## **AFFIDAVIT**

My name is service (FSIS). I am an inspector for the United States Department of Agriculture (USDA) Food Safety Inspection Service (FSIS). I am submitting this affidavit freely and voluntarily to Alyssa Doom, who has identified herself to me as the investigator for the Government Accountability Project's Food Integrity Campaign. 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 location of the establishment to which I refer. I am making this statement to assert my disapproval of USDA's pilot high-speed slaughter project for market hogs, known as HIMP.

I have many years of experience with FSIS. I am highly trained in the area of meat inspection. In tact, the agency actually uses me to mentor new employees in various positions. I am currently a relief inspector. In this role, I have traveled to many plants in my district, gained a great deal of knowledge about inspection operations, and had the opportunity to compare the various inspection systems of different establishments. One of the establishments I was previously stationed at was a HIMP plant. I worked at this plant for and I saw enough to know that the agency should not go forward with its plan to implement the HIMP inspection model in hog slaughter nationwide.

Under the HIMP model, company inspectors take over the duties of USDA inspectors at the lymph node incision and head inspection stations. Line speeds under HIMP have increased from about 1100 hogs per hour to about 1300 per hour, but there is still the same number (3) of inspectors on the line. There aren't enough eyes on the lines to monitor carcasses coming by at such high speeds. This makes it easy for employees to fail to notice flaws on the animals. Quicker line speeds also make it difficult for company inspectors to incise all lymph nodes of a carcass. Lymph node incision is critical in detecting different diseases that would make the product unfit for human consumption, such as septicemia or tuberculosis.

While their duties on the line are taken over, USDA inspectors are now tasked with monitoring

the activities of the establishment's in-house inspectors. We are stationed at different points in the slaughter process to provide oversight, ensuring that plant employees are doing their jobs correctly and that we catch any defects or contaminants that they might miss. For example, we monitor whether they recognize an abscessed lymph node or whether they are properly sanitizing their knives. Monitoring company inspectors is a lot more work for the USDA inspectors because lines are going way too fast. It's almost impossible to recognize problems with both carcasses and plant employees' activities at the high speed of a HIMP line.

What I have learned from watching the company inspectors is that unlike USDA inspectors, they don't seem to have much training. At the viscera station, where they are supposed to palpate or "puddle" the animals' guts, as well as during the process of incising lymph nodes, I've witnessed company inspectors make a lot of errors. This is because they weren't trained in the proper procedures for inspecting the viscera and incising lymph nodes. They aren't meeting the same standards the USDA inspectors are held to on a regular basis and there is no consistency among the way in-house inspectors take on their tasks. A large part of doing a good job at the viscera station comes from developing a technique. At this station the inspector is exposed to many of food safety hazards and biological pathogens like salmonella and e. coli. He or she needs to know how to properly feel each organ to detect diseases. The person in this role also needs to understand and maintain preventative measures for ensuring that the carcass isn't contaminated. For example, if fecal matter or ingesta spills out of one of the animal's organs, the employee needs to understand and have the ability to execute the proper precautions needed to make sure that the pathogens don't spread to other carcasses. Not all employees know and apply these precautions. On numerous occasions, I witnessed them fail to spot abscesses, lesions, fecal matter, and other defects that would render an animal unsafe or unwholesome.

Furthermore, plant inspectors don't actually want to shut off the line to deal with problems they spot on the job. When I was working at the plant, they scrambled to try to rail out carcasses as fast as

they could and it sometimes seemed like there was mass confusion. Unlike USDA personnel, I don't feel that they truly have the authority to shut off the line. Obviously their employer will terminate them if they do it too many times. This alone is reason enough to show that HIMP is a bad idea.

If the modernization plan goes through, USDA inspectors will probably receive less training than they currently do because under the model, they are only present in establishments as a precautionary measure, to ensure that plant inspectors are catching everything. In my experience, we didn't get any special training before we started inspecting under HIMP. If this comes to be the case, then USDSA staff would no longer have the expertise to verify whether plant inspectors were doing an adequate job. The same goes for USDA veterinarians. Newer vets probably won't be properly trained to handle the program and advise their staff.

It may not seem like it at first, but USDA inspectors are under much more stress under HIMP. Sure, we may not be doing the actual palpation and incision of animals, but we're constantly there making sure that company inspectors are doing it right and verifying the carcass is wholesome. And it's not as simple as monitoring one person. When I was at the plant, in some cases USDA inspectors would monitor the activities of up to 4 different employees at a time, all while also checking the carcass for defects. What's more is that the line speeds make it impossible to monitor everything all at once.

At the HIMP plant where I worked, management was pretty respectful to USDA employees who were stationed there. They did not try to ruffle any feathers and tried maintain a low-key profile. At some establishments there's a lot of conflict between management and USDA, but I think the management at this plant didn't want to create and trouble so they could make it look like HIMP was going well.

In reality, I don't believe that either in-plant management or FSIS know how to implement the program. Moving forward with HIMP in hog plants is a bad idea for the workers in these plants, USDA

inspectors, and consumers.	
f. have reviewed this	statement of 4 pages and hereby declare under
Dated this 27 <sup>th</sup> day of September, 2014	true and correct to the best of my knowledge and belief.
(Signature)	Sworn and subscribed before me this 29 day of August, 2014.
	(Notary Signature: