

DECLARATION

My name is REDACTED and I am an employee of the United States Department of Agriculture's Food Safety Inspection Services (USDA/FSIS). I am submitting this declaration to the Government Accountability Project voluntarily, without any threats, inducements or coercion. I authorize the publication of this statement contingent upon the redaction of my name, and the name and specific location of the federal establishments to which I refer. I am making this statement because, based on my many years of experience as a HIMP inspector, I know that the claims the government is making about the HIMP program are not true. I also have children and I am concerned about the poultry products they may eat if this program is implemented nationally.

I have worked at the same plant for over 8 years. When I began working at this plant, the plant operated under the traditional system. This plant has since switched to HIMP. I strongly believe that many of the changes that have accompanied this switch have harmed our ability to ensure that only safe, wholesome birds reach consumers.

Under traditional inspection, inspectors would look at the whole bird. Under HIMP, we only see the backside of the bird during carcass inspection. As a result, we are unable to see breast blisters, which form because the birds lay on their front, or to spot certain other harmful defects. For example, fecal matter can appear anywhere on the bird, including on the front of the bird, or under the wings, which are folded up. Inflammatory process and leukosis can also appear only on the front of the bird, meaning we won't see it. Tumors can be on the breast that would make the bird condemnable, and may not appear at all on the back. And even when you see a tumor on the back, without being able to see the front of the bird, you may not be able to tell that the bird has multiple tumors, and that they're coalescing, making the bird condemnable. Additionally, under HIMP, we are not permitted to look inside the bird, meaning we are likely to miss any defects or diseases that don't show up on the outside back of the bird.

Under traditional inspection, the inspector was allowed to decide whether birds were

condemned, passed or trimmed. Under HIMP, our authority has diminished substantially. We have very limited authority to remove carcasses for condemnation and no authority for trimming specific carcasses that we feel needs to be trimmed. Additionally, because the plant's critical control point (CCP) was moved, several years ago, to a point *after* our inspection station, we are no longer permitted to write Noncompliance Records (NRs) for fecal contamination found by the carcass inspector. I've sometimes found 4 or 5 birds with fecal contamination within a timeframe of 15 minutes and still cannot issue an NR to the plant. Because there is room to place the inspector station after the plant's CCP, I believe that the CCP was moved solely to prevent the plant from being documented for non-compliances.

Under traditional inspection, we would have 3 inspectors on each line, with 90 birds per minute split among them, so that each inspector was looking at 30 birds per minute. Now, under HIMP, we have one inspector on the line looking at up to 200 birds, or more, per minute. Several years ago, we had a Verification Inspector and a team leader on the slaughtering floor at all times. Now, the team leader and Verification Inspector covers not only the slaughter floor but also huge processing floor, which can easily be larger than a football field. Additionally, with the Public Health Information System (PHIS) being implemented, the Verification Inspector now spends much of his time off the floor entering data in the office.

Under traditional inspection, we would have 3 inspectors and 3 trim people, provided by the establishment, on a line. So, each inspector would have a dedicated trimmer, and the inspector would decide whether birds should be trimmed or condemned. Under HIMP, there are now 7 sorters –all company employees that are supposed to remove all birds that would not pass inspection – and only 1 company trim person on the line. So, the sorters generally now have to hang any bad birds they spot onto the reprocessing line by themselves, while still trying to watch for the next bird. It's difficult, if not impossible to do. Increased line speeds and staffing changes only compound the problem. I've seen sorters attempt to slow down or stop the line to move birds to the reprocessing line, only to be rebuked

by their supervisors. In my plant, some of the sorters really try to look at all of the birds. Others, though, seem to not care or to have given up on doing their job.

As a result, I believe that unsafe and unwholesome birds will be more likely to reach consumers. Furthermore, under the HIMP program, the agency has established performance standards for "other consumer protections" (OCPs) -- those defects that are not supposed to pose a threat to public health. According to the model performance standards listed in HIMP Final Draft 8, in order to meet performance standards, only 1.7% of birds are permitted to pass that have OCP-1 conditions, while up to 52.5% of birds may pass with OCP-2 conditions. However, I have seen birds whose bodies were at least half covered with inflammatory process, an amount indicative of generalized inflammatory process, an OCP-1 condition, and been told that because part of the bird can be salvaged through trimming, the inflammatory process is only localized, an OCP-2 condition. So, in reality, the plant is still considered to be meeting performance standards even if up to 52.5% of birds are affected by generalized inflammatory process.

I, REDACTED have reviewed this statement of 3 pages and hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Dated this 6th day of March, 2012.

(Signature)