

## 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. This statement evidences my concern with the USDA's proposed, "Modernization of Poultry Inspection" rule. The rule, based on the piloted HIMP model inspection system turns the majority of inspection duties over to the poultry plants themselves. I worked for a poultry plant as a supervisor. Based on my direct experience, I believe that the proposed rule poses a significant danger to the public's health and safety.

Prior to my current position as a USDA inspector, I worked for the poultry industry in a supervisory role for over 10 years. The HIMP model system expansion would eliminate many USDA poultry inspection jobs, but it should be noted that I currently do not work in poultry inspection and I am not concerned with losing my position. I am making this statement because I know how poultry plants operate and they are concerned primarily with productivity instead of safeguarding the public health and welfare. It is my experience that the fewer USDA inspectors that are available to inspect actual product, the more the plants will try to cut corners and pressure their employees to maintain productivity at any and all costs. The examples provided below are based on my experience as a plant supervisor in a poultry plant.

### **"Yield, Yield, Yield"**

In every management and staff meeting, plant employees had it drilled into their heads that productivity and maintaining the production line was their chief responsibility, not making sure the poultry was safe to eat. In fact, we were encouraged to hide diseased or dirty chicken carcasses from the

USDA inspectors in the plant and process it out to consumers. All plant supervisors and managers had walkie-talkies and we would inform each other where inspectors were and where they were heading so that we could be prepared and prevent them from seeing any number of the food safety violations we committed. A constant refrain on the radio was, "USDA inspector on the floor." The culture of the plant was that everyone should be working to constantly maintain and increase the yield we processed, the weight of the hundreds of thousands of bird carcasses processed on the kill floor and shipped out to be sold. We would receive bonuses for any extra yield we produced and shifts would compete against each other to produce the most meat. As supervisors, we never questioned the plant manager's directives; we just did what we were told to do. The impression we got was that anyone who did not toe the line would be yelled at, fired, or most likely both. The workers that we supervised would be even less likely to speak out about the company's actions. Most of them were from other countries and did not speak English. If we asked them to do something they would do it. The constant pressure to maintain yield and evisceration line speeds made the kill floor a very intense place.

### **"Food Safety Violations"**

When I worked on the slaughter side of the plant or "kill floor" we would consistently encourage the workers along the evisceration line to push as many carcasses down the line in the shortest possible amount of time. The evisceration line is where the bird carcasses are de-feathered, scalded, the viscera are removed, and any unwholesome or diseased birds need to be trimmed or condemned before entering the "chiller." The chiller is a cold water bath meant to lower the temperature of the carcasses to standard before they are sent out to the processing side of the plant to be cut up and shipped out to consumers. When we knew that we had a bad, diseased, or unwholesome-looking flock that might get pulled off the line by the USDA inspector we would mix a "good" flock with the bad flock and turn up the speed of the evisceration line so that it would be more difficult for the inspector to catch the bad birds.

Birds that had inflammatory process, airsacculitis, or puss-filled bruises and other unsavory conditions are supposed to be hung back on a separate line and “re-worked” with the diseased parts cut off and re-inspected by the USDA. When I knew that the USDA inspector was not around, I would instruct the plant workers to pull those birds off of the line and dump them into the chiller. I remember one bird that was dropped and landed on a filthy drain cover. The drain was covered in dirt, grime, and blood from the kill floor. We just quickly washed it off and put it back on the line. Birds that were full of fecal matter or covered in stomach contents, or ingesta, that were supposed to be thoroughly washed and then re-inspected we would dump into the chiller when the USDA inspector was not around. We were in a constant battle with the USDA inspectors, we used to call them “cry babies” and complain when they insisted that the viscera that were removed from each carcass should be matched up with its original carcass from the evisceration line for viscera inspection. Now, as an inspector, I know that having the corresponding viscera for each bird available is an important way to detect diseases, like leukosis, that may affect an entire flock. In the over ten years that I worked for the company, I was never trained in diseases that might be present on the kill floor like salmonella or e-coli and how to minimize their risk. I never trained any of the line workers in what conditions to look for either, we were so short-staffed because of high turnover that each person had to just “learn on the job.” Each plant has a HAACP (Hazard Analysis and Critical Control Points) coordinator who is supposed to ensure that the organization complies with set quality standards and safety measures. The HAACP coordinator tests the plant’s product and its evisceration and processing areas to identify areas that may pose risks to public health. According to federal regulations, the chiller at the end of the evisceration line is supposed to be set at 40 degrees Fahrenheit to adequately cool the freshly killed chicken carcasses and prevent disease. I remember an instance when a USDA inspector checked the temperature of the chiller and found that it was too warm at 42 degrees and ordered a corrective action. However, when the inspector left, instead of taking corrective action and recording the accurate temperature in the official record, I saw the

HAACP coordinator leave the chiller as it was and record that the chiller was 40 degrees for the entire shift. I also worked as a supervisor on the processing side of the plant, where the bird carcasses are cut up and then boxed and shipped out. When the USDA was not present, we would re-label boxes of poultry product so that boxes of product would have their "use by" dates changed so that we could meet the specific requirements of an order. If we had a contract that required that poultry slaughtered was shipped out within the same day, we would just re-label old product to get rid of it and increase our yield for the shift.

**"USDA Inspector"**

I started working for the USDA because I wanted to do the right thing because when I worked for the plant I did not have the ability to work for the consumer. The constant pressure to "run, run, run" the production line against any and all other concerns was my only thought to avoid getting fired. Every minute that the plant was not running the line, thousands of dollars would be lost and not only the slaughter side, but the production end of things would be held up as well. We were told that these employees would then be paid for doing nothing, which was unacceptable. I know that the expansion of the HIMP proposal is so dangerous because of my experience working for the plant. If plants are placed in charge of the inspection process, there will be no inspection at all.

I, (REDACTED), have reviewed this statement of 4 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 21 day of May, 2012.

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(Signature)

