

**Testimony of Dr. Elizabeth A. Krushinskie
Director of Quality Assurance and Food Safety
Mountaire Farms, Inc.**

On behalf of

**The National Chicken Council
Before the Subcommittee on Livestock, Dairy, and Poultry
Of the House Committee on Agriculture**

April 23, 2009

Good morning. My name is Elizabeth Krushinskie. I am Director of Quality Assurance and Food Safety at Mountaire Farms, Inc. in Millsboro, Delaware, and have worked on quality assurance and food safety issues in various capacities within the poultry industry for over 15 years. I am pleased to testify today on behalf of the National Chicken Council. NCC is the national trade association representing the country's broiler producing and processing industry. This morning, I would like to share with you information about the regulatory framework that governs the poultry industry and the success that our industry, in partnership with the government, has had in ensuring the safety of the food we produce.

The broiler chicken industry has always taken very seriously its obligation to produce safe, wholesome, high quality products. One of the basic reasons chicken is the most popular meat in America is the trust and confidence consumers have in the food safety of our products. The U.S. chicken industry's track record is unmatched with more than 37 billion pounds of chicken having been processed in 2008 and a per capita consumption of 85

pounds. The success of our brand names depends upon consumer confidence, something we strive to earn every day. Our industry is continually investing in research and development of the most effective and advanced food processing technology and food safety systems, which is why U.S. consumers enjoy the safest and most abundant food supply in the world.

In addition, the poultry industry is subject to strict regulation by USDA's Food Safety and Inspection Service (FSIS). All plants producing poultry products operate under continuous inspection by FSIS. No poultry product may enter interstate commerce if it has not been produced under inspection. FSIS may suspend operations of a facility or detain product when food safety concerns arise. And, imported meat and poultry products are not permitted entry into U.S. commerce unless produced under standards equivalent to those established by FSIS and applied to domestically produced products. Companies violating FSIS regulations are subject to severe administrative sanctions and criminal penalties.

All poultry plants follow detailed food safety plans that are designed by the plants to address potential food safety hazards that may occur in the processing of their products. The Hazard Analysis and Critical Control Points (HACCP) system was developed and voluntarily implemented by the food industry more than four decades ago. Under HACCP, plants analyze their production systems, identify all potential physical, biological and chemical

hazards that may occur, and adopt controls to prevent or reduce those hazards that are reasonably likely to occur in processing. In 1996, FSIS made HACCP mandatory, but the industry had already relied upon HACCP principles to ensure food safety.

In addition to HACCP, FSIS requires plants to adopt and follow written Sanitation Standard Operating Procedures (SSOPs) to reduce the likelihood that harmful bacteria will contaminate finished product. FSIS also sets pathogen reduction performance standards for *Salmonella* that poultry plants must meet for certain raw poultry products, and verifies that plants are meeting the standards.

In reviews of the effectiveness of HACCP and the performance standards, FSIS has reported that the vast majority of plants are complying with the *Salmonella* performance standards and that *Salmonella* prevalence, in most product categories, is lower since HACCP implementation than in baseline studies conducted before implementation. In 2006, the agency began posting industry performance categories to highlight how well the industry was doing in meeting the *Salmonella* standards, and these data reveal remarkable improvements. Between the first quarter of 2006 and the fourth quarter of 2008, the percent of broiler establishments operating at the category 1 performance level – achieving *Salmonella* prevalence levels averaging less than 10% – increased from 35.5% to 82%.

The key to success with HACCP has been industry's commitment to food safety. FSIS mandates HACCP plans and verifies compliance with the plans, but it is the plants that conduct hazard analyses and adopt and implement controls to address potential food safety hazards. The role of government is to ensure that plants have effective plans and comply with applicable regulations governing their implementation; it is not government's responsibility to second guess a plant's hazard analyses or controls determined to be appropriate for a specific product or establishment. It is critically important that each plant has the flexibility to tailor its HACCP system to its unique circumstances. This has been paramount to the success of the poultry industry in addressing potential food safety hazards.

To be clear, poultry products are subject to stringent regulation, and FSIS has a broad arsenal of enforcement authority. Yet, the poultry industry's success in making safe and wholesome products has been achieved by the industry working in cooperation with FSIS to reduce potential food safety hazards and, thereby, ensure consumer safety.

I am aware that the Congress is currently considering several bills to modernize the nation's food safety laws. To the best of my knowledge, none of these bills would expand FSIS regulatory authority. Since FSIS regulation is already pervasive, the agency does not need more power. And I am not here to

discuss what authority might be appropriate for the Food and Drug Administration in its regulation of other foods.

I do want to stress, however, that adequate funding for FDA is an essential first step toward food safety modernization. FDA has operated with less than adequate funding for too many years. Giving FDA more regulatory power would be useless without first adequately funding the agency.

And, although adequate funding is crucial to the effectiveness of any regulatory agency, user fees are not the answer. Congress should continue to fund regulatory agencies through appropriations. User fees have been proposed for FDA activities such as sampling of imported foods, recall effectiveness checks, and investigations of potential sources of contamination. Over the years, there have been various proposals to fund FSIS inspection through similar user fees imposed on the meat and poultry industries. Each time such a proposal has been considered, it has been rejected because these activities are central to the government's role in enforcing the law; they are government activities, not voluntary services for which companies receive commercial benefits.

In short, the chicken industry has done a very good job at producing safe, wholesome, high quality foods. The industry is continually developing new interventions and related technologies, and refining its food safety systems, to enhance food safety. Although FSIS regulation is strict, it has been industry's

commitment to cooperating with the government by complying with those regulations but independently seeking new and more effective ways to produce products that consumers can enjoy and trust.

Thank you for this opportunity to testify this morning. I would be pleased to respond to questions or supplement my statement as may be useful to the Committee.

Committee on Agriculture
U.S. House of Representatives
Required Witness Disclosure Form

House Rules* require nongovernmental witnesses to disclose the amount and source of Federal grants received since October 1, 2004.

Name: Elizabeth A. Krushinskie
Address: PO Box 1320, Millsboro, DE 19966
Telephone: 302-934-4107
Organization you represent (if any): Mountaire Farms, Inc.

1. Please list any federal grants or contracts (including subgrants and subcontracts) you have received since October 1, 2004, as well as the source and the amount of each grant or contract. House Rules do NOT require disclosure of federal payments to individuals, such as Social Security or Medicare benefits, farm program payments, or assistance to agricultural producers:

Source: _____ Amount: _____

Source: _____ Amount: _____

2. If you are appearing on behalf of an organization, please list any federal grants or contracts (including subgrants and subcontracts) the organization has received since October 1, 2004, as well as the source and the amount of each grant or contract:

Source: _____ Amount: _____

Source: _____ Amount: _____

Please check here if this form is NOT applicable to you:

Signature: E Krushinskie 4/14/09

* Rule XI, clause 2(g)(4) of the U.S. House of Representatives provides: *Each committee shall, to the greatest extent practicable, require witnesses who appear before it to submit in advance written statements of proposed testimony and to limit their initial presentations to the committee to brief summaries thereof. In the case of a witness appearing in a nongovernmental capacity, a written statement of proposed testimony shall include a curriculum vitae and a disclosure of the amount and source (by agency and program) of each Federal grant (or subgrant thereof) or contract (or subcontract thereof) received during the current fiscal year or either of the two previous fiscal years by the witness or by any entity represented by the witness.*

PLEASE ATTACH DISCLOSURE FORM TO EACH COPY OF TESTIMONY.

CURRICULUM VITAE

Dr. Elizabeth A. Krushinskie
125 Blue Stone Hills Drive
Harrisonburg, VA 22801
540-383-4266 (home)
Email: bkrushinskie@gmail.com

EDUCATION:

Doctor of Philosophy 1993
University of Minnesota
Doctor of Veterinary Medicine 1987
Colorado State University
Bachelor of Science 1982
University of Alaska

BOARD

CERTIFICATION:

American College of Poultry Veterinarians (ACPV)
Diplomate, 1995

FELLOWSHIPS:

2000-2001 Science, Politics, and Animal Health Policy Fellowship
Virginia-Maryland Regional College of Veterinary Medicine/Michigan State University College of Veterinary Medicine

WORK EXPERIENCE:

(6/2007 - Present)
Director of Quality Assurance and Food Safety
Mountaire Farms, Inc.
29106 John J. Williams Hwy
Millsboro, DE 19966

Nature of Work: Provide direction and technical support of the quality assurance, food safety, and regulatory compliance programs for the 6th largest broiler integrator in the U.S. consisting of three processing plants in two states with combined slaughter of 3 million head per week. Manage Animal Welfare program. Assist with export program to 40 countries.

(7/2006 – 5/2007)
Senior Technical Advisor, Avian Influenza
ORC Macro
11785 Beltsville Drive
Calverton, MD 20705

Nature of Work: Sub-contracted full-time to the Avian and Pandemic Influenza Preparedness and Response Unit, U.S. Agency for International Development (USAID), Washington, DC, to provide technical assistance and guidance on determining funding priorities for monies from the U.S. government's contribution to the international efforts to eradicate highly pathogenic Avian Influenza (HPAI) in animal agriculture in an effort to prevent the transmission of the disease to humans. Between November 2006 and May 2007, I participated in 15 USAID-funded missions to nine countries providing HPAI preparedness and response assessments, training, and aided in the programming of USAID and other donor (such as World Bank, FAO, and WHO) HPAI funds in close cooperation with host government Ministry of Agriculture and Ministry of Health officials in developing and recovering economy (former Soviet Union) countries in Europe and Eurasia.

(5/2006 – 7/2006)

Senior Technical Advisor, Avian Influenza

ACDI VOCA
50 F Street NW
Washington, DC 20001

Nature of Work: Provided technical assistance to AVDI VOCA, a USAID contractor, in the area of avian influenza control and containment.

- Traveled to West Africa (Ghana and Niger) and Eastern Europe (Armenia, Georgia, and Ukraine) providing technical assistance to U.S. Embassy's, USAID missions, World Bank, and host government agriculture agencies.
- Assisted in the preparation of operational prevention, detection, and eradication plans for highly pathogenic avian influenza (HPAI) virus incursion in these countries.

(7/2004 – 5/2006)

Vice President, Food Safety and Production Programs

U.S. Poultry and Egg Association
1530 Cooledge Road
Tucker, GA 30084-7303

Nature of Work: U.S. Poultry & Egg Association is the major trade association representing the broiler, turkey and commercial egg industries. Responsible for providing technical assistance and representing the poultry industry on issues of concern regarding food safety and poultry production programs.

- Developed and implemented monitoring systems for government programs and regulations affecting food safety and production. Developed appropriate responses and comments to regulatory dockets.
- Represented the Association regarding food safety and food science programs relating to production, processing, further processing, government, and consumer food safety issues.
- Provided basic expertise in food safety and food science related to poultry and egg products.
- Provided technical assistance on issues concerning poultry health including avian influenza.

(11/2003 – 7/2004)

Director of HACCP and Regulatory Compliance

Pilgrim's Pride Corporation
PO Box 7275
Broadway, VA 22815

Nature of Work: Responsible for assuring company compliance to USDA-FSIS HACCP and other regulatory requirements for 34 Pilgrim's Pride processing facilities in 17 states and Puerto Rico.

- Reviewed and assessed in-plant HACCP and SSOP plans for compliance to federal regulatory requirements.
- Provided technical assistance for developing, modifying, and implementing HACCP and SSOP plans, including HIMP.
- Provided veterinary technical assistance to support broiler and turkey export programs (40 plus countries including Russia, Mexico, and Japan).
- Managed Pilgrim's Pride Corporation's Animal Welfare program.
- Represented Pilgrim's Pride Corporation's interests in animal health and food safety regulatory policy development at the state, federal, and international level.

(4/2001 – 11/2003)

Director of Veterinary Services and Food Safety

Pilgrim's Pride Corporation

PO Box 7275

Broadway, VA 22815

Nature of Work: Responsible for Quality Assurance from farm-to-fork for all chicken and turkey products produced in the Eastern Division (formerly Wampler Foods, Inc.) including veterinary services for the broiler division containing three chicken processing plants and two turkey processing plants in four states.

- Provided technical direction, quality assurance, and programming of breeder vaccination programs, broiler vaccination programs, and coccidial control programs.
- Troubleshoot breeder and broiler health and performance issues.
- Managed broiler side of company response to significant low pathogenic avian influenza H7N2 outbreak in 2002.
- Provided technical support to live production management for on-farm foodborne pathogen reduction, residue avoidance, carcass processability, and judicious antibiotic use.
- Provided technical support to in-plant QA personnel for condemnation reduction and technical/regulatory issues involving food safety.
- Provided technical support for export programs of chicken and turkey products to over 40 countries including Russia, Japan and Mexico.
- Initiated numerous food safety research projects involving new pathogen reduction technologies at the live production and plant level.
- Implemented effective new pathogen reduction technologies at the live production and plant level.
- Implemented USDA-FSIS food safety regulatory requirements at the plant level.
- Managed the Eastern Division Food Safety and Quality Assurance Laboratory that performed foodborne pathogen (primarily salmonella, campylobacter, and listeria) testing, serological assays, feed analysis, water quality analysis, and pesticide residue testing for all processing plants, feedmills, and live production groups in the Eastern Division (chicken and turkey).
 - Managed the QA Lab Manager and up to 10 hourly technicians and a laboratory budget in excess of \$1.0 million annually.
- Represented Pilgrim's Pride Corporation's interests in animal health and food safety regulatory policy development at the state, federal, and international level.
- Active member of numerous industry associations and technical committees.

(7/1997 – 4/2001)

Director of Chicken Veterinary Services

Wampler Foods, Inc.

PO Box 7275

Broadway, VA 22815

Nature of Work: Provided technical support and poultry health expertise to the live production managers in each complex.

- Provided technical direction, quality assurance, and programming of breeder vaccination programs, broiler vaccination programs, and coccidial control programs.
- Troubleshoot breeder and broiler health and performance issues.
- Developed and implemented hatchery quality assurance programs.
- Coordinated diagnostic services for chicken live production managers.
- Managed the National Poultry Improvement Plan participation.
- Managed the Director of Quality Assurance, four in-plant QA Managers, and 75 QA supervisors and technicians and plant QA budgets in excess of \$4.5 million annually.
- Directed the successful implementation of the HACCP Inspection Models Project (HIMP) inspection system in our largest chicken processing plant (Moorefield, WV).
 - Received HACCP Based Slaughter Inspection Models Project (HIMP) Training at USDA-

FSIS Training Center in College Station, TX.

- Initiated numerous food safety research projects from farm-to-fork.
- Implemented pathogen reduction technologies at the live production and plant level.
- Implemented USDA-FSIS food safety regulatory requirements.
- Provided technical support for export programs of product to over 40 countries including Russia, Mexico and Japan.
- Represented Pilgrim's Pride Corporation's interests in animal health and food safety regulatory policy development at the state, federal, and international level.
- Active member of numerous industry associations and technical committees.

(12/1994 - 7/1997)

Health Services Research Laboratory Manager

Perdue Farms, Inc.

P.O. 1537

Salisbury, MD 21802-1537

Nature of Work: Designed and implemented approximately 50 research projects per year related to poultry health issues such as Marek's Disease, Infectious Bursal Disease, coccidiosis, competitive exclusion products, *Salmonella* and other foodborne pathogen control.

- Performed cooperative applied research projects with university, government, and allied industry groups.
- Analyzed data, interpreted results, and prepared written research summaries for each laboratory and field trial.
- Supervised six associates working in a research laboratory, with BL-2 level isolation units, and on two colony house research farms.
- Managed \$500,000 annual budget.
- Provided National Poultry Improvement Plan (NPIP) monitoring services for Perdue primary and parent breeder programs.
- Coordinated diagnostics for Perdue live production.
- Provided technical direction, quality assurance, and programming for live production vaccination programs.
- Represented Perdue and the broiler industry at national and international meetings.
- Active member of numerous industry associations and technical committees.

(1/93 - 12/94)

Professional Services Veterinarian

Solvay Animal Health, Inc.

1201 Northland Drive

Mendota Heights, MN 55120-1149

Nature of Work: Provided professional veterinary technical support service for an international poultry biologics company.

- Included troubleshooting disease problems, writing technical reports, giving countless oral presentations at scientific and lay meetings, and coordinating and lecturing at several Solvay poultry shortcourses.
- Required extensive travel within and outside the U.S. (primarily Canada, Mexico, the Caribbean region, South America, and Asia).

PROFESSIONAL MEMBERSHIPS:

American Association of Avian Pathologists (AAAP)

Member, 1993-2009
AAAP Board of Directors, Director-At-Large 1998-2000
Chair, Membership Committee 2000-2002
President-Elect, 2002-2003
President, 2003-2004
Past President, 2004-2005

American Association of Food Hygiene Veterinarians (AAFHV)

Member, 2003 - 2009

American Veterinary Medical Association (AVMA)

Member, 1987-2009
Steering Committee on Antimicrobial Resistance,
2000-2003
Clinical Practitioner's Advisory Committee, 2002-2003
Food Safety Advisory Committee, 2003-2006

Association of Veterinarians in Broiler Production (AVBP)

Member, 1995-2004, 2006-2009

Delmarva Poultry Industry, Inc. (DPI)

Member, 1995-1997, 2006-2009
Poultry Health Committee 1995-1997
Poultry Health Committee Chair 1997
Food Safety and Processing Committee 1995-1997
Breeder and Hatchery Committee 1997

Mid-Atlantic Poultry Health Council

Maryland Industry Representative 1997-1999
Virginia Industry Representative 1999-2004

National Chicken Council (NCC)

Poultry Health Committee, 1997-2001
Antimicrobial Subcommittee, 1999-2001
Technical and Regulatory Committee, 1999-2003, 2006-2009
Steering Committee, 1999-2003

National Poultry Improvement Plan (NPIP)

General Conference Committee, 1996-2000
South Atlantic Region Representative, 1996-2000

National Turkey Federation (NTF)

Technical and Regulatory Committee, 2001-2004, 2006-2009

U.S. Animal Health Association (USAHA)

Member, 1995-2009
Transmissible Diseases of Poultry Committee, 1995-2008
Food Safety Committee, 2000-2008
Salmonella Committee, 2004-2008
Animal Emergency Management Committee, 2006

U.S. Department of Agriculture

National Advisory Committee on Meat and Poultry Inspection, 2005-2006

Virginia Veterinary Medical Association (VVMA)

Member, 2001-2004