

DECLARATION

My name is (REDACTED) and I am an employee of the United States Department of Agriculture's Food Safety and Inspection Service (USDA/FSIS). I am submitting this statement to the Government Accountability Project. I am doing so without any threats, inducements or coercion. I authorize the publication of this statement contingent upon the redaction of my name, and the name and specific location of the federal establishments to which I refer. I am making this statement because I think that the government's plan to implement the pilot "HIMP" inspection program in all poultry plants would be a mistake with very serious negative consequences. I believe that more unwholesome and potentially harmful products will reach consumers if the HIMP system is mandated on a national scale.

I have worked in poultry inspection for over 15 years, including many years in a plant under the piloted HIMP system. In the HIMP program, the plant carries out the majority of inspection activities that would be carried out by USDA inspectors in a traditional plant. My experience under both inspection systems is that poultry plants are concerned with making money and not protecting the consumer, inspectors fulfill this crucial role instead. The Agency should come down and speak with inspectors, like my coworkers and me, about how things are actually working before making decisions that affect the inspection floor. They would find widespread concern about the HIMP program and the on-the-floor realities about its implementation.

Under the traditional system, our inspection was characterized by a "hands on" mentality. In a traditional plant, several USDA inspectors are on the production line and they are able to see all angles of the birds as they go by and look at the inside and outside of the birds. This is important because fecal contamination of the birds, a Food Safety issue for which FSIS has a zero tolerance policy, is oftentimes found inside the birds. Under HIMP, we are explicitly told to be "hands off." Under the HIMP system, the production line is set up so that inspectors can only see the back of the bird. We cannot see the front or the inside of the bird to look for fecal contamination or signs of diseases like localized inflammatory process. When we only see the "back" of the bird we cannot see the widely consumed "breast tissue" of the birds, which is a common site for Other Consumer

Protection Defects or OCPs. OCPs can include blisters, tumors, or excessive feathers stuck to the bird carcass.

In the traditional plant I worked in, the speeds of the production lines were approximately 72 birds per minute, so that each inspector was responsible for inspecting just over 35 birds per minute. This gave us enough time to get a good look at the birds as they were going by and we had the ability to pull birds from the line or an inspectors helper would be instructed which birds to pull from the line or trim any defective parts of the bird. In the HIMP plants, the bird carcasses fly by at between 165-175 birds per minute. It is difficult, if not impossible, to spot defects at that rate. It's very frustrating for me to be unable to examine the birds closely for problems. I feel like I am there to protect the consumer and make sure that the product that is produced is something that my family would eat. Under HIMP, my ability to do that is limited. My coworkers and I rotate between several inspection locations in the plant. Under HIMP, when I am on carcass inspection (CI) duty at the production line, our inspection station is at the end of the line and I am unable to see a lot of what goes on. I will pull birds from the line that look suspicious to me or ask a plant employee to trim off parts that look bad, but these actions are not actually part of my job, as it pertains to the HIMP program, and I have been told in the past not to do it. Plant "sorters" are supposed to pull birds from the line for defects or food safety issues, with little, if any, training about what to look for. My response has always been the same, I don't care what the HIMP draft says, if I would not eat it, I pull it from the line.

Throughout the implementation of HIMP, the district office has worked to make it easier, not harder, for the plant management to get away with more and more. It was almost like they're more concerned with keeping the poultry plants happy at any cost, rather than holding them to a strict standard. For example, throughout the production line there are several "Critical Control Points" or CCPs where tests are administered by the plant to look for food safety issues like fecal contamination, septicemia and toxemia. If the plant fails these tests before the inspection station where USDA inspectors are located, we can then issue them a Non-Compliance Report or NR. A Non-Compliance Report documents the plants failure to maintain the necessary standards for food

safety and requires the plant to take immediate action to correct problems. When we first came under the HIMP system, the CCP for fecal contamination was located before the inspection station and we were writing NRs for fecal contamination 5-6 times a shift, which was much more than under the traditional inspection system. When this kept happening, the plant was permitted to have the CCP *after* the inspection station. Because of this, according to the HIMP Final Draft 8 guidelines, we can no longer write NRs for fecal when we're doing carcass inspection when the CCP is after the inspection station. All we can do is record our findings on a form and turn that in to our team leader, the Veterinarian.

If I report a problem at the CI station, like widespread fecal contamination, the Veterinarian can perform a "system check." A system check consists of a ten to fifty bird sample, which is tested for food safety and OCP issues. If this sample passes the system test, there is nothing further I am permitted to do.

I also perform "Verification Inspections" or VIs several times a day. During verification inspection, we take a 10 bird sample (out of the tens of thousands the plant produces) 8 times a day for close inspection. We are able to look at the inside of these birds for diseases and contaminations, but we are not able to look at the viscera of the birds. Under traditional inspection, the viscera are usually still attached to the birds during processing. This is important because many diseases like airsacculitis, which can infect an entire flock, are confirmed through looking at the viscera.

I've noticed that the plant will usually do better quality control at the beginning of the shift, then start to degrade and allow more feathers and other OCP defects to pass through the sorting station after the 4th test or so, when the numbers are such that the plant is confident it will pass for the day. The plant seems to note when I'm getting ready to do VI testing. I've gotten up on the stand to pull my ten bird sample, and watched the quality of the birds improve for the next two minutes or so after I get on the stand. After two minutes pass, I'll see birds with feathers and tails go down the line again. It's clear that the plant is trying to manipulate the VI tests. I've found ways to combat this, like

waiting longer to pull my 10 bird sample after getting on the stand, but it's a constant battle to stay one step ahead of the plant.

If I report a problem at the verification inspection, like detection of fecal contamination, septicemia or toxemia, the Veterinarian and I must observe the plant quality control employees perform several checks and retests to ensure that the problem is fixed and that corrective action (like finding the source of the problem and resolving the issue) has been taken. Normally, the plant passes the checks and retests, even though I, and other, inspectors continue to find the same problems at the verification inspection.

In my opinion, the plant's checks and retests are not conducted thoroughly. It is just a game- they prepare the sample birds for the rechecks to ensure they will not fail, taking much more care with these birds than they do with the majority of the birds to make sure they are free of contamination and disease and the initial problems persist.

It is my experience that the HIMP guidelines for USDA inspectors give too much power to the plants themselves, which are concerned primarily with keeping the line speeds up and maintaining productivity. USDA inspectors are trained to protect the consumer, but we are not supported by the Agency to do so when they create systems like HIMP. In my plant it is a constant battle to hold the plant to a high standard of consumer safety because HIMP has weakened our ability to create incentives for the plant to change through enforcement actions. Occasionally, we have been short-staffed, but we are tough. We push back against the plant's efforts to use the weak HIMP guidelines to sacrifice protections for consumers, and this has been an ongoing process. When the Agency proposes regulations like the HIMP model, we are not empowered to do our jobs in the same way and it takes a great deal of persistence to be able to work as an inspector in an effective way. I am worried that if HIMP is implemented in every poultry plant, the products they produce will be much less safe because HIMP inspectors are continually told to be "hands off." When I am asked if I would eat the poultry produced in my plant, my answer is always the same, "Yes, but only because I am there."

I, (REDACTED), have reviewed this statement of 5 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 28 day of March, 2012.

(Signature)