

UPDATE: Scientific/Technical Issues

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Legislative Issues

Nutrition Labeling

Growing consumer awareness and interest in the relationship between diet and health have sparked new debate on what should and should not appear on food labels.

Five bills have been introduced in this Congress to address current concerns. Rep. Henry Waxman (D-CA) and Sen. Howard Metzenbaum (D-OH) have introduced far-reaching bills (H.R. 3028, H.R. 3562, S. 1425) to amend the Federal Food, Drug and Cosmetic Act (FFDCA) to require nutrition labeling. Sen. Orrin Hatch (R-UT), the ranking minority member of the Senate Labor and Human Resources Committee, has introduced the Food and Nutrition Labeling Act of 1989 (S. 1505). Hatch's bill, while requiring nutritional labeling, allows greater flexibility to the Secretary of Health and Human Services to establish content and format. Unlike the Waxman and Metzenbaum bills, it would also establish introduced H.R. 2051, a bill to require certain mandatory nutrition information of products containing fat, cholesterol or sodium. Rep. Jim Cooper (D-TN) introduced the Fair Food Labeling and Advertising Act (H.R. 514). This bill seeks to restrict the use of certain comparative claims such as "lite" and "lean" on a food label.

Pending proposals to change food labels include requiring a realistic statement of serving size and number of servings per package; detailed analysis of calories per serving, including calories from total fat per serving, calories from saturated fat and calories from unsaturated fat. Most proposals would require specific label statements about cholesterol per serving, sodium, carbohydrates, complex carbohydrates, sugars, protein and dietary fiber. These proposals also seek to change how labeling claims made by food manufacturers (such as "low sodium" and "lean/lite") are handled by FDA, and seek to set stringent requirements on health relationship claims such as "lower risk of heart disease" or "may help prevent cancer."

STATUS:

To date, only the Metzenbaum and Waxman bills have had any action. Last summer, the House Energy and Commerce Committee's subcommittee on Health and the Environment passed and sent a somewhat revised version of the bill to the full committee.

On November 13, the full Senate committee on Labor and Human Resources held a hearing on Sen. Metzenbaum's

version of the nutrition labeling bill (S. 1425). At that time, Sen. Metzenbaum introduced an updated version of S. 1425 that incorporates some of the changes made by the House Health and Environment subcommittee. The full Senate Labor Committee favorably reported a substitute bill on April 25, 1990. The language included in the substitute amendment addressed some of the concerns of the food industry with regards to health claims and descriptors but left the majority of the concerns untouched.

AMI POSITION:

AMI has a number of concerns about legislation to mandate nutrition labels. Even though meat is not included in the foods covered by the proposed legislation, we believe the scope and direction of the legislation will ultimately affect our products.

AMI's position is that if Congress should decide to establish a new food labeling policy, it should give the appropriate federal agencies responsibility to determine label format and content. Congress should avoid micro-managing federal food labeling policies.

Labeling policies adopted by the government should provide uniform federal labeling that will prohibit states from requiring additional or conflicting labels. Finally, labels adopted by the government should not be viewed as an endorsement of one food over another or give the impression of "good food vs. bad food."

AMI is committed to working with the Congress, USDA and other interested groups to assure that USDA has sufficient authority to effectively resolve this issue and to ensure that any nutrition labeling requirements conform to the above stated principles.

Seafood Inspection

Reacting to increased negative publicity on seafood safety in the summer of 1988, both the seafood industry (noticing a precipitous drop in per capita sales) and consumers called on Congress to set up a mandatory seafood inspection program.

Early in 1989, the seafood industry sought Administration support for a mandatory seafood inspection program, but the Administration elected not to adopt a formal policy position, preferring to let Congress decide. By the end of 1989, eight separate legislative proposals to establish a mandatory program had been introduced in Congress. The bills differ on where responsibility should be lodged (USDA, FDA, NMFS, or some shared concept), how it would be financed (user fee vs. public monies) and the actual inspection procedure. J.R. 3155, authored by House Energy and Commerce Committee Chairman John Dingell (D/MI), was reported from the full committee in March. While no floor action is expected on this bill, it will give Dingell a hand in determining the final outcome of seafood inspection debate.

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In late April, the Administration formalized its position on seafood inspection. Its plan is to enhance the current FDA authorities to regulate seafood and seafood products and expand the NMFS current voluntary fee-based inspection program.

The major legislative proposal now being studied in the House is a compromise drafted by the House Agriculture and Merchant Marine and Fisheries Committees. A hearing has been held, and mark-up is scheduled for mid-May.

In addition, the Senate Agriculture Committee has presented a draft bill to the interested parties for their comments.

AMI POSITION:

AMI is in favor of a mandatory seafood inspection program at the U.S. Department of Agriculture (USDA), provided the inspection program meets inspection standards similar to those for meat and poultry.

AMI supports public financing of such a program since seafood inspection, like meat and poultry inspection, exists for public health reasons, not for the benefit of the companies.

AMI believes the approach envisioned under most draft bills to require the Hazard Analysis Critical Control Points (HACCP) program as the basis for the seafood inspection program is a positive step.

AMI would oppose efforts to impose microbiological standards for seafood. Such standards fly in the face of HACCP and cannot assure safe seafood products.

Similarly, AMI opposes the civil penalty and "whistleblower" provisions in a number of the proposed measures.

Industry Concentration

Mergers, acquisitions and an overall trend towards larger plants in the steer and heifer sector have been occurring to varying degrees for the past decade. Over the past two years, this trend has accelerated, resulting in the 4-firm slaughter share of steers and heifers increasing from 55.1% in 1986 to 69.7% in 1988. Several producer groups are now questioning what these changes mean and will mean in the future to the competitiveness of livestock procurement.

The task force issued its final report in October, 1989. Despite a recommendation that no more mergers or acquisitions of beef slaughter facilities by the "Big Three" be allowed, the report basically supported free enterprise and unfettered competition. It recommended that no action be taken to alter or halt current trends toward contractual integration, but did call for voluntary packer reporting of controlled fed cattle inventories. It also called for voluntary price reporting of livestock. Several AMI members met with NCA officers on April 23 to discuss progress made in reporting and producer perceptions about what else needs to be done.

STATUS:

Presently, at the request of Senator Baucus, the Government Accounting Office is studying industry concentration and its implications. No completion date has been set for the GAO's report.

GAO is also conducting a separate study on the Packers

and Stockyards Administration's effectiveness in ensuring competitive behavior. Requested by Congressman de la Garza on April 18, the study was initiated following efforts by the Livestock Marketing Association to change the P & SA law to provide more flexibility to livestock markets.

A broad-based coalition of western and midwest state agricultural community activist groups, operating under the umbrella of the Western Organization of Resource Councils (WORC), held a forum and press conference on "Monopoly Control of the Livestock Industry" in conjunction with the Farm Aid IV Concert on April 16 in Indianapolis. All major farm groups boycotted the concert and there has been no press coverage of the WORC event. WORC is reportedly the group that spurred state attorneys generals from South Dakota, Iowa, Montana, Minnesota and North Dakota to cosign a letter to U.S. Attorney General Thornburgh calling for an investigation of the meat packing industry for potential violations of Federal antitrust laws.

Senator Harkin has indicated that he will hold a hearing on industry concentration in the near future. As of early May, the hearing's date, location, or possible witnesses had not been finalized.

AMI POSITION:

The AMI position has been to work with the various groups studying the changing industry structure in an attempt to ensure that their perspectives remain balanced. AMI has commissioned two reports related to structural issues that have been widely referenced by the various groups.

Regulatory Issues

FSIS Areas of Emphasis

- HACCP
- Food Label Reform
- Science Based International Food Regulation (Codex Alimentarius)
- Reduction of Microbiological Hazards
- Total Quality Management
- Public Information and Consumer Education
- Residence Control

HACCP

A 1988 study published by the International Commission on Microbiological Specifications for Foods (ICMSF), entitled "*HACCP in Microbiological Safety and Quality*," aptly describes HACCP as "... a systematic approach to hazard identification, assessment and control. The system offers a rational approach to the control of microbiological hazards in foods, avoids the many weaknesses inherent in the inspectional approach and the shortcomings of reliance on microbiological testing." These HACCP programs work equally well for other hazards, such as physical and chemical contamination.

The HACCP system, as defined in the study, is comprised of these steps: (1) Identification of hazards and assessment of severity of these hazards and their risks; (2) Determination of critical control points at which identified hazards can be controlled; (3) Specification of criteria that indicate whether an operation is under control at a particular critical control

point; (4) Establishment and implementation of procedures to monitor each critical control point to check that it is under control; (5) Taking whatever corrective action is necessary when monitoring results indicate that a particular critical control point is not under control; and (6) Verification to ensure the HACCP system is working properly.

By focusing attention of key factors that directly affect the safety and quality of a product, government inspectors, producers, processors and consumers can all be assured that the desired levels of safety and quality have been met. It is determined that when food is being produced, processed and used in accordance with the HACCP system, there is a high degree of assurance that it will meet end-user needs and expectations.

STATUS:

The Food Safety and Inspection Service (FSIS) has established a HACCP initiative project with an Executive Team and Steering Committee to integrate HACCP systems into the meat and poultry inspection program. The agency will initiate a 2-year study to determine the optimal implementation of HACCP, and in the course of this study will solicit input from the public, FSIS personnel, other regulatory agencies and the industry.

AMI POSITION:

AMI established a HACCP Task Force which recommended the following four-point HACCP implementation strategy:

1. Implementation of HACCP should be the responsibility of the processor.

Hazard Analysis Critical Control (HACCP) provides a systematic approach for achieving food safety. The Task Force recognizes the merits of HACCP and recommends its implementation in the meat and poultry industries. However, because HACCP is based on process control principles, implementation of HACCP must be the responsibility of the processor.

2. HACCP should address product safety issues only.

HACCP is based on the assessment of hazards associated with the growing, processing, distribution and consumption of food and determination of critical control points required to control the identified hazards.

HACCP, therefore, by definition, addresses product safety issues only. Issues such as product quality and economic adulteration should not be a part of the HACCP system.

3. AMI should conduct HACCP training programs for its members and certify individuals as having expert knowledge of HACCP principles.

The AMI HACCP Task Force recommends that AMI organize and conduct appropriate HACCP training programs for its members and members of other associations serving the meat and poultry industries.

4. AMI should organize an independent body of recognized HACCP experts to certify plant HACCP implementation plans.

The AMI HACCP Task Force recommends that an independent body of recognized experts be organized to review the HACCP implementation plans of AMI member companies.

After review by this independent body, HACCP plans would be shared with FSIS prior to implementation. However, implementation of HACCP would be totally the responsibility of the processor.

AMI's HACCP Task Force has scheduled a consultation with FSIS representatives to discuss implementation's strategy.

USDA Regulations on Flavoring and Added Water

BACKGROUND:

On March 1, 1990, USDA's Food Safety and Inspection Service (FSIS) issued two final rules which will have significant impact upon the meat, poultry and flavoring industries. The first alters that Agency's regulation of ingredients which can and cannot be designated as "spices" and "flavors" on the labeling of meat and poultry products. Its companion regulation modifies that Agency's compliance procedures regarding the determination of "added water" in cooked sausage products.

STATUS:

The new regulation requires that substances used to flavor meat and poultry products be listed on the label by their common or usual name. In the past, substances such as proteinaceous materials derived from livestock, poultry, eggs, milk, plants or yeast could be listed just as flavorings.

FSIS in a public announcement underscored the public health implications of the regulation. The concern is for individuals with severe allergies to these proteinaceous substances, who cannot avoid inadvertent exposure unless the substances are properly labeled on the ingredients statement.

Concern was also expressed about the marked increase in the use of these ingredients during the last several years. In the public announcement, the Agency suggested that some manufacturers may be using substances inappropriately as "low-cost meat replacements." Both the flavoring regulation and the added water regulation address this issue.

The effective date of both regulations is established at 6 months after publication, i.e. August 28, 1990. This reflects the recognition that the new rules will dictate modification of numerous finished product labels and may also cause individual processors to reevaluate their formulations in the new regulatory context.

AMI POSITION:

AMI has consistently supported the concept of labeling protein containing flavorings by their common or usual names. However, we are concerned that the 180-day compliance period is not adequate to accommodate the large number of labels that will be affected by this regulation. As a result, we have petitioned the Agency to extend the effective date of the flavoring regulation to March 1, 1991. FSIS has declined to extend the effective date at this time, stating that AMI's request is "premature." However, FSIS will continue to consider AMI's request.

An additional area of concern is the discrimination in the regulation against livestock-derived protein. As the rule now reads, unless otherwise exempted, the common or usual name for livestock-derived proteins must identify the species

and animal tissue of origin. AMI has written FSIS expressing our concern and asking for clarification on this issue.

Listeria Monocytogenes in Ready-to-Eat Meat Products

BACKGROUND:

Listeria monocytogenes bacteria can be found in most unprocessed foods of animal origin (meat, poultry, fish) and in some processed foods (cheese, ice cream, processed meats). It is sometimes found in fresh fruits and vegetables that have been treated with organic fertilizers.

It is highly probable, given the ubiquitous nature of *Listeria*, that most individuals are regularly exposed to the organism through the environment or food. The organism poses a health risk to a small number of immunocompromised individuals.

Scientists still do not know the infectious dose of *Listeria monocytogenes*, but believe the risk of listeriosis in normal, healthy individuals is minimal.

Recent outbreaks of listeriosis have been traced to raw vegetables (1979), Coleslaw (1981), pasteurized milk (1983) and soft cheese (1985).

Heating foods to an internal temperature of 160F. will kill this bacteria.

Because of its widespread distribution, ability to grow under refrigeration, and hardy nature, *Listeria* is extremely hard to eradicate from meat processing plants.

STATUS:

USDA Monitoring Program. The revised USDA monitoring program was implemented on 7/1/89. Since that date, the analysis for LM carried out by the USDA science laboratories has been based on a 25-gram sample; prior to 7/1/89, a 1-gram sample was used. Table 1 summarizes the results of analyses carried out prior to 7/1/89 and analyses carried out during the period 7/1–2/28/90.

Table 1. USDA LM Analysis.

Category	Prior to 7/1/89		7/1–2/28/90	
	LM	Samples	LM	Samples
Cooked Beef	27	1003	7	282
Sliced Canned Ham	1	235	2	52
Cooked Sausage	2	733	14	763
Cooked Poultry	2	224	6	329
Salads/Spreads	0	15	12	612
Jerky	0	216	0	84
Imported, Cooked Beef	0	78	1	11
TOTAL	32	2504	42	2133

% Positive 1.28%

% Positive 1.97%

Based on these USDA analyses, the frequency of positive LM samples is higher under the revised program, but it is still low relative to the incidence of LM that has been cited in the scientific literature and in AMI-sponsored surveys. However,

in the cooked sausage category, which included frankfurters and bologna, the frequency of positive samples has increased from 0.27% to 1.84%. This is much higher than anticipated and is cause for concern.

When the program was initiated, one of the major problems was the slow turn-around between the time the product was sampled and notification of results. During the first few weeks, turn-around times of three weeks or more were common. Since that time, the USDA has implemented a number of improvements in the sample collection and notification process, including air shipment of samples, initiation of testing upon receipt of the sample at the laboratory and notification by telefax. As a result, the average turn-around time between 9/7 and 12/13/89 was 11.6 days for the collection of the sample through notification of the IIC at the plant. The time required for laboratory analysis of the samples at the USDA Science Laboratory has been reduced to an average of 3 days.

Recalls. One of AMI's principal objectives relative to the USDA *Listeria* monitoring program has been the prevention of recalls. To date, no AMI member has been involved in a *Listeria* recall. However, the Emergency Programs staff of FSIS has conducted a total of nine recalls for *Listeria* since 4/1/89.

Four of the recalls were the result of follow-up action by FSIS in response to positive findings through testing conducted by units outside of the agency, eg. FDA, State, CDC.

Two of these four recall cases each involved an illness reported by the Centers for Disease Control; one case was associated with Turkey Franks, the other a pork product.

Five of the recalls were a direct result of FSIS monitoring program. In each of these instances, the producing firms were notified of the option of holding the production lot being tested, but the lot was nonetheless shipped.

In addition to the nine recalls shown above, FSIS conducted action in one instance to return to the country of origin two shipments of imported cooked beef which were found during import inspection testing to be positive for *Listeria monocytogenes* during import testing. A recall action was not involved since the product was placed under hold at the port of entry.

By holding production lots that are tested for LM, the possibility of a FSIS recall resulting from the monitoring program is eliminated. However, there is still a possibility of a recall occurring as a result of action from the CDC or a state agency.

In addition, the FDA has accelerated their *Listeria* monitoring program for meat containing sandwiches and this has resulted in a number of recalls.

AMI POSITION:

AMI's Meat Safety Working Group has made the following recommendations to the National Advisory Committee on Microbiological Criteria for foods regarding *Listeria* Research:

1. Methodology should be developed to differentiate virulent from non-virulent strains of *Listeria monocytogenes* and to identify genetic markers associated with invasiveness.
2. The manifestations of disease associated with *Listeria monocytogenes* needs to be clarified in such a way as to distinguish between:

- a. Random individual cases of opportunistic infection among immune-compromised populations.
 - b. Acute foodborne illness.
3. The incidence of virulent types of *Listeria monocytogenes* in the food supply needs to be determined.

Cooked Pattie Regulations

BACKGROUND:

Since *E. coli* 0157:H7 was first recognized as a human pathogen in 1982, several outbreaks have been reported and most have been attributed to undercooked beef.

The original FSIS proposal for cooked patties was in response to an outbreak of hemorrhagic colitis in a Minnesota school. The causative agent in the outbreak was *E. coli* 0157:H7, and although it was not identified in the product, it was suspected that the organism was present in under-processed cooked beef patties.

STATUS:

The proposed regulation called for a 7D Thermal Process for *Listeria monocytogenes* which translates to a minimum instantaneous internal temperature of 160°F. As a result of numerous comments which were critical of the 7D requirement, FSIS requested a recommendation from the National Advisory Committee on Microbiological Criteria. The recommendation from the Committee was that a 4D process be required.

An Agency Task Force was then set up within FSIS to review the recommendations of the Microbiological Criteria Committee and that task force agreed on a compromise 5D process.

An AMI Task Force on cooked patties was formed and commissioned research to identify and enumerate *E. coli* 0157:H7 in 50 samples of ground beef patties. However, neither the AMI research nor USDA survey on 0157:H7 has identified the organism in any sample to date.

On June 5, 1990, FSIS reissued a proposal for cooked patties and an advanced notice of proposed rule making for other uncured, comminuted meat products, including nuggets and meat balls. The reproposal includes a requirement for a minimum cooking temperature of 151°F. for 41 seconds.

Carcass Prewash Petition

In the early 1980's, USDA's Food Safety Inspection Service (FSIS) requested that the National Academy of Sciences (NAS) study and evaluate the current Meat and Poultry Inspection Programs (MPIP). In 1985, the NAS reported its findings to the USDA.

Among other things, the NAS recommended that FSIS and the industry work together to develop new technologies, and to modify slaughtering and dressing techniques in order to reduce infectious and other hazardous agents in meat and poultry products. In the wake of the NAS study, a new philosophy was developed. Eight years of research and training has led to a new management culture based upon the concepts of team management, HACCP (Hazard Analysis Critical Control Points), and Statistical Process Control. This cultural change was designed to create a work environment with each employee designated as an "expert" in his job.

FSIS has worked with various packers and processors to develop new methodologies, consistent with the principles established by NAS to develop procedures which will enhance product safety. One method developed not only enhances and adds to the capabilities of a Process Control System, but also increases total product wholesomeness and safety. This method involves an acetic acid carcass prewash which reduces the bacterial load on beef carcasses. The method is currently under evaluation at a number of slaughter plants as part of the Streamlined Inspection System (SIS) Program. The use of an acetic acid carcass prewash is not generally permitted under current FSIS regulations. The effectiveness of the process in reducing microbiological hazards has been remarkable.

Table 2. Control of Microbiological Hazards on Beef Carcasses Using a HACCP Approach.

	Conventional Process	Process Control, Streamlined Inspection System and Acetic Acid Treatment
Total Plate Count	260,000	6,300
Lactic bacteria	93,000	800
Coliforms	375	20
E. Coli	23%	1.75%
Salmonella	4.8%	0.25%
Listeria	45.0%	0.3%
Staph	9.0%	0.78%

FSIS will probably delay any decision on carcass washes until the National Academy of Sciences (NAS) study on the Streamlined Inspection System for Cattle is completed later this summer. We believe the Department is favorably inclined to begin approving partial quality control programs to implement the carcass washing system after issuance of the report.

Ergonomics and OSHA Guidelines

The Occupational Safety & Health Administration (OSHA) will soon publish voluntary ergonomic guidelines for the meat packing and processing industry, (Standard Industrial Classification Codes (SIC) 2011 and 2013). The meat packing industry has a significant employee accident and illness rate, including the highest of all industries for disorders associated with repeated trauma. In a labor-intensive, low-profit business, these injuries and illnesses translate into lost workdays, high workers' compensation rates, soaring medical costs and unacceptable employee turnover. All of this prompted OSHA, in late 1989, to designate the red meat industry for a "special emphasis" program.

During the 1980's, the entire U.S. manufacturing community has become aware of a category of occupational illnesses called "Repetitive Trauma Disorders" (RTDs). These illnesses are the wear and tear on people caused by repeatedly performing a movement that is traumatic to a part of the body.

The meat packing business is labor-intensive and employs more than 180,000 workers nationwide. These workers

often perform repetitive motions, such as cutting or lifting. The meat industry recognizes that the nature of the work—at any rate of speed—is potentially injurious.

Many meat packing plants now employ ergonomic approaches in their safety programs. AMI has developed and implemented a comprehensive industry education, research and regulatory liaison program to help in the reduction of accidents and illnesses nationwide. OSHA will now ask all meat companies to voluntarily follow its new ergonomic guidelines.

AMI remains committed to working with its members and with OSHA to insure continued improvements in workplace safety and health. To assist those members who wish to consider the OSHA guidelines, AMI is planning: 1) a series of regional meetings to answer questions about the guidelines; 2) a "how-to" manual to help management determine ergonomic needs and to set up ergonomic programs, and; 3) a video that will assist employers and employees alike to recognize ergonomic hazards and how to prevent them.

Public Relations Issues

Diet and Health—Cholesterol

The issue of how dietary cholesterol affects serum cholesterol is more controversial than ever. New information questioning the importance of both could have a significant impact on the meat industry.

BACKGROUND:

Cholesterol, chemically a lipid, serves many functions in the body. It is found only in animal products. Humans make their own cholesterol in quantities larger than those usually derived from food. The effect of dietary cholesterol on serum cholesterol levels has been controversial for over a decade.

A consensus conference sponsored by the National Heart, Lung and Blood Institute (NHLBI) led to the National Cholesterol Education Program which was founded to educate consumers on the relationship of cholesterol to health. Begun as an educational effort for high-risk individuals, the Steering Committee will release guidelines for the entire population, regardless of risk status or propensity to develop heart disease.

The NHLBI, along with the American Heart Association and many scientists who promulgate a similar philosophy, have led the country to accept the theory that diet can elevate one's serum cholesterol level and that an elevated serum cholesterol level increases the risk of heart disease.

STATUS:

Recently this theory has been revisited. First, an article, "The Cholesterol Myth," by Thomas Moore appeared in the *Atlantic Monthly*. A report issued by the American Council on Science and Health (ACSH) generated considerable coverage of a growing minority viewpoint that genetics and other risk factors, such as smoking, are more important than diet in determining the risk for developing heart disease. Subsequent press coverage has raised the question: Is cholesterol, both serum and dietary, really important?

It is not cholesterol, but fat content which has led to some negative perception of meat products. Three ounces of lean red meat contain only 75-80 mg cholesterol. Health organiza-

tions recommend 300 mg. cholesterol/day, making meat an appropriate choice for any diet.

Regarding the current revival of the cholesterol controversy, AMI believes that continued reasoned debate over this scientific issue is necessary. Further investigation is needed until more definitive answers are found and all parties engaged in the debate come closer to agreement.

Animal Welfare

The health and well-being of livestock animals dictates the quality of meat they provide. Thus the meat industry, along with many other groups and individuals, is concerned that meat animals be raised and treated humanely. Some people feel livestock are not humanely raised. Others feel animals have the same rights as humans and should not be used or killed for food, medical research or clothing. Funding and public support for a broad spectrum of animal welfare groups appears to be growing. This issue has the potential to affect consumer demand for meat.

BACKGROUND:

For both ethical and financial reasons, it is important to the meat industry that livestock be kept healthy and stress-free.

- Diseased animals cannot be accepted at packing plants for human food production; likewise animals recently given drug injections or known to carry illegal drug residues will be rejected from packing plants. Producers lose money on these animals.
- Meat packers must comply with The Humane Slaughter Act of 1978, which requires that animals be handled and slaughtered humanely. The act requires livestock pens, ramps and driveways to be in good repair, safe for animals and free of injurious flooring or protrusions; that animals be handled with a minimum of excitement and discomfort; that animals in holding pens have access to water and, if held longer than 24 hours, access to feed and, if held overnight, sufficient room to lie down. The act further requires that stunning methods prior to actual slaughter must be applied effectively, thus rendering the animal unconscious prior to shackling, hoisting and slaughtering. Approved humane stunning methods include use of carbon dioxide gas (chemical), captive bolt (mechanical) or electric current (electrical).
- Animals stressed from excessive prodding, tormenting, teasing or other mishandling will produce inferior meat which may contain bruises (must be trimmed away) and may have off-color or off-texture due to the animal's internal chemical response to stress. Packers lose money on these animals.
- Some groups feel cattle, swine, sheep, chickens and turkeys should be raised differently to improve humane farming conditions. Current U.S. agricultural practices are world-renowned for their efficiency, productivity and the quality products they produce. Alternative farming methods are gaining popularity, but tend to result in costlier products of inconsistent quality. These products are difficult to deal with in the broader market-place, where quality and value are determining factors.

STATUS:

Meat packers comply with The Humane Slaughter Act, and many have developed holding pens, equipment and

management practices to handle live animals in the most humane, least stressful way possible. Some companies purchase animals only from producers who raise livestock in an environment the company believes to be most healthful or humane for the animal.

Despite industry's compliance with federal humane treatment laws, some moderate and radical animal welfare groups are increasingly vocal in their efforts to get Americans to eat less meat or no meat at all. These groups, such as the Humane Society of the U.S. (HSUS) and People for the Ethical Treatment of Animals (PETA), have developed extensive grassroots support networks, huge budgets (PETA: \$10 million per year; HSUS: \$2-4 million per year), a media following and even congressional support.

The three target areas of most animal welfare groups are: animals used in medical research or product testing; animals raised for fur; and farm animals raised for food.

Congressional focus on animal welfare, provoked by these activist groups, has already led to hearings (on veal raising practices), and could lead to other costly legislative proposals in the next 18 months. Furthermore, publicity generated from these groups' events, such as a planned "March for Animals" June 10 in Washington, DC—attracts public attention to the animal rightists' cause.

AMI RECOMMENDATION:

As a end-user of farm animals, the meat industry has a vested interest not only in their humane treatment, but in countering the misinformation campaigns context. It is recommended that AMI play a more active role in this issue than it has in the past.

AMI recommends that an industry task force be formed to analyze the meat industry's vulnerability to these groups and their tactics. This task force would then recommend a course of action to AMI. The task force would also direct development of any information or materials AMI might provide to member companies in an effort to equip them to handle this issue at the company level.

EEC Hormone Ban

The EEC's ban on hormone-treated beef shut off most of a \$100 million market for the United States. The ban is a

trade barrier which sets a dangerous precedent for free and fair international trade.

BACKGROUND:

On January 1, 1989, the EEC implemented its long-threatened Hormone Ban Directive, prohibiting the use of growth promotants in meat. The U.S. protested that the ban lacked scientific merit and imposed \$100 million in retaliatory duties on various EEC products. A US-EEC Task Force set up to resolve the dispute devised an "interim agreement" providing for the shipment of untreated products.

STATUS:

The "interim agreement" has not led to the restoration of significant trade in beef. Our retaliatory list has been brought down by only some \$4 million. Additionally, the EEC continues to impose new and costly residue testing requirements on U.S. plants for meat and live animals that are exported to the Community.

AMI POSITION:

AMI continues to urge strong government reaction to the "Hormone Ban" and related EEC trade barriers, such as the recently-promulgated testing requirements. We are also encouraging the development of, and adherence to, a strong U.S. negotiating position for the Uruguay Round GATT talks to establish a binding dispute-settlement mechanism for health and sanitary disputes. Our government must work for international adherence to the principle that we cannot allow spurious health or scientific claims to restrict trade.

Ecological Concerns

- Meat as an "Environmentalism" Symbol
- Vegetarianism
- Religious and Ethical Influences
- Ideologically Driven Health Concerns
 - Meat and cardio-vascular disease
 - Meat and cancer