The Future of Food Safety Regulation

Farm Foundation Forum
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James H. Hodges
Executive Vice President
American Meat Institute
About AMI

• Members process more than 90% of nation's beef, pork, lamb, veal
• Several members have substantial poultry interests
• Food safety is industry’s top priority
• Food safety is a non-competitive issue
Is Food Safety System Broken?

• Not for meat and poultry
• Illness associated with meat and poultry consumption have declined
• Billion meals consumed each day without incident
Percentage of Illnesses by Foodborne Pathogens

- **Bacterial**
  - 67.20% - Norwalk-like Viruses
  - 14.2% - *Campylobacter* spp.
  - 9.7% - *Salmonella*
  - 0.5% - *E. coli* O157:H7
  - 0.3% - *E. coli*, non-O157:H7 STEC
  - 0.0% - *Listeria monocytogenes*

- **Parasitic**
  - 30.20%

- **Viral**
  - 2.60%

Mead et al. (1999)
Deaths for 10 Leading Causes of Death, All Ages, 2006

Total Deaths: 2,425,901
Total Other: 576,491 of which estimate 5,000 are caused by Foodborne Illness
### A Comparison of Resources for Food Oversight Agencies

<table>
<thead>
<tr>
<th></th>
<th>Food Safety and Inspection Service</th>
<th>Food and Drug Administration (Foods Only)</th>
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<tbody>
<tr>
<td><strong>Funding (FY09)</strong></td>
<td>$1.11 billion</td>
<td>$649 million</td>
</tr>
<tr>
<td><strong>Staff (est. field only)</strong></td>
<td>8,000</td>
<td>1,900</td>
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<tr>
<td><strong>Domestic Facilities</strong></td>
<td>6,300 slaughter and/or processing establishments</td>
<td>136,000 facilities</td>
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Robust FSIS Import Inspection

• 33 foreign countries equivalent
• Annual foreign audits
• 75 import inspectors at 150 official import establishments
• Routine product inspection and analysis
Strong Preventative Measures

Mandatory Hazard Analysis Critical Control Points Programs

• Hazard analysis
• Critical Control Points
• Critical limits
• Monitoring
• Corrective actions
• Recordkeeping
• Verification
FSIS Assures Processes Are Validated

- In-depth Food Safety Audits
- Environmental sanitation monitoring
- Extensive product sampling
## FSIS Microbiological Tests

**Salmonella**

- Raw Products: 41,805
- RTE Products: 11,651

**E. coli O157:H7**

- Ground Beef: 11,607
- Beef Products: 2,836

**Listeria**

- All Products: 12,665

**Total Micro Tests:** 80,564
FSIS Continuously Monitors Plant Sanitation

- SSOP Programs
- Immediate corrective action
Lower Pathogen Prevalence Shows System Works
Prevalence of *E. coli* O157:H7 in Ground Beef*

- **Fiscal Year**
  - 00: 0.8
  - 08: 0.4

- **Percent Positives**: 45% Reduction
Prevalence of *Listeria monocytogenes* in RTE Meat and Poultry Products*

 FSIS results of ready-to-eat products analyzed for *Listeria monocytogenes*
Lower Illness Incidence Shows System Works
Incidence of Foodborne Illness 2000-2007: *E. coli* O157*


*40% Reduction*
Incidence of Foodborne Illness
2000-2007: *Listeria*

*Preliminary FoodNet Data on the Incidence of Infection with Pathogens Transmitted Commonly Through Food --- 10 states, 2007*
Are Performance Standards Needed?
Prevalence of *Salmonella* in Chickens*

![Graph showing 58% reduction in prevalence of *Salmonella* from Performance Standard to 2007.]

*FSIS results of broilers analyzed for *Salmonella*
Prevalence of *Salmonella* in Pork*

*FSIS results of market hogs analyzed for *Salmonella*
Prevalence of *Salmonella* in Ground Beef*

*FSIS results of ground beef analyzed for *Salmonella*

64% Reduction

Performance Standard | 2007
---|---
Percent Positives | 8 | 2

*FSIS results of ground beef analyzed for *Salmonella*
Incidence of Foodborne Illness 2000-2007: *Salmonella*

*Preliminary FoodNet Data on the Incidence of Infection with Pathogens Transmitted Commonly Through Food --- 10 states, 2007*
Are Performance Standards Needed?

• Yes, if properly constructed to achieve public health protection
• Must be objective and scientifically-based to measure if food is safe and non-injurious to public health
Are Performance Standards Needed?

• No, if solely based on achieving arbitrary outcome that yields no public health protection

• Existing *Salmonella* performance standards have lowered product prevalence but not improved human health
Will More Enforcement Authority Spur Improvement?

- FSIS can detain and seize products
- FSIS can condemn products
- FSIS can shut down plant
- FSIS can withdraw inspection
- FSIS can criminally prosecute management
Is Mandatory Recall Necessary?

- Industry has business incentive to recall product
- Speed of removing contaminated product from market will not improve
- Industry cooperation to execute recalls has been excellent
- FSIS can detain and seize product without court order
- FSIS has ability to issue press release stating company is uncooperative
What Will Improve Food Safety?
Elements of an Effective Food Safety Program

- Focus on public health protection
- Focus on preventive process control systems
- Adequate publicly-funded resources
- Resources allocated to public health risk
- Objective, measurable, achievable, science-based food safety standards
Elements of an Effective Food Safety Program

- Compatibility with recognized international standards
- Better analysis and reporting of outbreak investigations
- Rigorous government inspection and testing to verify product safety
- Public/private research partnership
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