How should government regulation be used to keep the meat industry safe at all levels of production?
Food Safety: How should government regulation be used to keep the meat industry safe at all levels of production?

Introduction
The safety of human food is one of the most important topics of today’s society. Increasingly there have been more food borne outbreaks over the years. According to the Surveillance for Food borne-Disease Outbreaks November issue there were over 6,000 reported outbreaks between 1998 and 2002 (Swede 2010). Every year new regulations are imposed on large and small scale meat producers. There is huge controversial issue, many believe that smaller farms are healthier and safer than large scale meat farms. With the strict regulations, small scale farmers have a hard making the revenue they could make.

APPROACH 1
Maintain the regulations
This perspective suggests that all meat production farms should abide by the same regulations. With the increase in food borne illnesses the safest way would be to regulate all meat production farms without any exceptions. By, having all size farms abide by the same rules and restrictions will decrease the possibility for future large scale outbreaks.

APPROACH 2
Adjust regulations depending on the size of the farm
This perspective suggests that regulations are needed at levels of meat production. Small scale farmers are not at risk as much as larger farms, so they should not have to uphold the same criteria as the larger farms. Adjusting regulations depending on the size of the farm will satisfy the demand of meat from the small farmers as well as help increase the income of the smaller scale farmers.

APPROACH 3
Do not require government regulation for small scale farms
This perspective suggests that the government should be a secondary resort when it comes to regulating meat for small scale farmers. The producer and consumer will be entirely responsible of the determination of the safety of the meat produced. Consumers feel as if their right to choose what they eat and from where comes without government interference comes into direct play.
Introduction

Food borne illness is a concern everywhere in the world and the United States is no exception. There are an estimated 76 million cases of food borne illness each year in the United States, with 325,000 of these resulting in hospitalization and 5,000 in deaths (Swede). Recently, widespread outbreaks of food borne diseases have sparked much attention to this issue. Outbreaks such as the 2007 E.Coli outbreak have resulted in the recall of huge amounts of food on several different occasions. That particular 2007 outbreak resulted in the recall of over 21.7 million pounds of ground beef, the second largest ground beef recall in United States history. The continuance of such outbreaks and food recalls has created a consumer backlash that has resulted in an urge for increased food safety standards.

The Centers for Disease Control states that raw animal products are the most likely to be contaminated with pathogens such as viruses, bacteria, or parasites, and are thus the most dangerous. In 1996, the United States Department of Agriculture, (USDA) conducted a survey of ground beef and determined that 7.5% of US ground beef was contaminated with Salmonella, 11.7% was contaminated with Listeria monocytogenes, 30% was contaminated with Staphylococcus Aureus, and 53.3% was contaminated with Clostridium perfringens. It is for this reason that we should focus first on re-working the food safety standards of the meat industry.

As consumers, we must be active participants in the shaping of our food system and we must work to ascertain that all policies are made in our best interests. We must make decisions not only with our dollars but by taking an active part in shaping our laws and regulations. However, before taking measures to improve the safety of meat products, we must make some basic decisions as to what sort of policies we want to enact, what types of food we find safest and what types of regulations we feel will best guarantee that safety.

Why do we have this problem?

There is some debate as to how we can best guarantee food safety. The official recommendations of organizations such as the Centers for Disease Control, the Food and Drug Administration, and the United States Department of Agriculture often promote industrial production as being safest, while warning of the dangers of home-produced foods. Many believe that strict regulation and inspections are the best way to guarantee food safety. However, there is a growing sentiment that large-scale, industrial meat products may not be as safe as we have been lead to believe. Even the CDC states that “foods that mingle the products of many individual animals, such as bulk raw milk, pooled raw eggs, or ground beef, are particularly hazardous.” Meat packing plants have consolidated and expanded hugely in recent years. In 1997, only four companies processed 80% of the heifers in the United States. Also, in the past twenty years slaughter houses have gone from processing 175 animals per hour to four hundred or more per hour. This increase in speed leaves less time for the care in processing that is needed to ensure there is no contamination of the carcass from feces either in the digestive tract or on the animal’s coat or hooves.
At the same time, new regulations such as the 1996 USDA Hazard Analysis and Critical Point (HACCP) system has allowed meat companies to carry out many of their own inspection tasks and the USDA has become less directly involved in their regulation. Company inspectors are less likely to call for a halt in production due to a safety issue, as the potential losses are significant. These halts of production however, are essential if food safety may is compromised. Putting these regulations tasks back in the hands of USDA inspectors would limit this conflict of interests and better guarantee safety.

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On the other hand, some would argue that the USDA does not always make the best decisions when promoting food safety. One example of a questionable call would be the allowance of irradiation in foods, many without even requiring a label. The USDA and CDC both promote irradiation as being a promising new development in food safety. However, there have been no long term studies done to guarantee that irradiated foods are safe to eat. Irradiation creates free radicals which kill some of the bacteria present in the food, thus adding some benefit from a food safety standpoint. However, irradiation does not kill all bacteria and they can still grow in these foods if they are not properly stored. Also, there is some question as to their safety from a health standpoint. The free radicals produced also destroy vitamins and healthful digestive enzymes in the foods. Studies have shown that anywhere from 5-80% of a food’s vitamin content may be lost through irradiation, depending on the food, the dose of irradiation, and other processing the food goes through. Additionally, the free radicals combine with other chemicals in the food to form other chemicals, such as the known carcinogens benzene, formaldehyde, and lipid peroxides, as well as untested, new chemicals called unique radiolytic products. Animal feeding studies show increased rates of tumors, reproductive failure, and kidney damage. Health effects were not found in humans but the longest study was 15 weeks, and there have been no significant studies on babies or children. Yet, the USDA has approved irradiation of...
foods since 1982. Vegetables can be irradiated and still labeled as “fresh,” undistinguishable from fresh, untreated foods.

This is only one example of the USDA’s at times, questionable decisions on food safety. Consumers should have the right to make their own decisions in these matters. Currently, it is illegal for someone to sell meat directly to a consumer without proper government inspection and regulation. Many feel that small, local, or organically grown foods are healthier and would argue that consumers should have the right to buy meat processed without government interference. This is because many of small farms/processors can be visited by consumers and directly inspected by them, creating transparency. This sort of transparency guarantees that producer’s process meat in a way that the consumer feels is safe. While some would argue that this transparency is not enough and all producers should be held to rigid government regulations, others would argue that small producers regulated by the consumer are safer.

What should We Do?
To start the discussion, here are the three perspectives on how regulations should be dispersed amongst meat production farms in United State.

◊ Approach 1:
Maintain the regulations as they are today.

◊ Approach 2:
Adjust regulations depending on the size of the farm.

◊ Approach 3:
Do not require government regulation for small scale farms.

Learn More Online....
- Check out the Centers for Disease Control and prevention online data base to look up reported out breaks all over the United States from 1998 to 2007. (http://wwwn.cdc.gov/foodborneoutbreaks/Default.aspx)
Approach 1

Maintain the regulations as they are today.

The best way to promote food safety is to maintain rigid regulations and inspections for all levels of production. All processors should be held to the same standards regardless of size or mode of sales. Only in this way can we guarantee consistent, uniform quality and safety every time for the consumer. Currently, the U.S. senate has been working on the S.510, the FDA Food Safety Modernization Act. This Act would require regulation of all farm sizes by the Secretary of Health and Human Services. All food producers will have to abide by the regulations set by the agency. At recent time this Bill has not passed, its next step is to be voted on by the Senate. Below is a brief summary of the Act.

3/3/2009—Introduced

FDA Food Safety Modernization Act - Amends the Federal Food, Drug, and Cosmetic Act (FFDCA) to expand the authority of the Secretary of Health and Human Services (the Secretary) to regulate food, including by authorizing the Secretary to suspend the registration of a food facility. Requires each food facility to evaluate hazards and implement preventive controls. Directs the Secretary to assess and collect fees related to: (1) food facility re-inspection; (2) food recalls; and (3) the voluntary qualified importer program. Requires the Secretary and the Secretary of Agriculture to prepare the National Agriculture and Food Defense Strategy. Requires the Secretary to: (1) identify preventive programs and practices to promote the safety and security of food; (2) promulgate regulations on sanitary food transportation practices; (3) develop a policy to manage the risk of food allergy and anaphylaxis in schools and early childhood education programs; (4) allocate inspection resources based on the risk profile of food facilities or food; (5) recognize bodies that accredit food testing laboratories; and (6) improve the capacity of the Secretary to track and trace raw agricultural commodities. Requires the Secretary, acting through the Director of the Centers for Disease Control and Prevention (CDC), to enhance foodborne illness surveillance systems. Authorizes the Secretary to order an immediate cessation of distribution, or a recall, of food. Requires the Administrator of the Environmental Protection Agency (EPA) to assist state, local, and tribal governments in preparing for, assessing, decontaminating, and recovering from an agriculture or food emergency. Provides for: (1) foreign supplier verification activities; (2) a voluntary qualified importer program; and (3) the inspection of foreign facilities registered to import food.

What do the people have to say??...

These comments are from bloggers commented on an article on food safety. The article is titled “Food Safety in the U.S.: We’re on Red Alert” by journalist Andrew Kimbrell. To view the article please visit http://www.huffingtonpost.com/andrew-kimbrell/food-safety-in-the-us-wer_b_532948.html.

More "small = safe" nonsense. Americans get sick every year from farmer's markets. But we don't see it because our surveillance systems are geared to catch large outbreaks, like the bagged spinach one.

-wadcitcy, blogger

Small does result in smaller outbreaks, whereas the national giants create giant nation outbreaks.

-research, blogger

We deserve better for ourselves and our families. We are only 1 of many families starting a garden this year - we've always bought from the local farmers market. This year we hope to sell some of our harvest to others for their families' health. We must make the changes ourselves and teach our children how to work, live and survive in our rapidly changing world. We can no longer leave it up to "the other guy" to make things right. Make your voice heard by doing what you know is right. Let your conscience be your guide.

-Ziger123, blogger

What this might entail

- Creating stricter processing laws, especially in regard to speed of processing.
- Discontinue allowing meat packers to self regulate and put regulation back in the hands of government inspectors.
- Give government inspectors more power, especially the power to halt production when necessary to maintain cleanliness and safety.

Benefits

- Wherever consumers buy from, they will be guaranteed a certain level of safety and quality.
- Giving more power to government inspectors will insure proper enforcement of safety standards.
- A slight increase in cost is worth the guarantee of safety.

Drawbacks

- Increased government inspection will be more costly to taxpayers.
- Slowing down or halting product will decrease efficiency and thus increase cost.
- If all meat packers have to abide by the same laws, many small businesses will be put at a disadvantage. Also, citizens will not have the right to freely choose meat prepared in a way they feel safe and ethical without government interference.
Approach 2

Government regulation and inspections are the best way to guarantee food safety. However, regulation needs to differ based on different levels of production and/or mode of sales. Some regulations are irrelevant to extremely small producers and only hinder them economically. While these producers should be held to the same safety standards, their size demands differing approaches to regulation in some arenas.

What this might entail

- First, creating distinctions between producers based on size and/or the mode of sales (direct sales to consumer, or to a third party company)
- Drafting regulations for each category which guarantee safety but do not favor one type of company over another
- Regulations which might be removed include those which require special facilities, bathrooms or parking places, solely for the inspector. These only add costs and are not necessary on very small operations

Benefits

- Small producers generally process fewer animals more slowly and are thus less likely to have the huge contaminations of meat that we have seen in recent years
- Creating regulations which still ensure safety standards, but do not create special economic benefits for large producers. Safety regulations are important, but they should not be overly burdensome to the point where some producers cannot operate
- The maintenance of government regulation and inspection at all levels of production will continue to guarantee safety to all consumers

Drawbacks

- It will be difficult to make fair distinctions between producers
- Creating different regulations for smaller producers may give smaller producers an advantage over larger producers
CASE STUDY: Hazard Analysis and Critical Point plan

Meat and poultry processing plants are required by congressional mandate to have safety and sanitation controls in their facilities. Controls are verified by the Food Safety and Inspection Service (FSIS) of the USDA. The Hazard Analysis and Critical Control Point (or HACP) is a plan that is used to help reduce potential spread of food-borne microorganisms in small meat and poultry farm. (Taylor, 2008)

One View Point
Under the HACCP system, each processor identifies the points in its operation at which health risks might occur, then takes steps to monitor and contain those risks. The hazard analysis shows that producers have identified risks linked to their production processes, explains Caroline Smith DeWaal, director of food safety at the Center for Science in the Public Interest, a Washington-based consumer rights group; the critical control points indicate where in the production process measures have been enacted to contain those hazards (Taylor, 2008)

One such critical control is to periodically make a clean break in production—stopping the flow of ground meat in processing, for example, and cleaning the equipment. This helps to draw a clear line between lots of product in the event a recall is warranted. (Taylor, 2008)

Another View Point: Is it Fair?
“The development, maintenance, and recordkeeping of HACCP plans is much more of a resource burden on small operators because of the economies of scale,” explains Mark Schad, a former small plant owner/operator who now works with other small operations to help them attain an FSIS grant of inspection. “...Sometimes [small] plant operators are driven to make tough business decisions resulting in eliminating a product because the cost of a HACCP plan cannot be financially justified.” (Taylor, 2008)

Amy Lanou, an assistant professor of health and wellness at the University of North Carolina at Asheville, says meat producers in her area can’t keep up with demand even though their product costs $1 more per pound than meat in the supermarket. “...There’s a training component, an equipment component, a plan component, and monitoring,” she says. These components add up to a significant investment in staff time devoted to developing possibly multiple HACCP plans and to keeping records of the monitoring. (Taylor, 2008)

......hmmm
This plan is a great plan to control contamination. It is costly and not very easy to manage.

◊ How can changes be made to make this plan work?

◊ Is it that, meat producers don’t want to do the extra work and are just being lazy?
**Approach 3**

Government regulation and inspection should only be a second resort to consumer regulation. While large meat packers or those with little or no transparency must be regulated by a government agency, small scale producers who market directly to consumers provide consumers with the opportunity to make their own judgments as to what is safe. These types of producers must work with their customers and be open to customer visits and inspections. The consumer can then see for himself/herself how the processor operates, whether it is safe, and can decide whether to buy their products. The government can make controversial decisions as to what is safe (such as promoting irradiated foods) and it is unconstitutional to hamper citizen’s right to free choice when it comes to food.

**What this might entail**

- Creating distinctions as in approach two.
- Allowing small producers who sell directly to consumers and allow customers to view facilities and operations to operate without government inspection.
- Continue to inspect larger facilities or those who sell to a third party buyer.

**Benefits**

- The government sometimes makes controversial decisions as to food safety without adequate studies. Consumers have the right to make their own decisions as to what types of food are best for their health and are safest.
- Outside regulation is only necessary as food becomes more industrialized and impersonalized. When buying directly from a farm, producers can see for themselves how their meat is processed and whether it is safe.
- Operations in which there is no transparency or opportunity for direct consumer regulation still require government inspection, and there will still be a guarantee of safety for these products.

**Drawbacks**

- This approach may favor small producers economically.
- There will be no outside guarantee of safety for the consumers of meat produced by small producers and direct sales of meat.
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References


