

## 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 have worked in federal poultry inspection for almost 15 years, both in plants under the "HIMP" model inspection system at various phases of its implementation and at plants under the traditional inspection system. I am making this statement because, based on my direct experience, the government's plan to bring the HIMP inspection system to all poultry plants would be against the best interests of consumers and taxpayers. The HIMP program shifts the majority of inspection duties over to the poultry plants themselves. When I worked under the HIMP system I felt like I was working more for the plant than for the USDA and the plant is concerned with making money, not protecting those that are eating its products. USDA inspectors are trained to look for and prevent food safety violations of the poultry products that are produced. Under HIMP we were prevented from using our knowledge to fully protect consumers. If HIMP is implemented on a national scale, I am worried that more consumers will be exposed to potentially harmful diseases, in addition to unwholesome products that they would not want to feed their families.

I worked under the HIMP program when it was first piloted, over ten years ago. Inspectors would primarily rotate between "Carcass Inspection" or CI duties and "Verification Inspection" or VI duties. Carcass inspection duties take place on the production line. In a plant under the traditional inspection system, inspectors will be at the beginning of the production line observing the bird carcasses that go by and will pull any that look suspicious. The things that we look for are "Food Safety" issues which the Food Safety Inspection Service (FSIS) has a zero tolerance policy for and "Other Consumer Protection" items for which a percentage of the birds are allowed to have under the HIMP system. Food Safety items will be infectious diseases like septicemia, toxemia or fecal contamination. OCPs include items like scabs, blisters, tumors, bruises, feathers, oil glands and

other extraneous materials that stick to the bird carcasses. Whereas in the traditional system, inspectors will pull birds from the line or ask an inspector's "helper" assigned to them to trim any suspicious parts of the birds, in the HIMP system we were instructed to avoid stopping the production line and the message we received was to be generally less involved because "sorters" that work for the plants would remove any suspicious looking birds. From what I could tell, the plant sorters were given roughly two days of training in what to look for in terms of Food Safety and OCP problems. In contrast, for my USDA inspector training I had almost two weeks of training in addition to continual training throughout the year. We were there to "supervise" the plant employees and their activities, but not to actively take part in the inspection process. My fellow inspectors and I found several problems with this approach.

In a traditional plant, the line speeds average about 70 birds per minute for every two inspectors but in the HIMP plant that I worked in the line speed was over 110 birds per minute for one inspector. This was at the very beginning of HIMP implementation and I have heard from other inspectors at HIMP plants that the line speeds go over 150 birds per minute. It is very difficult to get a good look at the birds at that rate and in a HIMP plant we are only permitted to see the "back" side of the bird. We were unable to see the "front" of the bird, or the breast tissue, and could not see inside the birds. This is a big problem because fecal contamination can be rampant in many flocks and in many cases will only be found inside the bird. We were told to "verify from the outside" and to be sure of what we saw before stopping the line. This seemed absurd to me, because you cannot be sure of a food safety violation until you "inspect" the bird. Traditionally, when an inspector notes fecal contamination coming down the line you can stop the line and pull that bird off. Under HIMP, we were told to write NRs or Non-Compliance reports for fecal contamination. An NR documents the plant's Food Safety violation, and requires the plant to take immediate action to correct the source of the contamination or violation. Under HIMP, along the production line are several "Critical Control Points" or CCPs where the plant must perform several tests to ensure their compliance to standards. When I worked in the HIMP plant, at first we were able to write NRs for fecal contamination that we found before the CCP, where the inspection station was. We were finding so many fecal

contaminations that the rumors in the plant were that the plant was considering leaving the HIMP pilot program. It seemed like our USDA supervisor, maybe from pressure from the district office, was concerned that the plant might leave the system because we were told to combine several NRs into one NR and told to “give them a break” for violations. When the fecal violations keep coming, the CCP was moved to *after* the inspection station. According to our supervisor, and the HIMP guidelines, we were not permitted to write NRs when the CCP was after the inspection station.

This change worried me because during our “Verification Inspections”(VIs) we continued to find excessive fecal contamination. During VI, a USDA inspector will pull in ten bird samples from the production line to examine closely for diseases or adulteration every hour. At VI, we could write NRs for Food Safety violations. I would continue to find fecal contamination on the inside of the birds, so I knew that birds that were not collected for the sample might be going down the line contaminated and out to the consumer. These Verification Inspections are also supposed to be random to get an accurate reading for potential infectious diseases, contaminations or OCPs. What eventually happened was that when the plant supervisors saw us preparing for a “random” sample, they would slow the line down and pull out any suspicious looking birds, and fewer and fewer NRs were written from the VI station. The plant supervisors would even instruct the sorters to pull suspicious looking birds off the line before our VIs. As a result, the samples were not an accurate reflection of what was going down the line. Our supervisor did not see the plant supervisors do this, and when we told him, he said that he would have to see it himself before he could take action, which he never ending up doing. When I heard that HIMP was going to be implemented on a national scale, I felt that it was important for the Agency to get input from inspectors that have experienced the reality of inspection under HIMP. I think they should know that I do not eat poultry from HIMP plants.

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 29 day of March, 2012.

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(Signature)