

establishment is a critical control point. This would require that the establishment and the producer work together to ensure that an appropriate critical limit has been met. This possible linkage between in-plant mandatory HACCP and the control practices of producers simply reflects the reality that improving the safety of meat and poultry products will require cooperative action across the entire food system from production on the farm all the way to the consumer. The expertise and commitment of the producer community will be critical to making real progress.

FSIS invites comment on the role it can best play to improve food safety at the animal production stage. Because FSIS resources in this area are limited, the private sector must continue and perhaps expand its efforts and initiatives. One role FSIS expects to play is as a facilitator of research and other activities designed to define problems and opportunities for improvement and develop animal production technologies and practices that can improve food safety. FSIS intends to work closely with academic researchers, other government agencies, producer groups, and consumer organizations to help shape an appropriate research agenda and devise effective on-farm food safety strategies.

FSIS also intends to work closely and cooperatively with producers and with State health and agricultural officials when outbreaks of foodborne illness necessitate investigations to trace a safety problem to its origins which may in some cases be at the animal production stage. Such investigations are a problemsolving tool intended to assist public health authorities in controlling an ongoing food safety problem and finding means to prevent or reduce the likelihood of occurrence of the problem in the future. Traceback investigations are resource-intensive and difficult to conduct. They require cooperation among government agencies at all levels and with the animal production and processing industries. FSIS invites comment on the appropriate role of traceback investigations and how they can best be conducted and used to improve food safety.

#### C. Transportation, Distribution, Storage, Retail

Just as food safety hazards can arise before animals enter the slaughterhouse so too can they arise after meat and poultry products leave FSIS-inspected slaughter and processing establishments. The transporter, the wholesaler, the retailer, and the food

service industry are important links in the chain of responsibility for food safety that extends from the farm to the consumer. FSIS has historically focused on the manufacturing of meat and poultry products, but the Agency's public health mandate requires that it also work with the animal production, transportation, distribution, and retail sectors to implement effective prevention strategies and ensure that the whole system is working effectively to prevent food safety problems.

FSIS and FDA share authority and responsibility for overseeing the safety of meat and poultry products after they leave FSIS-inspected facilities. In accord with the Administration's National Performance Review, FSIS and FDA have agreed to work together to ensure effective oversight and the adoption of preventive approaches through the chain of transportation, distribution, storage, and retail.

FSIS exercises regulatory oversight of meat and poultry products in transportation, storage, and distribution channels through the activities of about 130 compliance officers who conduct a nationwide monitoring program to prevent adulterated or misbranded product from reaching consumers. FDA also conducts regulatory activities in this sector. In addition to monitoring retail food safety programs at the State level, FDA provides technical assistance to States in the form of a uniform code (the *Food Code* discussed below) that prescribes appropriate food handling practices in distribution and retail channels.

FSIS and FDA will review their respective programs to determine how they can, considering all of the resources being devoted to this sector, reconfigure the program or initiate activities to increase program effectiveness. Two specific areas of review will be transportation of product in commerce and handling and preparation of food products by retail stores, restaurants, and institutions.

In the area of transportation, FSIS is currently working with FDA on the development of guidelines for conveyances used to transport food products. FSIS and FDA have agreed to:

- Ask a group of experts to provide systematic information on the hazards and controls that currently exist;
- Develop practical standards of performance for establishments and carriers with respect to the transport of food;
- Develop a list of Good Manufacturing Practices and options for encouraging their use;
- Initiate joint rulemaking to establish appropriate standards to ensure the

safety of meat and poultry products and other foods during transport;

- Work with the Department of Transportation to implement the National Food Safety Transportation Act, and investigate whether additional authority is needed to carry out the shared food safety mission of FDA and FSIS.

In the area of retail distribution, FSIS has worked closely with FDA in the recent updating of the Food Code, a set of model ordinances that serve as a guide for State and local authorities who have primary responsibility for the regulation of retail stores and restaurants. FSIS and FDA will continue to work on making the code comprehensive, focusing on areas of greatest concern, and using existing FDA mechanisms such as seminars, workshops, and evaluations for getting the word out in a timely manner on important changes and assuring good understanding of the practices involved. FSIS and FDA will collaborate in presenting issues to the Conference for Food Protection and in responding to the Conference's recommendations, on which the States vote. In addition, the two agencies will work together to facilitate State audits, and to provide assistance for whatever changes the audit results indicate.

FSIS and FDA will also work together to encourage State adoption of the *Food Code* as a means to ensure that consistent, science-based food safety standards are being observed at the retail level across the country.

#### D. Health-Based Standards for Pathogenic Microorganisms

##### Overview

As explained elsewhere in this document, the FSIS food safety regulatory strategy rests on articulating what constitutes an acceptable level of food safety performance by meat and poultry establishments and holding establishments accountable for achieving that level of performance. The proposed HACCP regulations will provide the framework for adoption by all meat and poultry establishments of the science-based preventive controls that will be necessary to achieve the food safety objectives established by FSIS.

As an initial step toward articulating an acceptable level of food safety performance and reducing the frequency and degree of contamination of meat and poultry products with pathogenic microorganisms, FSIS is proposing to require reductions in the incidence of one pathogenic microorganism of significant public health concern,