



**Testimony of Robert G. Reinhard**

**On behalf of the**

**National Turkey Federation**

**Committee on Agriculture**

**Review of Current Issues in Food Safety**

**July 16, 2009**

Good morning Chairman Peterson, Ranking Member Lucas, and members of the House Agriculture Committee. My name is Bob Reinhard and I am the Director of Food Safety and Regulatory Affairs for Sara Lee Corporation. Today I will be testifying on behalf of the National Turkey Federation, as Co-Chairman of the federation's Technical and Regulatory Committee, which oversees all scientific and technical food safety activities for the federation. The National Turkey Federation is a non-profit, U.S. trade association located in Washington, D.C., representing the entire turkey industry, including local farmers, processors, marketers, retailers and industry allied services. Currently, NTF represents nearly 100 percent of the U.S. turkey industry and we greatly appreciate the opportunity to provide comments today.

The U.S. turkey industry raises more than 260 million turkeys, which after processing represents approximately 6 billion pounds of safe, wholesome, nutritious protein products for domestic and international consumers. Food safety is NTF's number-one priority and federation members' future success is directly linked to customer confidence in the safety of the food supply and turkey products. Since the inception of the National Turkey Federation in 1940, science-based food safety has been an industry priority and over the years the membership has agreed food safety is an issue on which they would cooperate, share best practices, and developing science-based, state-of-the-art food safety interventions from the farm to the consumer.

Federal inspection of turkey and other meat and poultry products by the USDA Food Safety Inspection Service (FSIS) has undergone major changes in the last 13 years, and the collaborative efforts of industry and FSIS have resulted in some major accomplishments related to food safety and pathogen reduction. Both the government and industry have shown they are capable of implementing scientific food safety programs and that a modern, science-based

inspection system within the framework of the existing inspection statutes can be effective.

However, work remains to be done on all sides, as we will discuss momentarily, and there should be a role for Congress to play in this process. Yet, we believe that the mindset and commitment that has been established by both the regulators and the regulated has created a foundation for the continuing improvement of the meat and poultry inspection.

Going back more than a decade, it was a coalition from the food industry that included the National Turkey Federation, which petitioned the USDA's FSIS for a preventive, science-based food safety system and in 1996 FSIS promulgated the Pathogen Reduction/Hazard Analysis Critical Control Point (HACCP) requirements. With this "HACCP rule," which was implemented by industry in 1998, certain naturally occurring pathogens in raw meat and poultry products were identified as potential food safety hazards and if those hazards were likely to occur, process controls to eliminate or control those hazards were implemented at the production facility. Further, a processing establishment was also required to have programs for ensuring they maintain the highest sanitary conditions in their facility, known as Sanitation Standard Operating Procedures (SSOPs). We feel these programs have been highly successful, but again recognize that further progress is and can be accomplished.

On March 14, 2009, President Obama announced the creation of a Food Safety Working Group (FSWG) to focus on food safety based on the need to improve the existing food safety systems. The FSWG is chaired by the Secretaries of the Department of Health and Human Services and the Department of Agriculture. The purpose of the FSWG is to provide information to the President on how the food safety system can be modified for the 21<sup>st</sup> century, assist in fostering coordination on food safety issues throughout all of government, and to work to ensure that existing food safety laws are enforced.

In the last week, the FSWG announced several new initiatives, founded on three core principles: prevention, strengthening surveillance, and improving response and recovery.

Examples fostering these principals, which were shared by the Secretaries included:

- Preventing harm to consumers;
- Food safety inspection and enforcement dependent on data and analysis; and
- Outbreaks identified quickly and stopped.

Industry supports and believes in these same principles. The use of scientific data analysis is particularly critical in making informed decision towards the improvement of our public health system. To that end, the agencies need to continue to strive to have more specific information on attribution, as well as work together to share data, not only with each other but more broadly with the regulated industry and with other interested parties.

The industry is confident and optimistic that the White House FSWG, the Secretary of Agriculture, and the Secretary of Health and Human Services will continue to take a leadership and preventive role on food safety issues and work to break down barriers in working across different government agencies. The FSWG should monitor implementation of their recommendations, as well as ensure coordination of food safety policies between the different parties overseeing the implementation of recommended measures.

At this point, it is very important to note, HACCP and SSOPs have yielded significant and measurable successes, as shown by USDA FSIS pathogen testing data. Specifically, on an annual basis, the Office of Public Health and Science analyzes more than 125,000 products and conducts more than 650,000 combined analyses on these meat and poultry products and in the

processing environment in federally inspected establishment. These FSIS analyses include testing for chemical and biological food safety hazards, including pathogens of public health concern like *Listeria monocytogenes* and *Salmonella*. Using this scientific quantitative data as a benchmark, since turn of the century (2000 to 2007) we have seen a 74 percent reduction in the incidence of *Listeria monocytogenes* in ready-to-eat meat and poultry products. Additionally, since an initial baseline study by FSIS in 1996 on *Salmonella* prevalence on raw turkey carcasses, we have seen a 64 percent reduction in this pathogen's presence. However, we need better attribution data to confirm what our best instincts tell us – that these food safety improvements have a correlation to the decline in foodborne illness. The development of attribution information will be of critical importance as we continue to make improvements in food safety.

We share this information to show that we are not in need of re-building a system, but in need of enhancing a system that is already working. Everyone wants to do better, but we need to build on our successes and use data with attribution information to drive the changes that will lead to improvements in public health.

### **Modernization**

HACCP is a science-based proven food safety system that has enhanced the safety of the meat and poultry products produced in the United States. And since initial implementation in 1998, there have been ongoing efforts to improve the way regulatory oversight is executed and how a processing establishment performance is measured. During HACCP's implementation period in 1998, FSIS hosted numerous public meetings across the country and provided countless supporting documents to assist the regulated entities in achieving compliance with the new requirements. The process was phased-in based on plant size, with specific focus on small and

very small establishments. Today, all federally inspected meat and poultry establishments have implemented a hazard analysis and preventive control system.

We bring this up to only caution that any such changes to the existing laws and regulations should be done carefully and all due diligence should be exercised. Any changes to the existing statute should be done with a scalpel, not an axe, to ensure that the current level of inspection is not compromised.

When the current food safety statutes were passed, no one envisioned HACCP, yet the law proved flexible enough to accommodate it. As science and technology improves, it is highly plausible that the food safety inspection process would and should be improved as well. Changes to FSIS and FDA statutory authority should not be so prescriptive that they stifle innovation and prevent industry, the Secretary of Agriculture, or the Secretary of Health and Human Services from making science-based improvements with definable public health outcomes that are deemed appropriate. Currently, as reiterated by the White House FSWG, FSIS has embarked on further refining its inspection process using science, risk and other appropriate data. The agency has been moving to utilize public health risk in determining how to best utilize their inspection resources. In today's economic environment, it is prudent that the government and industry focus more of their limited resources toward processes to prevent food safety concerns and that we focus specifically on interventions that have a measurable outcome related to public health. This clearly is the way of the future. FSIS' efforts offer instructive lessons for anyone interested in food safety. All food safety systems should be designed to manage and reduce risk to the food supply. Congress may want to consider giving FSIS expanded authority to allocate inspection resources according to risk so that inspectors are focused most closely on those tasks that will have the biggest impact on food safety. For example, federally inspected

establishments could be allowed to share bird-by-bird inspection duties in a joint effort, working with and under the close supervision of FSIS employees to assure the safety of poultry caresses. Such a system would permit inspection resources to be shifted to inspection processes that have a higher risk related to food safety and a measurable public health outcome.

### **Current Legislation**

Given the nature of this hearing, it would not be appropriate to close without discussing H.R. 2749, the “Food Safety Enhancement Act of 2009” recently passed by the Energy and Commerce Committee.

One thing of note is the exemption in Section 5 regarding products that are inspected under the Meat and Poultry Inspection Acts and the farms raising these products. We applaud these exemptions and the efforts of Chairman Waxman, Ranking Member Barton and the entire Energy and Commerce Committee to include this exemption, and we would encourage Congress to preserve and, if appropriate, strengthen the exemption as the bill moves through the legislative process.

The opportunity for Congress to pass significant food safety legislation rarely comes along. It is NTF’s position that with an opportunity like what is presented; legislation should give USDA and FDA additional tools to collaborate with industry, consumers, academia and all other stakeholders to prevent food safety problems from occurring in the first place. Before adding new regulations, we strongly encourage this Committee and all Members of Congress consider whether legislation provides measurable public health outcomes.

In closing, it should be reiterated that the U.S. meat and poultry supply is one of the safest in the world. However, the turkey industry recognizes changes could and should be made to further enhance confidence in the consuming public. As the food safety reform debate moves

to the forefront of the congressional agenda, any changes that are enacted should ensure demonstrable improvements in food safety and that a measurable public health outcome is achieved.

Mr. Chairman and other members of the committee, again, let me thank you for allowing the National Turkey Federation the opportunity to provide this testimony today. The number one goal of the U.S. turkey industry is to provide safe, wholesome, nutritious, quality products at an affordable cost to our customers. Thank you very much and I will be happy to answer any questions.