

E.coli Outbreaks: A New Way of Life

Two additional E.coli 0157:H7 recalls were experienced the final week of October, 2009, both emanating from consumer outbreaks. Recall # 057-2009 was announced on October 26, from South Shore Meats in Brockton, Massachusetts, involving 1,039 lbs of fresh ground beef. Recall # 059-2009 was announced but five days later, in which 545,699 lbs of fresh ground beef was recalled by Fairbank Farms in Ashville, NY. Neither of these two plants slaughter, but obtain all their meat from source slaughter providers. Since E.coli originate from within animals' intestines, and are found on manure-covered hides, neither of these two further processing plants INTRODUCED E.coli into the food system, but merely processed meat which was previously contaminated with invisible E.coli pathogens when the meat arrived on their docks. The ability of such further processing plants to produce wholesome products is primarily dependent on the wholesomeness of incoming meat, which is becoming an increasingly lethal roulette game for these downstream establishments, and for consumers.

These embarrassing recalls again reflect systemic problems within the USDA's current deregulated method of meat non-inspection, called HACCP (Hazard Analysis Critical Control Point). When the agency initially introduced the HACCP concept to the industry in the 1990's, USDA stated that the two primary foundations upon which HACCP was built were **Prevention**, and **Corrective Actions** in those few occasions when pathogens appear in meat. Recurring recalls and ongoing outbreaks publicly reveal that agency HACCP policies constructed these two foundations on sand, absent true science.

First of all, initial prevention is inadequate at the slaughter establishments, where E.coli bacteria are introduced into the meat supply via sloppy dressing procedures. Secondly, when E.coli are detected at downstream plants, the agency focuses its enforcement actions primarily against the victimized further processing plants which lack the ability to prevent purchases of previously-contaminated meat from their source slaughter providers. Since USDA forces the downstream plants to implement corrective actions to prevent recurrences, while insulating the source plants from accountability, corrective actions are understandably deficient. Instead of forcing the source plants to utilize corrective actions to prevent recurrences, the agency makes the destination plants jump through a plethora of paperwork changes, which ostensibly would prevent the source slaughter plants from ever again shipping hot meat into commerce. Since USDA intentionally places the wrong target into its cross hairs, the true target is misdiagnosed (by agency design), resulting in no efficacious corrective or preventive actions to eliminate future recurrences.

Interestingly, Fairbank Farms previously announced an earlier recall on September 5, 2007, for 884 lbs of ground beef which may have been contaminated with E.coli

0157:H7. Obviously, one or more source slaughter providers to Fairbank Farms have not implemented meaningful corrective actions to prevent future production of pathogen-laden meat. Fairbank Farms is not unique in being victimized on multiple occasions. On February 24, 2004, Richwood Meat Company in Merced, CA announced a recall of 90,000 lbs of meat which may have been contaminated with E.coli 0157:H7. Three years later, on April 20, 2007, Richwood Meat Company announced a subsequent recall of 107,943 lbs of ground beef which was possibly contaminated with E.coli 0157:H7.

The slippery slope on which the agency slides with no rudder is further described in a June 2, 2005 letter from Dr. Kenneth Peterson, Deputy Administrator in USDA/FSIS' Office of Field Operations, in which he stated "*I would expect a prudent establishment to have appropriate procedures to determine product acceptability prior to receiving the product*". USDA is fully cognizant that downstream plants have no control over the wholesomeness of incoming products. While the source slaughter plants' employees, as well as USDA inspectors assigned to the plants, fail to detect and remove enteric bacteria, the agency instead requires the downstream destination further processing plants to detect and remove these invisible pathogens. Interestingly, previously-contaminated meat arrives at destination establishments in containers labeled "**USDA Inspected & Passed**". Since both the agency and the originating slaughter plants do not adequately inspect the meat on the originating kill floor, the agency now expects that inspection will subsequently be fully accomplished at the downstream establishments.

Following the October 4 issue of the New York Times which included the article entitled "**E.coli Path Shows Flaws in Beef Industry**", the same Dr. Kenneth Peterson discussed the possibility of additional agency-mandated testing. Dr. Peterson stated "*I have to look at the entire industry, not just what is best for public health*". We should not fault Dr. Peterson for admitting the truth, as such candor constitutes a welcome change in the agency's non-transparent method of formulating USDA meat inspection policies. Instead, USDA/FSIS should be called to task for embracing biased, deregulated non-inspection policies as the agency's own Dr. Kenneth Peterson so eloquently delineated. The agency is more concerned with maintaining its comfortable relationship with the big packers than it is in protecting public health. USDA chooses to ignore that the Federal Meat Inspection Act was implemented primarily to protect public health, not promote agency comfort.

When USDA introduced HACCP in the mid-90's, the agency stated that HACCP was an improvement over its previous meat inspection system because HACCP was ostensibly "**Science Based**". The agency went on to state that HACCP's scientific basis was predicated upon a large increase in microbial testing of meat products. The biggest plants implemented HACCP on January 26, 1998. On February 1, 1998, a mere six days

later, the agency issued Directive 10,010.1 which essentially exempted the large plants from agency-conducted sampling. This payback was not science-based, but big-packer biased. In recent years, the agency has placed a much higher emphasis on testing, which is anathema to the original (and truly science-based) HACCP program as authored by Pillsbury in the 60's & 70's. Realizing that substantial testing is contrary to Pillsbury's HACCP protocol, we must consider why the agency has chosen to place such high priority in testing.

Although USDA/FSIS has stated that E.coli 0157:H7 is an adulterant in ground beef, the agency states that H7 is not an adulterant when it is on the surface of intact cuts. These recurring recalls and ongoing outbreaks reveal that a substantial portion of intact cuts shipped to further processing plants carry a substantial load of E.coli residing on their surfaces. Therefore, the idea of increased testing for E.coli is mandatory. Rather than keeping the barn door closed, the agency is willing to let the horses out of the barn, only to subsequently attempt to detect the horses at downstream plants. Therefore, because of increasing numbers of E.coli recalls and outbreaks, USDA/FSIS is forced to consider an increased incidence of testing, which hopefully will **Detect** the presence of adulterated meat, and remove it from commerce, protecting consumers. Rather than **Preventing** the initial contamination of carcasses with enteric bacteria, the agency is more comfortable **Detecting** the bacteria downstream, and then bring enforcement actions against the hapless downstream facilities. While detection has its merits, it must be subservient to initial **Prevention** at the Source. As long as the agency pays little attention to initial Prevention at the Source, detection has become the number one priority at USDA/FSIS.

It is time that we reconsider USDA's inadequate HACCP policies, which have contributed to the high incidence of recurring public health outbreaks. The agency itself is fond of reminding small and very small meat plants that HACCP is a living, ever-changing entity. As such, USDA/FSIS must be willing to conduct a mid-stream examination of its own HACCP policies. If the agency were to do this, only then will we PREVENT enteric bacteria from entering the food chain.

Rather than experiencing these multiple public health outbreaks and recalls, we should instead demand that recalcitrant top agency officials be recalled in order to implement long-overdue and meaningful reforms which would truly promote public health and safe food.

John Munsell, Manager
Foundation for Accountability in Regulatory Enforcement (FARE)
Miles City, Montana
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