



National Pork Producers Council

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FSIS Docket Clerk
Docket No. 99-026N
Room 102
Cotton Annex
300 12th Street, SW
Washington, DC 20250-3700

RE: Draft Report - The Future of FSIS Veterinarians: Public Health Professionals for the 21st Century

The following comments are submitted on behalf of the National Pork Producers Council (NPPC), which represents the nation's pork producers through 44 affiliated state associations. Our members account for the overwhelming majority of this nation's commercial pork production. The pork industry is one of the largest agricultural sectors in this country, generating approximately \$11.0 billion in annual farm sales. In addition, the pork industry creates an estimated \$64.0 billion in economic activity and supports an estimated 600,000 jobs.

NPPC has carefully reviewed the draft report and appreciates the agency conducting a public meeting and allowing the opportunity for written comments. Food safety is a high priority for pork producers. We are committed to producing a product in which our domestic and international consumers can have the highest confidence. NPPC has established a Pork Safety Committee with the mission of assuring the safety of U.S. pork through coordinated, science-based efforts throughout the pork chain.

The Task Force should be commended for developing a draft report that addresses an important issue with long-range thinking. The public meeting on February 1 with Task Force members in attendance provided a good opportunity to discuss the concepts in the draft report.

General Comments

NPPC has several specific comments on the draft report as well as some overarching comments. Numerous times in the report it is not clear if the proposed activities or potential role of veterinarians refers specifically to FSIS veterinarians or to veterinarians in general. This is important to clarify as veterinarians have a critical role in public health and food



safety but there may be difference of opinions on the appropriate role for FSIS veterinarians in different parts of the chain.

One group that appears to not have been represented on the Task Force is actual private practitioners. Producers use veterinarians to provide guidance in animal health and food safety areas. Their herd veterinarians are on their operations on a regular basis and are looked to as conveyors of information. Modern operations have strict biosecurity protocols and severely limit people traffic. Therefore, producers would not necessarily be interested in or supportive of additional visitors to their operations.

In recognition of the key relationship between producers and their practitioners, NPPC devotes significant resources to working with the American Association of Swine Practitioners (AASP) to ensure the latest information is in the hands of veterinarians. We recently just completed a mailing of a *Salmonella* roundtable discussion of key researchers to all members of AASP. In addition, we have co-produced fact sheets on cleaning and disinfection of transportation equipment. Practitioners have had the key role in carrying the message of the PORK QUALITY ASSURANCESM (PQA) Program to producers.

Background Comments

The background was extremely interesting reading and a good summary of the history of government meat inspection. It would be more appropriate and accurate to replace the term genetic manipulation on the bottom of page 6 and the top of page 7 with "application of modern breeding practices and selection."

What Veterinarians Bring to the Food Safety Table

This section describes the broad range of skills that veterinarians may possess. It should be noted that there could be a broad range in the depth of understanding by veterinarians with regard to production practices and animal disease and the linkages between them. Depending on the veterinary school and the student's own choice of area for emphasis and background, this understanding may be extensive or very limited. New information and technologies are rapidly evolving in the pork industry. Veterinarians working with pork producing farms require significant continuing education to stay current. FSIS must recognize that FSIS veterinarians in general do not possess the background understanding of modern pork production.

It is noteworthy that there is extremely limited discussion on the role of food animal practitioners in animal health and public health. The last bullet point in this section does acknowledge that food animal veterinarians are "first line promoters of the production of animals that

are healthy, free of violative residues, and other public health hazards" and that they "form important links to FSIS veterinarians by validating and maintaining food safety and quality assurance certification programs and auditing systems. Again, NPPC would stress that producers view their practitioner as the key conveyor of animal health and food safety information.

I. Defining the Role of the FSIS Veterinarian

It should be stressed that industry is responsible for food safety. Producers would look to their practitioners to lead efforts to address appropriate food safety issues at the farm level. FSIS veterinarians can play an important role in identifying areas needing additional attention or emerging issues that manifest with lesions at processing. Summary information on a species basis with regard to pathology and other lesions would be useful. At the present time, maximal use is not made of current condemnation data. **The report should provide more specific details on what FSIS veterinarians are uniquely qualified and situated to do.**

With regard to identification, the pork industry has had mandatory identification of all hogs bought and sold into interstate commerce since 1988. This identification has been used for residue and animal health tracebacks related to regulatory programs. It is appropriate to conduct tracebacks for residues and program diseases. However, additional research is needed on the on-farm ecology and epidemiology of microorganisms of public health significance before recommendations can be made as to the appropriateness of on-farm control strategies. Without the scientific tools to offer a producer to improve the situation, it is inappropriate to take punitive regulatory action.

With regard to improvements in current identification systems, the industry has been funding testing of improved tags for culled animals and working with the Animal and Plant Health Inspection Service (APHIS) to implement enhancements to the current system.

NPPC strongly agrees with the report's support for a more integrated approach to policy development and implementation. It is critical that technical expertise is central to policy development and action plans.

With regard to this section's recommendations, NPPC has several comments on specific recommendations.

Recommendation 2. *Utilize more of the skills of veterinarians to oversee the implementation and interaction of system controls, rather than just verify their application, to ensure better critique of the appropriateness and adequacy of these systems.* It is not clear what this is saying with regard

to veterinarians in general or specifically FSIS veterinarians. Again, industry is responsible for food safety with government in a verification role. Throughout the document, it is unclear if the Task Force members are accepting of the agency's paradigm shift from command and control.

Recommendation 3. *Provide clarified authority for FSIS veterinarians that ensures food safety performance standards compliance from farm to table. Such activities will require informed judgments to prioritize inspection actions to verify control processes within the HACCP systems.* It is not clear if this is proposing expanded authority for FSIS veterinarians or more clearly outlining current authority.

Recommendation 7 and 8. These recommendations address communication and education roles for FSIS veterinarians including development of educational materials. It should be noted that there are other governmental agencies as well as producer group efforts in these areas that it may be appropriate to participate with but the need for allocation of FSIS limited resources should be carefully evaluated. FSIS should not duplicate what others are already doing.

Recommendations 10, 11, and 12. Further discussion needs to take place with regard to the current and proposed Veterinary Officer positions. It is not clear what adding two positions does to better address the issues. Perhaps better coordination would accomplish the same objective without additional bureaucracy.

Recommendation 13. Again in this recommendation on providing leadership it is unclear whether veterinarians in general or FSIS veterinarians are being discussed. It should also be noted that auditing skills are not taught in veterinary schools so training will be very important for any veterinarians performing auditing functions.

II. Education, Training, Recognition and Recruitment

With regard to correlating slaughter data and evaluation of on-farm pathogen reduction efforts to confirm the effectiveness of on-farm quality assurance programs for animal producers, the role of the practitioner vs. the in-plant veterinarian needs to be explored. It would seem to be more appropriate for the practitioner to have the key role in this type of analysis along with university researchers. There are many confounders when reviewing on-farm pathogen reduction efforts that only someone very knowledgeable about the production practices on the farm would be aware of. It is critical that misleading results are not put forward.

The education and training recommendations in general are appropriate and over time will provide a more skilled workforce.

Recommendation 2. While it is important that veterinary students are exposed to the variety of career tracks that may be available, with regard to the Inspection Application Track, NPPC questions the role of FSIS veterinarians in monitoring animal health and product safety from farm to table. The role in animal health is already filled by private practitioners and where appropriate for regulatory or voluntary programs with APHIS veterinarians. There currently are already over 300 APHIS field veterinarians who work with producers on animal health issues. In addition, private companies have developed software that may be used in-plant to track animal health conditions on each carcass at line speed. Duplication of already provided services should not take place.

Recommendation 4. *Conduct a needs assessment to determine the kinds of professional knowledge and skills the Agency needs now and in the foreseeable future to accomplish its public health mission.* This is an important recommendation and perhaps should have preceded the work of this Task Force.

III. Partnerships

FSIS has developed many excellent partnerships with a variety of governmental agencies and groups. The concept of future partnering to have joint studies with FSIS in-plant veterinarians is excellent.

The last paragraph on page 24 does cause some concern for NPPC. The first sentence is "Commodity groups and the food industry are key partners in producing safe food." Again, the food industry is not just a partner but is in fact responsible for producing safe food. The next sentence says that "FSIS veterinarians will play important roles in auditing and verifying animal health and treatment records for certified and branded meat and poultry products produced under partnerships involving producers (such as the National Pork Producers Council), practicing veterinarians, and processors." The paragraph continues to say the partnerships will include residue avoidance (NPPC PQA Program, Level 3) and joint partnerships with USDA (NPPC Trichina Safe Certification).

FSIS must recognize that there are other groups that industry may look to for this type of certification. This may include practicing veterinarians, other third party certifiers, and other governmental agencies such as APHIS and Agricultural Marketing Service. There are examples currently of third party auditors performing these functions. FSIS should not compete with private business but should verify when it is appropriate and either necessary for international certification or exemption from other requirements or when requested. Pork producers take a lot of pride in having developed the PQA Program as a producer-driven initiative.

IV. Coordinated Databases and Animal Identification

With regard to the nationally coordinated database, it is unclear what the database is to do. A collection of data does not lead to problem solving. A more thoughtful process is needed to determine the objectives of the database. As described in the Swine Futures Project - a joint USDA and industry project - establishing a surveillance system is a four-part process:

- Working with the users of the surveillance information to establish appropriate objectives,
- Identifying data sources and developing an efficient and reliable data collection mechanism,
- Developing a plan for the analysis of data in a scientifically valid manner, and
- Disseminating surveillance information in a timely manner through the formation of strategic linkages with the main stakeholders.

The basic purpose of a specific surveillance program should determine the design and source of data rather than first deciding a national database is needed. The Task Force should review the Swine Futures Report that includes a section on emerging issues (includes disease and food safety) detection and selection of a response. Detection of emerging issues can include a surveillance system but also needs other components that are outlined in the Swine Futures Report. It should be noted that three different groups within FSIS participated in discussions with the Swine Futures Project members as well as one Swine Futures Project member was on the FSIS Task Force.

There is a distinction between descriptive information in a database and cause and effect linkage. To more specifically answer questions, targeted studies may be more important and appropriate than a general database. It is unclear and confusing in the report if individual herd information is sought or collective information to look at trends. Again, there are private companies that are developing software for use by plants to provide individual information back to producers.

On the identification comments, current identification systems exist for some species and in all cases, plants need to maintain identity to provide payment to owners. One identification system is most likely not able to meet the needs of various species.

On page 28, the second full paragraph includes the sentence "The database must be transparent for all; however, privacy issues must be addressed, and the overall system be user friendly." It is difficult to see how the database can be transparent and still have an appropriate level

of confidentiality. NPPC recognizes the ability to put in some security with regard to the depth of information that individuals are able to access. However, it should be noted that plant identity and identity of limited suppliers to the plant might end up being derived from some of the accessible data.

Rather than do as in Recommendation 5, which is to establish a working group to update the data system needs on a yearly basis, an exploratory group should be formed with the users to establish the objectives. Recommendation 7 should be directed to developing the objectives of a surveillance system and then to determine what is needed to address the objectives. A database may be one aspect of this.

One example discussed at the February 1 meeting was that of a residue database with regard to information collected from residue violators. Having timely information available with regard to the violative residues being found and certain characteristics or practices of violators would be helpful. This is dependent on information collected at the farm visits conducted after a violation occurs. In this example, specific information is known about on-farm practices and valid conclusions can be drawn with this type of information.

However, with regard to emerging pathogens, animal health, or potential on-farm pathogens, such on-farm practice information would not exist. Therefore, it is difficult to see the value for expending significant funds in collection of information for a large database that will not be usable and is more appropriate for university-based studies.

V. Veterinary Contributions to International Credibility of FSIS

International trade is extremely important to the pork industry. It is critical that scientific expertise and knowledge is used in trade negotiations. The only comment on the recommendations in this section is the need to collaborate with APHIS on industry quality assurance programs where it is appropriate and necessary for trade. Scientific participation in Codex and OIE is important for USDA.

Recommendation 6 includes validating import controls. The Task Force report did not appear to include much discussion on the role of FSIS veterinarians in verifying internationally that U.S. import requirements are being met with regard to food safety and animal health protection. In the January 10, 2000, final rule published by APHIS amending import regulations with regard to pork originating from regions with African Swine Fever, it was noted that FSIS periodically inspects these processing establishments to make sure important requirements such as cooking temperature, are met. With more and more countries being

recognized as free of animal diseases or being regionalized, verification is important to safeguard animal and public health.

Conclusion

The Task Force Report lays out a variety of areas to be addressed. In the final report, there should be clarification of roles that veterinarians in general play vs. FSIS veterinarians. The Task Force did not have any private practitioners on it and the report would benefit from this perspective. FSIS should not duplicate the services of private business or other governmental agencies. The report should be tightened to more clearly reflect areas where FSIS could have a lead role vs. more of a partnership, supportive, or limited role.

NPPC appreciates the opportunity to provide these comments on the draft report and the willingness of the agency and Task Force to accept public input. The Task Force should be commended for the effort it has put forward and NPPC is very interested in continuing to provide input as the Task Force works.

Sincerely,

A handwritten signature in cursive script that reads "Beth Lautner".

Beth Lautner, D.V.M., M.S.
Vice President, Science and Technology