

Update On Implementation Of USDA's HACCP And Pathogen Reduction Initiatives

James H. Hodges *

Introduction

On January 25, 1999, the second group of approximately 2815 plants became subject to USDA's Hazard Analysis and Critical Control Point (HACCP) regulations. Most plants are adapting as resilient survivors. Small plants did an outstanding job in preparing for HACCP. However, USDA's stringent pathogen reduction standards, aggressive enforcement actions, and numerous recalls overshadow an otherwise successful implementation. Products are safer than ever, but the level of fear among owners and operators of meat and poultry plants is at an all time high.

Discussion

Based on current science and technology, HACCP is the best-known way to ensure meat and poultry products are as free as reasonably possible of potentially harmful defects. However, government regulators seem unable or unwilling to use HACCP as it was designed and intended. Rather, they seem intent on transforming it into another regulatory enforcement program.

Several factors have influenced USDA's positions including: 1) the Clinton Administration's desire to establish food safety as one of its major policy objectives; 2) the continuing public discussion, and doubts among some, as to whether or not USDA has an inherent conflict of interest between promoting production agriculture and regulating the safety of meat, poultry, and egg products; 3) the need to show special interest groups, and perhaps the industry, that USDA can and will take strong enforcement actions; and 4) the need to show frontline inspectors that HACCP is not a scheme for turning inspection over to the industry.

The largest packers and processors that implemented USDA's HACCP regulations on January 26, 1998 were those employing 500 or more employees. Several plants experienced significant unexpected difficulties. Many changes were needed

to ensure compliance with additional layers of regulatory burden. Some of the changes would have been driven by market forces, but USDA's intense regulatory approach has accelerated the process.

The second group of plants coming under HACCP on January 25, 1999 were those employing between 10 and 499 employees. This group of plants comprises the largest segment of AMI members. Two months prior to this last HACCP implementation deadline, AMI began contacting each small plant member to determine their readiness to implement HACCP. We were pleasantly surprised. The majority of plants had one or more employees trained, over half of the plants had plans written, and many plants had implemented their HACCP plans on a trial basis. The same level of preparedness also existed among plants that are not AMI members. FSIS reported that out of the approximate 2,815 plants, only six plants had HACCP plans that did not meet basic compliance on the first day of implementation.

Initial implementation among these so-called "small" plants appears to have been smoother than with the large firms. FSIS apparently decided that it would be politically unacceptable if large numbers of the small plants were shut down. Therefore, the agency adopted a more cooperative approach during the second round of HACCP implementation. Inspector training was improved and provided earlier. Inspectors were instructed to cooperate in the development of HACCP plans. AMI and the other industry associations, knowing the pitfalls of the 1998 implementation, were in a much better position to train, advise, and assist small plants with their HACCP development and implementation.

Several years ago, AMI petitioned USDA to require HACCP in all plants. We did not envision HACCP being layered on top of all the old out-dated inspection policies and procedures. We did not anticipate the extent to which special interest groups would influence the Administration. We were overly optimistic that USDA could transform itself under the HACCP umbrella. Nonetheless, HACCP is working and will be successful if reasonable expectations prevail.

The industry is taking more care than at any time in its history to ensure that only clean, defect-free carcasses and birds emerge from slaughter, and processing is conducted in a more hygienically controlled manner. But the incidents of positive analytical results for *E. coli* O157:H7 in raw ground beef and for *Listeria monocytogenes* in cooked, ready-to-eat processed products are on the rise. Both pathogens have

James H. Hodges, President
American Meat Institute Foundation
1700 North Moore Street
Arlington, Virginia 22209
jhodges@meatami.org
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caused catastrophic economic consequences for some companies. No company is immune.

No meat and poultry processor wants a single illness or death from foodborne pathogens to occur. However, reality says they will occur. The industry understands the difficulty in controlling *Listeria monocytogenes* and *E. coli* O157:H7. We also know that testing programs cannot ensure the safety of meat and poultry products, but that fact is not well understood by special interest groups that demand perfection.

Major problems remain with USDA's pathogen testing programs and its enforcement policies. Zero tolerance policies coupled with more sensitive analytical detection capabilities have exceeded the industry's ability to meet regulatory standards. This situation creates widespread difficulties and is felt in both small family-owned operations and large corporations.

A positive finding of *E. coli* O157:H7 or *Listeria monocytogenes* affects the structure of the entire industry. As problems are identified and solutions are implemented consolidation in all sectors of the industry will continue. Live-stock producers will likely face increasing government oversight that necessitates changes in current production practices. But for now packers and processors are bearing the brunt of current food safety problems and media attention.

A century ago, 100 percent organoleptic inspection of every plant activity may have been the most appropriate method for instilling public confidence in the safety and wholesomeness of the meat supply. Today that is not the case.

Objective science-based performance standards are needed. Those standards should be realistic and attainable. No other sector of the food industry operates with the degree of regulatory oversight imposed on the meat and poultry industry. If other industries were regulated in a similar manner, many more U.S. citizens would be working as government inspectors. Regulatory change has been promised, but little has been delivered. "Command and control" by government inspectors remains alive and well. A major overhaul of the federal meat and poultry inspection system is needed, but that seems unlikely given USDA's ability or willingness to do it.

Conclusion

HACCP is an excellent tool. The industry has done an outstanding job in preparing for HACCP. HACCP will improve the safety of our meat and poultry products, if allowed to function in a regulatory environment that enhances its capabilities.

Human illnesses and deaths, increasing numbers of recalls, and intense media interest have put the industry under the microscope. Closing the gap between our ability to detect potential food safety problems and our ability to effectively address them is the challenge the entire industry now faces.