NATIONAL CATTLEMEN'S BEEF ASSOCIATION

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Testimony

on behalf of the

NATIONAL CATTLEMEN'S BEEF ASSOCIATION

in regard to Food Safety

Presented and Submitted to

The Senate Agriculture, Nutrition and Forestry Committee
Food Safety Hearing

Chairman Dick Lugar
Tom Harkin, Ranking Member

submitted by

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Producer-directed and consumer-focused, the National Cattlemen's Beef Association is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry.

Good morning. My name is Gary Weber; I am the Executive Director for Regulatory Affairs for the National Cattlemen's Beef Association. On behalf of the more than 230,000 members, 45 State cattle associations and 27 national breed organizations, I want to thank you Chairman Lugar, Senator Harkin and Members of the Committee for holding this hearing to discuss the issue of food safety.

The NCBA commends you and this committee for providing this opportunity to examine the issues affecting our continual efforts to provide consumers with the most safe and wholesome beef supply in the world.

Let me preface my remarks by saying we have been ardent supporters of a more science-based meat inspection system, specifically the principles inherent in the Hazard Analysis and Critical Control Points or HACCP approach.

We have also been supporters of the need to conduct microbial testing as a means of verifying the performance of HACCP plans.

However, we must recognize that we do not have the ability to produce and distribute fresh meat products with current technology that are sterile. Some level of microbial contamination is virtually unavoidable.

Your first question, **"Is microbial contamination the most significant threat to our food supply?"** is an appropriate starting

point for this hearing. On the surface, the simple answer appears to be yes. However, the truth is that individuals greatly influence the microbiological risks inherent in or on foods through their actions in the production, processing, transport, handling and cooking of meat products.

When individuals, from the farm to the table, carry out their respective responsibilities to raise, process, transport, handle and prepare foods correctly, there is little risk to public health from the known, inherent and expected microbial contamination in or on fresh meat products.

This leads to your next question, **"What are the food safety responsibilities of the federal government and the private sector related to microbial contamination?"**

While at each step from the farm to the table, steps can, and arguably must be taken, to reduce the risk of food borne illness; some individuals won't fulfill responsibilities. Hence, historically, the government has regulated the industry at key points in the farm-to-table continuum to protect the safety of the meat supply.

For many reasons, the government's focus has been on the packing and processing phase of the industry. This is thought to be where the greatest benefits can be made to protect public health because it is the funnel through which all meat animals must pass.

With the advent of HACCP, an evolutionary process has begun. The government inspection system is changing incrementally as is the role of the industry. Hopefully, we are moving toward a point where a more collaborative, cooperative relationship will develop between government and industry to ensure continued improvements in food safety. We are not there yet but that must remain the primary focus.

We must be careful not to do anything that would allow or force the government's role in terms of HACCP to return to the "command and control" mode. We must also be careful not to impact the industry in such a way as to stop or reverse the dramatic progress that has been made as the result of industry taking more responsibility for food safety.

In other words, we need to continue to foster the continued evolution of HACCP.

Your question **"What is the value of the HACCP approach to food safety in addressing microbial contamination?"** can be addressed, in part, by focusing on the concept of "critical limits." Once a hazard is identified, such as Salmonella for example, then we have to discuss what the critical limit should be. How much Salmonella should be allowed? When the HACCP rule was written, no one really knew, so the USDA decided to take a shot at it. They developed a set of baseline data for each of the species and decided that the industry should try to be at or below the average. The average was now for all intents and purposes, the "critical limit." This limit had no real

relationship to public health; it was just what the industry seemed capable of doing. It was a starting point in this evolutionary process of implementing HACCP.

I must say the "critical limit" for Salmonella for beef was 25 times less than the one set for poultry. Effectively we can have one packing plant processing poultry running a 25% Salmonella positive rate, while another company processing beef cattle might be shut down by the government because their Salmonella positive rate went over the 1% mark one too many times!

In truth, the microbiological "critical limits" should be based on science and a realistic, rational risk assessment, consistent with identifiable and achievable public health goals and documented benefits, not simply on what the industry is currently doing. I must add, however, that while the government had to start someplace, it seems the time is right to evolve to a more science based "critical limit." That limit, given current technology, is not "zero."

In addition, with respect to microbial "critical limits," these should be viewed as targets rather than absolutes. Levels should be monitored. If found to be moving in the wrong direction, cooperative and collaborated efforts on the part of government and industry should begin. This will result in a better understanding of the situation and a stabilization or shifting of the trend the other way. Most often, this takes time, money and technology.

Your next question relates to the challenges facing the industry in terms of "…**barriers to the development and implementation of new technologies and tools to detect, prevent and reduce microbial contamination.**"

The NCBA has invested millions of Check-off dollars to develop and validate technologies that will reduce the contamination on beef carcasses. We have shown that through the use of a multiple set of interventions such steam vacuuming, antimicrobial rinses and steam cabinet pasteurization; we can reduce microbial contamination levels by over 99%. These interventions are in place and functional in plants that process nearly 90% of all beef cattle in the United States. Today, beef has the best microbiological profile of all meat and poultry inspected by the USDA.

An array of new technologies is being developed that will improve the microbiological profile of meat products. However, despite all the interventions that are in place, no one can ensure these products are totally free of bacteria, either benign or pathogenic.

The development of more rapid, more sensitive and specific microbial testing systems holds promise to offer almost real-time detection of pathogens. These should allow more responsive HACCP based decision-making and enhance the ability of the industry and government to verify systems are under control and meeting their targets.

Your last question, **"Are there changes needed in the food safety system to aid in the detection, prevention and reduction of microbial contamination?"** might be simplified to ask are there changes needed in the food safety system, period. This would include a wider array of options and suggestions.

As I stated earlier, we have viewed development of HACCP as an evolutionary process for both government and industry. It is a process that should embrace the concept of continuous improvement.

The microbial performance targets currently used in the regulatory component of HACCP, the --"critical limits" -- need to be revisited. They need to be more science based, and linked to tangible public health benefits. The pressure to continually reduce the "critical limits" will logically run head long into the law of diminishing returns. We need to ask what is the real significance to public health of the "critical limits" in a science and risk-based assessment.

The regulatory process needs to employ a more cooperative, collaborative approach whereby government and industry work together to achieve mutually established goals that work to protect public safety. The adversarial, command and control approach of the past is not consistent with HACCP.

In order for government regulations not to contribute to more consolidation of the livestock industries and corresponding loss of small businesses when problems arise, government should reach for

technical assistance rather than reach for the stick. The paradigm must continue to shift from adversarial command and control to collaboration and cooperation focused on science-based microbial performance targets correlated to real public health benefits.

Let me close by asking the Committee to consider the follow request for assistance.

1. We need more research dollars and a coordinated government, industry and consumer driven priority setting process and better access to plants for research purposes.
2. We must establish a means of developing more science and risk assessment based "critical limits."
3. We need a more rational and logical regulatory framework consistent with the concepts of HACCP and the regulated sector's true "sphere of influence" and enforced in a more cooperative collaborative manner.
4. Last but not least, we need technical assistance education from the farm to the table to aid in our pursuit of an even safer food supply.

Thank you again for this opportunity to address the challenges facing us as we continue to provide consumers in this country and around the world the safest and most wholesome meat products.