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**Developing a Comprehensive Strategic Federal Food Safety Plan
President's National Food Safety Initiative**

**Department of Agriculture
Food Safety and Inspection Service
Food and Drug Administration
[Docket No.98-045N]**

January 7, 1999

The Humane Society of the United States

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The Humane Society of the United States, on behalf of its more than 7 million members and constituents, appreciates this opportunity to comment on the development of a federal food safety agenda. Foodborne disease is an extremely serious problem, with an estimated annual 33 million to 250 million illnesses and 9,000 deaths. Even at the more conservative rate, every second in the United States someone is sickened by the food they eat, at an estimated annual economic cost of \$22 billion. This is a food safety *crisis*.

We are glad to see the President's Council on Food Safety has been directed to develop a food safety plan that contains "specific recommendations on needed changes" with "measurable outcome goals." This is in contrast to the vague and ill-defined findings and recommendations of the National Academy of Sciences report, "Ensuring Safe Food from Production to Consumption," which the Council is to take into consideration in developing the plan.

The Greatest Gap: Production Level Safeguards

By far the greatest gap in the food safety system is the appalling lack of safeguards at the production stage of animal agriculture, the lack of attention to them and seemingly even a lack of interest in them. Foodborne illness and death represent preventable illnesses and deaths. Prevention is the only sensible way to address foodborne problems. This can best and often only be effectively accomplished at the production stage, where the preponderance of these problems begin. Since the vast majority of food-borne disease is attributed to foods of animal origin, attention should focus on animal production. Animal agriculture is also the source of contamination for fruits, vegetables and other crops contaminated by animal manure used as fertilizer and those that are cross-contaminated by contact with contaminated foods of animal origin. Prevention at the animal production level is infinitely the most efficient way to remedy the food safety crisis which, given the scope of the problem and the limited resources available to address it, nothing less can be afforded.

From Vision to Reality

In order to make the Council's Draft Vision Statement a reality, this gap needs to be closed. Industry needs to acknowledge and accept its responsibility for ensuring that the products it sells are indeed safe. It is the government's responsibility to verify that they are. While reasonable precautions at the processing, distribution and consumer stages are also necessary, addressing food safety problems at these later stages is of a much more limited ability and may even exacerbate the problems. For example, the use of acids in processing can create problems and hot water can enhance the ability of pathogens to adhere to meat, while antibacterial soaps and other household products may actually be contributing to antibacterial resistance. In regard to *E. coli* 0157:H7, the USDA, noting that human sickness can actually be worsened by treatment with antibiotics, cautioned "prevention is of critical importance." Efforts at the consumer level are also limited by the ability and willingness of consumers to act on food safety information. These problems must primarily be addressed at the production level.

Mutual Call for Actions

There have long been calls from within the scientific community, the government, and even industry for food safety to be addressed at the production level. The following are only a few of very many examples:

- o “Safety of foods of animal origin,” an article published in The Journal of the American Veterinary Medical Association in 1991, advises: “A major component of any national food safety strategy must be reduction or elimination of offending pathogens at the farm level.”

- o In July of 1985, a National Research Council report requested by FSIS called for control and monitoring of hazardous agents on the farm, where these agents first enter the food supply. The report favored HACCP inspection as a comprehensive approach applicable to the range of operations beginning with the production of animals.

- o An early draft of the interagency report to the President entitled “Food Safety from Farm to Table: A National Food-Safety Initiative” stated: “To move forward in any pathogen reduction effort, it is important to understand the sources of the microbial load in the live animal population. An inspection plan that includes an evaluation of the husbandry practices, diet and environment...is critical to the establishment of this knowledge base.” (For unexplained reasons, this elementary concept was omitted from the final report.)

- o The Council for Agricultural Science and Technology (CAST)’s October 1998 report, Foodborne Pathogens: Review of Recommendations, states that producers should be *required* to adopt effective preslaughter intervention strategies. Peggy Foegeding, Cochair of the Task Force, asserts that production stage controls are a key component of any farm to consumption food-safety plan.

- o The National Milk Producers Federation has called for greater emphasis on food safety at the farm level, beginning with good management practices that lead to the prevention of herd health problems.

The Humane Society of the United States has previously submitted comments (in particular, those in response to dockets 93-016P and 97-024N) and otherwise repeatedly urged the USDA to address the food safety crisis at the production level, giving both reasons and recommendations. The intensification and consolidation of agriculture, with the accompanying crowding of and demand upon animals, has led to the development of more virulent variant strains of endemic pathogens and the rapid spread of both common and newly introduced diseases. The more animals are crowded the greater the exposure, and with animals bred to be nearly genetically identical pathogens are able to make multiple passages through many susceptible animals in flocks and herds with common risk profiles. Increased pathogen shedding is attributed to stressful environments. The routine subtherapeutic use of antibiotics has also added to the problem. For example, the Centers for Disease Control associates the rise in Salmonella with the increase in large numbers of animals crowded together receiving frequent low doses of antibiotics.

Short-Term Steps

There are production practices which are known to pose food safety hazards. Rather than attempting to find some technological 'fix' to remedy practices which are known to exacerbate pathogen problems such as forced molting, whereby hens are starved for up to two weeks and deprived of water for days at a time -a practice which has been shown to exponentially increase birds' susceptibility to salmonella and its transmission to other birds and eggs- such practices should be banned outright. Highly suspect and risky production practices, such as the inclusion of "downed" animals (i.e., diseased animals) in the food supply, should be prohibited until the time, if ever, that they are proven safe.

Federal regulatory authority at the production stage is imperative. Just as at the processing stage, it is unrealistic to expect voluntary compliance to suffice. The agency vested with this authority should be free of compromising interests, such as the USDA's absurd dual and conflicting mission of both regulating while promoting agriculture.

Other known problematic practices throughout the food system can and should be swiftly acted upon. For example, unreasonably fast line speeds in processing plants make meaningful inspection impossible. Current efforts to redeploy federal inspection forces away from processing to retail distribution are irresponsible.

National Food Safety Database

A national food safety database and a comprehensive literature review may be the best way of determining what is known in the realm of food safety and how best to proceed. Section 615 of Title 6, subtitle B, of Public Law 105-85 directs the Secretary of Agriculture to establish a Food Safety Research Information Office at the National Agricultural Library. This will serve to link existing food safety research databases. These databases should be both national and international in scope, as much food safety research has already been conducted in other countries. They should include not only databases of the federal sector, as is currently authorized, but to the greatest extent possible they should also include those of the university sector and the private sector.

Long-Term Steps

Modifiable risk factors do exist at the production level, and a HACCP-based approach at this stage is warranted. A final working group draft of the Interagency Food Safety Initiative noted that such production factors as housing, crowding, feeding practices and drug treatment impact the load of pathogens carried by animals used for food. FSIS's February 1995 Federal Register notice of its then-proposed HACCP rule stated: "There are major aspects in the production phase that can influence incidence, control, and prevention of potential human pathogens....Management systems addressing increased animal welfare and better husbandry decrease levels of stress, and would be expected to decrease the incidence of pathogens. For example, improvements in cattle handling systems reduce stress-related immune suppression associated with animal processing procedures. A number of other factors, such as animal density, frequency of feedlot pen use, and commingling of sick animals, can affect stress levels and thus

risk of human pathogen exposure.... Stressed animals have lowered disease resistance, making them more susceptible to pathogens and at increased risk of shedding potential human pathogens. Various forms of stress can result in increased shedding and clinical disease, causing increased exposure to penmates, increasing the risk also to humans through contaminated meat.”

Many foodborne pathogen problems are known to begin with faulty animal production practices. From breeding animals exclusively for production traits at the expense of their immunocompetence to the intense overcrowding of animals in unsuitable and unhealthful environments to feeding animals inappropriate substances and diets and the inappropriate and excessive use of antibiotics and other drugs to unhygienic and inhumane transportation and slaughter, animal production is rife with problems for animals and ultimately consumers. New-variant Creutzfeldt-Jakob Disease, which was initiated by the unnatural practice of feeding animal protein to herbivorous animals, is the preeminent example of this. These practices need to be examined, and research should be conducted into more humane and sustainable agricultural production practices which may provide a safer food supply as well as a healthier environment.

Inappropriate Technologies

Food safety research is predominated by a quest for inappropriate technologies. For example, depriving birds of feed for 14-16 hours and longer prior to slaughter is not uncommon. Birds will begin groundpecking after having been off of feed for four hours, and can inoculate themselves with infectious agents. USDA research has shown a five-fold increase in Salmonella in the crops of birds after feed withdrawal, and an approximate 2.5-fold increase in Campylobacter. Rather than sensibly recommending a reduction in the amount of time that birds are deprived of feed, a researcher at the National Food Safety Research Conference commented, “We need to invent something to prevent that.” This typical orientation toward resolving food safety problems is illogical and inefficacious. It cannot be afforded, and should stop being pandered to.

Conflicting Research

Throughout the government (as well as the university and private sectors), conflicting research is being conducted. This includes research into making animals produce at even more exhausting rates than are already demanded of them, making them yet more susceptible to disease, contrary to the interests of food safety. There needs to be a coordinated agricultural research agenda which take humane considerations of animals into account and makes human health top priority. Research needs to be practical in its application to the production environment, and ideally should be conducted in a production setting. More sustainable agricultural systems, including organic agriculture, which offer a decreased dependence on drugs and other consumer benefits, should also be given research priority.

Chronic Disease

Degenerative diseases of a foodborne nature are actually a far greater problem than is acute foodborne disease, and the Council should include it in the plan. According to "The American Diet: Health and Economic Consequences," ERS's Agriculture Information Bulletin Number 711: "Four of the 10 leading causes of death in the United States are linked to diet. Heart disease, cancer, stroke, and diabetes account for more than 1.4 million deaths each year, nearly two-thirds of the U.S. total. Diet also plays a role in other health conditions such as overweight, hypertension, and osteoporosis, which can reduce quality of life and productivity and contribute to premature death....Diets high in calories, fat, saturated fat, cholesterol, and salt and low in such fiber-containing foods as fruit, vegetables, and whole-grain products, are associated with risk of those diseases." An article entitled "Researchers Say Meat Consumption Costs Billions In Medical Costs," published in the November 27, 1995 issue of Food Chemical News, estimates the yearly medical bill for meat and poultry consumption to be \$28 billion to \$61 billion.

The Surgeon General's Report on Nutrition and Health has long recommended that Americans reduce their consumption of fat (especially saturated fats) and cholesterol. This can easily be accomplished by choosing foods that are low in these substances, such as vegetables, fruits, and whole grain foods. The United States federal dietary guidelines recognize vegetarian diets as being a healthy option, as does the American Dietary Association. Additional ways to widely disseminate this information to the public will be a laudable goal, and may very possibly be the most effective means of improving consumer health. Consumers have a responsibility to select a healthful diet from food which they can trust to be wholesome.

Conclusion

A proactive approach to foodborne disease is needed, which requires the prevention of pathogens at the beginning of the food system, the production stage, with the emphasis on animal production. The best and only genuinely effective way to address microbial contamination is at the production stage. A September 14th article in Feedstuffs Newspaper entitled, "Food safety on the farm called a crucial link," begins by stating:

"The farmers who produce the nation's food supply are the first link in the animal food safety chain. Regardless of what safety precautions are taken farther down the line by processors, transporters, retailers and consumers, the farmers have the first responsibility for sending a clean product into the system."

The Humane Society of the United States agrees, and we appreciate this opportunity to contribute to the development of a federal food safety plan. We expect fair and due consideration will be given to our recommendations. Please contact us if any clarification is required. Thank you for your attention to these critical issues.



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