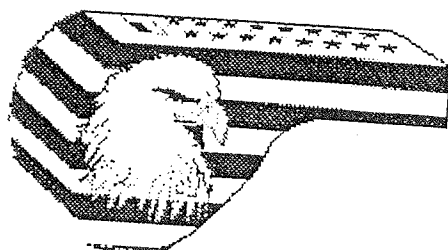


# Fighting Filth on the Kill Floor: *A Matter of Life and Death for American Families*



A Government Accountability Project  
White Paper

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

November 9, 1995

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## **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.<sup>1</sup>

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

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<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>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>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 ante-mortem 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 Deficiency Notice	Review Date: 11/15/94
31. Accelerated Deficiency Notice	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
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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

*D.C.*  
**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

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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

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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.

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- . 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

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5,000 pounds of rancid necks.

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. 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.

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- . 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

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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

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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."

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. 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

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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 <sup>D.C. who D.C.</sup> ~~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  
Date

David Carney  
David Carney

Mary A. Walters 11/8/95  
Notary  
Commission expires 10 31 98

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

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

U S D A

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. (Joe) 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

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

	INSPECTION UNIT (IU) NUMBERS																								
	AREA #					AREA #					AREA #					AREA #					AREA #				
Initial Sample																									
Expanded Sample																									
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) from Reference List on back page.

		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).)
		Kill Floor A Shift	
E		Cooler unit leaking water Informed maintenance Foreman he informed rounds men +	rejected 3 rails
C		Sink by bareless meat inspection table at end of head table had no soap dispenser *	Informed,
C		Brisket saw blades have black marker line on them & knits room put it on there	Informed
C		Sink on openers stand plugged drain	Informed
B		water dripping from overhead by grade chain indexer. Mid shift clean hose sprang leak	+ informed, wiped down
		* Need to know who is in charge of repairing or replacing old soap dispensers?	

PAGE NUMBER

1 OF 1

7-25-95

## INSPECTION UNIT (IU) NUMBERS

[illegible]

PAGE NUMBER

FSIS FORM 11040-1 (12/86)

## SANITATION REPORT

Exhibit 8

7-27-95

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

	INSPECTION UNIT (IU) NUMBERS																								
	AREA #					AREA #					AREA #					AREA #					AREA #				
Initial Sample																									
Expanded Sample																									
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) from Reference List on back page.

[illegible]

INSPECTOR(S) SIGNATURE

PAGE NUMBER

1 OF 1



8-2-95

## SANITATION REPORT

## (A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

	INSPECTION UNIT (IU) NUMBERS																			
	AREA #					AREA #					AREA #					AREA #				
Initial Sample																				
Expanded Sample																				
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) from Reference 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).)
		Kill Floor A Shift	
	E	Cooler 1 two drains on south end were plugged Informed	Tagged off cooler Unplugged & washed down released
L		Handwash sink on headtable by Jaw breaker had no soap	Informed
C		Hand skinner on head inspect had fat and blood in it at start of shift	Rejected Informed cleaned & released
	B	trolley room had used empty combos & pallets stacked on top of bins at trolleys maintenance left nuts & bolt and other part on floor after working on trolley return chain that night	Informed Informed
	C	stomach stickler drain basket had no drain plug Ingesta running onto floor	Informed Plugged hole Hosed down mess
	L	sterilizer for floor hog trolley's not 180°	Inform Rised temp 180°
	L	Sterilizer for head clipper not 180° at start up after dinner	Inform Rised temp 180°
	C	Feedible belt in front of final rail has pieces missing in it	Talk to
	B	Trolley room outside air vent on east end leaking rain water	

PAGE NUMBER

1 OF 1

## SANITATION REPORT

Exhibit 10

8-3-95

(A) SELECT AND RECORD [REDACTED] FOR DESIGNATED AREAS

	INSPECTION UNIT (IU) NUMBERS																								
	AREA #					AREA #					AREA #					AREA #					AREA #				
Initial Sample																									
Expanded Sample																									
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) from Reference List on back page.

[illegible]

RECEIVED BY ESTABLISHMENT OFFICIAL

INSPECTOR(S) SIGNATURE

PAGE NUMBER

1 OF 1

## Exhibit 11

8-11-95

(A) SELECT AND RECORD [REDACTED] FOR DESIGNATED AREAS

INSPECTION UNIT (IU) NUMBERS																								
AREA #					AREA #					AREA #					AREA #					AREA #				

(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.

[illegible]

RECEIVED BY GOVERNMENT OFFICIAL

INVESTIGATOR'S SIGNATURE \_\_\_\_\_

PAGE NUMBER

1 OF 1

8-14-95

Exhibit 12

(A) SELECT AND RECC [REDACTED] FOR DESIGNATED AREAS

	INSPECTION UNIT (IU) NUMBERS																								
	AREA #					AREA #					AREA #					AREA #					AREA #				
Initial Sample																									
Expanded Sample																									
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) from Reference List on back page.

[illegible]

PAGE NUMBER

98

13-17-95

## INSPECTION UNIT (IU) NUMBERS

[illegible]

PAGE NUMBER

1 OF 1

## SANITATION REPORT

Exhibit 14

8-18-95

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

	INSPECTION UNIT (IU) NUMBERS																								
	AREA #					AREA #					AREA #					AREA #					AREA #				
Initial Sample																									
Expanded Sample																									
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) from Reference List on back page.

[illegible]

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INSPECTOR(S) SIGNATURE

PAGE NUMBER

1 OF 1

8-21-95

## SANITATION REPORT

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

		INSPECTION UNIT (IU) NUMBERS																			
		AREA #					AREA #					AREA #					AREA #				
Initial Sample																					
Expanded Sample																					
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) from Reference List on back page.

[illegible]

RECEIVED BY DEPT. OF DEFENSE

PAGE NUMBER

OF

SANITATION REPORT

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

	INSPECTION UNIT (IU) NUMBERS																			
	AREA #					AREA #					AREA #					AREA #				
Initial Sample																				
Expanded Sample																				
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) from Reference 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).)
L		29 Compas in inedible needs to be ran - Penning said - maint took fork truck lift	Informed Dr. Hult who contacted John A - rendering got fork lift back
C		Box carts needed scrubbed - blood & charcoal	Rejected carts released when cleaned
C		Meat rack in palletizing needed a good scrubbing	Rejected meat rack
	C	Hose drop behind the final rail bays won't shut off	informed
	E	Cooler #1 spray kill nozzle broken - water (ice) on 4 rails	Rejected 4 rails until wiped down & dried
	L	Sink on the hold stand doesn't have hot running water	Rejected sink - release
L		Sterilizer - split saw - side hook wasn't 180° at start up	Brought up to 180° Hooks were taken to other sterilizer until 180°
	O	Some employees had dirty clothing & helmets - some needs new apron	Sent to wash
	M	Plastic wasn't pulled upon 2 times	New equipment check Plastic was changed
	C	Hose drop for rinsing out mouths was on the floor platform	Rejected hose

RECEIVED BY ESTABLISHMENT OFFICIAL

INSPECTOR(S) SIGNATURE

PAGE NUMBER

OF



## SANITATION REPORT

8-25-95

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

		(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS																								
		INSPECTION UNIT (IU) NUMBERS																								
		AREA #					AREA #					AREA #					AREA #									
Initial Sample																										
Expanded Sample																										
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) from Reference List on back page.

[illegible]

8-29-95

## SANITATION REPORT

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

	INSPECTION UNIT (IU) NUMBERS																								
	AREA #					AREA #					AREA #					AREA #					AREA #				
Initial Sample																									
Expanded Sample																									
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) from Reference List on back page.

[illegible]

S-30-45

(A) SELECT AND RECORD PREOPERATIVE SAMPLES FOR DESIGNATED AREAS

(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.

INSTRUCTORS SIGNATURE

PAGE NUMBER

Q8

Exhibit 20

AS

NSIS FORM 11040-1 (12/86)

①

ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 512  
REVIEW DATE: 4/15/94  
REGION/AREA/CIRCUIT CODE:  
03-04-22 (Omaha #1)  
COVERAGE: Full-time  
REVIEW OFFICER:  
Ms. Wilma J. Alley  
PLANT MANAGEMENT REPRESENTATIVE:  
Mr. Bill Wallace, Operations Manager  
AREA PERSONNEL CONTACTED:  
Dr. Ronald Kelly,  
Area Supervisor  
\*\*\*\*\*  
PLANT PROFILE: This is a medium-sized beef slaughter/processing plant that conducts breaking, boning, cutting, and grinding operations.

At the conclusion of the review, an exit conference was held with Mr. Lowell Huggerson, Plant Representative, Mr. Bill Wallace, Operations Manager, Ms. Janice Schamp, Quality Control Technician, Dr. L. W. Seidara, Inspector-in-Charge (IIC), and Dr. Stanley Johnson, Circuit Supervisor, who were notified of the issuance of this report. Ms. Pam Ogden, Program Review Officer, was also present.

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

PROCESS 3. SLAUGHTER

Poor dressing procedures observed in the slaughter department resulted in fecal/ingesta contamination on bung, tail, rump, midline, shank, brisket, and neck areas of the cattle carcasses. Subsequent trimming was inadequate, allowing contaminated carcasses to enter the final wash. Similar defects, tail dust, and grease were observed on the majority of the approximately 600 carcasses in the holding cooler (approximately 10 percent examined). Although minor trimming was being performed on carcasses entering the processing room, contamination was also observed on carcasses ready for boning. See Process 6.  
Corrective Action: The IIC retained all carcasses in the cooler and 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 trimming of contaminated carcasses. The plant employees in the slaughter department, at the direction of the Operations Manager, washed their hands, washed and sanitized their equipment, and trimmed the affected areas of carcasses. When slaughter

ACCELERATED DEFICIENCY NOTICE (Esc. 512)

PROCESS 3. (Continued)

operations resumed, the line speed was slowed because of the previously observed poor dressing procedures and also because of the lack of available storage space in the carcass cooler. Once again contaminated carcasses were observed entering the final wash. These contaminated carcasses were retained by the IIC at the direction of the Circuit Supervisor. Slaughter operations continued until 1430 hours until cooler space was filled.

PROCESS 6. PRODUCT HANDLING AND PREPARATION

Fecal/ingesta contamination, tail dust, grease, and unidentified material were observed on the midline, shank, and neck areas of approximately 10 percent of the 120 carcasses, ready for boning in the boning room.  
Corrective Action: The Circuit Supervisor directed the IIC to retain all the carcasses in the boning area pending a 100 percent reinspection.

PROCESS 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

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

Director, Program Review Division/Date  
*Robert E. Bartlett* 4/22/94  
Robert E. Bartlett, DVM

## Exhibit 22

## ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 9318

REVIEW DATE: 4/18/94

PLANT NAME AND ADDRESS:  
 Vern's Moses Lake Meats  
 2721 W. Peninsula Drive  
 Moses Lake, Washington 98837

REGION/AREA/CIRCUIT CODE:  
 02-10-25 (Spokane)

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 small slaughter* \*\*\*\*\*  
 PLANT PROFILE: ~~XXXXXXXXXXXXXXXXXXXX~~ processing plant slaughters cattle and produces Hotel/Restaurant/Institutional (HRI) cuts and fresh sausage.

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.

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

PROCESS 4. RODENT AND PEST CONTROL PROGRAM

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. Bartlett* 4/20/94  
Robert E. Bartlett, DVM

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

Page 2 of 3.

## ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO 4C/P-5

REVIEW DATE: 4/19/94

## PLANT NAME AND ADDRESS:

Cambell Soup Company  
2200 Franklin Boulevard  
Sacramento, CA 95824

REGION/AREA/CIRCUIT CODE:  
02-04-17 (Sacramento)

COVERAGE: Full-time

## PLANT MANAGEMENT REPRESENTATIVE:

Mr. John Staszewski, Plant Manager

## REVIEW OFFICER:

Dr. Beverly Landa

## AREA PERSONNEL CONTACTED:

Mr. Jose Garcia,  
Acting Area Supervisor

## TO REPRESENTATIVE:

Mr. Wayne Batson,  
Circuit Supervisor

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

This plant was placed on Stage I, Step 1 of the Progressive Enforcement Action (PEA) program on August 23, 1993, and removed from PEA on October 10, 1993. The plant was again placed on Stage I, Step 1 of PEA on February 25, 1994.

At the conclusion of the review, an exit conference was held with Mr. John Staszewski, Plant Manager, Mr. Bob Becker, Plant Sanitarian, Ms. Sandy Sineoff, Quality Control Technician, Mr. Greg Parks, Inspector-in-Charge (IIC), and Mr. Wayne Batson, Circuit Supervisor, who were notified of the issuance of this report.

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Page 1 of 3

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

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

An employee sprayed water onto overhead structures directly above exposed product. The resulting overspray dripped from a dirty pipe directly into a cooking kettle of whey powder slurry used in amenable product. Also, splash water was observed in two gondolas of dry ingredients in this area.

Corrective Action: The IIC, at the direction of the Circuit Supervisor, suspended operations and directed plant management officials to condemn the affected products.

Rust and flaking rust and paint were present on overhead structures above exposed products and exposed-product walkways in production areas throughout the plant.

## PROCESS 2. (Continued)

Corrective Action: The IIC, at the direction of the Circuit Supervisor, rejected the affected areas, suspended operations, and retained products pending further disposition. The first affected area was rejected at approximately 1000 hours, with other areas rejected as the review progressed. All affected areas remained rejected at the conclusion of the review at 1230 hours.

Black particles were observed on a piece of masking tape loosely attached to the wall adjacent to exposed dry ingredients. The Plant Sanitarian stated that these particles were pieces of the floor covering that had splashed onto the tape during cleanup operations.

Corrective Action: The Circuit Supervisor directed the IIC to remove the tape and retain the ingredients in the area pending further disposition.

Product residues from previous days' operations were observed on a metal rack directly above exposed cooked chicken meat stored in plastic totes, on plastic lids of containers of dry ingredients, and on kettle vent hoods, 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 affected products pending further disposition.

Black grease 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 material.

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.

A stainless steel shovel, ready for use with exposed sirloin burgers, was stored directly on the floor.

Corrective Action: The IIC rejected the shovel and directed plant management officials to provide an appropriate storage place.

## PROCESS 3. RECEIVING AND CONTROL OF INCOMING PRODUCTS/MATERIALS

In the third-floor freezer, exposed boneless hams in a box were contaminated with unidentified black particles. Also, boxes of beef ravioli were stored directly on the floor. In the second-floor freezer, exposed cooked chicken meat was stored in a dirty shipping container. Both freezers contained heavy accumulations of ice and frost on the ceilings and walls. Boxes were stored in disarray, and debris and dirt were present throughout the freezer.

Corrective Action: The Circuit Supervisor rejected the freezers and retained the affected product pending further disposition.



## ACCELERATED DEFICIENCY NOTICE (Est. 4G/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.

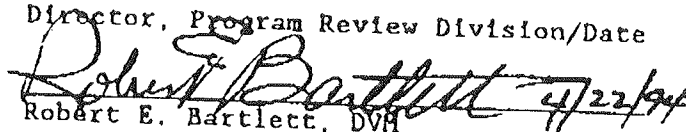
## PROCESS 1. FACILITIES, EQUIPMENT, WATER SUPPLY, AND SEWAGE DISPOSAL

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, DVH

4/22/94

## ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 6961

REVIEW DATE: 5/17/94

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REGION/AREA/CIRCUIT CODE:  
04-0A-31 (Washington, IN)PLANT NAME AND ADDRESS:  
Pohlman's Meat Processing Plant  
6150 W. Evans Drive  
Tipton, Indiana 47022

COVERAGE: Facult

PLANT MANAGEMENT REPRESENTATIVES:

Mr. Theodore Pohlman, Owner

REVIEW OFFICER:

Mr. Steven D. Lallicker

IO REPRESENTATIVE:

Dr. Muhammad Chuman, Circuit Supervisor

AREA PERSONNEL CONTACTED:

Dr. Ted D. Bek, Area Supervisor

PLANT PROFILE: This small, multi-species slaughter/processing plant slaughters cattle, swine, goats, and sheep. Further processing activities includes b: aging, boning, grinding, curing, smoking, and cooking.

At the conclusion of this review, an exit conference was held with Mr. Theodore Pohlman, plant representative, Dr. Muhammad Chuman, Circuit Supervisor, and Mr. Leslie Demmy, Relief Inspector-in-Charge (IIC), 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 2. SANITIZATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

Dried fecal material and/or residues from previous days' operations were observed on the hand-contact areas of several boost controls, ready for use, and on the hand-contact areas of water hoses, ready for use to wash carcasses and parts in the slaughter department.

Corrective Action: The Relief IIC rejected all affected hand-held equipment pending cleaning and sanitizing.

Residues from previous days' operations were observed on the product-contact surfaces of a cutting table and trays, ready for use with exposed product in the processing room.

Corrective Action: The Relief IIC rejected the table and trays pending cleaning and sanitizing.

A heavy accumulation of loose and flaking rust was observed on portable storage carts used to store cooked vacuum-packaged products in the freezer.

Corrective Action: The Relief IIC rejected the carts pending cleaning and sanitizing, and retained all affected product pending further disposition.

## PROCESS 2. (Continued)

Unidentified black particles and/or residues from previous days' operations were observed on a staging table, ready for use to package exposed product, and on an electrical drop-cord in direct contact with product-contact packaging material, ready for use.

Corrective Action: The Relief 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 stored in the holding cooler.

Corrective Action: The Relief IIC rejected the shelves and retained the affected product pending further disposition.

## PROCESS 4. RODENT AND PEST CONTROL PROGRAM

Rodent droppings were observed on a shelf where an open box of cornmeal 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 sealed properly to exclude vermin entry.

Corrective Action: The Relief IIC rejected the areas and retained all affected ingredients and packaging material pending further disposition.

NOTE: Due to the aforementioned serious deficiencies, 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, Program Review Division/Date

Steven D. Lallicker

Director, Program Review Division/Date

Robert M. Bartlett, DVM

ACCELERATED DEFICIENCY NOTICE  
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. Colner, Area Supervisor

IO REPRESENTATIVE:

Dr. Staven Stephansen

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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. Staven Stephansen, Circuit Supervisor, and Dr. Donna Pottsgill, Inspector-In-Charge (IIC), who were notified of the issuance of this report.

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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 sheat was installed. The affected forequarters were immediately trimmed of contamination.

## ACCELERATED DEFICIENCY NOTICE (Est. 3D)

Page 2 of 3

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

Meat 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.

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.

PROCESS 6. PRODUCT HANDLING AND PREPARATION

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.

Munsif Khan, DVM

Director, Program Review Division/Date

Robert E. Bartlett 6/6/94

Robert E. Bartlett, DVM

ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 6444/P-6444 REVIEW DATE: 6/15/94  
PLANT NAME AND ADDRESS: REGION/AREA/CIRCUIT CODE:  
Angus Meats, Inc. 02-10-25 (Spokane)  
N. 2810 Hogan COVERAGE: Patrol  
Spokane, Washington 99207  
PLANT MANAGEMENT REPRESENTATIVE: REVIEW OFFICER:  
Mr. Thomas Scachecki, Vice President Mr. Steven D. Lalicker  
AREA PERSONNEL CONTACTED: IO REPRESENTATIVE:  
Dr. Allen Knox, Dr. Dwight Olson, Circuit Supervisor  
Assistant Area Supervisor

PLANT PROFILE: This small red meat/poultry Total Quality Control (TQC) processing plant manufactures products for Hotel/Restaurant/Institutional (HRI) distribution.

At the conclusion of the review, an exit conference was held with Mr. Thomas Scachecki, plant representative, Dr. Dwight Olson, Circuit Supervisor, and Mr. Dennis Hovka, Inspector-in-Charge (IIC), 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 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

Residues from previous days' operations were observed on product-contact surfaces of several plastic containers with cracked and/or broken corners, in use or ready for use with exposed products in the processing room. Also, a black, foreign residue was observed on the hand-contact surface of another cracked and broken plastic container in use with exposed product at the flaker machines. A blood-soaked cotton apron was used to deflect product into a plastic container at the exposed-product exit of the flaker machine.  
Corrective Action: The IIC rejected the equipment and containers for removal or repair, and the affected product was placed in an inedible product container at the instruction of the plant representative.

PROCESS 2. (Continued)

Residues from previous days' operations were observed on the hand-contact areas of a knife sharpening steel, ready for use, on a production table in the processing room.  
Corrective Action: The IIC rejected the steel pending cleaning and sanitizing.

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

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

PROCESS 3. RECEIVING AND CONTROL OF INCOMING PRODUCTS/MATERIALS

Residues from previous days' operations and/or unidentified foreign material were observed on product-contact packaging materials in use or ready for use with exposed product in several areas of the processing room and in the dry storage area.

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

NOTE: Due to the aforementioned serious deficiencies, the Circuit Supervisor and IIC temporarily suspended operations (1040 hours), which remained suspended at the conclusion of the review (1230 hours) pending appropriate corrective action.

Review Officer, Program Review Division/Date

Steven D. Lalicker 6/17/94

Director, Program Review Division/Date

Robert E. Bartlett, DVM 6/17/94

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# CANADIAN ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 1265/P-1265

Page 3 of 3

PLANT NAME AND ADDRESS

Valley Fresh, Inc.  
680 D Street  
The Dalles, California 97058

REVIEW DATE: 9/16/94

REGION/AREA/CIRCUIT CODE:  
02-04-09 (Modesto)

COVERAGE: Full-time

PLANT MANAGEMENT REPRESENTATIVE:

Mr. Gerald Parker, Plant Manager

REVIEW OFFICER:

Dr. N. Douglas Parks

AREA PERSONNEL CONTACTED:

Dr. Alfred Aquino,  
Assistant Area Supervisor

IO REPRESENTATIVE:

Dr. Amir Khamsi,  
Circuit Supervisor

PLANT PROFILE: This large, two-shift poultry slaughter and processing operation slaughters light fowl, and produces fully cooked and canned product.

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

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

Page 1 of 1

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

## PROCESS 4. ROBERT AND PEST CONTROL PROGRAM

Large accumulations of cat manure were observed in the dry storage area where packaging materials were stored. This area had no direct access to production or production-related areas.  
Corrective Action: The Circuit Supervisor rejected the entire area pending cleaning and reinspection.

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

Massive amounts of dirt and cobwebs were observed on packaging materials in the dry storage area.

Exhibit 27

## PROCESS 2. (Continued)

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

Review Officer, Program Review Division/Date

*M. Douglas Parks*  
N. Douglas Parks, DVM 9/16/94

Acting Director, Program Review Division/Date

*Karen V. Morris*  
Karen V. Morris, DVM 9/24/94

Representatives of the establishment who have concerns concerning the findings of this report may contact the Program Review Division, 4710 West 138 Street, Lethbridge, Alberta, T1K 4G4, or call (403) 441-5600. Review and Assessment reports are available for public inspection under the Freedom of Information Act. If plant representatives wish to file written comments concerning this report, the Food Safety and Inspection Service will facilitate the comments in (also please in display for public viewing or release) is response to public request for documents.

ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 13348/P-13348

REVIEW DATE: 10/18/94

PLANT NAME AND ADDRESS:  
Judsonia Packing Company  
Highway 167 N  
Judsonia, Arkansas 72081

REGION/AREA/CIRCUIT CODE:  
03-02-02 (Batesville)  
COVERAGE: Full-time

PLANT MANAGEMENT REPRESENTATIVE:  
Mr. Rick Harris

REVIEW OFFICER:  
Mrs. Wilma J. Alley

AREA PERSONNEL CONTACTED:  
Dr. Joe Zurborg, Area Supervisor  
(through Dr. Perry Page,  
Assistant Area Supervisor)

10 REPRESENTATIVE:  
Dr. K. A. Khan,  
Acting Circuit Supervisor

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PLANT PROFILE: This small slaughter/processing plant has halted slaughter operations at this time. The plant is now starting a poultry deboning operation. Boneless hams will also be manufactured on a limited basis.

At the conclusion of this review, an exit conference was held with Mr. Rick Harris and Mr. James Gude, plant representatives, Mr. Donald Finch, Inspector-in-Charge (IIC), and Dr. K. A. Khan, Acting Circuit Supervisor, who were notified of the findings of this report.

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Page 1 of 2

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

PROCESS 4. ROENTGEN AND PEST CONTROL PROGRAM

Recent droppings were observed on shelves containing work gloves, ham netting, and packaging materials, and were in close proximity to clean work racks. More droppings were observed on other shelves in this dry storage room and on the floor along the walls. Also, droppings were observed on the floor in the boiler room.  
Corrective Action: The IIC rejected this area and retained all affected packaging materials and supplies pending corrective action as outlined in the Manual of Procedures for cleanup and inspection requirements. This area remained rejected at the conclusion of the review.

PROCESS 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

Condensate was blowing out of an overhead refrigeration unit into a partially covered cargo bin of raw product in the cooler. Pooled water was also observed on the single layer plastic cover.

Exhibit 28

PROCESS 2. (Continued)

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

Heavily beaded condensate was observed on the bottom of an overhead refrigeration unit above an open tank of poultry being defrosted in the cooler.

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

Review Officer/Program Review Division/Date

Wilma J. Alley

Acting Director, Program Review Division/Date

Karen V. Morris, DVM  
10/24/94

Representatives of the establishment who have completed the findings in this report must contact the Program Division, 4920 West 15th Street, Lawrence, KS 66044, or call 913-841-5600. Service and Amendment requests are available for public distribution under the Freedom of Information Act. If plant representatives wish to file written comments regarding this report, the Food Safety and Inspection Service will attempt to make the comments available to the public in a timely manner or respond to public request for documents.



ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 8063

REVIEW DATE: 11/9/94

PLANT NAME AND ADDRESS:

Laird Sheep Co.  
301 E. 4th Street  
Benton, Kentucky 42025

PLANT MANAGEMENT REPRESENTATIVE:

Mr. Grant Laird, Owner  
Dr. William Williams,  
Acting Area Supervisor

AREA PERSONNEL CONTACTED:

Dr. William Williams,  
Acting Area Supervisor  
Circuit Supervisor

\*\*\*\*\*  
PLANT PROFILE: This small red meat slaughter/processing plant slaughters cattle, sheep, and swine. Processing activities include cutting, boxing, grinding, and production of sausage. Also, this establishment slaughters and processes under the custom-exempt provisions of the Federal Meat Inspection Act and Regulations.  
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At the conclusion of this review, an exit conference was held with Mr. Grant Laird, plant owner, Mr. Floyd Statton, Relief Inspector-in-Charge (IIC), Dr. Harley Blane, Supervisory Veterinary Medical Officer (SVMO), and Dr. Ellwood Brown, Circuit Supervisor, who were notified of the issuance of this report. Dr. Paul Kerveber, Program Review Officer, was also present during this review.  
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Page 1 of 2

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

PROCESS 1. SLAUGHTER

Fecal material and unidentified foreign contaminants were washed from partially opened sheep carcasses prior to evisceration, allowing contaminated water to run into body cavities. In addition, wash water from contaminated carcasses was splashed onto other previously washed carcasses.  
Corrective Action: The IIC retained the contaminated carcasses pending further disposition, and the plant management official agreed to discontinue washing carcasses prior to final inspection.

In one cooler, ingesta, 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 carcasses. Also, in another cooler, ingesta, black particles, and large seams of unidentified foreign material were observed on 20 out of 20 sheep carcasses.  
Corrective Action: The IIC retained all contaminated carcasses pending further disposition.

ACCELERATED DEFICIENCY NOTICE (Est. 8083)

PROCESS 1. (Continued)

The brisket saw was not sanitized between uses in the slaughter area as required.

Corrective Action: The Circuit Supervisor instructed the plant management official to sanitize the brisket saw.

Ingesta and fecal material were observed on sheep carcasses after the final inspection station and prior to washing. Light intensity measured 26 fc's at the final inspection station where 50 fc's are required.

Corrective Action: The Circuit Supervisor suspended operations at 1015 hours pending the increase of light intensity to 50 fc's, and retained affected carcasses pending trimming and reinspection. Operations remained suspended at the completion of the review at 1130 hours.

PROCESS 6. PRODUCT HANDLING AND PREPARATION

Black particles, unidentified foreign material, and hids were observed on both of the beef hindquarters that were cut and boxed in the processing area.

Corrective Action: The IIC retained the affected product pending trimming and reinspection.

Reviewer Officer, Program Review Division /Date

Munir Khan, DVM 11-14-94  
Munir Khan, DVM

Acting Director, Program Review Division/Date

Karen V. Morris, DVM 11/14/94  
Karen V. Morris, DVM

Representatives of the establishment who have questions concerning the findings in this report may contact the Program Review Division, 9720 West 14th Street, Centerville, MO 64504, or call 817-841-5600. Review and Assessment reports are available for public disclosure under the Freedom of Information Act. If public representatives wish to file written comments concerning this report, the Food Safety and Inspection Service will include the comments in files placed on display for public viewing or release in response to public request for documents.

Exhibit 29

ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO 18899 REVIEW DATE: 11/15/94  
REGION/AREA/CIRCUIT CODE:  
05-02-33 (Tampa)  
COVERED: Full-time  
REVIEW OFFICER:  
Mr. Steven D. Lalicker  
PLANT MANAGEMENT REPRESENTATIVE:  
Mr. William Orduela, Plant Manager  
AREA PERSONNEL CONTACTED:  
Dr. Thomas Barlow,  
Area Supervisor  
At the conclusion of this review, an exit conference was held with  
Mr. William Orduela, Plant Manager, Dr. Pedro Almanan, Supervisory  
Veterinary Medical Officer (SVMO), and Dr. Pedro Ramos, Reling Supervisory  
Veterinary Medical Officer, who were notified of the issuance of this  
report. Mr. John Carlson, Branch Chief, Program Review Division, was also  
present.

Page 1 of 2

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

PROCESS 4. RODENT AND PEST CONTROL PROGRAM

Numerous flies were observed on exposed carcasses, on exposed product,  
contact equipment, and on employees handling exposed product in the  
slaughter department. Numerous live and/or dead flies were observed in the  
employee welfare room, on boxes containing exposed product-contact  
packaging materials, and on the floor in the box storage area. Swarming  
flies were observed around the outside doors of the plant and around  
several uncovered barrels containing inedible material from the previous  
week's production in an outside storage area. Also, doors leading from the  
outside premises into production and production-related areas were not  
sealed properly to preclude entry of insects.  
Corrective Action: The SVMO suspended operations at 1015 hours pending  
removal of the flies, cleaning and sanitizing of equipment, and retention  
of the affected product and materials pending further disposition and  
reinspection. The operations remained suspended at the conclusion of the  
review at 1200 hours.

ACCELERATED DEFICIENCY NOTICE (Cat. 18899)

PROCESS 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE  
Heavily breaded condensate was observed on a dirty refrigeration unit drip  
pan above exposed product, and on a dirty rail above an exposed-product  
trafficway in the carcass holding cooler.  
Corrective Action: The SVMO rejected the cooler pending removal of the  
condensate, and plant representatives moved the exposed product from the  
affected areas.

Residues from previous days' operations were observed on hand-contact zones  
of water hoses and spray nozzles in use by employees handling exposed  
product, and on scabbards containing knives, ready for use with exposed  
product in the slaughter department.  
Corrective Action: The SVMO suspended operations (at 1015 hours), which  
included the rejection of equipment pending cleaning and sanitizing, and  
retention of affected product pending further disposition. Operations  
remained suspended at the conclusion of the review at 1200 hours.

Residues from previous days' operations and rust were observed on a table  
where product-contact string (cotton type) and numbered identification tags  
were stored, ready for use in the slaughter department.  
Corrective Action: A plant representative discarded the affected string  
and tags, and the SVMO rejected the table pending cleaning and sanitizing.

Review Officer, Program Review Division/Data

*Munsey Khan, DVM 11/17/94*  
FOR Steven D. Lalicker

Acting Director, Program Review Division/Data

*Karen V. Morris, DVM*  
Karen V. Morris, DVM

Representatives of the establishment who have questions concerning the findings in this report may contact the Program Review  
Division, 970 West 15th Street, Leesville, MS 39043, or call 913-441-5000. Review and Assessment reports are available  
for public disclosure under the Freedom of Information Act. If plant representatives wish to file written comments concerning this  
report, the Food Safety and Inspection Service will include the comments in the plant-on display for public viewing or release  
in response to public request for documents.

ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 627

REVIEW DATE: 12/08/94

PLANT NAME AND ADDRESS:

Vienna Beef Ltd  
11511 Route 14 North  
Harvard, Illinois 60033

REGION/AREA/CIRCUIT CODE:

04-04-05 ((DeKalb))

COVERAGE: Full-time

PLANT MANAGEMENT REPRESENTATIVE:

Mr. My Rasmis, President

REVIEW OFFICER:

Mr. Valmar D. Chipps

AREA PERSONNEL CONTACTED:

Dr. John Overstreet,  
Acting Area Supervisor

IO REPRESENTATIVE:

Dr. Alan Matheson,  
Maltt-1775 Supervisor

PLANT PROFILE: This small red meat establishment slaughters and bones carcasses into primal cuts and trimmings, and occasionally chops meat for further processing.

This follow-up review was conducted due to the serious nature of the deficiencies identified during the previous review on September 28, 1994, and the subsequent issuance of an Accelerated Deficiency Notice. During this review, Process 1, Sanitation of Facilities and Equipment/Personal Hygiene, and Process 3, Slaughter, were again found to have serious deficiencies.

At the conclusion of this review, an exit conference was held with Mr. My Rasmis, President, Dr. Alan Matheson, Maltt-1775 Supervisor, and Mr. Robert Penman, Inspector-in-Charge, 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 3. SLAUGHTER

Beef heads removed from carcasses contacted each other, a guard rail, end/or the cement floor curbing. In addition, the hooks used to hang beef heads were not sanitized between uses as required.

Corrective Action: The IIC suspended slaughter operations and retained affected product pending further disposition.

Beef heads contacted each other on the boning table and were being boned prior to the viscera and tail inspection. A carcass was retained for further disposition and subsequently condemned for pathology; however, the head-boning table was not sanitized with 180° F. water as required.

Corrective Action: The IIC suspended slaughter operations and retained affected product pending further disposition.

ACCELERATED DEFICIENCY NOTICE (Est. 627)

Page 2 of 2

PROCESS 3. (Continued)

The deboning equipment was not sanitized with 180° F. water between each use as required. Also, 180° F. water was not available in this area, and the plant president stated that the deboning machines were never sanitized.

Corrective Action: The IIC suspended slaughter operations pending availability of 180° F. water.

Black grease smeared, up to 12 inches in length, from the hide-puller chain were observed on the necks of several large, skinned carcasses. An employee was cutting through the black grease during the carcass splitting operation. Also, exposed carcasses contacted a dirty inedible product vat at the carcass trimming station, and exposed tails and necks on carcasses contacted the contaminated surface of the hide-puller.

Corrective Action: A plant employee trimmed the affected carcasses and parts, and the IIC instructed a plant official to trim contamination prior to cutting into the neck areas.

PROCESS 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

Condensate from dirty overhead structures was dripping onto approximately 10 carcasses in the cooler. Also, heavily beaded condensate was observed above the majority of carcasses in this same cooler.

Corrective Action: The IIC retained the affected product pending further disposition, and rejected the affected areas pending removal of the condensate.

Residues from previous days' operations were observed on several refrigeration unit drain hoses that contacted exposed carcasses in the cooler.

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

Review Officer, Program Review Division/Data

*[Signature]*  
Valmar D. Chipps

Acting Director, Program Review Division/Data

*[Signature]*  
Karen V. Morris  
Karen V. Morris, DVM

Exhibit 31

Representatives of the establishment who have questions concerning the findings in this report may contact the Program Review Division, 4970 West 17th Street, Loveland, CO 80540, or call 913-441-5400. Review and Assessment reports are available for public disclosure under the President of the Kansas Act. If plant representatives wish to the original documents concerning this report, the Food Safety and Inspection Service will provide the documents in full (based on display for public viewing or release) in response to public request for documents.

4

ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. 10629/P-10629  
REVIEW DATE: 2/28/95  
REGION/AREA/CIRCUIT CODE: 03-02-08 (Little Rock)  
COVERAGE: Full-time  
REVIEW OFFICER: Mr. Steven D. Lalicker  
TO REPRESENTATIVE: Dr. Wahibah Sharaf, Circuit Supervisor  
AREA PERSONNEL CONTACTED: Dr. Perry Page, Supervisor, Assistant Area Supervisor  
PLANT MANAGER/REPRESENTATIVE: Mr. Arthur Green, Owner  
\*\*\*\*\*  
PLANT PROFILE: This small red meat slaughter/processing plant slaughters cattle, with further processing activities that include breaking, cutting, boning, and grinding.  
At the conclusion of this review, an exit conference was held with Mr. Arthur Green, owner, Dr. Wahibah Sharaf, Circuit Supervisor, Dr. John Hill, Multi-IPPS Supervisor, and Mr. Duane Anderson, Inspector-in-Charge (IIC), who were notified of the findings of this report.  
\*\*\*\*\*

Page 1 of 2

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

PROCESS 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE  
Heavy accumulations of product residues from previous days' operations were observed in scabbers contacting knives in use by three out of four employees who handled exposed carcasses in the slaughter department.  
Corrective Action: The IIC suspended slaughter activities (at 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 remained suspended at the conclusion of the review at 1100 hours.  
An employee used a hand-held hose during cleanup operations and splashed waste water from the dirty floor onto an exposed carcass in the slaughter department. Also, another employee used a hand-held hose at the carcass wash station, and overspray from the washing operation splashed onto the rusty, dirty ceiling, then dripped into a trafficway in use with exposed carcasses in the slaughter department.  
Corrective Action: The IIC retained the affected carcasses pending trimming and reinspection. Rejected the area pending cleaning, and the plant official instructed the employee on proper procedures when using a cleanup hose.

PROCESS 2. (Continued)

Heavy accumulations of product residues from previous days' operations were observed on the hand-contact surfaces of a clipboard and pencil used by an employee who handled exposed carcasses at the carcass wash and inspection area. The employee also used the "inspected and passed" brand with rough, frayed tape on the handle.  
Corrective Action: The IIC rejected the equipment, and the plant owner instructed an employee to dispose of all affected equipment. Also, the IIC retained all affected carcasses pending trimming and reinspection.  
An accumulation of residues from previous days' operations and unidentified foreign particles were observed on a portable cart located directly above containers of exposed product, ready for packaging in the grinding room.  
Corrective Action: The IIC rejected the cart pending cleaning and sanitizing, and retained the affected product pending reinspection.

NOTE: The IIC had documented several repetitive sanitation deficiencies as evidenced by pre-operational and operational sanitation reports on file.

Review Officer, Program Review Division /Date

*John P. Lalicker* 3/2/95  
STEVEN D. LALICKER

Acting Director, Program Review Division/Date

*Karen V. Morris* 3/2/95  
KAREN V. MORRIS, DVM

Representatives of the establishment who have questions concerning the findings in this report may contact the Program Review Division, 4920 West 14th Street, Lawrence, KS 66049, or call 913-841-0500. Review and Assessment reports are available for public examination under the Freedom of Information Act. If plant representatives wish to file written comments concerning this report, the Food Safety and Inspection Service will include the comments in this plant's on display for public viewing or released in response to public request for documents.

Revised 3/9/95

ACCELERATED DEFICIENCY NOTICE

ESTABLISHMENT NO. P-1272

REVIEW DATE: 2/15/95

PLANT NAME AND ADDRESS:  
Golden Poultry Company, Inc.  
McNeal Drive  
Douglas, Georgia 31533

REGION/AREA/CIRCUIT CODE:  
05-04-09 (Douglas)

CONTACT: Full-time

PLANT MANAGEMENT REPRESENTATIVE:  
Mr. Dave Courdin, Plant Manager

REVIEW OFFICER:  
Mr. Velmer D. Chipps

AREA PERSONNEL CONTACTED:  
Dr. Kristin Holt,  
Assistant Area Supervisor

TO REPRESENTATIVE:  
Dr. Samuel Watson,  
Circuit Supervisor

PLANT PROFILE: This large establishment slaughters young chickens on two shifts under an approved New Retailment Line Speed (NRLS) program, produces cut-up chickens, and ships whole chickens. This review began on the first shift and extended into the beginning of the second shift.

At the conclusion of this review, an exit conference was held with Mr. Dave Courdin, Plant Manager, Dr. Samuel Watson, Circuit Supervisor, and Dr. Malcolm Spring, Supervisory Veterinary Medical Officer (SVMO), 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 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

Condensate dripped from the dirty ceiling, refrigeration units, pipes, and drain pans onto chickens on a cut-up line and evisceration line. Also, water from a plugged drain pan located under an overhead chicken conveyor line in the cut-up room was overflowing onto chickens on another line below. Approximately half the product in the cut-up room was affected.

Corrective Action: The SVMO/ILC on the first shift suspended operations in the cut-up room. Plant management officials emptied the cut-up lines, and plant employees removed condensate from the affected areas (downtime 105 minutes). Affected product was held for reconditioning. The second-shift SVMO suspended operations on the evisceration line. Plant management officials removed the affected birds for reconditioning and installed a drip pan (downtime approximately 15 minutes).

Accelerated Deficiency Notice (Est. P-1272)

2 of 2

PROCESS 2. (Continued)

Employees' waterproof gloves and plastic sleeve protectors were stored during company breaks on boxes, product-contact surfaces, and behind dirty pipes.

Corrective Action: Plant management officials placed the employees' affected gloves and sleeve protectors into a trash container, and instructed employees to store articles in the proper storage area during breaks.

PROCESS 3. STANDSTILL

The chlorine level of sanitizing water at the chicken reprocessing station measured 10 ppm rather than the minimum of 20 ppm as required.

Corrective Action: The Slaughter Inspector suspended reprocessing operations until the level of chlorine was in compliance, and instructed plant management officials to rewash the previously reprocessed chickens.

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

Black grease from the ice conveyor feeder was observed on product-contact ice in a storage bin. Also, a similar black substance was observed in a combo bin of ice, ready for use in the chicken cut-up room.

Corrective Action: Plant management officials suspended the use of ice from the ice storage bin pending cleaning of the conveyor feeder and reinspection of the ice, and the SVMO/ILC rejected the combo bin of ice in the chicken cut-up room pending further disposition.

Review Officer, Program Review Division /Date

*Velmer D. Chipps* 3/9/95  
Velmer D. Chipps

Acting Director, Program Review Division/Date

*Karen V. Morris* 3/9/95  
Karen V. Morris, DVM

Exhibit 33

Representatives of the establishment who have opinions concerning the findings in this report may request the Program Review Division, 4920 West 15th Street, Lawrence, KS 66044, or call 913-441-5600. Bureau and Management reports are available for public release under the Freedom of Information Act. If plant representatives wish to file written comments concerning this report, the Plant Safety and Inspection Service will include the comments in files placed on display for public viewing or submit a response to public request for documents.

ACCELERATED DEFICIENCY NOTICE (Rev. 2820/P-2820)

ACCELERATED DEFICIENCY NOTICE

REVIEW DATE: May 1, 1995

ESTABLISHMENT NO. 2820/P-2820

PLANT NAME AND ADDRESS:  
McFarland Company, Inc.  
6212 Roselle Avenue  
Riverbank, California 95367

REGION/AREA/CIRCUIT CODE:  
02-06-17 (Sacramento)

COVERAGE: Patrol

PLANT MANAGEMENT REPRESENTATIVE:  
Mr. Melvin Coonan, Plant Manager

REVIEW OFFICER:  
Ms. Marlene Beth

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

TO REPRESENTATIVE:  
Mr. Wayne Larson,  
Circuit Supervisor

PLANT PROFILE: This small processing establishment debones poultry for wholesale distribution.

This plant was placed on Stage 1, Step 1 of the Progressive Enforcement Action program on February 17, 1995. Following this review, the Circuit Supervisor advised plant officials that PEA status would be increased to Stage 1, Step 2.

This follow-up review was conducted due to the serious nature of the deficiencies identified during the previous review on February 16, 1995, and the subsequent issuance of an Accelerated Deficiency Notice.

At the conclusion of this review, an exit conference was held with Mr. Melvin Coonan, Manager, Mr. Curtis Coonan, Plant Supervisor, Mr. Don Zipser, Production Supervisor, Mr. Jim Dawson, Relief Inspector-In-Charge, and Mr. Wayne Larson, Circuit Supervisor, who were notified of the issuance of this report.

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

PROCESS 2. SANITATION OF FACILITIES AND EQUIPMENT/PERSONAL HYGIENE

Contaminated water from the outside surfaces of dirty shipping cartons containing ice-packed chicken breast trimmings dripped onto the table where the exposed product was placed prior to entering the rotary meat processor (deboning equipment). These shipping cartons were previously stored on wet, dirty wooden pallets, and the bottom layers of some cartons were smashed. This is the only processing line in the establishment, and virtually all product manufactured is processed through this system.

PROCESS 2. (Continued)

Corrective Action: The Plant Manager, at the direction of the Circuit Supervisor, suspended operations. The Circuit Supervisor instructed the IIC to retain the finished product pending further disposition. The affected area was cleaned and released for use, and two more employees were assigned to the area to properly open the cartons and remove the product.

PROCESS 3. RECEIVING AND CONTROL OF INCOMING PRODUCTS/MATERIALS

Cartons of product received from Zsc. F-6401, Starval Poultry Inc., Poyallup, Washington, were labeled as "Chicken Breast Halves"; however, chicken legs, thighs, and chicken breasts with wings were commingled with chicken breast halves in these cartons, were processed through the rotary meat processor (deboning equipment), and were packaged and labeled as "Chicken Breast Meat".  
Corrective Action: The Circuit Supervisor instructed the IIC to retain the approximately 17,000 pounds of mislabeled product pending reinspection and relabeling. The Circuit Supervisor stated that the appropriate Area Office of the shipping establishment would be notified.

PROCESS 4. FACILITIES, EQUIPMENT, WATER SUPPLY, AND WASTE DISPOSAL

Two truck trailers used to store shipping cartons were extremely congested, and review of the contents 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 inaccessible for proper examination for evidence of rodents.  
Corrective Action: The Circuit Supervisor instructed plant officials to discontinue use of the trailers for storage until Agency guidelines were set.

Review Officer, Program Review Division /Date

*John P. [Signature]*  
Marlene Beth

Director, Program Review Division/Date

*Ralph C. Terry*  
5/5/95  
Dwayne Metz

Representatives of the establishment who have questions concerning the findings in this report may contact the Program Review Division, 4920 West 13th Street, Livermore, CA 94551, or call (913) 441-5400. Agency and Amendment responses are available for public distribution under the Freedom of Information Act. If plant representatives wish to file written comments concerning this report, the Food Safety and Inspection Service will include the comments in files placed on display for public viewing or included in response to public request for documents.

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

PROCESS DEFICIENCY RECORD

1. DATE

4-17-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

Exhibit 35

8. DESCRIPTION OF DEFICIENCY AND LOCATION:

I inspected a comb of pork picnics and found pieces of green chow pads in the picnics. I did retain the comb.

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

0600/az

11. DEFICIENCY CLASSIFICATION GUIDE

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain Likely Potential

☒ ☐ ☐  
☒ ☐ ☐  
☒ ☐ ☐

Deficiency classification

Critical

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

PROCESS DEFICIENCY RECORD

1. DATE

4-17-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

Exhibit 36

8. DESCRIPTION OF DEFICIENCY AND LOCATION:

I observed a floor janitor on the ham converting line. Later on that evening he went to the knife room and got equipment to go and work on the line. He still had on his dirty old pants chaps. I spoke with

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

0200/02

11. DEFICIENCY CLASSIFICATION GUIDE

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain Likely Potential

Deficiency classification

Adulterated



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

PROCESS DEFICIENCY RECORD

1. DATE

4-18-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

Exhibit 37

16. DESCRIPTION OF DEFICIENCY AND LOCATION:

I inspected a combo of picnic trim. I found skin, bones, and blood clots. I did retain.

17. PQC

☒ YES  
☐ NO

18. ISG Task Code

16 D0422

19. DEFICIENCY CLASSIFICATION GUIDE

	Certain	Likely	Potential
A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	✓		
B) Will the adulterated or misbranded/mislabeled product reach consumers?	✓		
C) Will the product have a detrimental effect upon the consumers?		✓	

Deficiency classification

Minor

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE  PROCESS DEFICIENCY RECORD	1. DATE	2. RECORD NO.	3. ESTABLISHMENT NO.	4. TQC
	4-18-95			

Exhibit 38

16. DESCRIPTION OF DEFICIENCY AND LOCATION:

OBSERVED THAT THERE WASN'T ANY 180° WATER AVAILABLE IN THE CUT AND CONVERTING DEPTS. DURING PRODUCTION. STOPPED PRODUCTION UNTIL 180° WAS AVAILABLE.

17. PQC	18. ISG Task Code	19. DEFICIENCY CLASSIFICATION GUIDE	Certain	Likely	Potential
<input type="checkbox"/> YES	01C04a2	A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	X		
<input checked="" type="checkbox"/> NO		B) Will the adulterated or misbranded/mislabeled product reach consumers?	X		
		C) Will the product have a detrimental effect upon the consumers?	X		

24. SIG

25. DATE

4/19-95

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

PROCESS DEFICIENCY RECORD

1. DATE

4-19-95

Exhibit 39

5. TA  
7. PE

8. DI

I observed a employee picking up a bareless butt from the floor and started to go to work with out washing his green gloves. I did stop him.

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

02C0302

11. DEFICIENCY CLASSIFICATION GUIDE

	Certain	Likely	Potential
A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?			
B) Will the adulterated or misbranded/mislabeled product reach consumers?			
C) Will the product have a detrimental effect upon the consumers?			

Deficiency classification

Critical

U.S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
PROCESS DEFICIENCY RECORD

1. DATE

4-20-95

ESTABLISHMENT NO 14 TQC

Exhibit 40

8. DESCRIPTION OF DEFICIENCY AND LOCATION:

I observed a maintenance employee with dirty-greasy gloves on peeling edible fat from the ham fat belt and put it on the ham fat inside belt on the honey lake line. I did send Fred inedible.

9 PQC <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	10 ISG Task Code 02B02a2	11. DEFICIENCY CLASSIFICATION GUIDE			Certain	Likely	Potential
		A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?					
		B) Will the adulterated or misbranded/mislabeled product reach consumers?					
		C) Will the product have a detrimental effect upon the consumers?					
					Deficiency classification Critical		

16. DESCRIPTION OF DEFICIENCY AND LOCATION:

I observed the other maintenance employee using his dirty-greasy pliers to pull on the fat belt. I did stop the honey lake ham line.

17. PQC <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	18. ISG Task Code 02B03a2	19. DEFICIENCY CLASSIFICATION GUIDE			Certain	Likely	Potential
		A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?					
		B) Will the adulterated or misbranded/mislabeled product reach consumers?					
		C) Will the product have a detrimental effect upon the consumers?					
					Deficiency classification Critical		

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

PROCESS DEFICIENCY RECORD

1. DATE

4-20-95

Exhibit 41

PERSONNEL INVOLVED

B. Shift

8. DESCRIPTION OF DEFICIENCY AND LOCATION:

I inspected a trailer at the fresh dock, dock #12 was a trailer that had been washed. I still found wood, cigarette butts, staples and screws. I did report the trailer.

9 PQC

☐ YES  
☒ NO

10 ISG Task Code

09B01a2

11. DEFICIENCY CLASSIFICATION GUIDE

	Certain	Likely	Potential
A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	✓		
B) Will the adulterated or misbranded/mislabeled product reach consumers?	✓		
C) Will the product have a detrimental effect upon the consumers?	✓		

Deficiency classification

Critical

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE	1. DATE <b>4-20-95</b>	2. RECORD NO.	3. ESTABLISHMENT NO	4. TQC
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**PROCESS DEFICIENCY RECORD**

5. TO (Name)

Exhibit 42

7 PERSONNE

**MAJOR**

8. DESCRIPTION

PRE-OP: PROTEIN buildup ON  
CLEANED before STARTUP.

1- LOIN pullers KNIFE SANITIZER  
2- ham incline belt  
3- bns loin saddle TABLE  
4- FAT back incline belt

9 PQC <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	10 ISG Task Code <b>02A01a2</b>	11. DEFICIENCY CLASSIFICATION GUIDE			Certain	Likely	Potential
		A)	Will the "deficiency" result in adulterated or misbranded / mislabeled product?			X	
		B)	Will the adulterated or misbranded/mislabeled product reach consumers?			X	
		C)	Will the product have a detrimental effect upon the consumers?			X	
12. SIGNATURE OF I				Deficiency classification <b>MAJOR</b>			

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

PROCESS DEFICIENCY RECORD

1. DATE

4-20-95

2. RECORD NO.

3. ESTABLISHMENT NO

4. TQC

5. TO (Name and

7. PERSONNEL NO

8. DESCRIPTION (

Exhibit 43

OBSERVED OPEN ABSCESS IN A COMBO OF TOWLS. RETAINED  
TAG # 370392. TOWLS TANKED

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

06L04a.2

11. DEFICIENCY CLASSIFICATION GUIDE

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain Likely Potential

X

X

X

Deficiency classification

CRITICAL

12. SIGNATURE OF

13. PLANT MANAG

D  
1

potential

on

D

95

U.S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
**PROCESS DEFICIENCY RECORD**

1. DATE

4-21-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

Exhibit 44

7. PERSONNEL NOTIFIED

+ B Shift

**8. DESCRIPTION OF DEFICIENCY AND LOCATION:**

I observed hydraulic oil dripping into a combo of pork  
pennic skins. I showed Product was  
retained for tankage.

9. PQC

☐ YES  
☒ NO

10 ISG Task Code

06001a2

**11. DEFICIENCY CLASSIFICATION GUIDE**

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain

Likely

Potential

Deficiency classification

Initial



U.S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
**PROCESS DEFICIENCY RECORD**

1. DATE

4-22-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

☐ YES

Exhibit 45

7. PERSONNEL NOTIFIED

**8. DESCRIPTION OF DEFICIENCY AND LOCATION:**

I found a couple of more bellies on the floor again tonight. The is at the belly incline belt. This has been a on going problem. I spoke to the other day. Spoke with tonight. Must be done by 4-24-95

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

06 L0522

**11. DEFICIENCY CLASSIFICATION GUIDE**

	Certain	Likely	Potential
A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	✓		
B) Will the adulterated or misbranded/mislabeled product reach consumers?	✓		
C) Will the product have a detrimental effect upon the consumers?	✓		

Deficiency classification

Critical

corrective action)

13a.

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U.S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
PROCESS DEFICIENCY RECORD

1. DATE

4-25-95

Exhibit 46

16. DESCRIPTION OF DEFICIENCY AND LOCATION:

I observed a pork butt on the floor by the butt line. There was a foreman 2 to 3 feet away. He turned around and walked away from the product on the floor. was with me at the time.

17. PQC	18. ISG Task Code	19. DEFICIENCY CLASSIFICATION GUIDE			
<input type="checkbox"/> YES	02B022	A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	Certain	Likely	Potential
<input checked="" type="checkbox"/> NO		B) Will the adulterated or misbranded/mislabeled product reach consumers?			
		C) Will the product have a detrimental effect upon the consumers?			
20. 1		Deficiency classification Critical			

25. DATE

4-27-95

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  
**PROCESS DEFICIENCY RECORD**

1. DATE

4-26-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

☐ YES

Exhibit 47

**DESCRIPTION OF DEFICIENCY AND LOCATION:**

I observed the B Shift tipper tie area. I found 13 pieces of product on the floor. I did reject the area. Product was tumbled.

17. PQC <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	18. ISG Task Code 02B02a2	19. DEFICIENCY CLASSIFICATION GUIDE			
		A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	Certain	Likely	Potential
		B) Will the adulterated or misbranded/mislabeled product reach consumers?	2		
		C) Will the product have a detrimental effect upon the consumers?	2		
		Deficiency classification			
		Unrated			

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE  <b>PROCESS DEFICIENCY RECORD</b>	1. DATE	2. RECORD NO.	3. ESTABLISHMENT NO.	4. TQC
	4-27-95			<input type="checkbox"/> YES

+ B Shift

Exhibit 48

8. DESCRIPTION OF DEFICIENCY AND LOCATION:

I observed 2 employees from the converting after washing their equipment out thru the inedible bone grinding room. I did speak with

9. PQC <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	10. ISG Task Code  02C03a.2	11. DEFICIENCY CLASSIFICATION GUIDE			Certain	Likely	Potential
		A)	Will the "deficiency" result in adulterated or misbranded / mislabeled product?	<input checked="" type="checkbox"/>			
		B)	Will the adulterated or misbranded/mislabeled product reach consumers?	<input checked="" type="checkbox"/>			
		C)	Will the product have a detrimental effect upon the consumers?	<input checked="" type="checkbox"/>			
						Deficiency classification Critical	

U.S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
**PROCESS DEFICIENCY RECORD**

1. DATE

2-28-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

*Shift*

Exhibit 49

7. PERSONNEL NOTIFIED

**8. DESCRIPTION OF DEFICIENCY AND LOCATION:**

*I did a inspection on a combo of picnic trim. I found patches of skin and bruise. I did retain it.*

9. PQC

☒ YES  
☐ NO

10. ISG Task Code

*0600422*

**11. DEFICIENCY CLASSIFICATION GUIDE**

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain Likely Potential

*2* *2* *2*

Deficiency classification

*Major*

**12. DESCRIPTION OF DEFICIENCY AND LOCATION:**

*Observed the new reject butcher not following the salvage program. He was cleaning his knife with 155° water. The temp should be 180° water. The program for a new reject butcher was also violated. The program taken away.*

17. PQC

☐ YES  
☒ NO

18. ISG Task Code

*02B0202*

**19. DEFICIENCY CLASSIFICATION GUIDE**

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain Likely Potential

*2* *2* *2*

Deficiency classification

*Critical*

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

PROCESS DEFICIENCY RECORD

1. DATE

7-27-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TOC

Exhibit 50

5. TO (Name and title)

7. PERSONNEL NOTED

8. DESCRIPTION OF DEFICIENCY

OBSERVED RUNNING WATER SEVERAL inches deep ON  
FLOOR in hallway BETWEEN CARCASS COOLERS AND CUT dept.  
Ref. Tag # 356500

9. PQC	10. ISG Task Code	11. DEFICIENCY CLASSIFICATION GUIDE		
<input type="checkbox"/> YES	01A01a.2	A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	Certain	Likely
<input checked="" type="checkbox"/> NO		B) Will the adulterated or misbranded/mislabeled product reach consumers?		X
		C) Will the product have a detrimental effect upon the consumers?		X

12. SIGNATURE OF INSPECTION	Deficiency classification MAJOR
-----------------------------	------------------------------------

13. PLANT MANAGEMENT OFFICIAL REPLY: (Corrective action)

removed water

13a. Preventive measures:

drain to be repaired

14. VERIFICATION

15. DATE CORRECTED

7-27-95

16. DESCRIPTION OF DEFICIENCY

17. PQC	18. ISG Task Code	19. DEFICIENCY CLASSIFICATION GUIDE		
<input type="checkbox"/> YES		A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?	Certain	Likely
<input type="checkbox"/> NO		B) Will the adulterated or misbranded/mislabeled product reach consumers?		
		C) Will the product have a detrimental effect upon the consumers?		

20. SIGNATURE OF INSPECTOR	Deficiency classification
----------------------------	---------------------------

21. PLANT MANAGEMENT OFFICIAL REPLY: (Corrective action)

21a. Preventive measures:

23. DATE CORRECTED

25. DATE

8-3-95

THIS MAY BE USED UNTIL

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE  PROCESS DEFICIENCY RECORD	1. DATE	2. RECORD NO.	3. ESTABLISHMENT NO.	4. TQC
	7-28-95			<input type="checkbox"/> YES

Exhibit 51

I went to the womens locker room - I found the toilets full, toilet 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 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	18. ISG Task Code  02307m	19. DEFICIENCY CLASSIFICATION GUIDE			Certain	Likely	Potential
		A)	Will the "deficiency" result in adulterated or misbranded / mislabeled product?			✓	
		B)	Will the adulterated or misbranded/mislabeled product reach consumers?			✓	
		C)	Will the product have a detrimental effect upon the consumers?			✓	
20. ?					Deficiency classification Major		

U.S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
PROCESS DEFICIENCY RECORD

1. DATE

Aug 3, 95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

Exhibit 52

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

17. PQC <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	18. ISG Task Code 01B01a2	19. DEFICIENCY CLASSIFICATION GUIDE			Certain	Likely	Potential
		A)	Will the "deficiency" result in adulterated or misbranded / mislabeled product?			X	
		B)	Will the adulterated or misbranded/mislabeled product reach consumers?			X	
		C)	Will the product have a detrimental effect upon the consumers?			X	
20. SIGNATURE		Deficiency classification MINOR					



## PROCESS DEFICIENCY RECORD

1. DATE

8-4-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

5. TO (Name and title)

Exhibit 53

7. PERSONNEL NOTIFIED

8. DESCRIPTION OF DEFICIENCY AND LOCATION.

OBSERVED FLIES CRAWLING ON PRODUCT CONTACT SURFACE  
OF UNCOVERED PACKAGING MATERIAL STORED ON THE  
RECEIVING DOCK.

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

07D01a2

## 11. DEFICIENCY CLASSIFICATION GUIDE

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain

Likely

Potential

X

X

X

12. SIGNATURE OF INSPECTOR

Deficiency classification

MAJOR

17. PQC

☐ YES  
☐ NO

18. ISG Task Code

## 19. DEFICIENCY CLASSIFICATION GUIDE

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain

Likely

Potential

20. SIGNATURE OF INSPECTOR

Deficiency classification

21. PLANT MANAGEMENT OFFICIAL REPLY: (Corrective action)

21a. Preventive measures:

22.

INSPECTOR (corrective action has taken place)

23. DATE CORRECTED

24.

25. DATE

8-10-95

FSIS

PROCESS DEFICIENCY RECORD

1. DATE

08-07-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

5. TO (Name and title)

7. PERSONNEL NOTIFIED

Exhibit 54

8. DESCRIPTION OF DEFICIENCY AND LOCATION

FOUND 6 HAMS ON FLOOR BY SORTING COMBOS, HAD BEEN ON FLOOR FOR ENTIRE BREAK PERIOD (1900 to 1815) - COMMENT WAS "ROUND MAN WAS ON BREAK"

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

02B02@2

11. DEFICIENCY CLASSIFICATION GUIDE

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain

Likely

Potential

☒  
☒  
☒

12. SIGNATURE

Deficiency classification

~~CRITICAL~~ CRITICAL

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

PROCESS DEFICIENCY RECORD

1. DATE

15 Aug 95

2. RECORD NO.

3. ESTABLISHMENT NO.

5. TO (Name and title)

Exhibit 55

7. PERSONNEL NOTIFIED

8. DESCRIPTION OF DEFICIENCY AND LOCATION:

PLASTIC HUNG FOR LEAKING PIPE BY GREEN MEAT DOOR NOT BEING CHANGED. PLASTIC IS FULL OF WATER.

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

02B01@2

11. DEFICIENCY CLASSIFICATION GUIDE

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

Certain

Likely

Potential

B) Will the adulterated or misbranded/mislabeled product reach consumers?

C) Will the product have a detrimental effect upon the consumers?

Deficiency classification

CRITICAL

12. SIGNATURE OF II

16. DESCRIPTION OF DEFICIENCY AND LOCATION:

INCLINE BUTT BELT FLAKING RUBBER DUST TO PRODUCT AND PROCESS BELOW - SHOWED (FOREMAN) THE DUST. TANKED SOME EXPOSED PRODUCT

17. PQC

☐ YES  
☒ NO

18. ISG Task Code

02B01@2

19. DEFICIENCY CLASSIFICATION GUIDE

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

B) Will the adulterated or misbranded/mislabeled product reach consumers?

C) Will the product have a detrimental effect upon the consumers?

Certain

Likely

Potential

Deficiency classification

CRITICAL

20. SIGNATURE OF INSPI

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

PROCESS DEFICIENCY RECORD

1. DATE

18 Aug 95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

5. TO (Name and title)

7. PERSONNEL NOTIFI

Exhibit 56

8. DESCRIPTION OF DE

ALL LOCKER ROOMS - TOILETS NOT FLUSHING - TAGGED LOCKER ROOMS

9. PQC

☐ YES  
☒ NO

10. ISG Task Code

02B0702

11. DEFICIENCY CLASSIFICATION GUIDE

- A) Will the "deficiency" result in adulterated or misbranded / mislabeled product?  
B) Will the adulterated or misbranded/mislabeled product reach consumers?  
C) Will the product have a detrimental effect upon the consumers?

Certain

Likely

Potential

✓

✓

✓

12. SIGNATURE OF INSPE

Deficiency classification

CRITICAL

13. PLANT MANAGEMENT OFFICIAL REPLY: (Corrective action)

U.S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
**PROCESS DEFICIENCY RECORD**

1. DATE

8-21-95

2. RECORD NO.

3. ESTABLISHMENT NO.

4. TQC

IS

Exhibit 57

DEFICIENCY AND LOCATION:

I observed the reject butcher, he was partially washing the contaminated product that fell on the floor. I did check the product and found the product still contaminated. I did put the salvage program.

17. PQC <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	18. ISG Task Code 123022	19. DEFICIENCY CLASSIFICATION GUIDE			Certain	Likely	Potential
		A)	Will the "deficiency" result in adulterated or misbranded / mislabeled product?	✓			
		B)	Will the adulterated or misbranded/mislabeled product reach consumers?	✓			
		C)	Will the product have a detrimental effect upon the consumers?	✓			
						Deficiency classification Critical	

## APPENDIX

GOVERNMENT  
ACCOUNTABILITY  
PROJECT

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

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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 and 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.<sup>1</sup> 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.

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<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 food-borne 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 per se: the sample rate increases from once to twice daily. That is it.

This violates the most elementary rules of statistical sampling.

#### CONCLUSION

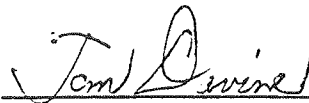
The bottom line is that with over 70 food poisoning outbreaks since Jack-in-the-Box, we need all the help we can get. Hopefully HACCP will provide it. If it is additive, it can only help. These comments seek to maximize the new program's contribution. An additive HACCP system fills the gaps.

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,



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Tom Devine  
Legal Director