

Winfrey. The article even mentioned the impact that her program on the mad cow disease had on cattle prices. This illustrates the impact that the media has on our business.

In summary, red meat producers livelihood depend upon a meat inspection system that safeguards the nation's food supply. Because of this, producers are vitally interested in working to ensure that the US system is effective, efficient

and uniformly applied in all plants and across all species. The system must restore full consumer confidence in the safety of meat and meat products. A part of this restoration of confidence of the consumer is a matter of convincing the nations media that any new meat inspection system is effective at ensuring meat safety. Producers must work with other interested parties in developing this system.

FOOD SAFETY

Meat Inspection Packer/Processor

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It's certainly a pleasure for me to share with you some general perspectives on the future of meat and poultry inspection.

First, let's set the stage by looking at the current debate. The issue of food safety is increasingly becoming an emotional and political debate. It is a debate about perception, and winners and losers. It is unfortunate that the debate is not one based on science, but one based on what people believe. There are a variety of factors that enter into inspection reform. Many of these factors are based on one's particular agenda. They may include anti-biotechnology, animal rights, job security for federal inspectors, political advantages for the politicians or simply fundraising for special interest groups. All of the issues, and many more, cloud the real facts that we need to establish a risk-based inspection system that is based on sound science and facts.

The *E.coli* O157:H7 outbreak in the Northwest in 1993 changed the way that we look at food safety. Microbiological issues and pathogens on raw meat took on a new significance. Prior to the Washington State outbreak, pathogens on raw meat were mostly an internal debate within the industry, but the highly publicized outbreak pushed the issue of pathogen control forward to food service and household

consumers and backwards toward the farm. Unfortunately, most of the debate in Washington since that time has focused on testing, detection and punitive regulatory measures, not prevention.

It is generally recognized that raw meat and poultry contain some level of pathogens, and the most effective critical control point is proper cooking and handling. That premise is increasingly being questioned with greater regularity as products move through food distribution channels. Each segment is being asked the question, "Have you done all that you can do to reduce the likelihood that pathogens will be present on the product?" That's a far different question than, "Are meat and poultry products safe?"

With the publication of USDA's Pathogen Reduction/HACCP rule within the next few weeks, the government and industry are embarking on fundamental changes in the way inspection is conducted in meat and poultry plants. For the first time in history, the industry will be required to develop and implement HACCP programs and standard operating procedures for sanitation, and to meet a regulatory standard for *Salmonella* and generic *E.coli* on raw meat and poultry. Publication of the so called mega-reg; however, will not assure food safety. Implementation of safe food production practices by industry coupled with government oversight to verify safe food production are the keys to food safety. The message that no regulatory program can assure safe food many times gets lost in the increasingly contentious debate over how we should be changing the inspection program. No one is satisfied with the current system, least of all industry that must operate under the existing government inspection. Fairly, or unfairly, the inspection system's public credibility is being

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eroded. We need to change our current system from its present emphasis on sight, touch and smell to a more science-based system that allocates limited government resources to areas that pose the highest risks to public health.

Inspection modernization is one of the industry's top priorities. The objective should be to establish a science-based food production system that eliminates, prevents or reduces microbiological, chemical or physical hazards that may endanger human health. This objective should be accomplished under a uniform legislative statute that emphasizes safe production of meat, poultry and seafood products. Appropriate penalties should be imposed on individuals or firms that intentionally produce, process, or distribute products that endanger public health.

The centerpiece of any new inspection system should be to establish an integrated HACCP-based food production system from farm to table. Better coordination between USDA's Animal and Plant Health Inspection Service and FDA's Center for Veterinary Medicine is needed to address livestock production issues related to disease control, residue prevention and pathogen reduction. Better coordination is also needed between FDA and state and local health authorities to properly inspect distributors, wholesalers, retail outlets, hotels, restaurants and other food service institutions. In short, we need to deploy our government resources throughout the food production and distribution system, not just in the plants, to conduct periodic audits that will truly set in motion efforts to establish a farm-to-table prevention program.

This integrated HACCP-based food production system must focus on prevention, rather than detection. Meat and poultry plants should be required to operate under a HACCP program that places the responsibility for development and implementation of HACCP programs on the industry. Approved HACCP training programs should be established to certify process control technicians that can manage the HACCP programs. Independent auditors, not just government inspectors, should be used to assure the lone functionality of the systems. A joint industry-government training program in HACCP, processing technology, basic science and related fields can facilitate the process. This is obviously a very significant change for the industry, but the entire industry must take the initiative to assure a safe food supply. In an era of decreasing federal budgets, government oversight should be limited to a verification and monitoring role.

Another area of emphasis should be the use of quantitative risk analysis for policy development and allocation of inspection resources. A risk-based food safety system must focus on public health not economic or aesthetic concerns. Today, a significant portion of USDA's inspection budget is devoted to economic and aesthetic issues. The existing concept of applying government oversight to all plants in a similar way, regardless of the public health risk and severity of the potential hazard, should be abandoned.

Slaughter inspection presents the most difficult challenge. Slaughter inspection resources should concentrate on the types of livestock and poultry that pose the highest pub-

lic health risk. Testing methods such as immunological screening should be developed to improve the present methods of organoleptic slaughter inspection, and over the course of time, transform the system from sight, touch and smell to a more analytical basis.

In a similar vein, government sanitation audits should emphasize the use of objective, rather than subjective, evaluation methods. Analytical evaluation methods should be used, where possible. Microbiological data can, and should be, used as an indicator of sanitation compliance, and the government should establish plant profiles that would assist on-site sanitation inspection.

For chemical contaminants, the national residue program should emphasize on-farm prevention. Producer quality assurance programs should be encouraged as the most effective means to prevent chemical residues. A joint industry-government residue avoidance program for livestock and poultry should focus on requiring farms and individuals that market livestock and poultry containing volatile residues to operate under an industry-certified quality assurance program. Producers must accept the burden of accountability for livestock and poultry shown to contain volatile residues. In the future, prevention efforts may focus on on-farm pathogen prevention.

These are only a few of the general parameters for a new inspection system. Nevertheless, general agreement—even among industry leaders—concerning the future of federal meat and poultry inspection is not easily obtained. Some have suggested that inspection programs be privatized to make them more effective and responsive to both industry and consumer concerns. Others have maintained that keeping a full complement of inspectors in plants on a continuous basis is the only way to promote uniformity and public confidence. I personally believe neither option is the correct way to proceed at this time.

Continuous federal oversight in slaughter facilities should be maintained for the foreseeable future, but processing establishments need only to be monitored periodically. Furthermore, the industry will increasingly be required to perform the actual work associated with postmortem inspection. Limited tax dollars and the ever increasing threat to fund the current system with user fees assessed on the industry may speed this transition. The industry paying for the existing system is the worst possible situation.

Finally, we must move to a system that encourages all industry to adopt all available technologies that will improve food safety and move away from the current system that dictates how an industry must achieve those food safety goals. Even USDA's pathogen reduction rule maintains a greater reliance on "command and control" regulatory regime than is necessary. Viable companies have every reason to produce safe food. They have no incentive to potentially damage a company's reputation or destroy brand names. I have great faith in the industry to produce safe food if government shackles are removed and the industry is allowed to focus on science and preventive management.