially covered coals bin of ray produce in the cooler. Pooled water was also observed on the single layer pleatic cover.

ACCRIPARATED DEFICIPROY BOTICE (ZEE, 13348/F-13348)

(Conclused) PROCESS 2.

reconditioning of the product. The plant representative instructed plant personnel to move the affected tank and to reject the size in front of the The IIC retained the product (at 0920 hours) pending cooling unit until corrective mateures could be implemented. Corrective Action:

Keavily beaded condensate was observed on the bottom of an overtiesd seffigeration unit above an open tank of politry being defrested in the

Char. Corrective Action: The IIC instructed plant personnel to remove the condensate from the cooling unit. The IIC also suggested that the defrosting tenks be moved away from the overbased cooling units and the drip pans be installed to sliminate the problem.

Vilas J.

Program Review Division/Dete

Review Office of

Acting Director, Program Review Division/Daca

Karen V. Horris. DVM a war i

70 124 Representatives of the small-inferent who have quantum contenting the flusfings in this region, may common the Program (Program of 1985), the state of 1985 of

96 6 1 គគ: 9 I MOM

5

# ACCELEDATED DIFICIENCY BOTICE

8083 ESTABLISHMENT NO.

REVIEW DATE: 11/9/94

PLANT RAKE AND ADDRESS: Leard Sheep Co. 301 E. 4th Street

REGION/AREA/CIRCUIT CODE: 05-06-01 (Benton)

> PLANT MANAGEMENT REPRESIBITATIVE: Bencon, Kentucky 42025

Pull-time COVERACE:

Mr. Grant Laind, Owner

Dr. Kuraif Khan REVIEW OFFICER:

> AREA PERSONBEL CONTACTED: Acting Area Supervisor Dr. Villiam Williams,

IO REPRESENTATIVE: Dr. Ellwood Brown, Circuit Supervisor PLANT PROFILE: This small rad meat slaughter/processing plant slaughters cattle, sheep, and swine. Processing activities includs cutting, boning. grinding, and production of sausage. Also, this satablishment slaughters and processes under the custom-exempt provisions of the Federal Man grinding, and production of sausage. inspection Act and Regulations. At the conclusion of this review, an exit conference was hald with Mr. Grant Laird, plant owner, Mr. Flayd Staten, Raise Inspector in Charge (IIC), Dr. Harley Blane, Supervisory Vetarinary Medical Officer (SVMO), and Dr. Eliwood Brown, Circuit Supervisor, who were notified of the issuance of this report. Dr. Paul Resveber, Program Maview Officer, was also present oppoped the substant of the su during this raview.

### Page 1 of 2

Sarious deficiencies observed and corrective actions taken during the CONTRA MOLAS!

#### SLAUCHTER PROCESS 3.

contaminated water to rum into body cavities. In addition, wash water from contabliated carcasses was splashed onto other previously washed carcasses. Pecal marerial and unidentified foreign contaminants were washed from partially opened sheep carcasses prior to evisceration, allowing further disposition, and the plant management official agreed to discontinue vashing carcasass prior to final inspection. In one cooler, ingests, unidentified foreign material, black particles, and hair were observed on four out of four beef forequarters, on two out of two beef hindquarters, and on three out of three sheep cartesses. Also, in another cooler, ingests, black particles, and large seears of unidentified foreign material were observed on 20 out of 20 sheep cartesses. Corrective Action: The IIC retained all cestaminated carcasses pending further disposition.

ACCELREATED DEFICIENCY BOTICE (Eac. 2023)

Fase 2 of 2

FROCESS 1. (Continued)

Corrective Action: The Circuit Supervisor instructed the plant annagement The brisket saw was not sanitized between uses in the slaughter cres as official to senitize the brisket saw. ingesta and fecul material vere observed on sheep carcasses after the finel Inspection station and prior to washing. Light intensity measured 26 fe's at the final inspection station where 50 fe's are required. Corrective Action: The Circuit Supervisor suspended operations at 1015 hours pending the increase of light incensity to 50 fc's, and retained siffected carcasese pending crimming and reknapaction. Operations remained suspended at the completion of the kevism at 1130 hours.

# PROCESS 6. PRODUCT BANDLING AND PREFABILITIES

The IIC receined the affected product pending trimming Black particles, unidentified foreign material, and hids were observed on both of the beef hindquarters that wers cut and boned in the processing Corrective Action: and reinapection.

Levien Officer, Program Ravies Division /Date

55-51-11 Mursy Man, DVM Muraif Khan, DPR Acting Director, Program Raview Division/Date

Exhibit 29

Karen V. Korris, DVR

Representatives of the establishment with larve questions establishes to findlings as this request the Program Reveror Environs. (970 West 15th Sidner, Correspon, KS 5604%), or sail \$13.461-5600. Reveror and Apparatives reports are provided for public destinator took to be the Forestian of Indemination Act. If place representatives with to disc versions assessmentation report, due found Serley and Companions Activities and unstale the constants of the property of the public versions or assessment. is response to public respons for decreas

### ACCRIMATED DEFICIENCY NOTICE

0.00 B ESTABLISHOOP NO.

HWY 64, 1 mils East of Zolfo Springs PLAST NAME AND ADDRESS: U.S. Kast Packers Inc.

PLANT MAKAGENENT REPRESENTATIVE: Zolfo Springs, Florida 33890

Mr. William Orthusia, Plant Manager

AREA PERSONNEL CONTACTED Dr. Thomas Barlow, Area Supervisor

REVIEW DATE: 11/15/94

REGION/AREA/CIRCUIT CODE: 05-02-33 (Tampa)

COVERAGE: Pull-time

Mr. Staven D. Lalicker REVIEW OFFICER:

Supervisory Veterinary Medical Officer IO MERRISMENTATIVE: Dr. Pedro Almaran,

PLANT PROFILE: This small red mear plant slaughters swine and cattle, with further processing activities that include boning and cutting.

At the conclusion of this review, an exit conference was held with Kr. William Orthuela, Plant Manager, Dr. Pedro Almazan, Supervisory Georinary Hadical Officer (SVNO), and Dr. Pedro Ramos, Reliaf Supervisory Veterinary Hadical Officer, who were motified of the Issuance of this raport. Mr. John Carlson, Branch Chief, Program Ravisw Division, was also

Page 1 of 2

Sarious deficiencies observed and corrective actions taken during the review ware:

### RODENT AND PRST CONTROL PROGRAM PROCESS 4.

Mussions live and/or dead flias vers observed in the week's production in an outside storage enes. Also, doors leading from the perchaging materials, and on the floor in the box storage eres. Swarming pickaging materials around the outside doors of the plant and around saveral uncovered barrels containing imadible material from the previous outsids premises into production and production-related azeas ware not Numerous files were observed on exposed carcases, on exposed product. contact equipment, and on amployees handling exposed product in the slaughter department. Musarous live and/or dead files were absenced esployee welfare room, on baxes containing exposed product-contact

sealed properly to preclude entry of insects.

Corrective Action: The SYGO suspended operations at 1015 hours pending temporal of the files, cleaning and smaltizing of equipment, and retantion of the affected product and materials pending further disposition and reinspection. The operations remained suspended at the conclusion of the review at 1200 hours.

ACCELEMATED DEFICIENCY NOTICE (Sat. 12889)

Pegs 2 of 7

# SANITATION OF PACILITIES AND EQUIPMENT/PERSONAL, EVOIDER PROCESS 2.

darvily beaded condeposts was observed on a dircy refrigeration unit uris condensate, and plant representatives moved the exposed product from the affected areas. pan above exposed product, and on a dirty tail above an exposed-product trafficway in the carcass bolding cooler.

Residues from previous days, operations were observed on hand-contact Georg product, and on scabbards containing knives, ready for use with exposed of water hoses and spray nozzles in use by smployees handling exposed product in the slaughter department.

Corrective Action: The SVMO suspended operations (at 1015 hours), which included the rejection of equipment pending cleaning and sanitising, and remarkion of affected product pending further disposition. Operations remained suspended at the conclusion of the review at 1200 hours.

where product-contact string (cotton type) and mabered identification tags Assidiss from pravious days' operations and rust were observed on a table and tags, and the SVND rejected the table pending cleaning and sanitians corrective Action: A plant representative disparted the affected string were stored, ready for use in the slaughter department.

lawies Officer. Program Ravies Division /Date

212 25.62 Bersy Staven D. Lalicker Ž

Acting Director, Program Review Division/Date

Karen V. Morris, DVM

sommerve of the coabbidance who kure questions ensuescent at factings in this report may occane. He Program Boroury inns, 4720 tens 15th threat, Leventon, 152 66044), or mat 913-441-5620. Review and Autonomena reports are similable white desciouse under the Freedom of Latinumena Am. If plant reparamentations were to the windom communate the or pomet sentiente tader ide Freston of Lafarmanese Act. If glent representations with 5 feb verious commune point and incommune foi representations with the freed ladery and languarion Serves outh include the commune in the pictual of the verious communes communes for its produce no public request for fortressents.

6

-

96

ноы

ISTABLISHMENT NO. 627

PLAKT KANE ABED ADORESS: Vience Beef LID

RECION/ARRA/CIRCUIT COOK:

O4-04-05 ((DeKalb)

COVERAGE: Fall-time

REVISE DATE: 12/08/94

darward, Illinois 60033 1511 Reace 14 Forth

FIANT MARACEMENT REPRESENTATIVE: Kr. Hy Remis, President

MAKA PERSONNEL CONTACTED: Acting Area Supervisor John Overstrast,

Mr. Velmer D. Chippe

REVIEW OFFICER:

Malti-IFFS Supervisor Dr. Alan Mathemasm, IO REPRESENTATIVE:

carcasasa into primal cuts and trimmings, and occasionally chops meat for FIANT PROFILE: This small rad mast astablishment slaughters and bornes further processing.

deficiencias identified ouring the pravious review on September 28, 1994, and the subsequent issuence of an Accelerated Dafiniency Worles. During this raview. Process 2, Sentiation of Pasilities and Equipment/Personal Mygiams, and Process 3, Slaughter, were again found to have serious This follow-up ravies was conducted due to the serious nature of the

AE the conclusion of this review, an exit conference was held with Nr. Ny Rasis, President, Dr. Also Kathmason, Multi-IFFS Supervisor, and Mr. Robert Pennissn, Inspector-in-Charge, who were notified of the leguence of this report.

Page 1 of 2

Serious definiennies observed and corrective actions taken during the review were:

PLOCIES 3. STANGETTE

In addition, the books used to hang best hadds wers not santtized between uses as required. Corrective Action: The IIC suspended slaughter operations and retained Seef heads removed from carteases contacted each other, a guard rail. affacted product pending further disposition. and/or the commut floor curbing.

prior to the viscore and rail inspection. A carcase was retained for further disposition and subsequently condemned for pathology; however, the Seef heads contracted each other on the boning table and were being boned head-boning table was not sanitized with 180" F. water as required. effected product pending further disposition.

ACCRIPATED DEFICIENCY FORTCE (Est. 627)

(Contimes) PLOCASE 3. The dehorning equipment was not sentitized with 180° F. water between hank use as required. Also, 180° F. water was not available in this arec, and the plant president stated that the deborating machines were naver

Corrective Artica: The IIC saspended slaughter operations pending awailability of 150° P. warmer. black greess smears, up to 12 inches in leagth, from the hids-pulles while employee was cutting through the black greeze during the cartass spiltting Corrective Action: A plant comployes trimmed the affected carcasasse and parts, and the IIG instructed a plant official to trim contemination prior operation. Also, exposed carrasses contacted a dirty inedible product var at the certaes trimming station, and exposed tails and moths on carcasses were chastrat on the necks of saveral large, sidened carrasses. An contacted the conteminated surface of the blde-paller. co cutting into the neck steam.

fractiss 2. Sebitarion of facilities and equipment/freesomal evolume

10 cartassas in the cooler. Also, hazvily beaded condensate was observed Condensate from dirty ovarband structures was dripping onto approximately Corrective Action: The IIC retained the effected product pending further disposition, and rejected the affected areas pending removal of the above the majority of carcasses in this sees cooler. condennasacia.

refrigatation unit drain hoses that contacted empassed carcasses in the Assiduas from previous days' operations were observed on several

Correctlys Antion: The IIC retained the affected certesess pending further disposition.

Raview Officer, Program Raview Division Data

Acting Director, Program Ravias Division/Date

Prox. Karen V. Morriss, DVM Lepanamativo of the ventalehmen who have question associated the facilitys in the report may occurred the Program Business Delains, with West Life Bares, Leverman, Al 1600-6, or and 912-94-1600. Became in April was no ventaled by the public delainment that the President of Delainments Ass. If your appearancement with it of the vertual association delainment for the committee of the vertual association for the delainment for the committee of the committee of the vertual association and the president for the committee of the comm a peoposius to public proposed for description.

Exhibit 31 4

## ACCELERATED DEFICIENCY NOTICE

10619/7-10629 ESTABLISHMENT NO.

REGION/AREA/CIRCUIT CODE:

REVIEW DAIR: 2/28/95

(Little Rock)

03-02-08

COVERAGE: Full-time

PLANT WANT AND ADDRESS: Senton Packing Company 1837 Southland Circle PLAST HARACEGERT REPRESENTATIVE: Mr. Arthur Grean, Owner

Benron, Arksnass 72015

Dr. Perry Paga, Assistant Area Supervisor AREA PERSONNEL CONTACTED:

10 REFERENTATIVE: Dr. Vahibab Sharaf, Circuit Supervisor

Mr. Staven D. Lalickar

MANIER OFFICER:

ses es ses estados de ses estados de ses PLAT PROFILE: This small rad meat slaughter/processing plant slaughters cartle, with further processing activities that include breaking, cutting boning, and grinding.

Kr. Arthur Green, owner, Dr. Wahibah Sbaraf, Circuit Supervisor, Dr. John Wils, Wulli-1PES Supervisor, and Nr. Duane Anderson, Inspector-in-Charge At the conclusion of this review, an exit conference was hald with Kr. Arthur Green, owner, Dr. Gabibeb Sharaf, Circuit Supervisor, Dr (IIC) who ware notified of the tasuence of this report.

### Page 1 of 2

Sariqua defiziencies obsorved and corrective actions taken during the imay as pair

# SABITATION OF PACILITIES AND ROUTHERST/PURSONAL HYDIENE PROCESS 2.

Corrective Action: The IIC suspended slaughter activities (ac 0920 hours), which included the rejection of equipment pending cleaning and sanitizing, and the retention of the day's slaughter production pending trimming and reinspection. Slaughter operations tensioned at the conclusion of Reavy accumulations of product residuas from previous days' operations ware observed in stabbards contecting knives in use by three out of four employees who handled exposed carcasses in the slaughter department. the review at 1100 hours.

An amployee used a band-held hose during cleamy operations and splashed waste water from the dirty floor onto an exposed carcass in the slaughter waste water. Also, another employee used a hand-held hose at the carcass vash station, and overspray from the washing operation splashed onto the trusty, dirty celling, then dripped into a trafficery in use with exposed corrective Action: The IIC retained the affected carcasses pending triangles and the triangles of the continuing and the triangles of the continuing and the continuing and the continuing and the continuing and plant official instructed the continuing of the continuing and the co carcasses in the slaughter department.

ACCELERATED DEFIGIRACE MOTICE (Est. 10629/F-10629)

Fegs 2 of 2

### (Continued) PROCESS 2.

issivy accumalations of product residues from pravious days' oparations were observed on the hand-contect surfaces of a clipboard and penoil used by an employes who handled exposed carcasses at the carcass wash and inspection The employee also used the "Inspected and Passed" brand with rough, frayed tape on the bandle.

Corrective Action: The IIC rejected the equipment, and the plant owner instructed an employee to dispose of all affected equipment. Also, the IIC racained all affected cartasses pending trisming and reinspection.

An accumulation of residuas from previous days' operations and unidentified foreign particles wars observed on a pertable cart lecated directly above containers of exposed product, ready for pariaging in the grinding room. Corrective Action: The IIC rejected the cart pending cleaning and sanitizing, and receiped the affected product pending reinspection. NOTE: The IIC had documented several repetitive sanitation deficiencies as avidenced by pre-operational and operational sentration reports on file.

Raview Officer, Program Raview Division /Date

Acting Director, Program Review Division/Date

Yann " may Karen V. Morris, DVM researches to the establishment who have remound recomment the fundange is the repets may some; the Program Armer visco, edge (1) was 14th Street Lavrence, KS 66040, or ead 912-841-6600. Review and Automoment exposule at arrandom public femalesses under the Frenchess of Information Act. If plans representations wide the Frenchess of Information Act. If plans representations with the file special communities. r, the Fred Safery and freparature Service will incloded the tooksamen or this placed on despiry for people wereing or released

in responses to people's mapped for economic

T

MCKINEATED DEFICIENCY NOTICE

į

REVIEW DATE: 2/15/95
DATE:
REVIEW
P-1272
ē.
RSTABLISHRENT NO.

REGION/AREA/CTRCOTT CODE: COVERAGE: Pull-time 05-04-09 (Douglas) Golden Poultry Company, Inc. PLAKT RAKE AND ADDRESS: Douglas, Georgia 31533 MCNOBL

PLAKT KARACININT REPRESENTATIVE; Mr. Dave Courdin, Plant Kanagar AREA PERSONNEL CONTACTED: Kristin Hole,

Er. Velmer D. Chippe Circuit Supervisor TO REPRESENTATIVE: Dr. Samual Vareon, Assistant Area Supervisor

ALVING OFFICER:

onstandorstander stander stands shifts under an approved New Batablishmant (Line Speed (MELS) program, produces cut-up chickens, and ships whole chickens. This review began on This large establishment slaughters young chickens on two the first shift and extended into the beginning of the second ehift." PLANT PROFILE.

At the conclusion of this ravies, an exit curreness, we conclusion to the base for the base was been founded in the base was been been for the base for the base of this report.

The statement of the base of this report.

}

### Fags 1 of 2

Serious deficiencies observed and corrective actions taken during the ravies sara:

# FROCESS 2. SAEITATION OF PACILITIES AND EQUIPMENT/PERSONAL HYCIPME

Condensate dripped from the dirty calling, refrigeration units, pipss, and drain pans onto chickens on a cut-up line and eviscation line. Also, water from a plugged drain pen located under an overtuand chicken conveyor line in the cut-up room was evertioning onto chickens on another line below. Approximately half the product in the cut-up room was affected. Corrective Action: The SVNO/IIC on the first shift suspended operations in plant saployees tracoved condensate from the affected areas (downtime 105 aimstes). Affected product was held for reconditioning. The second-shift SYKO sumpended operations on the evisceration line. Flatt management officials removed the affected birds for reconditioning and installed a drip pan (downtime approximately 15 minutes). the cut-up room. Plant management officials emptied the cut-up lines,

accelerated Deficiency Rotice (Esc. 7-1272)

### (Continued) PROCESS 2.

during company breaks on boxes, product-contact surfaces, and bahind dirty affected gloves and sleaves protectors into a crush concainer, and instructed employees to store articles in the proper storage eres daring Exployees' waterproof gloves and plastic slasve protectors were storod Corrective Action: Flant management officials placed the employees'

### PROCESS 3. STANCETER

The chlorine level of senitizing weter at the chicken reprocessing station measured 10 ppm rather than the minimes of 20 ppm as required. operations until the level of chlorins was in compliance, and instructed plant management officials to rewesh the previously reprocessed chickens. Corrective Action: The Slaughter Inspector suspended reprocessing

# process 1. Facilities, Equipment, Valle Supply, and Sevace Dixposal

Black greats from the ice conveyor feeder was observed on product contact foe in a storage bin. Also, a siedlar black substance was observed in a combo bin of ice, ready for use in the chicken cut-up rose. Gorrective Astion: Plant sanagement officials augenized the use of ice iron the ice atorage bin pending cleaning of the conveyor feeder and reinspection of the ice, and the SWO/IIC rejected the combo bin of ice in the chicken cut-up rose pending further disposition.

Rewiss Officer, Program Ravias Division /Daca

Velmer D. Chaps

Exhibit 33

Accing Director, Program Rawlew Division/Dage

man: 4/9/95 Karen V. Moeria, 078 Experimentalities of the establishment who have questions contentually the findings in this report tary consists the Program Reviews.

10. 10.0000, 40.00 West 15th Struct, Lowrence, 10. 565049, or call \$15.441-5600. Bowers and Americans imports are remained for peakle destinations trained the French of Extraorizes Act. If \$\text{plants representative rest in \$15.0000 to \$15.0

}

)

## ACCELERATED DEFICIENCY NOTICE

REVIEW DATE: MAY 1, 1995 REGIOM/AREA/CIRCUIT CODE: 02-04-17 (Sacramento) COVERACE: Parrol ESTABLISHMENT BO. 2820/F-2820 Riverbank, California 95367 PLANT HANG AND ADDRESS: McFarland Company, Inc. 6212 Rosslle Averus

Kr. Kalvin Coenan, Plant Kanagat PLANT MARACEMENT REPRESENTATIVE:

Assistant Area Supervisor AREA PERSONNEL CONTACTED: Dr. Alfred Aquino,

Circuit Supervisor Mr. Wayne Bataon,

IO REPRESENTATIVE:

Hs. Karlana Bach REVIEW OFFICER:

o a suspense de la lació de la lació de la lació de lació de lació de lació de lació de la lació de la lació de lació de lació de lació de lació de lació de la lació de lació FLANT PROFILE; This reall precessing establishment debones powlity for wholessle discribution. This plant was placed on Stage I, Step I of the Progressive Enforcement Action program on Pebruary 17, 1995. Pollowing this review, the Circuit Supervisor advised plant officials that PRA status would be increased to Stage 1, Step 2. This follow-up review was conducted due to the serious nature of the deficiancies identified during the previous review on February 16, 1995, and the subsequent issuance of an Accelerated Deficiancy Notice.

and Mr. Mayne Barson, Circuit Supervisor, who were norified of the issuance At the conclusion of this ravies, an exit conference was held with the , Kelvin Geenen, Hanager, Kr. Ourtis Commen, Plant Supervisor, Mr. Dom Zipser, Fraduction Supervisor, Mr. Jim Dewson, Relief Inspector-in-Charge, of this report.

### Page 1 of 2

Sextous deficiencies observed and corrective actions taken during the review vers:

# FEOCESS 2. SARITATION OF FACILITIES AND EQUIPMENT/FEERONAL HYGINNE

Contestnated water from the cutaids surfaces of dirty shipping cartons contesting its packed chicken breast trimedags dripped onto the table where the argosed product was placed prior to entaing the rotary meat processor (deboning equipment). These shipping cartons were previously stored on use, dirty wooden pallets, and the bottom layers of some cartons were mashed. This is the only processing line in the establishment, and wittuelly all product manufactured is processed through this system.

ACCRIBATED DEFICIENCY NOTICE (Ret. 2820/8-2830)

affacted eres was cleaned and released for use, and two more employees were sasigned to the area to properly open the cartons and readve the product. ervisor, suspended operations. The Circuit Supervisor instructed the to tetain the finished product pending further disposition. The corrective Action: The Flant Manager, at the direction of the Circuit Supervisor, suspended operations.

# PROCESS 5. EXCRIVING AND CONTEDL OF INCOMEND FRANCOIS/MAINLES

chicken legs, thighs, and chicken breasts with wings were commingled with chicken breast halves in these cartons, were processed through the retary Cartons of product raceived from Est. P-6601, Starkel Poultry Inc. Payailup, Gasbington, were labeled as "Chicken Bresst Relves"; however, mest processor (deboning equipment), and were packaged and labeled as Chicken Breast Kest.

Corrective Artion: The Circuit Supervisor instructed the IIC to retain the approximately 17,000 pounds of mislabeled product pending reinapection and relabeling. The Circuit Supervisor stated that the appropriate Area Office of the shipping establishment would be notified.

# PROCESS 1. PACILITIES, EQUIPMENT, VAITE SUFFLE, AND SEVACE DISPOSAL

Two cruck trailers used to store shipping cartons were extradaly congested, and review of the concents could only be accomplished from the doorway. Pallets of cartons were stacked close to the walls, and cartons were stacked directly on the floor, making the trailers inscressible for proper examination for evidence of rodents. Governmentive Action: The Circuit Supervisor instructed plant officials to discontinue use of the trailers for storage until Agency guidalines were

Review Officer, Program Review Division /Date

Exhibit 34

Director, Program Review Division/Dare

Representatives of the stabilishment who have quantizes becaming the flathings in this report surpressent the Program Aerner Division. Aerner and Aerner Aerne

The request to this information is Voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance. 9CFR 301.320 and 9CFR 381. FORM APPROVED OMB NO. 0583-0015

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE

1.DATE

2. RECORD NO.

3. ESTABLISHMENT NO.

PROCESS DEFICIENCY RECORD

8. DESCRIPTION OF DEFICIENCY AND LOCATION:

Exhibit 35

I inspected a combo of part picneis and found greats of gre Chare pade in the princis. I did retain the combo.	00n
Chere cade in al cineir I dil setan the combo.	
on o provide provide distribution	

9 PQC	10 ISG Task Code		***************************************		
	10 120 1928 CORE	11. DEFICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potential
H YES		A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?		- CINCIN	rotential
L&I NO	MONT	B) Will the adulterated or misbranded/mislabeled product reach consumers?			
	0600102	C) Will the product have a detrimental effect upon the consumers?			
12/	•				
_			Deficience	zy classifi	cation
			Mile	41	

	The request to this information is Vol whether establishments are in compl	untary. It is needed to niance. 9CFR 301.320 and	nonitor defects found i d 9CFR 381 FORM APP	n this inspection sys PROVED OMB NO D	stem. It is us 583-0015	sed by FSIS	to deter	mine
	U.S. DEPARTMENT OF AGE FOOD SAFETY AND INSPECT	NCULTURE	1 . DATE	2. RECORD NO.	3. ESTABI		THE RESIDENCE OF THE PROPERTY OF THE PARTY O	TQC
	PROCESS DEFICIENCY	RECORD	4-17-95					
-:. : <del>.</del>		POPULATION DE CONTRACTOR DE CO	all the state of t	شنون	Exhibi	t 36		
}			/			***************************************		
	8. DESCRIPTION OF DEFICIENCY AND	LOCATION:	n n		1	1 1		
	I observed a floor	lanital on x	he som co	meorting &	esi.	Later	in	
,	1.to	end to the	Snik room	a sec	+ eque	eman.	4.to	
di	en evening he we	0) 0/	A.00 R.O	D	0.11	00 10	. Es	
Go ,	and with on the	llye. The is	uit mas	on sur c	and a	a spa	LUEC	<i>;</i>
Che	8. DESCRIPTION OF DEFICIENCY AND P lat evening de ux and ench on the sold. Sopote mut	K						
	9 PQC 10 ISG Task Code		EFICIENCY CLASSIFICAT			Certain		Potential
	YES	A) Will the "deficiency	" result in adulterated or mist	branded / mislabeled proc	iuct?		<del></del>	

Will the adulterated or misbranded/mislabeled product reach consumers?

Deficiency classification

Will the product have a detrimental effect upon the consumers?

C)

The request to this information is Voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance. 9CFR 301 320 and 9CFR 381 FORM APPROVED OMB NO 0583-0015

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE

1. DATE

2. RECORD NO.

3. ESTABLISHMENT NO 4. TQC

PROCESS DEFICIENCY RECORD

4-18-95

Exhibit 37

16. DESCRIPTION OF DE	FICENCY AND LOCATION:		
I inspected	Λ.	sienie trim.	I found shew,
huson, and	blood Clots.	I dil retar	Á.

17. PQC	18. ISG Task Code	10 DESIGNATION CONTRACTOR			
YES		19. DEFICIENCY CLASSIFICATION GUIDE  A) Will the "deficiency" result in a transfer of the control of the contro	Certain	Likely	Potential
□ NO	W O ./	A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?      Will the adulterated or misbranded/mislabeled product reach consumers?	۷,	-	-
- A.	16/10422	C) Will the product have a detrimental effect upon the consumers?	<u> </u>		Complete Com
	and the second s			۲.	
			Deficiency	y classifica	ition
			11/2	w	

The request to this information is Voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance. 9CFR 301.320 and 9CFR 381 FORM APPROVED OMB NO 0583-0015

FOOD SAFETY AND INSPECTION SERVICE

1.DATE

2. RECORD NO. 3. ESTABLISHMENT NO. 4. TQC

PROCESS DEFICIENCY RECORD

Exhibit 38

	1	A	", , ,
Obanana / That The	E WINGALT ANY	180 WALER	AUAILABLE
Obserued That Ther.	E WHIN! IM	4	p commenced contractions
IN The CUT AND CON	WEDLING deals	duRING 1	DRODUELIEN.
IN THE CUI AND CON	UERING OFFI	, 0 - 0 1 1	

STOPPED PRODUCTION INTIL 180° WAS AUAILAblE.

17. PQC Likely Potential 19. DEFICIENCY CLASSIFICATION GUIDE 18. ISG Task Code Certain ☐ YES A) Will the product have a detrimental effect upon the consumers?

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE

#### PROCESS DEFICIENCY RECORD

1. DATE 4-19-95

Exhibit 39

I observed a employee preding up a boreless but from the flood and started to go to work with out wasdeny his green gloves. I did stop him.

9 PQC 10 ISG Task Code	11 DESIGNACY COMMAND	
YES	11. DEFICIENCY CLASSIFICATION GUIDE  A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	Certain Likely Potential
02003cz	Will the adulterated or misbranded/mislabeled product reach consumers?	
10xCO June	C) Will the product have a detrimental effect upon the consumers?	
		Deficiency classification

BOACECC MEDICIENTY	M SERVICE	1 . DATE		A DI ICLIANENT	N4C7 14	TQC
		4-20-95	— Exhih	it 40		
<u>.</u>		about the mount of the second			T. T.	
<del>-</del> -		ggalan-Commonwe				
•						
8. DESCRIPTION OF DEFICIENCY AND LO	OCATION:			22.76.20.20.20.20.20.20.20.20.20.20.20.20.20.		
I observed a maix rissing edible fat am fatenclasi bel	+	· Sours · 1147	to distra- one	EDIA ONE	? !!	na
I ovarved a main	enance of	g. Dos go	in all your	J. J.	.1	, , _
ising edible fat	hom the	ham fat	self and put.	it on.	the	
	de la la	In ? land	line. I d.	1 1000	1 Lu	. 2
an fatendere bel	et on dro	sicrey mass		a sune	i wal	
2 della						
2.000		DESIGNATION OF ACCIDICAT	'CALCINOT			<u> </u>
9 PQC 10 ISG Task Code		DEFICIENCY CLASSIFICAT		Certain	Likely	Potential
YES		ated or misbranded/mislabeled pr				
DINO DABOZAZ		have a detrimental effect upon the				
	-			Deficient	cy classific	ation
			K4205-0	1 Cri	tial	
16. DESCRIPTION OF DEFICIENCY ABOUT I observed the oto Pliers to Jule or ham line.	LOCATION: Lec maint	tenance ano	logee useng. Lit step the	Sur de Stoney	leit-	gene L
16. DESCRIPTION OF DEFICIENCY AND Dobserved the oto Shers to pull or ham line.	19	DEFICIENCY CLASSIFICAT	ON GUIDE	Shir ch Shorter	lett-	Potential
	19 A) Will the *deficie		ON GUIDE pranded / mislabeled product?	The state of the s		

Deficiency classification

The request to this information is Voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance. 9CFR 301.320 and 9CFR 381 FORM APPROVED OMB NO 0583-0015

D.S. DEFARMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE

PROCESS DEFICIENCY RECORD

1. DATE

9 PQC 10 IS	G Task Code	11. DEFICIENCY CLASSIFICAT				
H YES		Will the "deficiency" result in adulterated or misbr     Will the adulterated or misbr	ION GUIDE	Certain	Likely	Potential
LX NO X	201	B) Will the adulterated or misbranded/mislabeled pro	anded / mislabeled product?	4		
109	Bolar	C) Will the product have a detrimental effect upon the	anct reach consumers?	4		
		The state of the s	s courametrs;		-	
				Deficience	y classific	ation

The request to this information is Voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance 9CFR 301.320 and 9CFR 381 FORM APPROVED OMB NO 0583-0015

3. ESTABLISHMENT NO U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE 2. RECORD NO. 1.DATE PROCESS DEFICIENCY RECORD Exhibit 42 5. TO (Name a

7 PERSONNE

PRE-OP: PROTEIN buildup ON 1. low pullers KNIFE SANITIZER

2. hom melnie belt

CLEANED before STARTUP. 3- bale lain soulle Table 8. DESCRIPTI

4- FAT bACK INCLINE BELT

9 PQC 10 ISG Task C	11. DEFICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potential
	Will the "deficiency" result in adulterated or misbranded / mislabeled product?		X	
YES NO	B) Will the adulterated or misbranded/mislabeled product reach consumers?		<u>  X</u>	
10200L	C) Will the product have a detrimental effect upon the consumers?		LX	
12. SIGNATURE OF I	Annual Antibutana and	Deficier	cy classif	ication
12. SIGNATURE OF T		M	ATOL	?
was a superior of the superior		······································	1	

PROCESS DEFICIENCY RECORD  4-20-95  Exhibit 43  7 PERSONNELAY  B. DESCRIPTION (  Observed open abscess in a combe of Jowls, ReTained  Tag # 370392, Jowls Tanked  1. Deficiency classification Guide  No Object Office of Towls of T	The request to this information is Vol whether establishments are in compl U.S. DEPARTMENT OF AGR FOOD SAFETY AND INSPECT	NCULTURE	nd 9CFR 381 FORM AF	PROVED OMB NO 0583	-0015 used by FSIS to determine
POC 10 ISG Task Code 11 DEFICIENCY CLASSIFICATION GUIDE Certain Likely Potent No Object Of Hard 2 of Will the product have a detrimental effect upon the consumers X Will the product have a detrimental effect upon the consumers X Deficiency classification CRITICAL  Deficiency classi		COM DEMAICE		2. NECORD NO. 13.	
2. DESCRIPTION (  C) DS SERVED OPEN RDSCESS IN A COMBE OF JOWLS, RETOINED  TAY 370392. Jowls TANKED  POC 10 ISG Task Code  Al Will the "definency" result in adulterated armistanded product reach consumers?  NO 0660402  3. Will the adulturated or michanded middled product reach consumers?  2. SIGNATURE OF Will the product have a detrimental effect upon the consumers?  Deficiency classification  CRITICAL  STENSION	5. TO (Name and		19-20-93		which to
Observed open abserss in a combe of Jowls, ReTained  Toy # 370392. Jowls Tranked  I POC 10 ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Potent  NO OCICHA2 Q Will the editlerated or musbranded / musbaled product reach consumers?  2. SIGNATURE OF Q Will the product have a detrimental effect upon the consumers?  Deficiency classification CRITICAL  Deficiency classificati	7. PERSONNEL NO		pT-		Control of the Contro
Observed open abseess in a combe of Jowls. Retained  Tag # 370392. Jowls Tanked  I Deficiency Classification Guide  A with the adulterated or misbanded insubabled product?  NO OCIUHA 2 G Will the product have a detrimancial effect upon the consumers?  2. SIGNATURE OF  Deficiency classification  CRITICAL  D	DESCRIPTION /		MERIOSSISTERIOCOCONO CALVEDRA	UV	
PQC 10 ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Potent No OLD Hall 2 C Will the deficiency "result in adulterated or misbanded / misbabled product Texth consumers? X		ŧ	•		,
PQC 10 ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Potent No OLD Hall 2 C Will the deficiency "result in adulterated or misbanded / misbabled product Texth consumers? X	UDSERVED OPEN	ADSCESS	IN A COM.	be of Jown	S. RETAINED
PQC 10 ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Potent No OLD Hall 2 C Will the deficiency "result in adulterated or misbanded / misbabled product Texth consumers? X	TAY # 370342.	Jowls TA	NKED		
YES   NO   A)   Will the "deficiency" result in adulterated or mischanded product?   X					
YES   NO   A)   Will the "deficiency" result in adulterated or mischanded product?   X					
Will the product have a detrimental effect upon the consumers?  2. SIGNATURE OF  Will the product have a detrimental effect upon the consumers?  Deficiency classification  CRIVER!	The same code	11. DE	FICIENCY CLASSIFICA	TION GUIDE	Certain Likely Dec
2. SIGNATURE OF  Will the product have a detrimental effect upon the consumers?  Deficiency classification CR1/10 R		A) Will the "deficiency"     B) Will the adulterated	result in adulterated or misi	branded / mislabeled product?	X
Deficiency classification  RITIORI  Deficiency classification  Ritiorial  Deficiency classification  Deficiency classification  Ritiorial  Deficiency classification	2. SIGNATURE OF	C) Will the product have	e a detrimental effect upon ti	pe consumers?	X
D					Deficiency classification
) tentia	3. PLANT MANAG		***		CRILICAL
) tentia		-	•		
) tentia		·			
) tentia					
) tentia					
)					and the state of t
)					
)					***************************************
					D dar-
					D dur-
					D de-
					D A
					D dur"
					D
					D dur-
on					D January Market
on					D
on					American and a second a second and a second
					American and a second a second and a second
					otential
					otential

	The request to this information is Vo whether establishments are in com	oluntary. It is ne oliance: 9CFR 30	eeded to monitor defects found in 01.320 and 9CFR 381 FORM APP	n this inspection sy ROVED OMB NO D	stem. It is used by FSI IS83-0015	to deter	mine	
	U.S. DEPARTMENT OF A FOOD SAFETY AND INSPEC	GRICULTURE	1.DATE	2. RECORD NO.	3. ESTABLISHMENT		TQC	
	PROCESS DEFICIENC	Y RECORD	4-21-95					
<b>.</b>			4021-04	procession of the contraction of	Exhibit 44			
, <del>,</del>	7. PERSONNEL NOTHIED U		1 15 Soupi					
	8. DESCRIPTION OF DEFICIENCY AND	N OCATION:		•				
,	I observed hyphachi ail chirpina into a combo of perh pienie shins. I should Product was retained for tankage.							
N	etained for tank	ige).	Co					
	9 PQC 10 ISG Task Code		11. DEFICIENCY CLASSIFICAT	ION GUIDE	Certain	Likely	Potential	

PQC 10	ISG Task Code	11. DEFICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potentia
YES	0001	A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	ن		
⊠ NO		B) Will the adulterated or misbranded/mislabeled product reach consumers?	٠		
1600	16 40102	C) Will the product have a detrimental effect upon the consumers?			
			Deficiency classification		

The request to this information is Voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance. 9CFR 301.320 and 9CFR 381. FORM APPROVED OMB NO. 0583-0015 U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE 1. DATE 2. RECORD NO. 3. ESTABLISHMENT NO PROCESS DEFICIENCY RECORD T YES Exhibit 45 1. PERSONNEL NOTATION 8. DESCRIPTION OF DEFICIENCY AND LOCATION: couple of more bellies on the floor again 9 PQC 10 ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain \_ YES Will the "deficiency" result in adulterated or misbranded / mislabeled product? Likely Potential D NO Will the adulterated or misbranded/mislabeled product reach consumers? ۷ 8) C) Will the product have a detrimental effect upon the consumers? ۷... Deficiencyclassification prrective action) 13a. 17. 20. 21 21

The request to this information is Voluntary. It is needed to monitor defects whether establishments are in compliance. 9CFR 301.320 and 9CFR 381.20832.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE 1.DATE

PROCESS DEFICIENCY RECORD

4-25-95

Exhibit 46

10. DESCRIPTION OF DEPROPERLY AND SOCIATION:

I observed a park butt on the flow of the buttline. Here

Lives a forenear 2 to 3' feet away. 2k turned around and walled

was four the product on the flood.

Lives with me

at the time.

17. PQC

18. ISG Task Code

19. DEFICIENCY CLASSIFICATION GUIDE

A) Will the "deficiency" result in adultorated or misbranded/mislabeled product?

A) Will the adultorated or misbranded/mislabeled product?

B) Will the adultorated or misbranded/mislabeled product?

Q) Will the product have a destrimental effect upon the consumers?

(

2(

20-2 (8/88), WHICH MAY BE USED UNTIL EXHAUSTED

Deficiency classification

25. DATE

The request to this information is Voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance. 9CFR 301.320 and 9CFR 381 FORM APPROVED OMB NO 0583-0015 U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE 2. RECORD NO.

3. ESTABLISHMENT NO

4 TQC ☐ YES

PROCESS DEFICIENCY RECORD

4-26-95

Exhibit 47

I observed the B Shift tipper tie area. I found 13 sieres if product on the flor. I did reject the area. Product was tanked.

37 000						
17. PQC	18. ISG Task Code					
YES NO	Code	DEFICIENCY CLASSIFICATION GUIDE     Will the "deficiency" result in adulterated or misbranded / misb	lahata t	Certain	Likely	Potential
	02802a2	B) Will the adulterated or misbranded/mislabeled product reach or     Will the product have a detrimental effect upon the consumers?	0.04 (100 2	2 (	water the same of	
			**************************************	Deficiency	/ classifica	ation
				Suter	"d)	

	The request whether esta	to this information is Volur ablishments are in complia	ntary. It is ne nce 9CFR 30	eded to m 1.320 and	ionitor defects found i 19CFR 381 FORM APP	n this inspection sy ROVED OMB NO. 0	stem. It is us 1583-0015	ed by FSIS	to deterr	nine
		U.S. DEPARTMENT OF AGRIC FOOD SAFETY AND INSPECTIO			1 . DATE	2. RECORD NO.	3. ESTABL	ISHMENT	NO. 4.	TQC
	P	ROCESS DEFICIENCY F	RECORD		4-27-95		•		1 1	YES
`. ;				+ B	Shift	Differences to the second seco	Exhibi			
	/. CLINDOINIO	•			•					
eg	l obser suipme seal a	on of deficiency and lowed 2 emp at cut the	loyees.	from lo es	the convi rediffe bone	rting aft grinding	w war g Noom	oding V. I	the did	Ũ
V	9 PQC	10 ISC Task Code		11 DI	EFICIENCY CLASSIFICA	TION GUIDE		Certain	Likely	Potential
		10 ISG Task Code	A) Will th		" result in adulterated or mis	***************************************	oduct?	Cercom	CIRCIY	- Otential
	X NO				d or misbranded/mislabeled p	····		~		
	LESS 140	02003a2	C) Will th	e product hav	ve a detrimental effect upon 1	the consumers?		۷,		
								Deficience	y classific	ation

PROCESS DEFICIENCY RE  7 PERSONNEL NOTIFIED  8. DESCRIPTION OF DEFICIENCY AND LOCAL  Odd a inspection of titles of Shin and	CORD	21-28-95 Shift	Ex	3. ESTABLISHMEN		4. TQC
7 PERSONNEL NOTED V 8. DESCRIPTION OF DEFICIENCY AND LOC	ATION:	Shiff				
8. DESCRIPTION OF DEFICIENCY AND LOC		mbo of our				
B. DESCRIPTION OF DEFICIENCY AND LOC		m la od area				
		mbi of our				
		mli daien		. 0		
titles of shin and	m a Co	m (a) M alla		1 ()	1	
titles of shen and		in of puch	ne sim	. I fore	sol .	
1) 5-1-01-0 6020	Bruse	2 Delia	10 tain it			
$\iota$	300000000	· · · · · · · ·		***		
2 200						
9 PQC 10 ISG Task Code		DEFICIENCY CLASSIFICAT		Certain	Likely	Potent
	A) Will the "deficie	ncy" result in adulterated or misi	branded / mislabeled product	? 2	CIKEIY	rotent
10 D6D0462	Will the adultera	ited or misbranded/mislabeled pr	roduct reach consumers?			<del>                                     </del>
	y sem the product	have a detrimental effect upon ti	he consumers?		<u></u>	
				1 2	cy classific	cation
	Etter and a second	AND DESCRIPTION OF THE PROPERTY OF THE PROPERT		1///	esers	·
Description of BEFREINCY AND LOC Described the new re e was cleaning his.	pect but house a	teles not fe utl 155° un new reject &	ollowy the ater. Th: Interes was	salvoge teng sde	piez whole clate	2am 1 0.
7. PQC 18. ISG Task Code	D.					
	Will the "deficience	EFICIENCY CLASSIFICATION  To result in adulterated or misbra	)N GUIDE	Certain	Likely	Potenti
YES			Constraint based SUDM \ Depons	1 .	1	
YES AI	Will the adulterate	of or westerned ministration of or	Other reach comments			-
YES A) O 2BO 2CO G	Will the adulterate	or westeranded/mistabeled proc	duct reach consumers?		***************************************	destruction and the second
1× NO 0 2662 181	Will the adulterate	id or misbranded/mislabeled pro-	duct reach consumers?		y classyfica	
le was cleaning his.	pect but hrufe i	uth 155 un new reject o	ollowing the ater. The	Salvage tenp sola	ald h	2 d

101	U.S. DEPARTMENT OF AGRIC FOOD SAFETY AND INSPECTIO		1.DATE	2. RECORD NO.   3. EST.	ABLISHMENT	NO. 14.	TOC
PF	ROCESS DEFICIENCY	RECORD	7-27-9	5			
TO (Name	and titi			Exhi	bit 50		
á.			- Supl.				
PERSONNE	LNOTI		<i></i>			wax *	
				<i>I</i>		/	
DESCRIPTION	ON OF L	<del>-</del>	*	<i>k</i>	i		
				ERAl INches			
		•	WEEN CAR	cass coolers	ANd	cul	dep
ReJ.	Ting # 350	500					
PQC	10. ISG Task Code	11	DEFICIENCY CLASSIFIC	ATION GUIDE	Certain	Likely	Potential
,			**************************************	nisbranded / mislabeled product?		<del>Y</del>	. Julial
YES NO	01001	B) Will the adulter	rated or misbranded/mislabele	d product reach consumers?		$\hat{\mathbf{x}}$	le like deskending da kanana se anaman
	UlHOIa2	C) Will the product	t have a detrimental effect upo	n the consumers?		ス	***************************************
. SIGNATU	JRE OF INSPE		•		Deficienc	y classific	ation
	more and a second				$\perp M$	ATOR	<i>?</i>
, PLANT M	IANAGEMENT OFFICIAL K					COLUMN TO THE PARTY OF THE PART	
	rama	u beno	rater				
- Dearant					***************************************		CONTINUE DE LA CONTIN
a. rieveill	ive measures:						
	<b>\</b>	1-	he repa				
	ara	$\sim$	me / you				
ini andraini da karina and karangga		AP-P-PRINCH CANNELS - CARPON PERSON PRINCES AND ADMINISTRATION OF					
I. VERIFICA	TION				15. DATE	CORREC	TED
					/-2	77-9	2
i. DESCRIP	HON						
. PQC	18. ISG Task Code	10	DEFICIENCY CLASSIFIC	ATION GLIDS	Carrie	Lilector	Dotastis
<del>—</del>	ישיים אפשר בייור	THE RESIDENCE OF THE PARTY OF T		misbranded / mislabeled product?	Certain	Likely	Potential
YES NO			rated or misbranded/mislabel		***************************************		
14C		C) Will the produc	ct have a detrimental effect up	on the consumers?			
. SIGNAT	URE OF INSPECTOR	«Аланусууны дууртуу ултаун тануу тануу тануу тануу тануу тануу тануу тануу тануу тануу тануу тануу тануу тануу		anaangaga diga gagaan ka ka ka ka ka ka ka ka ka ka ka ka ka	Deficienc	y classific	ation
9884aaaaaadaybaabaayaaya						,	
1. PLANT I	MANAGEMENT OFFICIAL	REPLY: (Corrective i	action)			THE PERSON NAMED IN COLUMN	delilik
d ~		TARTETURE TO THE PARTY OF THE P			**************************************		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
ia. Prever	ntive measures:						
					23 DAT	E CORREC	TED
					2. DAI	ב בטתתבנ	
					25. DAT	E2 -	
						<b>7</b> - ?	7 -9

HICH MAY BE USED UNTIL

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE

1.DATE

2. RECORD NO

3. ESTABLISHMENT NO. 4. TQC

4. TQC

PROCESS DEFICIENCY RECORD

7-28-95

Exhibit 51

I went to the womens locker room - I found the trilets full, turket paper all over the floor- sinks had paper towels inside them, a very bad smell - locker room was trashed also. I did reject the room.

17. PQC	18. ISG Task Code	19. DEFICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potential
☐ YES		Will the "deficiency" result in adulterated or misbranded / mislabeled product?		ζ.	
K NO		Will the adulterated or misbranded/mislabeled product reach consumers?		ζ.	
-	02301m	C) Will the product have a detrimental effect upon the consumers?		<b>L</b>	
20		:J	Deficienc	y çlassific 1 on	ation

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE

2. RECORD NO.

3. ESTABLISHMENT NO. 4. TQC

PROCESS DEFICIENCY RECORD

Aug 3,95

Exhibit 52

the state of the s

Hydraulic cylinder on the trim vat dumper is leaking oil on the floor

17. PQC	18. ISG Task Code	19. DEFICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potential
		A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?			X
₩ YES	01801a2	Will the adulterated or misbranded/mislabeled product reach consumers?			X
١٧٥ سي		C) Will the product have a detrimental effect upon the consumers?			X
20. SIGNAT	UR TO THE RESERVE TO		Deficienc		cation
			1  10	200	

U.S. DEPARTMENT OF A FOOD SAFETY AND INSPE	GRICULTURE CTION SERVICE	1. DATE 2. RECORD NO.	3. ESTABLISHMEN	TNO. 4.	. TQC
PROCESS DEFICIENC	Y RECORD	8-4-95	ı	<u>į</u>	
5. TO (Name and title			Exhibit 5	3	-
7. PERSONNEL NOTIF					-
Ch.					
8. DESCRIPTION OF DEFICIENCY AND	o Location.	•	Augusta Augusta	r	
OBSERVED F	lies CRAWI	ing ON PRODUCT CO	SI IUAIN	URTA	CE
OF UNCOUERE	-d nakna	iNA MATERIAL STO	ged on .	THE	
OF UNLOUENZ	DACTING	7,17,12,111			
RECEIVING &	OCK.				
Ausrodi					
9. PQC 10. ISG Task Code	11. D	EFICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potential
YES	***************************************	y" result in adulterated or misbranded / mislabeled produ		X	Potential
X NO OHDAL 2		d or misbranded/mislabeled product reach consumers?		$\hat{x}$	
12. SIGNATURE OF INSPECTO	C) Will the product ha	ve a detrimental effect upon the consumers?		X	
12. SIGNATURE OF INSPECTO				cy classific	
***				INTO	R
17. PQC 18. ISG Task Code		FICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potential
YES		result in adulterated or misbranded / mislabeled produ	ct?		
L NO		d or misbranded/mislabeled product reach consumers?			***************************************
20. SIGNATURE OF INSPECTOR			Deficien	<u>l</u> cy classific	ation
71 PLANT MANAGERSCHT OFFICIA	I DEDLY /C			-	The state of the s
21. PLANT MANAGEMENT OFFICIA	L REPLIT: (Corrective active	on)			
21a. Preventive measures:					
<u>}</u>					
22.	iPECTOR (corrective acti	on has taken place)	77	r con	
months and a second	management of the second of th	on the same of process	23. DAT	E CORREC	TED
24.			25. DAT	E . / ()	.0/
ECI:			Ι ,	' (/	7 >

FSI:

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE	1.DATE	2. RECORD NO.	3. ESTABLISHMENT NO.	4. TQC
PROCESS DEFICIENCY RECORD	08-07-95			
5. TO (Name and title)	Adam (Griffing Annual State Andrea State And	E:	xhibit 54	•
7. PERSONNEL NOTIFIE	<u> </u>			-
ENTIRE BREAK PERIOD (1900 to 18)	SORTING COM	BOS, HAD IT WAS "ROU	BEEN ON floo NAMAN WAS ON	OR FOR

11. DEFICIENCY CLASSIFICATION GUIDE

Will the adulterated or misbranded/mislabeled product reach consumers?

Will the product have a detrimental effect upon the consumers?

Will the "deficiency" result in adulterated or misbranded / mislabeled product?

Certain

V

Likely

Deficiency classification

CRITICAL

Potential

9. PQC

YES NO

12. SIGNATURE

10. ISG Task Code

0280202

A)

B) C)

	U.S. DEPARTMENT OF AGE FOOD SAFETY AND INSPECT	RICULTURE TOM SERVICE	1.DATE	d in this inspection system. It PPROVED OMB NO 0583-001 2. RECORD NO. 3. EST	ABLISHMENT		TOS
***************************************	PROCESS DEFICIENCY	RECORD -	x5 Hug 95	To Communication of			
5. TO (Nam	e and title)			Exh	ibit 55		
7. PERSONN	IEL NOTIFIEI			MANAGATION A			
8. DESCRIPT	TION OF DEFICIENCY AND	100		_			
01	A STATE OF S	C A . TO .		L. CREEN ME	AT DO	OP A	110-
, , ,	43 TIC 1+010G.	MY LEHKI	NG PIPE	by GREEN ME NATER.		- L /	J ( )
being	CHANGED. 1	PLASTIC 15.	full of	UATER.			
,	·						
4-200distantini							
9. PQC	10. ISG Task Code	11. D	EFICIENCY CLASSIFIC	ATION GUIDE	Certain	Likely	Potential
YES		A) Will the "deficiency	y" result in adulterated or r	nisbranded / mislabeled product?	l		
NO لكظر	0280102			product reach consumers?	سا		
12. SIGNAT	TIREOE	C) Will the product ha	ve a detrimental effect upo	n the consumers?			
12. SIGNAT	ORE OF II					cy classific	
					I ( R)	-ica	6
INC	PTION OF DEFICIENCY AND LINE BUTT LESS BELOW	BELT FLAK	ING RUBB	EL DUST TO P (FOREMAN) THE	PODUC = DUST	—— Т Дл : ТЯ	UD INKEL
SOME	Exposed peo	DUT					
17. PQC	18. ISG Task Code	19. DE	FICIENCY CLASSIFICA	TION GUIDE	Certain	Likely	Potential
L YES	02801@2	A STREET, STRE	THE STATE OF THE PERSON NAMED AND POST OF THE	nisbranded / mislabeled product?	2		
NO LES	02001@2		THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.	product reach consumers?	اسما ا		
	i	C) Will the product have	va a datrimantal affact uno	n the consumers?	1 1	i	
20 SIGNAT	TIRE OF INSPI	1 c) with the broadering.	ve a detrimental effect upo	THE CONSUMERS	1		1
20. SIGNAT	URE OF INSPI	1 C) Will the production	a destribution effect app	True Consumers:	Deficienc	y classific	ation

PROCESS DEFICIENCY RECORD  TO (Name and title)  PERSONNEL NOTIFI  DESCRIPTION OF DE  LL LOCKER ROOMS - TOPLETS NOT FLUSHING - TAGGED LOCKER R  PQC 10. ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Po		U.S. DEPARTMENT OF AGRIC FOOD SAFETY AND INSPECTIO		1 . DATE	2. RECORD NO.	3. ESTABLISHMEN	T NO.   4.	TQC
PERSONNEL NOTIFI  DESCRIPTION OF DE  LL LOCKER ROOMS - TOPLETS NOT FLUSHING - TAGGED LOCKER R	р	ROCESS DEFICIENCY F	RECORD	18 Av. 95				
DESCRIPTION OF DE  LL LOCKER ROOMS - TOTLETS NOT FLUSHING - TAGGED LOCKER R	TO (Name	and title;			NO CONTINUES	Exhibit 56		
L LOCKER ROOMS - TOPLETS NOT FLUSHING - TAGGED LOCKER R	PERSONN	EL NOTIFI		; Сомуническия постановаченнями польности постановаченнями постановачення				
L LOCKER ROOMS - TOTLETS NOT FLUSHING - TAGGED LOCKER R	veceping.							
	LAMPER	ON OF DE						
		2.2.20						
<sup>2</sup> QC 10. ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Po		2.2.20	5 - 7 <b>6</b> I	LETS NOT FLU	15HING - 7	ALGED LOC.	KER	R\$57
PQC 10. ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Po		2.2.20	5 - Tori	LETS NOT FLU	15HING - 7	ALGED LOC	KER	ROST
PQC 10. ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Po		2.2.20	5 - 78x	LETS NOT FLU	5HING - 9	ALGED LOC	KER	ROST
PQC 10. ISG Task Code 11. DEFICIENCY CLASSIFICATION GUIDE Certain Likely Po		2.2.20	5 - 7 <b>6</b> T	LETS NOT FLU	15HING - 9	ALGED LOC	KER	ROST
10. ISG Task Code 11. DEFICIENCY CLASSIFICATION GOIDE Certain Likely Po		2.2.20	5 - 787	LETS NOT FLU	15HING - 7	AGGED LOC	KER	R157
	L L.	OEKER ROOM	S - 7617					mg/mmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmmm
	11 4	OEKER ROOM		11. DEFICIENCY CLASSIFIC	ATION GUIDE	Certain		Roo.
	Z Z.	OEKER ROOM	A) Will the "	11. DEFICIENCY CLASSIFIC	:ATION GUIDE nisbranded / mislabeled pr	Certain		mpropropropropropropropr

Deficiency classification

12. SIGNATURE OF INSPE

13. PLANT MANAGEMENT OFFICIAL REPLY: (Corrective action)

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE

1.DATE

2. RECORD NO. 3. ESTABLISHMENT NO. 4. TQC

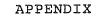
PROCESS DEFICIENCY RECORD

8-21-95

Exhibit 57

I observed the reject be token, he was partially washing the contaminated product that fell on the floor. I did check the product out found the product still contaminate I did pull the salute granam

17. PQC	18. ISG Task Code	19. DEFICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potential
YES		Will the "deficiency" result in adulterated or misbranded / mislabeled product?	<b>~</b>		
△ NO	2000	Will the adulterated or misbranded/mislabeled product reach consumers?		Material Services of the Service of	
	120012	C) Will the product have a detrimental effect upon the consumers?			
			Deficienc	y classific	ation





November 1, 1995

Diane Moore
Docket Clerk
Room 3171, South Building
Food Safety and Inspection Service
U.S. Department of Agriculture
Washington, D.C. 20250

Dear Ms. Moore:

Thank you for this opportunity to comment on the proposed Hazard Analysis Critical Control Point (HACCP) regulation. 60 Fed. Reg. 6774 (Feb. 3, 1995). The Government Accountability Project (GAP) is a non-profit, non-partisan organization whose mission is to protect the public interest and promote governmental and corporate accountability by advancing occupational free speech, defending whistleblowers and empowering citizen activists.

Since 1983 GAP has represented over 150 whistleblowers from the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS), more employees from that agency than from any department in the Executive branch. We also have represented over 75 corporate whistleblowers from the meat, poultry and pork industries.

These comments reflect lessons learned from USDA's inspectors, veterinarians and scientists, as well as from relevant Food and Drug Administration (FDA) scientists and statisticians, and from other employers who volunteered time to assist in analyzing this proposal. Our comments are consistent with and intended to reinforce those provided by the Safe Food Coalition and Safe Tables Our Priorities (S.T.O.P.). This comment offers more detailed analysis where GAP whistleblowers have particular expertise.

The proposed regulation is a long-awaited crossroad for food safety. The jury is out whether it will be -- 1) a food safety breakthrough for consumers; or 2) an industry profitmaking breakthrough camouflaging 1970's deregulation initiatives that would create unprecedented food poisoning threats. Hopefully the final result will not be too innocuous a compromise to reflect more than incremental or public relations significance.

On the positive side, the proposed regulation contains at least symbolic precedents to introduce scientific technology and West Coast Office

810 First Street, NE • Suite 630 Washington, DC 20002 202-408-0034 fax: 202-408-9855

8-14-CETT 40-21

1402 THIRD AVENUE • SUITE 1215 SEATTLE, WA 98101 206-292-2850 FAX: 206-292-0610 microbiological standards for meat and poultry approved by the U.S. Department of Agriculture (USDA). On the negative side, there is little basis for confidence in the enforceability of HACCP commitments. The proposal's scientific Achilles heel is the statistical sampling program for implementing microbiological standards and testing.

On balance, any genuine food safety reform must have both scientific technology <u>and</u> enforcement integrity. HACCP has the beginnings of the former but for all practical purposes skips the latter. As a result, if HACCP is additive to current enforcement efforts from carcass-by-carcass federal inspection, it will be a positive development. At a minimum, it would be welcome reinforcement for federal inspectors conducting sight inspections. That is USDA's announced intention.

But HACCP in its current form is not fit to substitute for federal inspection. Unfortunately, that is industry's objective. For consumer protection, it would be a disastrous lose-lose trade to substitute a token program of industry microscopic testing for carcass-by-carcass federal visual inspections. Both public and industry would lose. While inspectors do not have microscopic eyes, they can see the feces and other contamination that are symptoms for food poisoning germs. They are not compromised by the conflict of interest inherent when companies stand to make money from filth. Most important, they have the job freedom to enforce public health laws. Consumers are not going to believe an advertising campaign that they'd be safer if the fox were appointed to guard the henhouse. Specifics are summarized below.

### STATEMENT OF NEED

Each day in America, some 14,000 people get sick and twenty-five people die from eating contaminated food. According to the Centers for Disease Control and Prevention, the annual toll of over 9,000 deaths and 6.5 to 80 million illnesses from food borne sources ranks among the top three public health problems in the nation. By far, the leading causes of food poisoning are e.coli 0517:H7 and salmonella. Both are bacteria that live primarily in the intestines of beef and poultry that USDA inspects.

<sup>&</sup>lt;sup>1</sup> Currently, the Centers for Disease Control and Prevention rely only on voluntary hospital reports and do not systematically track incidents of death and infections from contaminated meat. Moreover, diagnosis of the foodborne illnesses are often incorrectly identified as influenza viruses. Thus, the true scope of the problem is, in all likelihood, vastly underestimated.

No one is safe, but the very young and others with vulnerable immune systems are in greatest danger of fatality and permanent disability from these bacterial infections. *E.coli* 0157:H7 causes Hemolytic Uremic Syndrome and Thrombotic Thrombocytopenic Purpura in humans. Many of those afflicted experience kidney failure, followed by a rapid succession of complications including multiple heart attacks, strokes, respiratory collapse, kidney failure, blindness, and irreparable brain damage. It is a tortured illness and death.

The crisis is not abating. Cases informally reported to volunteers at S.T.O.P. have risen dramatically -- from approximately 230 in 1993 to almost 400 in 1994. These outbreaks continue to be tragedies, not irritations. The statistics typically represent hospitalization from eating U.S.D.A.-approved fast food such as hamburgers. Examples include a six year old boy in Texas with kidney and brain damage; a two year old girl who died; and a 40 year old woman who endured four months of disability after being discharged from the hospital.

# OVERVIEWS

1. HACCP is neither a panacea nor an acronym for all seasons. A March 1994 article by Dr. Ross Goodrich is an impressively thorough academic analysis confirming the obvious: HACCP has two parts, both contained in the title. First, "hazard analysis" means assessing risk and setting standards. Second, "critical control points" which means strategically focusing resources.

This is a valid strategy to prioritize food safety -- no more, no less. The proposal can help to create effective corporate inspection systems, and it certainly can and should be used to strengthen the existing FSIS inspection systems. But to portray it as anything more simply is not realistic.

2. As emphasized above, HACCP must not be a vehicle to weaken the integrity of USDA's seal of wholesomeness by passing the food safety buck to industry. The philosophy has been expressed regularly that after HACCP, responsibility will shift from the federal government to industry. Consumers' reaction to that would be "bologna." If the federal government views HACCP as a way to shift the buck to industry, USDA's seal of approval won't be worth its rubber. Or the taxpayers' money.

HACCP must institutionalize increased, shared responsibility by industry. It cannot be an acronym to let the federal

government off the hook. Consumers count on USDA's seal of approval as the bottom line for our families' safety.

3. HACCP should not be the pretext to cut back on an inspection force that already is hopelessly understaffed. USDA's current commitment to flat line budgeting, combined with inflation and congressionally mandated cost-of-living adjustments, means there will be personnel cuts. USDA must cut the fat, not the meat, from its agency. The "meat" is the food safety cops on the front lines of production, enforcing food safety laws. Indeed, since inspectors will have increased duties under HACCP, their civil service grades should be reclassified to reflect their increased responsibilities.

There is only one place to find the resources for a strengthened inspection force -- USDA's soft middle management belly. Consumers do not need more government workers in the offices. Food safety requires more government workers checking what we eat. If HACCP is a vehicle to reduce the number of inspectors actually checking USDA-approved food, it will create a public health hazard.

4. Until there is proof that alternative systems are better, USDA also must maintain its current in-plant carcass-by-carcass inspection structure. Even if they keep their jobs and get raises, inspectors must not be kicked upstairs to become auditors limited by record review responsibilities. The central complaint by whistleblowing inspectors about deregulation proposals such as the Streamlined Inspection System and Discretionary Inspection was that their energies would be focused for checking paperwork instead of food. They must be where the action is in meat plants.

Ultimately, that may not mean carcass-by-carcass inspection at every point. After HACCP plans with checks and balances for corporate accountability prove themselves, there may be better priorities for inspectors than continuous visual inspection. Like HACCP, that theory must be subject to proof. Applying normal principles of science, USDA should try a variety of models to more strategically use inspectors, and empirically learn which one produces the best results.

5. HACCP must not be a mask for political science promoting technological or productivity changes that threaten public health. During the last few years industry scientists have asserted numerous theories that simply are amazing. For example, industry has contended that outlawing government-approved fecal contamination is dangerous to public health. Consumers are not

going to take these studies any more seriously than similar tobacco industry conclusions about cigarettes and cancer.

Another example is that a new vacuum and steam carcass washing system at the beginning of the slaughter cycle will solve the problem of workers not washing their hands. If workers at plants are not capable of washing their hands, they should not be operating complex technological fixes with the capacity to increase water weight or spread contamination.

This is the latest edition of a con that political scientists first sold as "washing" fecal contamination from poultry. Poultry is now soaked in fecal soup. And consumers pay for it. By law, 9-12% of poultry can be water weight. USDA's own studies demonstrate that 40 consecutive rinses do not remove the salmonella, and that washing increases the number of contaminated birds. At the sampling conference in Philadelphia, even one of the poultry industry's leading academic experts pointed out there is no question that current rinses are a significant agent of cross-contamination.

Similarly, there is the so-called solution of spraying poultry with trisodium phosphate. At the Chicago FSIS conference on new technologies, the same professor pointed out that claims for trisodium phosphate as a solution to salmonella -- some sort of miracle quick fix that can substitute for sanitation -- have been highly overstated. USDA should make sure we know what we are getting into before institutionalizing any new technologies. Objective application of the scientific method can call the bluffs on "political science" solutions.

Industry scientists also are touting a new system for technology that will permit poultry lines to run at over 100 birds per minute. If that is the case, USDA should first see how it affects contamination rates on lines operating at 70 to 90 birds per minute. How about getting under control with the line speeds that already exist?

In short, there is no substitute for basic sanitation. Technological quick fixes cannot circumvent that fact of life, nor will they create profit-making miracles that are safe for consumers.

6. HACCP should have flexible, realistic standards to hold small businesses accountable. It is not relevant whether our children are hospitalized because poisoned food came from Oscar Mayer, or from a mom and pop business. It will not matter the slightest in the aftermath of a tragedy. Every sector of any

profession is going to have bad apples, no matter how big or small the barrel is. We have to have accountability for small businesses as well.

Often, however, small businesses have been the corporate whistleblowers who worked with GAP. They challenged grossly contaminated products from huge operations with complete record systems in state-of-the-art laboratory and testing facilities, but were still playing games with records or laboratory test results. In short, small food processors have called GAP to protest the garbage they received from large processing plants.

Regardless of bad faith, there is little question that the most severe contamination threats are from plants with the highest volume. Unavoidably, the opportunities for cross contamination increases proportionately.

There also is little question that it is unrealistic to rigidly hold small firms to the same standards as big business. It could drive them out of business.

The solution is not to sacrifice consumers entirely by exempting small business from HACCP. Rather, burdens should be implemented proportionately for items like sampling, training and record maintenance. That approach permits accountability for realistic commitments in a flexible system.

# II. POSITIVES

1. HACCP extends the federal "zero tolerance" prohibition for fecal contamination to poultry, although the language is so indirect that this conclusion must be drawn by inference. For the first time, there will not be any government-approved feces in our food supply. In 1993 USDA instituted zero tolerance for feces in government-approved beef and pork.

Unfortunately, the reform may be cosmetic by failing to eliminate the salmonella living in poultry feces. Enforcement is based on washing away the visible evidence of fecal contamination. USDA's studies demonstrate that washing fails to eliminate salmonella from poultry carcasses.

2. HACCP creates a precedent for public-health based microbiological standards. That is the cornerstone for any public health program. For the first time, at least in principle the basic pass-fail rules for USDA's seal of approval will be based on public health -- whether the food is safe; rather than on

aesthetics -- whether it looks good.

- 3. HACCP requires industry to start microscopic laboratory testing of its meat and poultry. As discussed below, the rate of testing is token. But the proposal begins to implement the National Academy of Sciences' thrice-repeated cornerstone since 1985 for modernizing food safety. After ten years, USDA will be taking a tiny first step to directly protect consumers from the invisible germs that kill.
- 4. The proposal requires each company to make a signed, legally-binding commitment to the specific plan it prepares for its own plant. In this sense each HACCP plan could be a "Contract for America," instead of a contract on America. This requirement makes HACCP plans more credible. It is easier for consumers to trust corporate commitments when the company "puts it in writing," as summarized in AT&T commercials. The commitment has even more credibility if it is signed.

The leadership also must be from the top. To penetrate as an accepted premise of plant operations, the commitment should be issued by the corporation's chief executive officer. The higher up in the chain of command, the more that consumers will take the company's commitment seriously. This approach sends a much stronger message than from a mid-level manager who is responsible for keeping USDA off the firm's back by signing a HACCP plan. To analogize, the next time Frank Perdue boasts in advertisements that his inspection system is superior to the government's, he should have to hold up his HACCP plan and add, "I put it in writing, and I signed it."

Similarly, there must be accountability for false statements that violate those commitments. That means fines or forfeitures. Nor can USDA overlook false statements by omission. There must be a duty to disclose by all plant employees if the institution is not honoring its responsibilities or its commitments. Compliance should not require an employee to take a personal initiative by blowing the whistle. Every plant employee's responsibility as part of the HACCP commitment must be full disclosure of both the programs failures and successes.

# NEGATIVES

1. There are no pilot studies to check whether and how the current HACCP proposal works. Until that occurs, the proposed regulation is nothing more than paper promises. Unless various

versions of HACCP take the reality test through pilot programs, we will not know which, if any, work effectively. Pilot studies on the last draft HACCP proposal exposed roughly a 3% drop in sanitation levels. Pilot testing exposed the empty nature of USDA's promises for Discretionary Inspection and Streamlined Inspection System -- Cattle. At a minimum, it would be indefensible to cut back federal inspection in any manner until HACCP proves itself as an independent structure to enforce food safety laws. "No promises without proof" is a position from which we cannot responsibly retreat. This policy conclusion reflects scientific common sense, rather than mere cynicism.

- 2. Similarly, the proposal does not base subsequent or prior approval of generic or initial plant-by-plant HACCP systems on empirical proof. Paperwork reviews of promises are insufficient. There must be baseline prior approval of a system that proves itself before HACCP is anything more than speculation. Inspector assessments of corporate compliance, combined with credible microbial testing results, could be used to help approve plant-by-plant HACCP plans.
- 3. HACCP's microbiological standards are not science-based. The criteria reflect an industry "good manufacturing practices" approach. They do not even purport to outlaw levels of microbial contamination that would cause food poisoning. The followthrough work must begin immediately with epidemiological and other scientific studies to determine what levels for which food poisoning germs threaten which population subgroups. With or without HACCP, there is no excuse for further delay in beginning to meet this scientific public health challenge.
- 4. The proposed regulation does not have any provision for industry accountability through effective structural checks and balances to see that companies honor their HACCP promises. The two key loopholes are whistleblower protection and professional quality assurance standards. HACCP cannot be taken seriously unless there is both personal and organizational freedom to enforce the law. Until those premises are mandatory, there is no basis for confidence in the enforceability of HACCP commitments. Even if pilot studies demonstrate that HACCP could work when plants are on their best behavior, it would be naive to conclude that HACCP plans will work that way in practice.

Most obvious, it would be foolhardy to reduce carcass-by-carcass federal oversight unless HACCP has whistleblower protection and quality assurance structures with teeth. There is an unavoidable lesson from a decade of repeated food poisoning tragedies and countless national media exposes: Trusting the meat

and poultry industry with an honor system is an invitation to institutionalize Jack in the Box tragedies as a way of death.

If HACCP is to be taken seriously, there is no way around whistleblower protection. Without it HACCP plans will not be worth the paper they're written on, because employees who defend a plan's integrity will proceed at their own risk. Even corporate quality control managers have to practically adopt a deep throat posture in order to communicate with FSIS inspectors about the most obvious violations. Profiles in courage are the exception, not the rule. Without enforceable rights to defend themselves, it is unrealistic to expect plant employees to defend the public, or even cooperate with FSIS personnel in a normal manner. It is essential that FSIS institutionalize a viable partnership between corporate HACCP personnel and the federal inspectors.

Although the industry asserts it cannot survive with whistleblower protection, it already has. Through some 15 environmental laws it already exists at any food industry plant in the food processing plant that pollutes the air or water. Inexplicably, there is a legal loophole when firms threaten consumers who eat contaminated food that was processed at their facilities. There is no excuse to avoid whistleblower protection relevant for the meat of this industry's activities. The industry repeatedly has proven that it can live with freedom of speech on the job in more peripheral contexts.

In case there is any doubt, USDA has the authority to impose conventional whistleblower protection models as part of its regulation without statutory authorization. The Department of Energy has already successfully took that step prior to statutory authority in the nuclear weapons field.

Conventional whistleblower protection models are not the only viable alternative. The Department of Energy also has pioneered a joint labor management council for alternative disputes resolution in whistleblower reprisal cases. The council, which exists at the Hanford nuclear weapons facility, seeks a consensus between representatives of the facility's management, public interest/consumer groups, and the relevant labor union. Together they make binding decisions about allegations of retaliation for disclosures honoring the duty to disclose violations.

5. Hand in glove with whistleblower protection is the necessity for professional quality assurance/quality control (QA/QC) standards. USDA's current QA/QC standards reflect the lowest common denominator in the federal regulatory system. They

must be state-of-the-art before consumers realistically can have confidence that HACCP is more than a paper commitment. The point here is not about quality in the sense of aesthetic, marketing objectives. In the context of HACCP, QA/QC should mean a system of checks and balances for accountability within corporate organizations.

10 CFR Part 50, Appendix B for nuclear power plant safety has an excellent condensed list of principles to reinforce the integrity of an organization's commitments. Those same criteria, by and large, can be applied to any setting. For the most part, they were not developed for the nuclear industry. Rather, they are a cogent synopsis of standards put out by relevant professional societies. The absence of equivalent standards is a primary reason why GAP has opposed proposals such as Discretionary Inspection and the Streamlined Inspection System.

6. Compared to the status quo, the proposal reduces standards for federal oversight of private laboratory tests by industry. Currently USDA tries to keep outside laboratories honest through "split samples," in which the agency randomly chooses blind samples on which to conduct its own tests for comparison with industry results on the same products. For example, this is the system used for residue testing. And it has hardly been foolproof there. But under HACCP the agency proposes a retreat to "check samples," in which industry will pick the control group that USDA tests.

This switch could erase the integrity factor for industry laboratory test results. Integrity of laboratory test data must be a HACCP cornerstone, not a corner that is cut. The key SIS-Cattle pilot plant had state of the art laboratory facilities which consistently reported the company's beef was nearly sterile. National television cameras, however, exposed beef carcasses at the same operation being returned to the line after falling in pools of urine. Similarly, the 1987 60 Minutes poultry program featured a "born again" corporate whistleblower who confessed to wholesale rewriting testing data on chicken. One whistleblower who ran a quality control program at a pork plant described three sets of books on the same products -- one for the public record, one for USDA and one for the company. For years, GAP has been receiving whistleblowing disclosures from laboratories that produced whatever results the customer wanted.

- 7. HACCP's sampling plan for microbiological testing does not pass the laugh test.
  - a. It only covers salmonella. For beef, however, E. coli

01757:H7 is the primary public health threat, not salmonella. If there are only going to be tests for one type of food poisoning germ, it should be the most significant hazard for each species.

- b. There is only one sample per day. Beef plants slaughter up to 400 carcasses per hour, and poultry plants up to 90 plus birds per minute. Under SIS-Poultry, samples are taken eight times per day. Even SIS-Cattle required samples twice per day. As a result, there is no basis for confidence that the samples will be representative. For example, at large plants it is highly unlikely that the HACCP program will include even a single sample from each supplier in any given week.
- c. The plan does not require larger sample sizes for facilities with greater production volume, although both studies and common sense demonstrate that bigger facilities inherently facilitate more cross contamination.
- d. The plan ignores key temporal critical control points time of day and week. Research such as the King County study and numerous whistleblowers have confirmed two obvious conclusions:

  1) The later in the day, the dirtier the meat which is processed under increasingly filthy conditions. 2) The later in the week, the dirtier the plant. Samples taken on Monday morning are much less likely to be positive than those collected on Friday afternoon. HACCP's sampling program fails to control this critical variable.
- e. The sample size is 25 grams, or less than a quarter of a quarter pounder at McDonald's, for beef plants slaughtering thousands of cattle daily or tens of thousands of poultry.
- f. The company gets to pick which portion of which carcass is sent for laboratory testing.
- g. The standards are so rigged that it is almost impossible to rapidly detect or act when sanitation has broken down at a plant. It would take six days in a row of positive samples to conclude that the line is out of control at a poultry plant. If 10% of a plant's beef is contaminated with salmonella (several times worse than what industry asserts are normal levels), there is only a 50% chance that the sampling program would catch the contamination within 17 days.
- h. If the sampling system somehow discovers that operations are out of control, the corrective action is superfluous <u>per se</u>: the sample rate increases from once to twice daily. That is it.

This violates the most elementary rules of statistical sampling.

### CONCLUSION

The bottom line is that with over 70 food poisoning outbreaks since Jack-in-the-Box, we need all the help we can get. Hopefully HACCP will provide it. If it is additive, it can only help. These comments seek to maximize the new program's contribution. An additive HACCP system fills the gaps.

By contrast, if HACCP is a substitute for federal inspection, it will be a disastrous recipe for increased food poisoning outbreaks and reduced consumer confidence that could severely threaten industry markets. HACCP If the American Meat Institute and other industry advocates do not want "layering," the solution is simple: give the microscopes to federal personnel and spare companies the trouble of creating new departments.

Even with science-based public health standards, HACCP will not have credibility or foster public confidence without -- 1) legally binding commitments from corporate leadership, 2) a professionally credible sampling system for microbial testing, 3) state-of-the-art whistleblower protection, and 4) a mature structure of checks and balances for corporate accountability

It is not realistic to sell a corporate honor system is safer than federal law enforcement for public health. The lose-lose trade would sharply drop in demand for meat and poultry. It would reduce meat and poultry industry profits over the long term, and it could lead to sharp increases in food poisoning. No one participating in this process wants any of those results.

Respectfully submitted,

Tom Devine

Legal Director