



UNITED STATES DEPARTMENT OF AGRICULTURE

OFFICE OF INSPECTOR GENERAL

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REPORT TO THE SECRETARY ON THE MEAT AND POULTRY INSPECTION PROCESS

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SUBJECT: Food Safety Initiative

The Office of Inspector General initiated a series of audits of the U.S. Department of Agriculture's Food Safety Inspection Service (FSIS) to determine whether FSIS' meat and poultry inspection program remains effective under the science-based Hazard Analysis and Critical Control Point (HACCP) System. Our initiative included reviews of three facets of the new inspection system—HACCP, laboratory analyses, and foreign imports—and a review of the compliance program that carried over from the previous system.

The results of our Food Safety Initiative demonstrate that FSIS has taken positive steps to secure the safety of meat and poultry products. However, more needs to be done in all four of the areas we reviewed. For the science-based system to reach its full potential, FSIS needs to take maximum advantage of the expanding role that science now plays as a control over the meat and poultry that enters the marketplace. Some of this control is seen directly in the identification of pathogens; some is seen in the integration of scientific techniques (e.g., operational procedures, reliance on objective data) into the systems being established.

Most significantly, we found that FSIS needs to command a more aggressive presence in the inspection and verification process. FSIS has not always established needed procedures or apprised itself of all areas where inspection is critical; consequently, it has reduced its oversight short of what is prudent and necessary for the protection of the consumer.

FSIS initiated its conversion to HACCP in July 1996 when it issued the rules regarding HACCP and the Pathogen Reduction system. These rules clarified the respective roles of Government and industry in food safety: Industry is accountable for producing safe food; Government is responsible for setting food safety standards, maintaining inspection oversight, and maintaining an enforcement program to ensure that establishments that do not meet standards are appropriately sanctioned.

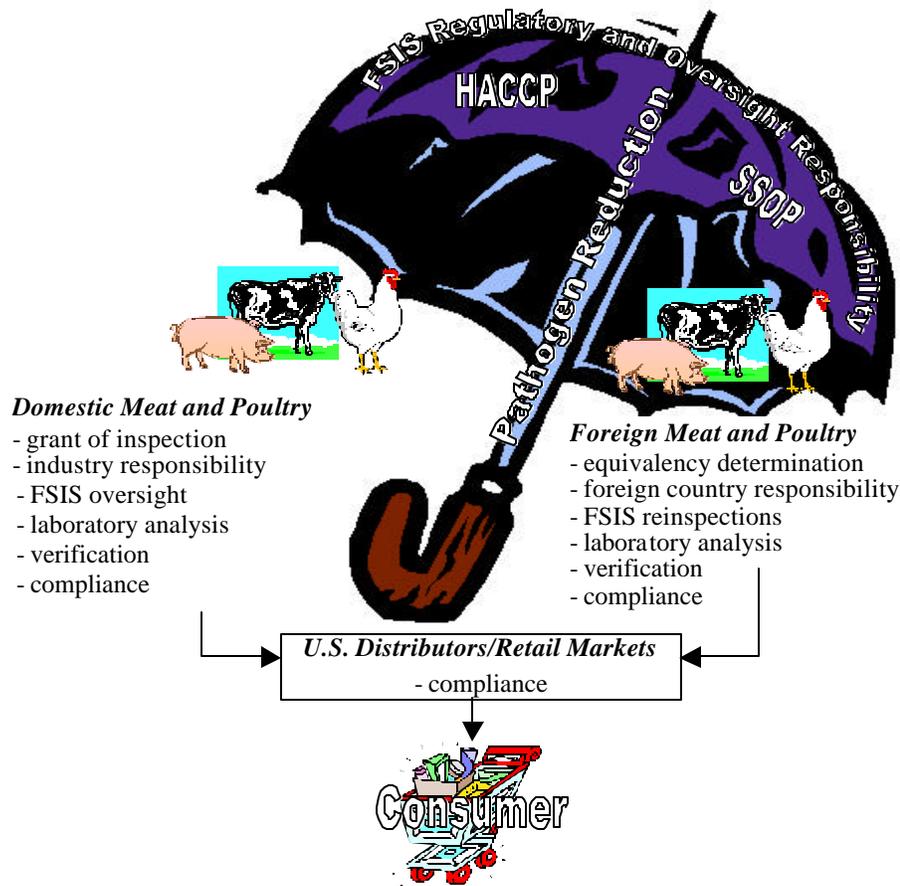
The key elements that constitute FSIS' transition from its former methodology to a science-based system include testing for *Salmonella* and other harmful pathogens and residues, ensuring the implementation of sanitation standard operating procedures (SSOP) at each of the 6,000 meat and poultry establishments under Federal inspection, and monitoring HACCP operating plans for each of these establishments. FSIS also implemented an "equivalency" program through which the food safety standards of foreign countries could be judged according to the requirements of the HACCP and Pathogen Reduction systems.

As the transition took form, we proactively monitored FSIS' implementation plans. Our goal was to ensure that the guarantee of product safety and wholesomeness existing under FSIS' former methodology would continue under the science-based system.

We reviewed FSIS' activities across a broad spectrum of meat and poultry inspection operations to assess the agency's major inspection and control components. Our reviews focused on—

- implementation of the HACCP program and of sanitation standard operating procedures, including efforts to test for pathogens and reduce their presence,
- FSIS' quality assurance programs over its laboratory facilities and operations, product sample integrity, and laboratory testing operations,
- FSIS' process to determine whether foreign countries' safety inspection systems are equivalent to that of the United States, and
- the effectiveness of FSIS' compliance review program in detecting violations of meat and poultry inspection laws at non-federally inspected firms.

The graphic on the following page depicts the relationship of the four evaluated areas. HACCP and laboratory testing are integral to FSIS' domestic industry oversight. FSIS also determines the "equivalency" of foreign systems, whose meat and poultry may then flow into domestic industry or directly to the marketplace. FSIS' program of enforcement and compliance monitors both the industry and the marketplace to verify compliance with meat and poultry inspection laws and the wholesomeness of meat and poultry products.



FSIS needs to strengthen its oversight in all four areas we reviewed. For example:

- FSIS allowed establishments to limit or reduce the number of critical control points identified in their HACCP plans and thereby limit Government oversight.
- FSIS' data base did not list all establishments subject to tests for pathogens and residues (i.e., pesticides, etc.).
- FSIS did not list all firms subject to compliance reviews and did not always target reviews at major metropolitan and geographic areas or at firms that could be regarded as high-risk.

- FSIS approved equivalency status to foreign countries without adequately developing and implementing procedures for determining the equivalency of foreign inspection systems or clearly documenting such determinations. Unclear lines of authority, the absence of inspection system verification, and minimal FSIS oversight did not always validate that foreign food safety inspection systems were equivalent to U.S. standards.

FSIS also needs to be more aggressive in using laboratory analyses and scientific expertise as a control against unwholesome product. We found that pathogen and residue testing were underutilized in many areas. For example:

- FSIS did not always review establishments' microbial testing plans and protocols to ensure the samples taken under the HACCP system were scientifically selected and accurately tested.
- FSIS did not enforce the requirement that foreign countries submit annual residue test plans and results.
- FSIS did not always adequately document the involvement of technical subject-matter experts in its determinations of foreign country equivalency, and it did not always timely use the results of microbiological tests to update its reinspection data of those countries.
- FSIS inspectors at meat and poultry establishments did not always provide required product samples to the FSIS laboratories for testing, thus leaving gaps in the sources of samples.

We also concluded that FSIS should expand its own testing requirements to increase the number of tests taken of *E. coli*, *Listeria*, and *Salmonella*, and to include other pathogens in those requirements. FSIS does not currently test for some major foodborne pathogens, such as *Campylobacter*, that are now scientifically detectable.

In the area of compliance, we concluded that FSIS needs to act more aggressively against repeat violators of the meat and poultry inspection laws. FSIS does not have authority to impose civil penalties in cases that do not warrant criminal prosecution. Letters of warning are often the only enforcement tool applied.

Overall, we are recommending that FSIS strengthen its procedures over the food safety system. It needs to institute stronger procedures to ensure that all establishments are tested. In the case of imported meats and poultry, FSIS needs to develop and implement formal procedures over its entire equivalency process and enforce existing regulatory requirements. For compliance verification, FSIS needs to refine its existing compliance plan to establish the universe and scope of its reviews and target its

resources, and it needs to seek authority to impose monetary penalties and ensure that violations of the meat and poultry inspection laws are met with these penalties and other sanctions commensurate with the violation.

We are also recommending that FSIS assert its authorities over the HACCP system to ensure that the intent of the program is met. To this end, FSIS needs to enhance its grant of inspection so it functions like a contract, stipulating exactly what is required of the establishments and defining the authorities and responsibilities FSIS has over their operations.

FSIS' responses to each of the audit reports are contained in the appropriate sections of this report.



The results of our Food Safety Initiative are presented in four sections:

- I. Implementation of the Hazard Analysis and Critical Control Point System (24001-3-At) (FSIS' response is found beginning on page 75.)
- II. Laboratory Testing of Meat and Poultry Products (24601-1-Ch) (FSIS' response is found beginning on page 58.)
- III. Imported Meat and Poultry Inspection Process (24099-3-Hy) (FSIS' response is found beginning on page 91.)
- IV. District Enforcement Operations—Compliance Activities (24601-4-At) (FSIS' response is found beginning on page 67.)

The diagram on the following page depicts the control points in the farm-to-table process that we reviewed through our initiative.

