

***Statement
Of
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***Domestic Policy Subcommittee
Oversight and Government Reform Committee***

***2154 of the Rayburn House Office Building
Thursday, March 4, 2010
2:00 p.m.***

***“Continuing Problems in USDA’s Enforcement of the Humane
Methods of Slaughter Act.”***

My name is Dr. Dean Wyatt. I am a supervisory public health veterinarian for the Food Safety and Inspection Service (FSIS) of the USDA. I have served the Agency and the public for over 18 years and have received numerous cash performance awards. I am speaking today in my individual capacity, and not on behalf of USDA. I am very grateful for the opportunity to testify before the subcommittee today, and I am especially grateful to Chairman Kucinich and his staff for their support in my efforts to blow the whistle.

I graduated from the College of Veterinary Medicine at Iowa State University. I have had my own private practice. I ultimately followed in my father’s footsteps and became a FSIS Public Health Veterinarian. My father died at a very young age, having contracted cryptococcosis – a highly fatal fungal disease – from a turkey slaughter plant at which he performed inspection services. Public service is in my blood.

People have asked me why I would risk ruining my career by testifying. I would respond by quoting Abraham Lincoln who said “to sin by silence, when one must protest, makes cowards of men.” I am not a coward...and I will not be silent. I truly believe that the USDA inspector is the only advocate animals have in slaughter plants. When we turn our backs on the helpless, when we fail to speak on behalf of the voiceless, when we tolerate animal abuse and suffering, then the moral compass of a just and compassionate society is gone.

I must admit that I feel somewhat like Don Quixote here because I have been in the trenches, I have fought the battles, I have the dents in my armor – only the dents in my armor have not come from plant management, they have come from upper-level FSIS management.

I am a law enforcement officer. The public has entrusted me to enforce the Humane Methods of Slaughter Act and the Federal Meat Inspection Act. The law is in place and regulated

establishments must be held accountable when they break the law. When upper-level FSIS management looks the other way as food safety or humane slaughter laws are broken, or, as has been my experience, retaliates against people who are enforcing those laws, then management is just as guilty for breaking those laws as are the establishments. The laws are there. The enforcement of those laws – in my experience – has not been there and, in fact, has been willfully ignored by well-paid public officials. I cannot emphasize this fact enough – public servants like me who take our public trust very seriously and who may even endure personal trauma in order to fulfill that trust are being thwarted in our law enforcement efforts by people who have taken that same public oath to enforce the law. It seems almost unbelievable to me, but I have been ignored by my own people and have suffered physically, emotionally, and financially in the process. More importantly, animal welfare and food safety have suffered as well.

My experience at Seaboard Farms

In March 2007, I was transferred to Seaboard Farms, a large hog slaughtering and processing establishment located in Guymon, Oklahoma. I was the night shift FSIS supervisor and my job was to oversee the enforcement of food safety and humane slaughter regulations for my shift. From almost the start of my tour there, I found numerous violations of the Humane Slaughter Act by the establishment. As I continued to raise concerns about problems at the plant, Seaboard began appealing my decisions to both my immediate supervisor and to District Office officials in Springdale, Arkansas who had never met me. FSIS officials who were hundreds of miles away simply took company personnel at their word that the egregious events that I personally witnessed did not justify my actions. A high-ranking FSIS official even went so far as to write a letter to Chairman Kucinich claiming that I was “incompetent” when the Congressman’s office inquired into allegations I had raised. All the events that I have listed in this testimony are very well documented and I will briefly describe them here:

Event 1:

May 23, 2007: I observed conscious pigs on the conveyor belt; some were moving and one was blinking and breathing regularly. As I stopped by the leg shackle station, a plant employee pointed at the blinking pig, indicating that he knew the pig was conscious, yet the pig was shackled and its neck was slit while it was awake. I suspended inspection operations and documented the event on a non-compliance report (NR). The plant did not appeal this NR to the FSIS district office.¹

¹ FSIS Notice 12-05: **VI. EGREGIOUS NONCOMPLIANCE:** Noncompliances involving injury or inhumane treatment of an egregious nature warrant immediate enforcement in accordance with 9 CFR 500.2 and 500.3, including suspension of inspection. As stated in FSIS Directive 6900.2, Revision 1, if there is an egregious situation of inhumane handling or slaughter, the Inspector-in-Charge (IIC) is to immediately suspend inspection in accordance with 9 CFR 500.3(b) and orally notify plant management of the suspension. In such situations, the IIC is to immediately notify the District Office (DO) for prompt documentation of the suspension action. An egregious situation is any act that is cruel to animals or a condition that is ignored and leads to the harm of animals such as: making cuts on or skinning conscious animals)

Event 2:

August 4, 2007: I found pigs already shackled on the slaughter line that were awake and kicking rapidly. They were being stuck with a knife and I verbally ordered the plant to stop operations.² I went to the USDA office to obtain official USDA reject tags to place on the stunning chambers. When I returned to the area, pigs were still being processed despite my suspension order. After tagging the machinery, I wrote an NR detailing my findings, which included an admission from a stunning foreman that there were many pigs being shackled and stuck who were conscious. Workers were trying to use a captive bolt stun gun on the pigs as they moved swiftly upside down along the “bleed line” – an indication that the Seaboard workers were aware that the animals were conscious.

District Office response:

The establishment appealed my NR and its appeal was granted by the District Office. The FSIS district office claimed that I was not close enough to have seen what I saw. The district office never talked to me before granting the appeal – completely accepting the establishment’s version of events. One of the FSIS supervisory inspection personnel at the plant wrote a letter to my supervisors protesting the fact that FSIS management had granted Seaboard’s appeal. Even the plant’s violation of my suspension order was ignored and never addressed by my supervisors.

Event 3:

February 27, 2008: I observed pigs being aggressively unloaded from a double-decker truck by a plant employee using a paddle to run the pigs as fast as he could off the truck. The unloading door was only wide enough to handle one pig at a time and at least five pigs went down at the bottom of the unloading ramp, while other pigs, still being driven aggressively off the truck, were trampling the prone animals who were vocalizing and being crushed by the weight of those animals coming off the truck.³ I notified plant management that I was suspending inspection operations and that they were to cease all activity. The ante-mortem public health veterinarian, Dr. Deena Gregory, also specifically told plant management to suspend all operations. I instructed Dr. Gregory to reject the truck unloading area. Rejection tags identify the area at which the violation occurred and make it clear to plant personnel that operations at that point forward are to cease until the rejection tag is removed. The plant management told me that it was “normal” for pigs to pile up and that I needed to use common sense. Dr. Gregory then told me that Seaboard had continued unloading pigs throughout the entire period of the suspension, again deliberately and willfully ignoring a federal law enforcement official’s order.

District Office response:

The District Office put the plant’s suspension in abeyance and allowed it to resume operations, at which point I removed the rejection tags from the stunners. I notified the District Office that the plant had ignored the suspension – a serious violation – but nothing was done to Seaboard even though this is a serious infraction and violates FSIS authority and USDA regulations and policy. Instead, in a telephone call the next day, inspection personnel were chastised and blamed for the

² *Id.*

³ FSIS Notice 12-05: **Category II - Truck Unloading:** Inspection program personnel must record their verification of the establishment’s humane handling procedures while unloading livestock. An example of verification procedures include observing that the proper positioning of vehicles and unloading ramps permits the unloading of animals without injury [9 CFR 313.1(b)].

bad actions of the plant. After this event, Seaboard installed huge rubber partitions at the unloading door. In addition, transport trucks arrived with the large removable panels installed on the sides of the truck despite the fact that it was unseasonably warm. These rubber partitions and truck panels prevented FSIS personnel from viewing what was happening inside the trucks and during the off-loading. I informed the District Office of Seaboard's actions and was told that there was nothing that I should do about it, even though unloading of animals is known to be a critical point for carrying out humane handling inspections.

Event 4:

March 6, 2008: At 11:40 p.m., Dr. Gregory observed an employee become frustrated and then angered by a pig that had gone down in the truck with his rear facing the unloading ramp. The Seaboard employee hit the animal hard in the face and nose 8-12 times. Dr. Gregory did not report this to me until almost two hours later, at which time I informed the plant's operations manager and stunning foreman that the plant was under suspension for the humane handling violation. I called the District Veterinary Medical Specialist (DVMS), Dr. David Ganzel, who told me that there was nothing that I should do since it had not been addressed immediately. I informed Dr. Ganzel that I was not going to take the risk of being fired because I failed to address an egregious humane handling event.

District Office response:

Dr. Ganzel spoke to Dr. Gregory as she was composing the violation documentation, and he was angry that the event had been classified as "egregious" because he considered it acceptable to hit a pig over the head and nose. Dr. Gregory and I were given a letter of reprimand (instruction) as a result of our attempts to enforce the humane handling laws.

Event 5:

March 26, 2008: I observed two pigs slip and fall on the incline ramp leading to the area just before the animals are put into the gas chamber. One of the pigs fell on his hind legs and the other pig lost his footing altogether. The plant employee driving the pigs up the ramp did not allow the fallen pigs to recover their footing, but continued to drive other animals around them. I rejected the area and immediately called Dr. Ganzel. Instead of supporting my decision, Dr. Ganzel asked me what I expected the plant to do about the slipping and falling. I stated the obvious – that, per regulations, the pigs should not be slipping and falling (proper flooring and sanitation are supposed to prevent this), and the plant employee should not continue to drive other pigs around the fallen animals.⁴ I wrote an NR to document the event and asked Dr. Ganzel if it was acceptable. He approved it for submission.

District Office response:

The following day, I was again chastised by the District Manager and told that they would not support my NR. I was told to drastically cut back on the amount of time that I was spending on humane handling enforcement. I was also notified that I would be demoted to a non-supervisory position for two weeks, a move meant to break my spirit and resolve to enforce regulations.

⁴ FSIS Notice 12-05 **Category VII - Observations for Slips and Falls:** Under this category, inspection program personnel record time spent observing whether any animals are slipping and falling. The observance of animals slipping or falling necessitates inspection program personnel to verify the following: presence of flooring that provides adequate footing [9 CFR 313.1 (b)]

These were traumatic times for me, but even after these retaliatory incidents, I still felt it was my duty to identify infractions of the law and address them.

Event 6:

On April 25, 2008, Seaboard was operating under a suspension held in abeyance because of two egregious humane slaughter violations that had occurred shortly before my shift. I was observing pigs being unloaded.⁵ Again, the pigs were being unloaded too fast, with pigs falling down and others being driven on top of them. I informed the plant official, and he replied “I don’t think that they are being unloaded too fast,” and did nothing. After a few more minutes of observing this and seeing no corrective action taken, I went to another plant employee and told him that the problem must be corrected. He was responsive and took action. I documented this sequence of events in an email and sent it to the inspector-in-charge (IIC), Dr. Evan Sumner. Dr. Sumner told me to inform the frontline supervisor, Dr. Kevin Ehlers, about the unloading problem. Dr. Ehlers told me that I needed to document the event on a non-compliance report and to call the District Veterinary Medical Specialist – Dr. David Ganzel, which I did. Dr. Ganzel also agreed that a non compliance report should be written.

District Office response:

Regardless of the fact that my immediate supervisors had approved the filing of an NR concerning the unloading incident, I was informed by Dr. Sumner the following Monday that I was to call Dr. Endersby, the District Office manager. With her on the call were the two assistant District Managers, the Frontline Supervisor, and the District Veterinary Medical Specialist. Dr. Endersby told me that there was no way I could have seen what I did indeed see during the truck unloading. She berated me for several minutes. Dr. Endersby then told me that I either had to transfer or I would be terminated. I was told that I would have to transfer to a graveyard shift at a poultry plant in Batesville, Arkansas. I was to leave the plant immediately and to never come back.

These episodes at Seaboard served to greatly undermine the authority and effectiveness of all inspection personnel, not only in that plant but throughout the district. Field inspectors could see what had happened to me simply because I was doing my job. They did not want the same thing to happen to them....Why would they risk their jobs by writing too many non-compliance reports?

It also served to embolden plant management. They knew that they could greatly push the line in the areas of humane slaughter enforcement and food safety and get away with it. After the District Office failed to support my NRs, the plant foreman snickered and laughed when I walked by. At one point, I took over to give a line inspector a break at the rail inspection station; a plant foreman came up beside me and told the meat trimmer in a loud voice so that I could hear, “This guy doesn’t know anything. Don’t trim what he tells you, just trim what you see.”

⁵ FSIS Notice 12-05 **Category II - Truck Unloading:** Under this category, inspection program personnel record their verification of the establishment’s humane handling procedures while unloading livestock.

My experience at Bushway

Because of my long tenure in FSIS, I was able to avoid being forced to transfer immediately to the graveyard shift at a location selected unilaterally by the District Office. I eventually transferred to Western Vermont, believing that there would be no way that I would see the same sort of violations as at Seaboard. However, I soon encountered inhumane handling practices at Bushway Packing and other slaughter plants, and experienced the same lack of support from FSIS management in yet another District Office.

Rifle stunning is commonly used in New England. FSIS regulations require immediate unconsciousness with a single bullet.⁶ Yet, I have seen cows shot multiple times in the head, thereby enduring unrelieved and needless suffering while plant management looked on until finally a properly placed bullet brought about death. After witnessing just such an event – a cow was shot once near her eye, again in her nose, and was still standing, fully conscious, and obviously suffering – I notified plant management that they were under suspension for an egregious humane slaughter violation. I called the District Office and my immediate supervisor. I was told by FSIS management to only document the event on a weekly meeting letter and not to even write an NR on the issue.

At Bushway, a calf slaughtering facility in Vermont, newborn male calves are typically brought in at one to seven days old. They are often trucked from long distances away, ten or twelve hours or more, and they often arrive injured, weak and dehydrated. As a result, calves may arrive “downed” and unable to get up.

I have suspended government inspection operations three times at Bushway for egregious humane handling events. And each time the district office allowed the plant to re-open and to continue operations. I witnessed animal handlers at Bushway grab a downed calf by a hind leg and drag him down an unloading ramp. Another calf was dragged through the holding pens. Dragging any non-ambulatory animal is against regulations. During another delivery, a handler swore at a downed calf and threw him off the second tier of the hauling trailer like a football. I wrote MOIs for all three of these inhumane handling events.⁷ In the case of the calf thrown to the lower level of the truck, the district office softened and diluted my written report of what happened, changing the significant word “thrown” to “dropped.”⁸ The District Office even deleted the fact that the calf handler was cursing angrily at the animal that could not rise. Cursing angrily at newborn animals that are in a weakened condition is something that could and should

⁶ FSIS Notice 12-05 **Category VIII - Stunning Effectiveness:** Under this category, inspection program personnel record their verification of the establishment’s procedures to appropriately and effectively administer stunning methods that produce unconsciousness in the animal before the animal is shackled, hoisted, thrown, cast, or cut (9 CFR 313.2 (f)). In the case of cattle, calves, horses, mules, sheep, goats, swine and other livestock, all animals are to be rendered insensible to pain by a single blow or gun shot or an electrical, chemical, or other means that is rapid and effective. Failure to properly stun animals is a serious violation of the Humane Methods of Slaughter Act (HMSA) and represents a deficiency in training, equipment design, maintenance, or application.

⁷ *Id.* at 1 (An egregious situation is any act that is cruel to animals or a condition that is ignored and leads to the harm of animals such as: dragging conscious animals).

⁸ *Id.* at 1 (An egregious situation is any act that is cruel to animals or a condition that is ignored and leads to the harm of animals such as: driving animals off semi-trailers over a drop off without providing adequate unloading facilities (animals are falling to the ground)).

be addressed. Often animals are mishandled because of misdirected anger and frustrations and these impulses need to be controlled in a job where humane handling is required.

On another occasion, the District DVMS came to the calf plant and noted that the stunning pen was too large and that there was a risk of mis-stunning the calves, as the person operating the large stunning device would often have to pursue moving calves while trying to make contact with their skulls. The size of the stunning floor also allowed too many calves to be stunned at one time, increasing the likelihood that the last calves to be shackled could regain consciousness. The DVMS told the plant manager that he had to reduce the size of the stunning area. The plant owner became very angry and said he would not do it. In response, the DVMS told us to disregard the size of the stunning area and to not enforce that regulation.

Calves arriving at Bushway after slaughter hours were destined to spend yet another 12-18 hours without food, when already they had been deprived of sustenance for perhaps days, since they were usually removed from their mothers immediately after birth. Sometimes calves are held overnight and it always broke my heart that employees would carry the bodies of these dead baby calves out of the pen because they died of dehydration and starvation. This should be considered inhumane handling.

Most likely through someone in my own agency, the plant manager at Bushway Packing in Grand Isle Vermont found out about my experience at Oklahoma and wanted me kicked out of his plant. In the middle of all the humane handling suspension actions at Bushway that I've mentioned above, the owner filed formal complaints against me implying that I was harassing him, when I was only doing my job. Suddenly, I was ordered by my FSIS supervisors to go to training for new Public Health Veterinarians, which took me out of the plant for three weeks. Again – an effort at retaliation for doing my job. I strenuously objected to this ridiculous order that was not only an insult but a waste of taxpayer money.

The turning point for me was when The Humane Society of the United States (HSUS), unbeknownst to me, hired an undercover investigator to look into my allegations of wrong doing at Bushway Packing. The video documentation produced by this investigation confirmed the gruesome humane handling violations that I was witnessing and documenting by way of noncompliance reports at Bushway. In fact, the video showed even more egregious events than I had been aware of and, in fact, showed footage of one of my subordinates telling plant personnel to only engage in violations when I was not present because otherwise “Doc (referring to me) would shut the plant down.”

As a result of the HSUS undercover investigation, I have had conversations with high-level USDA officials who listened to my concerns and have expressed a willingness to make changes in the current system. Operations at Bushway have been suspended and USDA officials are working with law enforcement officials to investigate the misconduct seen on the video. I am glad that after a long struggle, my disclosures have finally been corroborated. However, I am the exception. Food integrity and humane handling whistleblowers should not have to rely on an undercover video investigation in order for USDA supervisors to take their disclosures seriously.

As a result of my contacting advocacy groups, I am closer to achieving my dual goals of shedding light on humane handling issues and assuring that Public Health Veterinarians and inspectors are given the necessary support they need to adequately enforce the provisions of the Humane Slaughter Act. I am sincerely grateful for the opportunity to speak before Congress as both an advocate for animals and as an advocate for PHV's and inspectors who are charged with enforcing the Humane Slaughter Act. I would like to use this opportunity to propose several recommendations that will allow FSIS personnel to better protect our food integrity and to prevent the types of egregious humane handling violations that I saw at Bushway and Seaboard from happening again.

Recommendations

Staffing:

It is essential that FSIS is adequately staffed in order to allow USDA to ensure the integrity of our food supply, including humane handling. FSIS employees in the field have a very difficult job. Their main focus in slaughter plants is on performing livestock carcass inspection procedures, and they keep receiving additional duties – more testing, more reporting, more record keeping, more record reviews, more meetings with plant management, etc. FSIS staffing is such that field employees simply do not have adequate time to ensure proper humane handling along with all their other important responsibilities. This was a big problem at Bushway Packing. The inspector spent ninety-nine percent of his time doing carcass inspections and was unable to do his humane slaughter and other duties properly. The plant management loved this. The inspector told me once, “Frank Perretta [the plant manager] loves the fact that I am on the line all the time – I don't have time to snoop around!”

Even when FSIS employees do manage to spend a small amount of time on humane slaughter enforcement, the plant management always knows when the inspector is doing humane handling inspections because the slaughter line is stopped. Plant management knows what is proper and not proper. With the exception of the Bushway plant, managers will usually refrain from violating regulations when they know the FSIS inspector is watching. This points to the need for an FSIS inspector who is devoted to humane handling inspections.

There are other problems relevant to staffing that need to be addressed. New veterinarians are hired using recruitment bonuses, which has caused some frustration with established PHVs. New veterinarians are being hired with the understanding that a substantial percentage of their student loans will be paid back; in addition, a large bonus will be paid to them over a four year period. Established veterinarians who have spent their whole lives in public service receive nothing along these lines.

Also related to salary disparity – each district office has several Enforcement Investigative Analysis Officers (EIAOs). These officers do food safety assessments in plants – basically reviewing written plant records to check for compliance with regulations – and they also help with recall actions. EIAOs have no supervisory duties and most have never been a supervisor. The only qualifications are that they have a high school diploma and thirty online credit hours in a science-related course. Sometimes, these EIAO officers are asked to write humane slaughter verification plans when they have had no humane slaughter enforcement experience. Public

Health Veterinarians have a doctorate degree and they have extensive supervisory duties, they conduct critical post-mortem examinations on often dozens of animals each day and make food safety disposition decisions. PHVs also deal with Labor-Management issues, supervise complex HACCP (Hazard Analysis and Critical Control Point) programs in slaughter plants, and perform extensive humane slaughter enforcement duties. Yet PHVs receive the same amount of pay as the EIAOs. This has been a big source of frustration in the field – experienced PHVs feel under-appreciated and under-valued.

I would also like to suggest that plant management should be required to go through accredited humane handling training.

Whistleblower Protection

FSIS personnel need to know that they will not lose their jobs or suffer retaliation if they report misconduct, abuse of power or illegal activity. Whistleblower laws need to be strengthened, and agency officials must do everything possible to support personnel who report such problems, as it is in the interests of the agency and the public to know and address these problems.

Ombudsman

There is a disconnect between upper-level FSIS management and field inspection personnel. In all my years of service, I have never seen a Washington official or a district manager or deputy district manager visit a plant in the field. Personally, although I have been to the District Office five times, I have not met the district manager or two deputy district managers. These interactions are important to build camaraderie and support.

An ombudsman's office should be established so field inspectors have a place to go where they can report problems when they are not being supported by their supervisors. They need someone who will really listen to them, care about what they are saying, and actually try to have problems rectified. Such a position would be extremely valuable not only in terms of humane slaughter enforcement, but also for public health and food safety. Bushway Packing had serious food safety issues in addition to its humane handling problems – the two often go hand-in-hand.

MOI and NR

FSIS staff are required to record and document violations of any regulation on a non-compliance report (NR). The daily tasks are displayed on the computer and if there is a non-compliance, then it is entered into the computer system (PBIS) and inspectors in other plants can access these NRs. Also, each NR has to have corrective actions documented by plant management. These are permanently put into place and the plants are held accountable for implementing and enforcing them. In addition, NRs are accessible to the public through FOIA requests.

Ironically, egregious violations are not documented through the transparent NR system. After the Westland/Hallmark episode in California, the Agency started documenting egregious humane handling events only on a Memorandum of Interview (MOI) system. These are not documented as being a non-compliance in the establishment's PBIS system; the computer shows that everything is ok when in reality it is not. These MOI's cannot be accessed by other inspectors in other plants. Moreover, with the MOIs, the plant's corrective actions are documented on a verification plan system. The verification plan corrective actions are required to be performed

during the time the suspension held in abeyance is in place but, contrary to a NR, they can be dropped once the suspension is lifted. For example, if there was a problem with truck unloading and the plant's verification plan required a plant monitor to monitor truck unloading, with the NR, that would always have to be in place; with an MOI, immediately after the suspension is lifted, they would not have to have a monitor and could go back to the same system as they had before. In other words, only the most serious violations do not lead to permanent corrective actions, and only the most serious violations are unavailable to other inspectors and kept from being readily accessible to the public.

Concern about Suspensions

Sometimes the effects of a plant suspension action by the FSIS can be just as bad or worse in terms of animal suffering as the action that caused the suspension. This is true especially in larger plants. An example would be if an employee was observed dragging a downed pig across a pen, and the plant was placed under suspension. Animals are often trucked from very far distances – sometimes several states – and the result of this suspension could be that pigs that arrive at the suspended plant would have to remain for very long periods of time in trailers without water in extreme heat or cold. My suggestion would be to allow the plant to continue to operate – only at a reduced line speed so that an FSIS inspector would be free to observe humane handling operations on the part of the plant. Stiff fines could be levied upon the plant as a deterrent against future humane handling violations.

Conclusion

Businesses are held accountable by their customers, their employees are held accountable by their bosses, Congress and the President are held accountable by their constituents and the media...yet, the supervisors in the FSIS are held accountable to no one. The FSIS is like a chain. There are many strong links but there are weak links also. When these weak links break, the whole system is affected and the public's health is at risk. This administration, many District and Washington level officials, and this committee all are committed to proper and strong humane handling enforcement. I know these officials have so many issues that they deal with on a daily basis, so many crises and so many "fires" to put out. Unfortunately, though, they did not know that there was a "fire" in the field. It took HSUS, GAP and the GAO to actually reveal the raging fire that was burning out of control in the area of humane slaughter enforcement.

I have outlined several remedies to help keep these problems from flaring up into another fire storm of humane handling and food safety violations. Ensuring transparency and permanent corrective action for egregious violations will improve the integrity of the system. Passage of the whistleblower legislation will provide conscientious employees with the legal protection they need to speak out about violations of food safety and humane handling rules. An ombudsman's office will provide employees with a safe and direct avenue to reveal these "fires" to the highest levels of USDA without having their concerns trapped under layers of bureaucratic inefficiency and industry interference. Stiff fines and slower line speeds could provide useful deterrents against inhumane treatment, while avoiding unintended consequences from plant suspensions. Most importantly, we must encourage the change in the culture of USDA that I hope is already

underway, so that FSIS treats the consumer as its client, not industry, and that FSIS employees are valued and supported for protecting the integrity of our food.

Respectfully submitted,

Dean C. Wyatt D.V.M., SPHV