



National Broiler Council

STATEMENT OF GARY EDWARDS, CHAIRMAN NBC SCIENTIFIC COMMITTEE

FOOD & DRUG ADMINISTRATION "AWARENESS" MEETING
NOVEMBER 14, 1979

The National Broiler Council is pleased to be able to participate in the development of improved techniques to assure the safety of our food supply and express our appreciation to the Food and Drug Administration for the invitation to join in this meeting. The National Broiler Council and each individual member is constantly striving to find improved methods of preventing the introduction of contaminants into our food chain.

We are convinced that the efforts being made by government agencies such as the Food and Drug Administration, Department of Agriculture, Environmental Protection Agency and other regulatory agencies to protect consumers from contaminants in food have been effective in the past and improvements are continuing to be made. Also, we believe the poultry industry has shown a pattern of increased effectiveness in preventing contamination and thus a continual decrease in the number of residue violations, as measured by the testing programs for food contaminants conducted by USDA's Food Safety and Quality Service. As in all phases of our dynamic industry, while we are satisfied with the progress achieved in the past, we are continuing to develop improved methods in all phases of production, processing and marketing, including detection of contaminants that might affect our industry. The number of tests conducted by the private segment of our industry is increasing each year even though the incidence of contamination problems in poultry is constantly decreasing.

The Food Safety and Quality Service of the Department of Agriculture examined 9,085 tissue samples from chickens for feed additive residues and environmental contaminants during the four-year period from 1975 through 1978 and only 0.4% were found to have a contaminant above the permitted tolerance level. During the first quarter of this year, tests were conducted on 489 poultry tissue samples by the Department of Agriculture and not one violation was recorded. When additional quarterly data becomes available from USDA, we are convinced that residue analysis and evaluation results during the remainder of this year will also show an extremely low level of residue violations.

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In addition to the testing programs conducted by the Food Safety and Quality Service, the major producers of poultry meat in this country conduct an extensive monitoring program for contaminants in feed ingredients, finished feed, and tissues from processed birds on a voluntary basis and at their own expense. The vertically integrated nature of the broiler industry in this country provides an ideal situation for the detection and prevention of contaminants in poultry. Each individual company has direct control over the manufacture of feed, growing of the live bird, and processing technology. This allows the development of a structured monitoring program to prevent the use of contaminated ingredients in feed, to prevent the feeding of contaminated feed to chickens, and finally to prevent the marketing of poultry that might have been accidentally contaminated from another source.

In the very short time available to prepare this statement, I asked the National Broiler Council to survey the 75 major broiler producer/processors to determine more exactly the current level of testing for contaminants. Within a week's time from receiving NBC's residue testing survey over 40% of these firms responded. On such short notice I consider the response rate to be very excellent and also another indication to me that the broiler industry is sincere about providing consumers with a safe, nutritious, and good-valued food product.

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Briefly, our survey found that 27.4% of the responding firms test for possible contaminants on a routine basis. The other firms, while not testing on a routine basis, did generally indicate that they spot check feed ingredients, finished feeds, and/or broilers tissue, if they suspect a possible contamination problem.

The survey respondents who indicated that they did routine testing account for about 42% of the total broilers produced in the United States. If our survey is representative of the entire industry and thus we expand this 42% to an 45% industry-wide level, we could conclude that almost 80% of the broilers produced are directly covered by a routine residue testing system.

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It should be noted, however, that such a high level of testing tends to act as an umbrella for the entire industry. Since there are only a handful of suppliers or sources for the certain feed ingredients that have been found in the past to be linked with a residue problem, when these broiler firms test these certain feed ingredients for residues, they are also helping to ensure that another broiler firm who may not be routinely testing is also receiving a residue-safe ingredient.

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From our survey we found that the responding firms who do test routinely conduct at least 2,450 tests on feed ingredients, finished feeds, and/or broiler tissue every month. About 53% of the tests performed are on feed ingredients 36% on broiler tissue and the remainder, or 11% of the tests are on the feeds. Frequency of testing ranges from testing all incoming of feed ingredient shipments, to not testing the feed ingredients but testing the finished feed. Testing broiler tissue varies from firm to firm. The emphasis seems clearly on testing the feed ingredients and catching a problem, if there is

one, before it really starts. Testing on broiler tissue or finished feeds seems to be a double-check or an additional check that nothing has caused a residue problem within the producer/processor's own system.

Testing appears to be most extensive for chlorinated hydrocarbons, followed by organophosphates, and heavy metals. Other tests that are conducted by the responding firms are for aflatoxin, arsenicals, mycotoxins, and other possible contaminants.

That is a very brief summary of our survey, but I think it gives you some insight into why the broiler industry has been able to have a proud record in this area. Let me assure you, as I mentioned earlier, we are not content to sit back and say that we have a perfect system that does not need improvement. We are not saying that. At the same time we are saying that all parties involved in avoidance of contamination must act rationally, reasonable and in full understanding of the best information available.

If the broiler industry is to continue to develop new markets and increase the per capita consumption of poultry meat in this country, as well as expand exports to other countries, we must have public respect for our programs and behavior. The individual broiler producing companies are becoming more involved with branded type products that the public directly relates to the reputation established by each company and this in turn creates an economic incentive as well as the more important moral obligation for each poultry producer to prevent the introduction of contaminants into the food chain through poultry meat.

The broiler industry is willing to help develop new and improved technology to detect contaminants in the environment, feed ingredients, feed, and poultry tissue. These new testing procedures will have to be simple to conduct, accurate, and able to be performed in a minimal time. This is an area where various government regulatory agencies must become more involved. We do not, however, need additional regulations from the government but instead an accelerated program to develop improved testing techniques to detect these environmental contaminants at a cost our industry and the consumer can afford. We encourage the Food and Drug Administration to move additional manpower and resources into this area as quickly as possible.

We recommend that all the government regulatory agencies concerned with food contaminants as well as those concerned with the usage of these contaminants in all areas of our environment conduct an educational program to inform all people working with products that are capable of contaminating our food supply of the dangers involved. We believe these educational programs will immediately lessen the amount of contaminants in our food. As long as products capable of contaminating our food supply remain in the environment, there will always be the danger of accidents. We need increased efforts directed towards prevention rather than the production of more large, cumbersome fire engines to extinguish fires that could have been prevented by educational programs.

The National Broiler Council encourages the development of a system to notify poultry producers of possible contaminants in the environment or feed ingredients that might lead to accidental contamination of poultry meat. This system must be capable of responding in a matter of hours and inform all poultry producers of the possible existence of a contaminant even if it is only a suspicion and has not been confirmed by a government laboratory. This is another area where regulatory agency support could be useful.

In light of the seriousness of the recent PCB contamination in particular and the problems of chemical contaminants in general, our Board of Directors met on October 24 to discuss the National Broiler Council's role in protecting the food supply. The Board approved the following recommendations, and we are developing a program to implement them in the near future:

1. To urge the major animal by-product associations to develop testing programs at points of product origin, including analyses of daily production samples.
2. To develop a member "Residue Alert" system, whereby a National Broiler Council member who ascertains a residue problem would report it to the Association, and it would be reported in some manner of residue newsletter or alerting device. In the alternative, we urge the Food and Drug Administration to develop such a system through which residue problems could be reported, enabling other producer/processors to avoid a contamination problem.
3. To urge each National Broiler Council member to adopt and utilize the Department of Agriculture's approved voluntary residue control program, which has proven so successful in the past.
4. To petition the National Association of State Departments of Agriculture to institute feed ingredient testing programs for chlorinated hydrocarbons, utilizing an alert system to notify other states FDA and NBC's Residue Alert of potential or actual problems.

The broiler industry in this country has an impressive record of compliance, high ethical standards, and a desire to continue improving today's practices and techniques. We believe we have an excellent record of self-regulation through individual testing programs, establishment of good manufacturing and production practices, and cooperation with the Food Safety and Quality Service in testing programs. Participation in the design and implementation of new improved technology, and a willingness to cooperate with all government agencies in preventing contamination of our food supply have also been part of our history.

We do not believe the solution to the contamination problem will come from additional regulations. The answer to this complex problem is not more regulations but rather an increase in the public respect of the behavior demon-

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strated by private industry and government agencies. We are convinced a closer working relationship between private industry, the Food and Drug Administration, Department of Agriculture, Environmental Protection Agency, and other involved agencies is the realistic approach to the contamination problem. If we are to make progress in reducing the amount of contamination in our food, regulations must be simplified, responsibilities defined, new testing techniques developed, and education of all people, so that everyone understands the total problem. Additionally, we must continue searching for alternatives to replace the contaminants we are now having to use in our environment, but we must not create a hysterical situation because of a misinformed news media and a lack of understanding by the general public.
