

# Oregon

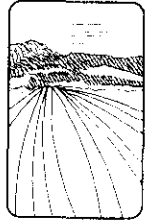
John A. Kitzhaber, M.D., Governor

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## Comment on Residue Violation Strategy

Oregon Department of Agriculture has had a contract with FDA to do residue violation investigations at farm level for nearly ten years. This experience, in addition to our work with many hundreds of investigations in other state-federal cooperative disease control efforts, has given us a practical perspective on programs involved with on-farm disease control measures.

Food safety is a critical component of animal production and recognized as such by both the Animal Health and Food Safety Divisions of the Oregon Department of Agriculture. Part of the Mission Statement of the department is to "ensure food safety and provide consumer protection". In keeping with this priority, activities of FSIS and the proposal for HACCP integration of residue avoidance is of great interest to the department. We have several concerns.

### 1. Identification of Animals

Accurate identification of animals is critical to any effort to trace, track, and follow back through the food production system. Collection of identification at point of slaughter is the most critical single point of breakdown in our ability to determine the animal's origin. FSIS plays the pivotal role in this regard, as it is FSIS personnel in slaughter plants who are responsible for the system of collection of identification from animals as they progress through the slaughter line. In other disease control programs, notably brucellosis, there have been significant deficiencies in collection of identification and this issue needs to be seriously addressed.

It is imperative for FSIS to collect all identification available and record it completely and accurately for the current system to work properly.



## 2. Clearing of Violations

Presently, a violator is required to pass five clean cattle through the system to clear a violation. This requirement is onerous and unproductive, as it impinges on many other operations down the line. Auction markets, buyers, transporters, and slaughterers are all required to be involved with the tracking and paperwork. This yields great potential for inaccuracy and poor performance. Further, the violator is in complete control of what animals are presented for testing and can easily ensure their purity. The system is intended to either punish the violator or ensure no further violation, but as presently designed does neither. It does, however, punish almost everyone else involved in the marketing system.

We suggest that a first violation be dealt with in an educational mode. Further violations should be handled in a straightforward, streamlined manner with required interviews at regional FSIS offices and significant monetary fines, increasing by a factor of 10 with each further violations.

## 3. Prioritization of Issues Addressed

The issue of food safety is multifaceted and the various component parts need to be quantified and prioritized. Residue avoidance must be integrated into food safety at a priority level related to its true problem potential. Issues of pathogen contamination, sanitation, disease control - and residue avoidance - must be addressed in relation to their public health significance. For example, how many documented, proven cases of human illness are directly attributable to drug and/or antibiotic residues? Is the level of concern and expenditure related to the level of human health risk? If not, the program should be reassessed and, if necessary, redirected.

Further, increased investment in quality assurance programs may be a significantly more cost effective approach to residue avoidance than punitive traceback. Animal industry commodity groups are strongly in favor of such approaches and can be tapped for support in this direction. A relatively small monetary investment can be leveraged into major quality control programs with industry-wide support and the cost/benefit effect in residue avoidance can be greatly increased.

## 4. Stakeholder Involvement

It is imperative that the animal production industries and other stakeholders be involved with program design and support the approach adopted. The meeting on December 11th in Washington DC is an appropriate response to this concern, although one meeting on the east coast is minimal at best and serves east coast interests selectively. For those of us in other parts of the nation, perhaps several meetings could be planned so that midwesterners and westerners could be more involved in the process.



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