**United States Government Accountability Office** 

GAO

**Testimony** 

Before the Subcommittee on Domestic Policy, Committee on Oversight and Government Reform, House of Representatives

For Release on Delivery Expected at 1:00 p.m. EDT Thursday, April 17, 2008

## HUMANE METHODS OF HANDLING AND SLAUGHTER

Public Reporting on Violations Can Identify Enforcement Challenges and Enhance Transparency

Statement of Lisa Shames, Director Natural Resources and Environment





Highlights of GAO-08-686T, testimony before the Subcommittee on Domestic Policy, Committee on Oversight and Government Reform, House of Representatives

#### Why GAO Did This Study

In fiscal year 2007, more than 150 million cattle, sheep, and other animals destined for human consumption were slaughtered in the United States. The U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service is responsible for enforcing the Humane Methods of Slaughter Act (HMSA), which mandates that animals are handled and slaughtered humanely. GAO reported on USDA's efforts to enforce HMSA in 2004 (Humane Methods of Slaughter Act: USDA Has Addressed Some Problems but Still Faces Enforcement Challenges, GAO-04-247). More broadly, GAO has also issued many reports that address federal oversight of the U.S. food safety system.

This testimony focuses on (1) GAO's 2004 report on the frequency and scope of reported HMSA violations and enforcement actions by USDA, (2) information on trends in staffing and funding for USDA food inspections, and (3) information on overall federal oversight of food safety. To provide this new information, GAO analyzed personnel and funding data from USDA and the Office of Management and Budget, and interviewed USDA food safety inspection officials.

To view the full product, including the scope and methodology, click on GAO-08-686T. For more information, contact Lisa Shames at (202) 512-3841 or shamesl@gao.gov.

# HUMANE METHODS OF HANDLING AND SLAUGHTER

### Public Reporting on Violations Can Identify Enforcement Challenges and Enhance Transparency

#### What GAO Found

In January 2004, GAO reported that incomplete and inconsistent inspection records made it difficult to determine the frequency and scope of HMSA violations, inspectors did not always document violations of the act, and they did not consistently document the scope and severity of each incident. GAO also reported that enforcement actions to address noncompliance with the act were inconsistent, and that USDA was not using consistent criteria to determine when to suspend plant operations in cases of serious or repeated violations. The Congress has urged USDA to report annually on trends in compliance with humane slaughter methods. Such public reporting can enhance transparency, but USDA's most recent report was in March 2003 and relied on incomplete data. For example, that report said very few infractions were for inhumane treatment, but GAO found that at least one-fourth of the infractions were for ineffective stunning which fails to meet humane standards. USDA has taken actions to address the recommendations GAO made in 2004 about oversight of HMSA. However, GAO has not evaluated the effectiveness of these actions.

USDA faces resource challenges that may make it difficult for it to enforce HMSA and ensure the safety of the food supply. Although USDA's budget for food safety-related activities has increased since 1988, staffing for these activities has declined from its highest level in 1995. Agency officials noted the overall decline is due, in part, to consolidation in the meat industry, resulting in fewer facilities. In 2004, GAO found that USDA lacked detailed information on how much time its inspectors spend on humane handling and slaughter activities, making it difficult to determine if the number of inspectors is adequate. USDA has taken actions to address most of GAO's recommendations for assessing its resource needs for HMSA, but GAO has not evaluated these actions. Although not directly related to HMSA activities, the quantity of meat and poultry inspected and passed by USDA has grown, and the quantity of meat and poultry recalled has increased.

USDA has oversight responsibility for ensuring the safety of meat, poultry, and processed eggs. For example, federal regulations prohibit companies from processing and selling meat from disabled cows—which have a higher probability of being infected with bovine spongiform encephalopathy—without explicit USDA inspector approval. However, USDA is only 1 of 15 agencies that collectively administer at least 30 laws related to food safety. This fragmentation is the key reason GAO added the federal oversight of food safety to its High-Risk Series in 2007 and called for a governmentwide reexamination of the food safety system. GAO has reported on problems with this system—including inconsistent oversight, ineffective coordination, and inefficient use of resources. Going forward, as GAO has recommended, a governmentwide, results-oriented performance plan and a reconvened President's Council on Food Safety could build a sustained focus on the safety of the nation's food supply.

#### Mr. Chairman and Members of the Subcommittee:

I am pleased to be here today to discuss the U. S. Department of Agriculture's (USDA) implementation of its program to ensure that animals destined for human consumption are handled and slaughtered humanely. More than 150 million cattle, sheep, hogs, and other animals ultimately destined to provide meat for human consumption were slaughtered in fiscal year 2007, at some 700 federally inspected slaughter facilities throughout the United States. The Food Safety and Inspection Service (FSIS), within USDA, is responsible for enforcing the Humane Methods of Slaughter Act (HMSA), which prohibits the slaughtering of animals, or the handling of animals in connection with slaughtering, unless it is humane. However, the recently documented inhumane treatment of disabled cows slaughtered at the Westland/Hallmark plant in California and the entry of their meat into the market calls into question FSIS's enforcement of the act. In particular, federal regulations prohibit companies from processing and selling meat from disabled (nonambulatory) cows without explicit FSIS inspector approval. Nonambulatory cows raise particular concerns because they have a higher probability of being infected with bovine spongiform encephalopathy, commonly known as mad cow disease.

In 2004, we reported that FSIS was not adequately recording instances of noncompliance with HMSA, and thus could not assure the Congress that it was fully enforcing the act at federally inspected slaughter facilities. Specifically, we found the following:

- Incomplete and inconsistent inspection records made it difficult to
  determine the frequency and scope of humane handling and slaughter
  violations. Those inspection records showed that inspectors did not
  always document violations of HMSA and that when they did, the
  inspectors did not consistently document the scope and severity of each
  incident. Enforcement actions to address noncompliance with the act and
  regulations were also inconsistent.
- FSIS officials were not using consistent criteria to suspend plant operations. As a result, plants in different FSIS districts were not subject to comparable enforcement actions.

Page 1 GAO-08-686T

<sup>&</sup>lt;sup>1</sup>GAO, Humane Methods of Slaughter Act: USDA Has Addressed Some Problems but Still Faces Enforcement Challenges, GAO-04-247 (Washington, D.C.: Jan. 30, 2004).

• FSIS lacked detailed information on how much time its inspectors spent on humane handling and slaughter activities, making it difficult to determine if the number of inspectors is adequate. In general, FSIS officials believed that, with the introduction of a District Veterinary Medical Specialist (DVMS) in 2002 at each of the agency's field offices, the number of personnel devoted to humane handling and slaughter compliance was adequate.

Our 2004 report did not specifically assess FSIS's effectiveness in enforcing the humane handling and slaughtering provisions of HMSA, such as those related to the Westland/Hallmark incident.

In this context, my testimony today focuses on (1) GAO's 2004 report on the frequency and scope of reported HMSA violations and enforcement actions by USDA, (2) trends in staffing and funding for USDA food inspections, and (3) GAO's designation of federal oversight of food safety to its High-Risk Series.

In summary, I would like to make three observations. First, FSIS has taken actions to address the recommendations we made in our 2004 report to improve its reporting of humane handling and slaughter methods at federally inspected facilities. These recommendations principally dealt with weaknesses in FSIS's internal reporting of the frequency and scope of HMSA violations. However, without further evaluation and public reporting to enhance transparency and accountability, we do not know the effectiveness of these actions.

Second, although the FSIS budget has increased since 1988, staffing levels have declined since 1995, and some districts have experienced high vacancy rates among inspectors, possibly impairing enforcement of HMSA and food safety regulations generally. Meanwhile, the volume of meat and poultry inspected and passed by FSIS has grown, along with the number of pounds of recalled meat and poultry. Staff levels are expected to rise slightly in 2008 as FSIS fills vacant positions.

Third, USDA's FSIS is only 1 of 15 agencies that collectively administer at least 30 laws related to food safety. This fragmentation is the key reason GAO added the federal oversight of food safety to its High-Risk Series in 2007 and called for a governmentwide reexamination of the food safety system.<sup>2</sup> The fragmentation results in federal resources for food safety

Page 2 GAO-08-686T

<sup>&</sup>lt;sup>2</sup>GAO, High-Risk Series: An Update, GAO-07-310 (Washington, D.C.: Jan. 31, 2007).

being directed to multiple agencies. For example, the majority of federal expenditures for food safety inspection were directed toward USDA's programs for ensuring the safety of meat, poultry, and egg products, even though USDA is responsible for regulating only about 20 percent of the food supply.

This testimony is based on new and previously issued work. To analyze trends in FSIS resources, we examined personnel and funding data from FSIS and the Office of Management and Budget for the past 20 years and determined they were sufficiently reliable for our analyses. To provide updated information on our previously issued reports, we interviewed FSIS officials and gathered information on the status of our recommendations. We conducted our work from April 2 through April 14, 2008, in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Background

The Congress passed the Humane Slaughter Act in 1958 following intense and broad-based public concerns about cruelty and abuse of livestock in meat-packing plants. At that time, the Congress determined that using humane methods of slaughter prevented the needless suffering of livestock, resulted in safer and better working conditions for employees, and brought about improvements in products and economies of slaughter operations, among other benefits. However, the act was limited to federal government agencies, which were required to contract for or procure meat products only from producers and processors that employed humane slaughtering methods in all of their plants. In 1978, the Congress passed HMSA, which required that all federally inspected slaughter establishments adopt humane handling and slaughter methods.

FSIS has issued regulations and directives to enforce the act. Important requirements of these regulations and guidance include the following:

 Animals stunned before slaughter must be rapidly and effectively rendered insensible before they are slaughtered. Stunning is effective when the animal feels no pain, is rendered instantly unconscious, and remains unconscious until slaughtered.

Page 3 GAO-08-686T

- Dragging of disabled and other animals unable to move while conscious is prohibited.
- All holding pens and driveways and ramps must be designed, built, and maintained to prevent injury to livestock.
- Livestock should be provided with access to water in holding pens, and food if held for more than 24 hours.
- The use of electrical prods and other devices to move livestock must not be excessive.

FSIS is responsible for ensuring compliance with HMSA. FSIS is also responsible for ensuring the safety of most meat, poultry, and processed egg products at federally inspected facilities. Currently, FSIS employs inplant about 7,800 inspectors—that is, public health veterinarians, food inspectors, and consumer safety inspectors. These inspectors work collaboratively, and are responsible for inspecting animals prior to slaughter, as well as the carcasses after slaughter, in order to ensure the food is safe for human consumption. According to FSIS officials, as inspectors carry out their food safety and other activities, they are responsible for monitoring compliance with humane handling and slaughter requirements at plants that are covered by HMSA. According to FSIS, while HMSA requires inspectors to observe the entire handling and slaughter process, inspectors do not have to observe all animals all the time for HMSA compliance.

When inspectors observe a violation of HMSA or its implementing regulations, they are required to notify plant management and document the violation.

In response to HMSA noncompliance, FSIS can take a number of enforcement actions, which impose restrictions on a facility's ability to operate, including the following:

- For less serious violations of HMSA, inspectors at a facility can issue a
  "reject tag" to quickly respond to violations that are limited in scope.
  Inspectors place these reject tags on a piece of equipment or an area of the
  plant, prohibiting use until the violation is corrected.
- For more serious violations, the district manager can suspend inspection until violations are addressed. This usually results in suspended operations at the facility (or part of the facility) because without federal

Page 4 GAO-08-686T

inspections the facility's products are prevented from entering interstate and foreign commerce.

In the rare cases where a plant fails to respond to FSIS concerns about repeated or serious violations, the administrator of FSIS can withdraw inspection. This removes the grant of inspection from a facility, preventing its products from entering interstate and foreign commerce. The facility must reapply for and be awarded a grant of inspection before federal inspections may resume.

FSIS Has Taken
Actions Intended to
Improve Its Records
on Humane Slaughter
Violations, but Public
Reporting Can
Enhance
Transparency

In 2004, we identified weaknesses in FSIS's regulations and guidance for recording compliance with HMSA in key areas: (1) the frequency and scope of humane handling and slaughter violations, and (2) actions to enforce compliance with humane handling and slaughter provisions. FSIS has taken steps to improve its reporting of humane handling and slaughter violations. However, although the Congress has urged USDA to report annually on violations and trends in compliance, USDA has not issued such a report since March 2003. Such public reporting can enhance transparency.

In 2004, we reported that incomplete and inconsistent FSIS inspection records made it difficult to determine the frequency and scope of humane handling and slaughter violations. Available FSIS records showed that during the 28 months between January 2001 and March 2003, inspectors wrote 553 noncompliance records to document violations of HMSA and the implementing regulations at 272 facilities across the United States. According to these inspection records, ineffective stunning, which does not quickly render animals insensible to pain, and in many cases results in a conscious animal reaching slaughter, was the most prevalent type of noncompliance. To a lesser extent, the records showed incidents of, in declining order of prevalence: poor facility conditions, failure to provide water to animals awaiting slaughter, excessive force, and excessive use of electric prods. However, in conducting this analysis, we found internal control problems that call into question the reliability of FSIS records regarding compliance with the act. First, because the agency had not stored its noncompliance records in electronic form, it could not provide us with at least 44 of the 553 records from January 2001 through March 2003. Second, almost half of the DVMSs we interviewed at the time of our review reported that inspectors did not always document noncompliance when they should have because they were unsure about regulatory requirements. Third, the noncompliance records did not consistently document the scope and severity of violations. For example, some

Page 5 GAO-08-686T

noncompliance records mentioned that ineffective stunning occurred, but did not provide the cause of the violation or the number of animals affected.

We also reported FSIS took inconsistent enforcement actions to address noncompliance with HMSA. Inspectors stationed in slaughter plants had not consistently issued reject tags, which temporarily halt operations in all or part of a plant. Several of the DVMSs we interviewed attributed the inconsistent enforcement actions to inspectors' inexperience, lack of clarity regarding their authority, or the misperception that certain violations were minor. We found similar inconsistencies at the district management level. District managers can decide to take the more serious enforcement action of withdrawing inspectors from the plant, most likely suspending a plant's operations, when they are notified of serious violations. However, they lacked clear criteria on when to do so, which can lead to inconsistent enforcement. We found, for example, one case in which a district manager did not suspend inspections after inspectors had issued 16 noncompliance records to a slaughter facility documenting the plant's failure to properly stun animals. In contrast, another facility's failure to provide access to water and to maintain acceptable pen conditions led to a suspension of operations. As a result, FSIS could not ensure that humane slaughter requirements are consistently enforced across districts, a fact that undermines FSIS efforts to enforce the act.

To provide more useful information and to help strengthen oversight of HMSA, we recommended in 2004 that the Secretary of Agriculture direct FSIS to (1) include in noncompliance records specific information on the type and cause of violations, (2) establish additional criteria for when districts are to take enforcement actions in cases of repetitive violations, and (3) require that district offices and inspectors clearly document the basis for enforcement actions that they take in response to repetitive violations, among others. In response to these recommendations FSIS took steps intended to strengthen its oversight of humane handling and slaughter methods at federally inspected facilities. In particular, it has issued additional guidance to its district offices and inspectors to assist them in determining when to take enforcement actions for repeated violations. The guidance includes, among other things:

 categories for the types and causes of humane handling and slaughter violations to be reported on noncompliance records;

Page 6 GAO-08-686T

- questions inspection personnel should use to assist them in determining when a noncompliance trend exists; and
- examples of noncompliance activities affecting an animal's safety or constituting inhumane treatment of an egregious nature that would warrant immediate enforcement by inspection personnel.

Although the agency's actions were responsive to our recommendations, without further evaluation, we do not know the effectiveness of these actions.

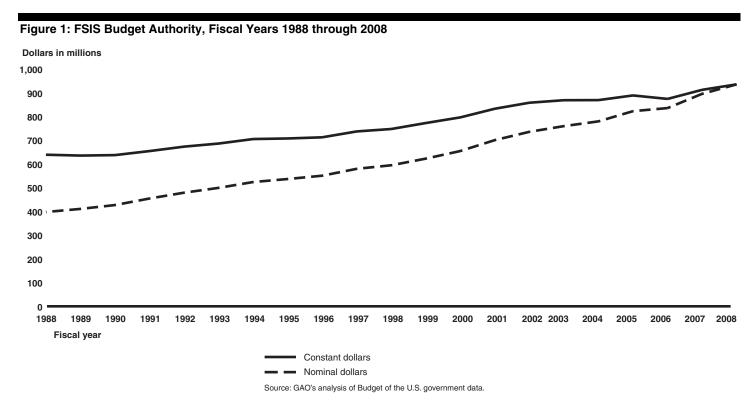
Finally, FSIS has not reported annually on trends in compliance with humane slaughter methods, as urged by the Congress, and its most recent data on violations were incomplete. Public reporting is the means through which the federal government communicates the results of its work to the Congress and the American people. Such reporting is in the public interest and promotes transparency in government operations. In 2002, the Congress urged the Secretary of Agriculture to fully enforce the Humane Methods of Slaughter Act and report annually to the Congress on the number of violations and trends recorded by FSIS inspectors.<sup>3</sup> According to FSIS officials, in response to the Congress and as part of its annual appropriations process, USDA has provided the House and Senate appropriations committees information on the number of suspensions as well as general information on HMSA activities. However, in recent years, USDA has not reported to the Congress on the number of violations and trends recorded by its inspectors. In its most recent report, in March 2003, USDA indicated to the Congress that during fiscal year 2002, "very few infractions were for actual inhumane treatment of the animals." However, we identified shortcomings in the data used to make this finding. At the time of our review, officials told us that the statement was based on a sample of approximately half of the noncompliance records available. In contrast, our analysis of all of the noncompliance records FSIS provided for fiscal year 2002 showed that one-fourth of the 366 noncompliance incidents documented by inspectors were for incidents of ineffective stunning which fails to meet humane standards in USDA regulations. Lack of complete and consistent data can make it difficult for FSIS to accurately assess compliance with the act, and prevents transparency in the reporting of violations.

Page 7 GAO-08-686T

<sup>&</sup>lt;sup>3</sup>Farm Security and Rural Investment Act of 2002, Pub. L. 107-171, Section 10305 116 Stat. 134, 493.

## FSIS's Budget Has Increased as Staffing Has Declined

Unlike the budgets of other federal agencies responsible for food safety, the budget for FSIS has seen a marked increase since 1988. As shown in figure 1, the agency's budget authority increased from \$392 million in fiscal year 1988 to \$930 million in fiscal year 2008, or 137 percent. When adjusted for inflation, the increase is about 47 percent.

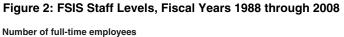


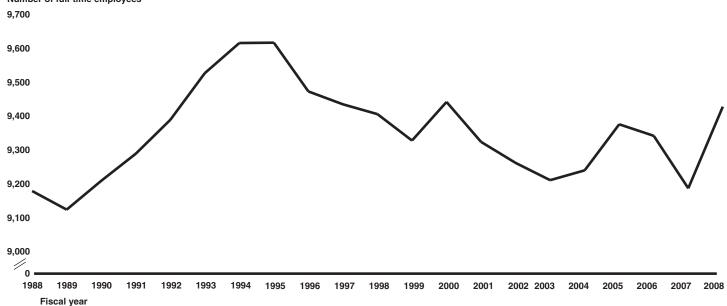
The Administration's proposed fiscal year 2009 budget calls for an increase in FSIS's funding to \$952 million. When adjusted for inflation, the proposed increase is about \$4 million, or 0.5 percent.

While FSIS's budget authority has significantly increased since the late 1980s, the number of FSIS employees has declined. As shown in figure 2, from fiscal year 1995 to fiscal year 2007, the number of full-time employees at FSIS fell from about 9,600 to about 9,200, or 4 percent. Vacancy rates across FSIS have declined to about 7 percent, and for its inspector positions vacancies have declined to about 4 percent. However, 2 of the agency's 15 districts—Boulder and Des Moines—reported vacancy rates among their inspector positions of about 22 percent and 11 percent,

Page 8 GAO-08-686T

respectively. As the figure also shows, staff levels are expected to rise slightly in 2008 as FSIS fills vacant positions. Agency officials noted the overall decline is due, in part, to consolidation in the meat industry, resulting in fewer facilities, and the introduction of the Hazard Analysis and Critical Control Point system, which is a risk-based effort to reduce food contamination.





Source: Budget of the U.S. government.

Note: Data for 2008 are estimated.

Furthermore, in 2004 we reported FSIS did not have data on the number of inspectors devoted to compliance with HMSA or on the amount of time that inspectors spend on humane handling and slaughter requirements. Without such information, FSIS could not determine the appropriate number of inspectors for different-sized plants or the number of inspectors needed overall to effectively enforce the act.

We recommended that FSIS (1) develop a mechanism for determining the level of resources that the agency devotes to humane handling and

Page 9 GAO-08-686T

slaughter activities, (2) develop criteria for determining the appropriate level of inspection resources, and (3) periodically assess whether that level is sufficient to effectively enforce the act. In response to these recommendations, FSIS took steps intended to improve its monitoring of resources needed to ensure compliance with HMSA. Specifically, FSIS

- implemented a system that tracks inspectors' time spent verifying that humane handling and slaughter requirements are met,
- developed policy that instructs FSIS managers to use data on the amount of time devoted to humane handling and slaughter activities to assist in inspection resource planning, and
- established performance measures and targets to compare against time spent on daily activities to enforce compliance with HMSA.

Again, these actions were responsive to our recommendations, but without further evaluation, we do not know the effectiveness of these actions.

Although not directly pertaining to FSIS's enforcement of HMSA, the quantity of meat and poultry inspected by the agency, as well as the quantity of meat and poultry recalled, identifies some of the current challenges the agency faces. Meat and poultry consumption in the United States has increased sharply. As shown in figure 3, the quantity of meat and poultry inspected and approved by the agency has increased from about 65 billion pounds in 1988 to more than 100 billion pounds in 2007. Much of the increase is due to the expanding U.S. poultry market.

Page 10 GAO-08-686T

Figure 3: Meat and Poultry Inspected and Passed by FSIS, Fiscal Years 1988 through 2008 Pounds in billions Fiscal year Poultry Meat

Note: Data for 2008 are estimated.

Source: Budget of the U.S. government.

Although the number of recalls has declined in recent years, the quantity of meat and poultry recalled has increased sharply. Meat and poultry product recalls declined from 125 in 2002 to 58 in 2007. However, 2 of the 6 biggest meat recalls in U.S. history have occurred in the past 6 months. In October 2007, Topps Meat Company LLC announced the recall of 22 million pounds of ground beef used for frozen hamburgers due to E. coli contamination. At the time, the Topps recall was the fifth largest in U.S. history. The E. coli-contaminated meat sickened at least 40 people in eight states. On February 17, 2008, Westland/Hallmark Meat Company announced the recall of more than 143 million pounds of beef, the largest recall in U.S. history. The quantity of meat and poultry recalled has increased from 5 million pounds in 1994, the first year for which data were readily available, to 145 million in just the first quarter of March 2008.

Page 11 GAO-08-686T

## Federal Oversight of Food Safety Is a High-Risk Area that Needs Governmentwide Reexamination

While today's hearing focuses specifically on FSIS's responsibilities for the oversight of food safety, it is important to note that FSIS is 1 of 15 federal agencies that collectively administer at least 30 laws related to food safety. This fragmentation is a key reason we designated federal oversight of food safety as a high-risk area. Primary responsibility for food safety lies with USDA—which has oversight responsibility for meat, poultry, and processed egg products—and the Food and Drug Administration (FDA) which is responsible for the safety of virtually all other foods. In addition, among other agencies, the National Marine Fisheries Service (NMFS) in the Department of Commerce conducts voluntary, fee-for-service inspections of seafood safety and quality; the Environmental Protection Agency (EPA) regulates the use of pesticides and maximum allowable residue levels on food commodities and animal feed; and the Department of Homeland Security is responsible for coordinating agencies' food security activities. This federal regulatory system for food safety, like many other federal programs and policies, evolved piecemeal, typically in response to particular health threats or economic crises.

In 2007, we added the federal oversight of food safety to our High-Risk Series, which is intended to raise the priority and visibility of government programs that are in need of broad-based transformation to achieve greater economy, efficiency, effectiveness, accountability, and sustainability. Over the past 30 years, we have reported on issues—for example, the need to transform the federal oversight framework to reduce risks to public health as well as the economy—that suggest that the federal oversight of food safety could be designated as a high-risk area. The fragmented nature of the federal food oversight system suggests the government could plan more strategically to inspect food production processes, identify and react more quickly to outbreaks of foodborne illnesses, and focus on promoting the safety and integrity of the nation's food supply.

While we have reported on problems with the federal food safety system—including inconsistent oversight, ineffective coordination, and inefficient use of resources—most noteworthy for today's hearing is that federal expenditures for the oversight of food safety have not kept pace with the volume of foods regulated by the agencies or consumed by the public. We have reported that four agencies—USDA, FDA, EPA, and NMFS—spent a

Page 12 GAO-08-686T

<sup>&</sup>lt;sup>4</sup>GAO-07-310.

total of \$1.7 billion on food safety-related activities in fiscal year 2003.<sup>5</sup> USDA and FDA were responsible for nearly 90 percent of those federal expenditures. However, the majority of federal expenditures for food safety inspection were directed toward USDA's programs for meat, poultry, and egg products even though those programs cover only about 20 percent of the food supply. In contrast, FDA accounted for only 24 percent of expenditures even though it is responsible for regulating about 80 percent of the food supply.

Others have called for fundamental changes to the federal food safety system overall. In 1998, the National Academy of Sciences' National Institute of Medicine concluded that the system is not well equipped to meet emerging challenges. In response to the academy's report, the President established a Council on Food Safety, which released a Food Safety Strategic Plan in January 2001. The plan recognized the need for a comprehensive food safety statute and concluded, "the current organizational structure makes it more difficult to achieve future improvements in efficiency, efficacy, and allocation of resources based on risk."

Taken as a whole, our work indicates that the Congress and the executive branch can and should create the environment needed to look across the activities of individual programs within specific agencies, including USDA, and toward the goals that the federal government is trying to achieve. To that end, we have recommended, among other things, that the Congress enact comprehensive, uniform, and risk-based food safety legislation and commission the National Academy of Sciences or a blue-ribbon panel to conduct a detailed analysis of alternative organizational food safety structures. We have also recommended that the executive branch reconvene the President's Council on Food Safety to facilitate interagency coordination on food safety regulation and programs. According to documents on the council's Web site, the current administration has not reconvened the council.

These actions can begin to address the fragmentation in the federal oversight of food safety. Going forward, to build a sustained focus on the

Page 13 GAO-08-686T

<sup>&</sup>lt;sup>5</sup>GAO, Overseeing the U.S. Food Supply: Steps Should be Taken to Reduce Overlapping Inspections and Related Activities, GAO-05-549T (Washington, D.C.: May 17, 2005).

<sup>&</sup>lt;sup>6</sup>National Academy of Sciences, Institute of Medicine, *Ensuring Safe Food from Production to Consumption* (Washington, D.C.: 1998).

safety and integrity of the nation's food supply, the Congress and the executive branch can develop expectations for food safety and follow up with congressional oversight and strategic planning by agencies, including USDA. We have previously reported that a governmentwide performance plan that is mission based and results oriented would help ensure agency goals are complementary and mutually reinforcing. Furthermore, this plan would help decision makers balance trade-offs and compare performance when making resource allocations and restructuring decisions.

Mr. Chairman, this concludes my prepared statement. I would be happy to respond to any questions that you or Members of the subcommittee may have.

Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this testimony. For further information about this testimony, please contact Lisa Shames, Director, Natural Resources and Environment (202) 512-3841 or <a href="mailto:shamesl@gao.gov">shamesl@gao.gov</a>. Key contributors to this testimony were Thomas Cook, Assistant Director; Kevin Bray; Leslie Mahagan; Ben Shouse; and Tyra Thompson.

(360951) Page 14 GAO-08-686T

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