

# Consumer Expectations and Issues Regarding Microbiological Testing Programs for *E. coli* O157:H7

October 2008

Presented by Felicia Nestor. Food and Water Watch

This material represents the views of the following members of the Safe Food Coalition:

- Center for Science in the Public Interest
- Consumer Federation of America
- Food & Water Watch
- Safe Tables Our Priority
- United Food and Commercial Workers Union

## GENERAL PRINCIPLES

A primary goal of meat and poultry inspection is to protect public health by reducing foodborne pathogens in these products.

It is the government's role to set public health standards and assure that the products resulting from industry process control programs meet those standards.

A strong microbiological testing program is essential to determine whether those standards are being met.

Both the government and individual companies must perform regular sampling of meat and poultry products to verify company process controls are working as intended. All sampling should be consistent with a protocol established by FSIS.

# 1. The objectives of microbiological testing must be clearly identified.

FSIS must:

- Identify its public health goals, and the specific objectives of the microbiological testing programs it conducts and oversees;
- Identify the particular sampling plan(s) it is considering;
- Identify possible sampling options (e.g. stratified sampling, purge sampling, etc.) and the public health benefits possible with each option;
- Identify techniques to improve the effectiveness of sampling.

## **2. FSIS and Industry must conduct effective sampling programs.**

Currently neither company nor FSIS sampling is sufficient to protect public health.

Increased government and industry sampling should occur in the context of the development, by FSIS, of a comprehensive program designed to trace contamination back to its source and the requirement that FSIS inspectors review sampling results regularly.

## FSIS should:

- Increase its own level of sampling in both slaughter and processing plants.
  - Specific goals for increased sampling should be identified and reasonable timelines should be set.
  - FSIS should periodically report on its progress in achieving those goals.

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## FSIS should:

- Require companies to increase their sampling frequency.
  - FSIS should recommend some sampling standards that are statistically valid for the specific purposes for which they will be used. Companies can develop alternative sampling regimes if they can demonstrate that they are equal to or more effective.
  - FSIS should make available sufficient resources and technical assistance to smaller plants\* to help them develop adequate sampling plans.

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## FSIS should:

- Periodically review its overall sampling program to determine whether it is performing the necessary functions and, after seeking public input, change the program as necessary.
- Report aggregated or individual plant testing results to the public on a routine basis, but not less frequently than biannually.



**3. The adequacy of each plant's sampling plan must be evaluated and certified/approved by an independent third party.**

Each plant's sampling plan must be certified by an independent certifying organization, such as ANSI.

**4. The sampling plan must be implemented correctly and there need to be mechanisms for verifying this.**

FSIS must:

- Identify standardized procedures for taking a sample;
- Ensure that inspectors are trained to carry out sampling procedures correctly and routinely verify that industry employees are collecting samples correctly;
- Instruct inspectors to collect a list of suppliers for any lot of product that it samples;
- Instruct inspectors to request and examine each plant's most current sampling results.

## Each plant must:

- Keep records on the source(s) of material for each lot that it samples;
- Provide the most recent sampling results to FSIS inspectors immediately upon receipt of the results;
- Notify the FSIS inspector or local officials if the plant receives notice of a positive result;
- Provide FSIS with a list of the source suppliers to any lot from which FSIS collects a sample, at the time FSIS takes the sample.

## **5. FSIS should clearly define the actions it will take based on the results of microbiological testing.**

Traceback is an essential element of effective process control. When a positive is found in a processing plant, traceback to the supplier is critical and must be done as quickly as possible so that other potentially contaminated products in distribution can be identified.

FSIS must hold a public meeting to discuss issues associated with traceback.

## Finally

We recognize that what we are recommending involves additional costs. However, we believe that what we have outlined here has a public value that is worth an investment of public funds.

FSIS should provide the public with a progress report in how the Agency is addressing these issues within six months.