UPDATE: USDA REGULATORY ISSUES

Food Safety and Inspection Service
FSIS: On the Move to Improve

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It is my pleasure to represent Dr. Lester M. Crawford, Administrator for USDA’s Food Safety and Inspection Service, and to provide you an update on several of the significant issues we face today in food safety and inspection.

Very likely, you have read or heard recent news media reports that food safety—more specifically, poultry—is suspect. While these reports focused on alleged microbial contamination of poultry and inherent dangers to poultry plant workers, they could just as easily have featured the meat industry.

HACCP

At the head of the pack, FSIS is looking to the Hazard Analysis and Critical Control Point (HACCP) system to make our approach to inspection even more efficient, consistent and scientific.

The National Academy of Sciences (NAS) suggested HACCP as “a rational approach by government and industry to controlling microbiological and chemical hazards in foods.” We took that recommendation very seriously as we updated and modified plans for an optimal food safety and inspection program.

Just a little over a year ago—in January 1990, to be exact—we began a comprehensive study to determine the optimal process for implementing HACCP into meat and poultry inspection.

As you probably know, HACCP is a system universally recognized as the best food protection system we know today. It serves as a preventive maintenance system. It helps to assure the manufacture of safe products before they pose unacceptable health risks, rather than having to catch them after production. It focuses on prevention, which is much more effective than the traditional way of detection inspection.

While HACCP is well-known as the best system for food safety, its value is limited without the total commitment of industry, FSIS employees, and, of course, responsible citizens. That is why we have designed the HACCP study to fully involve not only industry, but also our own employees and consumers.

FSIS subject matter experts and a HACCP Special Team are working together with industry technical experts in workshops to develop model HACCP plans for five types of products. In-plant testing of the models will begin this summer.

In February, FSIS facilitated a refrigerated foods workshop and, in May, a cooked sausage workshop. The HACCP workshop for fresh ground beef is scheduled for December. I am certain that many of you will be there. The two other workshops will be for poultry slaughter and swine slaughter.

The partnerships we have formed with industry, consumers, and our own employees illustrate the commitment and cooperation I mentioned earlier as essential for the success of HACCP.

To reiterate, with HACCP, we must focus on designing procedures that reduce or eliminate hazards. Then, it becomes your industry’s responsibility to control these processes within certain parameters as well as to document the controls during each stage of production. When these responsibilities are properly fulfilled, our inspections can concentrate on verifying that the process is under control. We will, of course, continue spot testing for microbial and other types of contamination, but these will be principally verification tests, and not detection inspection type tests.

By preventing and minimizing the risk from food safety hazards, HACCP offers greater assurance that food products are safe and wholesome. In fact, that assurance can go a long way toward maintaining and enhancing public confidence in the food supply.

Food Labeling

Our second “Area of Emphasis” at FSIS is Food Labeling Reform. One aspect of this is nutrition labeling.

On April 2nd, FSIS issued an Advance Notice of Proposed Rulemaking on nutrition labeling of meat and poultry products. During the last two years, there have been a series of major events affecting food labeling reform. Let me just review these events quickly:

- 1989—FDA and FSIS asked the National Academy of Sciences for a study on how food labels could be improved to help consumers follow healthy diets.
- Fall 1989—FDA and FSIS held hearings in five cities on all aspects of food labels.
- September 1990—NAS issued its recommendations.
- November 1990—Congress passed the Nutrition Labeling and Education Act of 1990, requiring mandatory nutrition labeling for most FDA-regulated packaged food products.

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January 1991—FSIS announced it would seek public comment on nutrition labeling for meat and poultry products.

Basically, we asked for input from the public, industry, the scientific community and all other interested parties before we develop a package proposal on nutrition labeling. The comment period for the Advance Notice ended last week.

We will establish mandatory nutrition labeling requirements for processed meat and poultry products and voluntary guidelines for fresh meat and poultry. Our timeframe for this regulatory schedule is ambitious, because we want to harmonize with FDA.

We intend to propse regulations during the fall of 1991. At that time, there will be more opportunity for public comment. May 1993 is the target date for FDA's mandatory nutrition labeling—we hope to meet that date also.

**International Food Standards**

The third "Area of Emphasis" is science-based international food standards—as a means of achieving international food safety and of reducing trade barriers.

I'm certain that you are interested in the latest information about the status of American meat exports to the European Economic Community (EEC). You are undoubtedly baffled—baffled with inspection procedures designed to detect diseases U.S. animals do not exhibit, confused about the inability of governments to agree on basic elements of food safety, and frustrated because you know that the U.S. meat supply surpasses or, at the very least, equals the safe food standards of any other country in the world.

We continue to work on a number of problems with the EEC. As a result of petitions from your industry, the U.S. Trade Representative started a formal trade review.

We hope there will be a successful conclusion to our efforts to increase market access for U.S. agricultural products not only to the EEC but also worldwide.

**Pathogens**

You are probably noticing a trend—that many of our "Areas of Emphasis" are closely aligned. The fourth area deals specifically with microbiological hazards.

We believe more attention must be paid to controlling the pathogens, and this control must extend from the farm to the table.

Handlers all along the food chain from processing plant to supermarket to the table need to realize that hazards can and do occur because of improper handling. Microbial contamination cannot be underestimated.

**Consumer Education and Public Information**

It is essential that the role of proper food handling and storage get more attention, which brings us to a most vital link in our "Areas of Emphasis." It is Consumer Education and Public Information.

FSIS has created publications, press releases, radio and television spots, pamphlets and public awareness projects. We target food safety messages to specialized audiences such as non-English speaking audiences; food preparers in restaurants, hospitals, and nursing homes; and at-risk groups such as the immune-compromised.

And, to answer immediate questions about the care and preparation of meat and poultry, we have the toll-free number for our Meat and Poultry Hotline. The number of calls has increased by 50% over this same time last year.

Our public information outreach programs are geared to provide the general public a better understanding of how the U.S. food protection system works and the challenges. The goal is to give scientifically accurate, responsible information about food safety issues as well as the benefits and costs of moving ahead with scientific and technical advances.

**Total Quality Management**

The FSIS Total Quality Management (TQM) effort is a sixth "Area of Emphasis." TQM strives to tap the creative energies of employees toward higher levels of quality service and customer satisfaction.

We believe that the dedication of the FSIS workforce is second to none. Yet our agency is developing participative management strategies throughout all program areas. This effort will enhance the already exceptional service FSIS provides and will encourage even more respect for the crucial job of meat and poultry inspectors.

**Residue Levels**

As a seventh "Area of Emphasis," FSIS is strongly committed to reducing residue levels in food products through prevention-oriented regulation.

As many of you know, the national FSIS residue program started in 1969 with localized testing when concerns were raised about DDT. Since that time, the program has greatly expanded. Today, our inspectors and laboratory technicians are testing for 130 animal drugs, pesticides and other compounds.

During fiscal year 1990, our inspectors examined 124 million head of livestock for disease and other abnormalities that could indicate a residue problem. Between March 1988 and June 1989, they conducted about 1.5 million tests on meat and poultry samples.

The tests included random and non-random samples and showed a 3-per-1,000 violation rate. This low figure demonstrates that illegal chemical residues are a decreasing problem nationwide. If there should be even a hint of widespread contamination, additional testing is always conducted.

As members of the meat industry, you may be familiar with the Calf Antibiotic Sulfur Test (CAST) for veal. In calendar year 1989, FSIS inspectors tested 175,420 calf carcasses, finding 4,600 violations or a rate of 2.62 percent. Preliminary analysis of the 1990 testing shows that rate is decreasing.

Concern continues to exist over the certification program under which producers voluntarily certify that their bob calves have either not been medicated or that if drugs were used, proper withdrawal times were observed. Under the program which began in 1984, certified calves are tested less intensively than uncertified calves.

By the late 1980's, FSIS was concerned about the effec-
tiveness of the certification program. So, by May 1990, FSIS changed the program to accept bob calves as "certified" only if the certificate used specific wording to specify stringent legal penalties for falsification of documents and only with certificates completed by all custodians of the calf. Since May 31, 1990, virtually no bob calves have been certified.

In 1988, FSIS also became very concerned when it found an unacceptable residue picture of sulfa and antibiotic compounds for formula-fed or "fancy" veal calves. To the industry's credit, it responded positively and constructively to our enforcement actions. The violation levels fell from 3.6% to less than 1% in 1989, which is the most recent year for which our National Residue Program data is available.

This is a splendid example of how cooperative efforts between government regulators and industry benefit both public health and industry.

As members of the food science community and meat industry, you may also be interested in a very promising new test that has been developed in FSIS labs. It is the Fast Antibiotic Screen Test (FAST). And, it does indeed work quickly—in just a matter of hours, it can detect antibiotic and sulfonamide residues in animal tissue.

This new test is expected to go to field trials this summer in five plants in the western region. If FAST proves satisfactory, we hope to use it for regulatory purposes.

**Workforce Diversity**

Another "Area of Emphasis" at FSIS is the diversity of our workforce. FSIS is committed to respecting the capabilities found in the wide variety of workers in this country. Only by tapping these resources can our agency and the Department meet the challenges of a fast-changing society and world marketplace.

FSIS faces many very complex issues. We value the work of scientific experts, such as you, whose endeavors are directed toward the health and well-being of our fellow citizens. We seek your support as we carry out our responsibilities in providing a science-based food inspection service to protect the public health.