



## Consumer Federation of America

### Report: The Promise and Problems of HACCP: A review of USDA's approach to meat and poultry safety ([LINK](#))

#### Summary

In a new report, the Consumer Federation of America traces the history of USDA's approach to meat and poultry safety regulations. The analysis of this food safety program, known as Pathogen Reduction/Hazard Analysis and Critical Control Points (PR/HACCP), identifies gaps which have hindered the ability of the regulation to fully protect consumers.

#### Findings

The analysis cites two examples of ongoing problems which have not been adequately addressed in the 17 years since the regulation first took effect:

- Too often plants have failed to develop effective food safety plans while USDA has failed to adequately identify problems with those plans.
- Plants are repeatedly cited for reoccurring food safety violations with little consequence.

#### Conclusion and recommendations for FSIS

1. Develop a better way to evaluate plants' HACCP plans.
2. Require plants to identify pathogens most commonly associated with particular meat and poultry products as hazards likely to occur and address them in their HACCP plans
3. Establish clear procedures and repercussions for reoccurring violations
4. Frequently and routinely update performance standards that are based on improving public health outcomes
5. Seek authority from Congress to set and enforce performance standards for pathogen reduction
6. Improve FSIS sampling programs to target riskiest facilities and products

#### Foodborne Illness Statistics

Each year 48 million Americans are sickened, 128,000 are hospitalized and 3,000 die from foodborne disease. (CDC, 2011)

Between 1998 and 2008, 22% of outbreak associated illnesses and 29% of outbreak-associated deaths were attributable to meat and poultry products. (CDC, 2013)

Illness associated with meat and poultry cost an estimated \$7 billion each year. (Batz, Hoffman, Morris, 2012)

#### Timeline

1906            *The Jungle* novel

- 1906 Federal Meat Inspection Act of 1906
- 1957 Poultry Products Inspection Act
- 1993 Outbreak of *E. coli* 0157 linked to undercooked hamburgers from Jack in the Box
- 1994 Food Safety and Inspection Service Administrator Michael Taylor told meat industry executives:  
 “To clarify an important legal point, we consider raw ground beef that is contaminated with *E.coli* 0157:H7 to be adulterated within the meaning of the Federal Meat Inspection Act.”
- 1996 USDA’s Food Safety and Inspection Service issued [Hazard Analysis and Critical Control Point Systems \(HACCP\)](#) final regulation for all meat and poultry plants.
- 2000-2013 USDA’s Office of Inspector General (OIG) and the U.S. Government Accountability Office (GAO) issued multiple reports evaluating FSIS’ implementation of HACCP.
- 2001 [Supreme Beef Processors Inc. v. USDA](#) decision  
 In December 2001, the Fifth Circuit Court of Appeals upheld a lower court ruling that the U. S. Department of Agriculture lacked the authority to shut down a meat-processing plant that repeatedly failed tests for *Salmonella* contamination.
- 2003 An Institute of Medicine panel called on Congress to “grant the regulatory agencies clear authority to establish, implement, and enforce food safety criteria, including performance standards.
- 2011 FSIS revised the *Salmonella* performance standards for young chickens.
- 2012 FSIS conducted baseline testing of poultry parts. The agency found high contamination rates – a 24% prevalence rate for *Salmonella* and a 21.7% prevalence rate for *Campylobacter*.
- 2013 FSIS proposed changes to its sampling program for *Salmonella* in raw ground beef, beef manufacturing trimmings, bench trim and other raw ground beef components.
- 2013-2014 A nationwide outbreak of antibiotic-resistant *Salmonella* which sickened 634 persons in 29 states is linked to multiple Foster Farms plants.
- 2015 FSIS proposed new standards for *Salmonella* and *Campylobacter* in poultry parts and ground poultry

**Contact:**

Chris Waldrop  
 Director, Food Policy Institute  
 Consumer Federation of America  
 202-797-8551 office  
 202306-0617 cell  
[cwaldrop@consumerfed.org](mailto:cwaldrop@consumerfed.org)