

# **NIAA Meeting - Animal Health Emergency Management Committee**

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# Emergency Preparedness and Response

- Food Defense
- Foodborne Outbreaks and Regulatory Actions
- Product Recalls
  - Impact



# Emergency Preparedness and Response

- Emergency/Response can protect animal health or public health
  - Within USDA – APHIS has primary role for oversight in protecting animal health
  - FSIS has primary role for oversight in protecting public health
    - Work together in areas of emergency management (e.g., BSE, AI, etc.)

# Food Defense

- Having measures in place to reduce the chances of someone intentionally contaminating the food supply in order to kill or hurt people, disrupt our economy, or ruin your business.



# Food Defense

- An attack on the food supply might be carried out by an extremist group, but it could be carried out by a disgruntled employee or result from something happening in a local area.
- While an individual facility might not be directly at risk, there is a high likelihood that if an attack were to occur even at one establishment it would likely impact the entire industry, including international trade.

# Food Defense Plan

- Inside and outside security,
- Slaughter and processing,
- Security,
- Storage security,
- Shipping and receiving security,
- Water and ice security, and
- Mail-handling

security<http://www.fsis.usda.gov/PDF/Securityguide.pdf>

## Outside Security

1. What food defense measures does your plant have in place for the exterior of the building?

	Yes	No	N/A
Is the plant's exterior secured to prevent entry by unauthorized persons (e.g., by locked fence, gate or entry/exit doors)?			
Is there enough lighting outside the building to properly monitor the plant at night/early morning?			
Do emergency exits have self-locking doors and/or alarms?			

# Food Defense Tools

- FSIS has a “Risk Mitigation Risk Tool”
  - “Look up” tool on website – This tool identifies some possible countermeasures that companies could implement, as part of a food defense plan, to better protect their business, employees, and customers.

You must choose a Category and a corresponding Node.  
Make your selections:

Slaughter & Meat Processing ▼

Ingredient Preparation Area ▼

SELECT



# Food Defense Tools

- Transportation Guidelines
  - [http://www.fsis.usda.gov/PDF/Transportation Security Guidelines.pdf](http://www.fsis.usda.gov/PDF/Transportation_Security_Guidelines.pdf)
- Disposal Guidelines
  - [http://www.fsis.usda.gov/PDF/Disposal Decontamination Guidelines.pdf](http://www.fsis.usda.gov/PDF/Disposal_Decontamination_Guidelines.pdf)
- FDA tools
  - <http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm20027049.htm#guidance>

# Model Food Defense Plans

- *Official establishments are not required to have food defense plans*
- In the event unintentionally contaminated product is shipped from the establishment, swift removal of the adulterated materials from commerce would be essential to protect the public health.
  - One mechanism for doing this would be a recall.
  - By having an integrated recall-food defense plan, a firm can implement either one, or both, of these measures at a moment's notice, as needed.

# Response to Findings

- Most of the food safety practices already in place apply equally to intentional contamination.
  - If specific, credible threats are received, then USDA, in cooperation with other homeland security agencies, would keep the public informed of measures to take.

# Foodborne Outbreaks and Regulatory Actions



# Foodborne Outbreaks and Regulatory Actions

- FSIS works with the public health community (CDC and states) when there are outbreaks that may involve FSIS regulated products
  - identify the source of production and the distribution, of the suspect meat, poultry, or processed egg product
  - Identify contributing factors to the outbreak
  - Recommend actions or policies to prevent future occurrences

# Foodborne Outbreaks and Regulatory Actions

- FSIS looks at all the evidence and may
  - Take samples
  - Conduct an in-depth investigation at the plant
  - Issue a public health alert
  - Recommend the plant conduct a product recall
  - Take enforcement action at the establishment

# Foodborne Outbreaks and Regulatory Actions

- FSIS conducts pathogen testing in RTE products and STEC testing in raw ground beef (and ground beef components)
  - Any finding and the products are considered adulterated
- When FSIS conducts pathogen testing in these commodities, establishments are expected to hold the associated products pending test results
- FSIS also conducts process control testing
  - *Salmonella* performance standard testing

# Salmonella (raw)

- FSIS conducts on-going performance standard testing for *Salmonella*
- However, if at any point FSIS determines there is specific product in commerce making people sick... They WILL ask for a voluntary recall of that specific production of product.





# *Salmonella* (raw)

- With *Salmonella*, if multiple production days implicated, (i.e., on-going outbreak) FSIS beginning to look at pre-harvest as the source
  - Unclear as to the break point if a recall is determined necessary
  - Unclear what steps a grower could take to “break” the source of “contamination”
    - Model for animal disease outbreaks and recall

# Product Recalls



# Product Recalls

- A recall is a firm's action to remove product from commerce (e.g., by manufacturers, distributors, or importers) to protect the public from consuming adulterated or misbranded products.
- Intentional contamination
- Response to an outbreak
- Shipment of adulterated product

# Product Recalls

- FSIS has procedures for requesting establishment to conduct recall
  - These procedures would be followed in the event an establishment has shipped adulterated product, including intentional contamination
  - FSIS post product labels and information to assist consumers in returning recalled product
    - One could expect heightened media surrounding an intentionally contaminated product

# Product Recalls

- Can lead to national/international news stories (depending on the nature and size of the recall)
- Cameras and media may appear at the facility
- Product labels appearing in the press and on the major news outlets



# Impact of Recalls

- Settlement Reached in hemolytic-uremic syndrome (HUS) Case Linked to Multistate Outbreak of E. coli O157:H7 Infections from November-December 2006
- This outbreak was clearly linked to XXX lettuce served in YYY restaurants in the northeastern United States. As of December 14, 2006, Thursday, 71 persons with illness associated with the YYY restaurant outbreak have been reported to CDC from 5 states....

**Litigation and settlement (extremely costly)**

# Impact of Recalls

## "Blaming The Victim" Strategy Remains In Food Industry's Playbook

- **New York Times** story titled "Increasingly, Food Companies Cannot Guarantee Safety" by Michael Moss:
  - Mr. Moss looks at the aftermath of the pot pie salmonella outbreak of 2007 that sickened at least 15,000 Americans. The New York Times reports this:
    - *"So ZZZ — which sold more than 100 million pot pies last year under its popular WWW label — decided to make the consumer responsible for the kill step. The "food safety" instructions and four-step diagram on the 69-cent pies offer this guidance: "Internal temperature needs to reach 165° F as measured by a food thermometer in several spots."*

***Bad Press – Tarnish the brand....***

# Impact of Recalls

## Costs

- Improvements to facility (but timeline becomes someone else's)
- Public perception of the brand
- Negative publicity last years
- Personnel
  - Under a microscope
  - Pressure to implement changes
  - Often personnel changes implemented during a crises
- Corporation
  - Can use the information as a “lesson learned”
  - Must support the team at the affected facility (often at the expense to other facilities)
  - May be asked to testify to the issues at the facility

*Better to prevent than react to a situation.*



# Impact of Recalls - Beyond the Plant

- **CASE STUDY**

# Public Perception – Beyond “The Plant”

- Polls have shown consumer confidence in food safety declining (**22.5%** consumers confident in their food supply) [2007]
  - Recalls of pet food involving illness and deaths of pets
    - Melamine issues
    - Recalls with national attention: peanuts, pistachios, peanut butter, peppers, beef, canned food, tomatoes, lettuce

*When the public loses confidence...*



# The Tipping Point

- Impacted those we love
  - Our pets (they can not make decisions for themselves - we fed them the contaminant)
- It was an intentional contamination
- It was imported



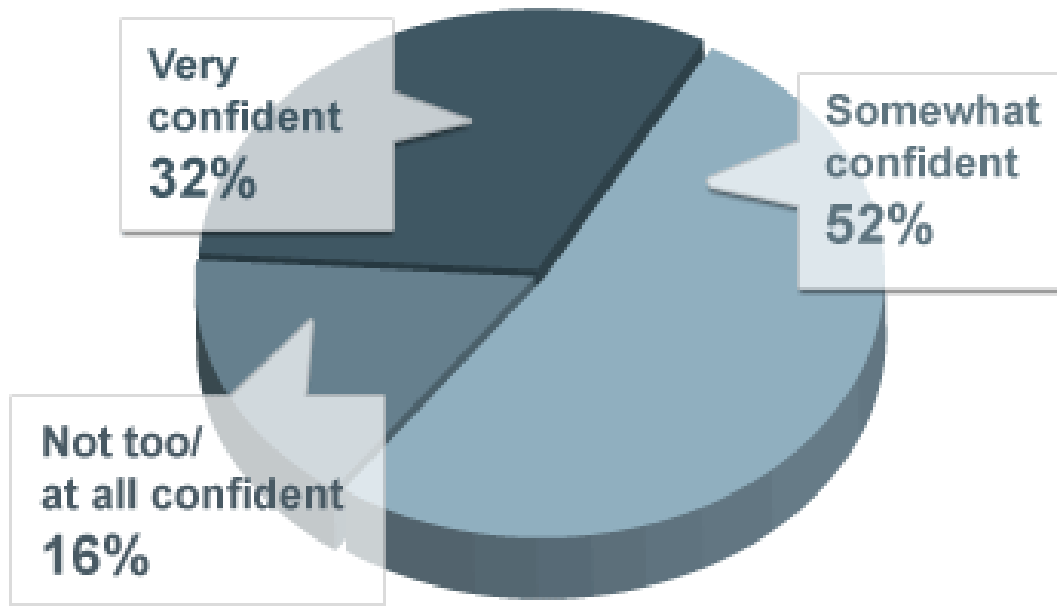
# Strategies to Address Food Safety Concerns

- Legislation
  - 2008 (10 food safety bills introduced in Congress)
  - Food Safety Modernization Act
- Regulation
  - Preventive Controls
    - Includes Mandatory Recall and Food Defense
  - Produce Safety
  - Hold and Test (FSIS)
- Enforcement

# Things do improve....

- 2009

HOW CONFIDENT ARE YOU  
THAT THE FOOD YOU BUY IS SAFE?



# Questions



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