

STATEMENT OF THE AMERICAN FARM BUREAU FEDERATION
IN REGARD TO WHAT CAN BE DONE TO REDUCE
CHEMICAL CONTAMINATION OF FOOD ANIMALS

Presented by
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✓ We appreciate the opportunity to present Farm Bureau's views on what can be done to reduce chemical contamination of food animals and their products. Farm Bureau members own a high percentage of the live-stock and poultry raised for meat, milk and eggs in this country.

Problems of substances getting into the food supply are not new. Since the Federal Food, Drug and Cosmetic Act was enacted in 1938, problems with environmental contaminants of food have continued, despite the efforts of federal, state and local governments and the food industry. The capacity to detect substances in food has improved. Many potential problems today would have gone unnoticed in years past.

✓ We are concerned about contamination of the food supply. Serious contamination is rare and affects only a small percentage of the feed and/or food produced. Each instance, however, is a potential catastrophe for the affected individuals, and poses a "public confidence" problem for us all. We are interested in finding solutions that will provide fair and timely response to specific problems, without creating undue burdens.

✓ In recent years, there have been a number of incidents in which the use or disposal of chemicals has resulted in the contamination of feed and food. Many of the incidences have resulted from contamination by fishmeal, fats, renderers products, and bakery products; others, from poor housekeeping or lack of education. (A detailed listing of some of these incidents is attached to this statement as Appendix A).

Farm Bureau is deeply concerned about the contamination of feed and food. Contamination not only results in huge economic losses to producers, but, more importantly, it presents a health hazard to humans. In addition, the reputation of the livestock and poultry industries in general, and the affected producers in particular, will suffer.

Farm Bureau policy adopted by voting delegates to the most recent AFBF Annual Meeting states:

"We believe that indemnification for livestock and poultry losses should be available where it is needed to control the spread of serious communicable diseases, and where dairy, livestock, or poultry are quarantined from the market or condemned as a result of man-made disasters caused by no fault of the producer.

"Producers should be responsible for losses resulting from condemnations for drug and pesticide residues due to negligence on their part.

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"Indemnification should be provided for losses of crops, perennial crops and orchards, when products are impounded, farms are quarantined, or movement or sales are restricted in the public interest. Producers should be compensated in these cases and not held responsible for conditions beyond their control.

"The current laws should be amended to include indemnification for losses due to the use of chemicals or drugs and not caused by producer negligence.

"Indemnity payments should be based upon current market values."

To help reduce, and hopefully eliminate, the problem of contamination, Farm Bureau recommends the following steps be taken:

(1) Testing for contaminants should be started closer to the source. The most likely sources of contamination are fishmeal, fats, renderers products, and bakery products.

(2) The Good Manufacturing Practices of FDA for food and feed should be followed at all times. In addition, special emphasis should be placed on the following items:

a. Personnel doing the mixing of feed should be the most experienced and highly trained individuals in the organization.

b. All feed mill employees should receive periodic training regarding proper mixing techniques, sources of contamination, and proper housekeeping and safety practices.

c. All employees should be aware of what the potentially toxic dangers are and where they are located. Safeguards should be provided to protect against accidental contamination by these toxic substances.

d. All pipelines in the feed plant should be properly cleaned before changing from one feed to another.

(3) Insurance companies should work with feed mill operators to educate them on possible sources of contamination which could result in residue problems and possible liability claims.

(4) Feed manufacturers and ingredient suppliers have a legal responsibility to provide users with products that do not contain more than allowable contaminant levels. FDA has the responsibility and authority to develop and implement good manufacturing practices and should be held accountable for enforcing them.

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(5) Disaster assistance to reimburse producers who suffer from extraordinary damages should be available from the federal government.

(6) State Departments of Agriculture should identify and provide a focal point for information relating to real or perceived contamination problems. Farmers will be more likely to respond to a State Dept. of Agriculture official than to FDA or other federal government entity. General farm organizations and livestock commodity groups should encourage state governments to assume their full responsibilities in this field and should urge livestock producers to cooperate fully with state regulatory programs.

In conclusion, Farm Bureau urges private industry, including producers, to take the necessary steps to correct this situation. An overreaction by individuals or groups either within or outside government could lead to additional government regulations and involvement which is not deemed necessary nor desirable.

REWORDED TO CLARIFY AND NO NEW PAGES NEEDED

APPENDIX A

Polychlorinated biphenyls (PCB's) were first recognized as a problem by scientists in Sweden in 1956. But they came to world-wide attention in 1968 when five people died and 1,000 others were stricken in Japan after eating cooking oil contaminated by PCB's.

The Food and Drug Administration's (FDA) food surveillance program detected PCB's in milk samples in West Virginia in 1959. The Agency's investigation revealed that cow grazing areas had become contaminated through a herbicide spraying program that used spent PCB fluid as a vehicle for the herbicide.

In 1970, the Campbell Soup Company reported PCB residues in chickens. After investigation by the state and FDA, the cause appeared to be bakery products and their wrappers used as feed for the poultry.

FDA inspection of a meat by-products firm in Illinois in 1971 revealed PCB residues in the firm's meat meal product. PCB's were used in their heat treatment equipment and subsequently leaked into the product.

Monsanto Chemical Company notified FDA in 1971 that large amounts of fishmeal may have become contaminated by a leaking pasteurization system. An FDA investigation revealed the presence of PCB in the system and in the fishmeal product being held by the firm. Contaminated fishmeal that had already been used resulted in the widespread contamination of poultry and eggs.

In 1974, the USDA reported finding residues of the insecticide dieldrin in chickens in Mississippi. An FDA investigation disclosed that vegetable oil destined for industrial use had been diverted into the poultry feed.

A Michigan dairy farmer sought help from state and federal diagnostic officials in 1974 when his herd appeared in poor health. Subsequently, it was learned that the dairy cattle were contaminated with polybrominated biphenyls (PBB's). An investigation revealed that the chemical plant that produced both the fire-retardant chemical PBB's and a dairy feed supplement had experienced a mixup in the packaging of those products. This resulted in the contamination of the feed.

In 1975, state, EPA and FDA investigations revealed environmental contamination resulted from the manufacturing of the pesticide Kepone at a plant in Virginia. The James River became contaminated as did the fish.

A fire in a Puerto Rican warehouse in 1977 resulted in the release of PCB's from transformers being stored in the warehouse. The building served as a storage area for tuna fishmeal. After the fire, the fishmeal was dried, rebagged, and shipped for use in the manufacture of feed. No analyses for PCB's were performed. The contaminated fishmeal was shipped to five consignees for use in manufacturing animal, fish and pet foods. Large numbers of eggs and chickens had to be destroyed in addition to over 2,000,000 pounds of finished feed and fishmeal.

In 1979, a herd of beef cattle in Kansas was treated with an automatic backrubber filled with an oil-pesticide solution. The oil in the solution had been purchased approximately eight years earlier by the farmer from a Kansas salvage oil dealer. The salvage oil contained used transformer oil and contained approximately 60 percent PCB's. Shortly after being treated, several animals died and others became ill. Although the exact cause of the deaths is not known, levels of up to 1100 ppm PCB's were found in the live cattle.

More recently a problem involving the contamination of animal feed and food with PCB's was detected in a number of Western states. FDA is currently involved in examining poultry, shell eggs, pork products, animal feed, meat and bone meal, animal grease, and other food products for contamination. Thousands of chickens and millions of eggs have already been destroyed. Undoubtedly, additional losses will be incurred as well.