



## Nancy Donley on food safety:

# “The problem is animal feces in our food”

Nancy Donley, president of S.T.O.P., believes we have a very haphazard food safety inspection system through FDA, USDA and the Department of Commerce. S.T.O.P. favors an independent, free standing food safety agency rather than responsibility for food safety divided among several agencies.

Safe Tables Our Priority (S.T.O.P.) took up the cause of food safety in the early 1990s following the tragic Jack-In-The-Box *E. coli* O157:H7 food poisoning epidemic. In this interview, S.T.O.P. president, Nancy Donley, speaks with a passion on a broad range of food safety issues.

**Q:** Ms. Donley, what are the greatest microbial threats to human health now from consumption of meat and poultry?

Campylobacter and salmonella are most prevalent. *Listeria monocytogenes* is a grave concern because of the recent recalls, illnesses and deaths from listeria contamination. *E. coli* O157:H7 continues to be of enormous concern because it is one of the deadliest of foodborne pathogens and because the infectious dosage is so small.

**Q:** We're now in the second wave of HACCP implementation yet, in the last 18 months, we've heard more about meat and poultry recalls than ever before. What's happening?

HACCP is not the silver bullet. It's not the panacea that government sometimes portrays it to be. Many recalls are attributed to companies that have established HACCP plans. That goes to show there still is a need for other preventive measures such as more microbial end-product testing under HACCP. That portion of HACCP needs to be strengthened.

**Q:** You're not ready to declare HACCP a failure?

No, I wouldn't say that, but, again, it's not the entire answer either. Here's where I think HACCP has fallen short, where we goofed up, if you will, when we put the HACCP regulation in place. S.T.O.P. advocated that the strength of HACCP is only as good as its plan. If the HACCP plan doesn't have the efficacy of meeting its goals which are identifying hazards, putting checks into place, monitoring critical control points and then verifying through microbiological testing, it's ineffective.

I can write a HACCP plan, but that doesn't necessarily

## What is S.T.O.P.?

**S.T.O.P.** — Safe Tables Our Priority — is a national, non-profit organization comprised of victims of foodborne illness, their families and friends and concerned individuals who recognize the threat pathogens pose in the U.S. food supply. It was founded in the wake of the Jack-In-The-Box *E. coli* O157:H7 epidemic in 1993.

The organization has three objectives:

1. Provide information and improve services to those made ill with food. S.T.O.P. provides information and support to victims and their families through its hotline (800-350-STOP) and information clearinghouse, and promotes proper diagnostic and treatment practices in the medical community.

2. Prevent foodborne illness through consumer education.

3. Reform government and industry practices that permit pathogenic contamination of food before it arrives in kitchens and restaurants.

Farm to fork, S.T.O.P.'s grassroots advocacy brings a powerful voice for consumers to debates on food safety policy and regulatory reform at local and national levels.

S.T.O.P. is headquartered in Chicago. Nancy Donley is president; Lynda DeLaforge is Executive Director.

mean it's going to work. S.T.O.P. has advocated that HACCP plans be validated by FSIS to make sure they met the goals of the seven principles of HACCP. That didn't make the final rule. That's a big problem, a real weakness. FSIS is finding there are plants operating with HACCP plans that are not effective.

**Q:** Why wasn't S.T.O.P.'s recommendation that all HACCP plans be validated by FSIS accepted?

No one wants to take ownership of the HACCP plan, nei-

ther industry nor FSIS, of being the ultimate responsible party for the safety of the product. As you know, government is trying to make us swallow the fact that everything is going to be great under HACCP. Having said that, I think we will see improvement in the safety of meat and poultry if HACCP plans are really effective. But if they aren't, we are just being fed Pablum by the government.

FSIS Administrator Tom Billy is doing a really good job, but the one thing for which I have criticized FSIS and challenged Billy to do is to go after more funding. They desperately need that. I don't want their commitment to aggressively pursue programs to strengthen food safety to fall by the wayside because they cannot afford to implement programs that are necessary.

**Q:** *FSIS and the inspectors' union recently signed a Memorandum of Understanding whereby, in certain poultry and livestock slaughter plants, industry would take greater responsibility for removing carcasses and parts that are unacceptable because of disease or unwholesome conditions. FSIS inspectors, meanwhile, would conduct oversight and verification inspection to ensure food safety. Is FSIS planning to eliminate carcass by carcass inspection and use inspectors for other duties?*

FSIS will tell you it has no intention of getting rid of carcass by carcass inspection. Rather, I think FSIS is attempting to redefine exactly what it means. Some tasks can be done very well by plant employees.

But two elements have to be in place for consumers to have confidence in such a program. Those company employees must be adequately trained through accredited programs. And they must have some measure of job protection. If they're not in place, we have to question just how reliable such a program would be from a safety standpoint. They are human beings. They have to feed their families. If their paycheck is resting on this, we are concerned about their ability to make tough decisions that could affect the company's bottom line.

**Q:** *Some people believe using plant employees for inspections is equivalent to industry inspecting itself. What's your take on that?*

Certain functions are task oriented that probably can and should be done by industry. But we will fight tooth and nail ever going to a self-inspected industry. There are some very basic things we insist government do to live up to its responsibility. That means looking at the product to determine everything has been done correctly, and you cannot necessarily do that by looking at the paper work. You have to look at the carcass for organoleptic defects, for zero tolerance standards, all those things. We will not accept an inspection system that inspects simply paper work and not the product itself. We want government inspected meat and poultry, not government inspected paperwork.

Another thing, too, about those pilot studies: An area of concern, and we've challenged FSIS on this, is the way they're designed, overall. If you really are interested in doing a pilot study with the end result having safer meat and poultry, you can't just design your study to go in one direction, meaning less government inspection and more reliance on plant employees doing some of the inspection. Perhaps let's take a look at the flip side of that which is increased government inspection and what the results would be. FSIS is not doing that, so to me it's an unbalanced study. We have challenged FSIS on that.

Another concern S.T.O.P. has about these pilot studies is that the end result is not already predetermined.

## About Nancy Donley

Nancy Donley got involved with S.T.O.P. in 1994, a year after her six-year-old son, Alex, died a brutal death because, she says: "There was cattle feces in his hamburger." That to Donley was an incredible wake-up call. Before that tragic event she recalls that she committed the cardinal sin people commit every day: to assume our meat and poultry are bio-safe. She assumed industry was making it safe and government was ensuring that it was safe.



"I was slapped silly to learn that was occurring," says Donley. "When I went through something as horrific as the death of my child from food poisoning, I made it my business to get educated about food safety. I would jump on planes weekly to Washington, sit in on public meetings on HACCP, talk to people in industry with a passion and a drive to right a real wrong."

On a personal note, Donley, reflecting on the agony of seeing her child suffer and die, felt she had no control over what was going on, says: "I happen to be one of those control people. I like to have control of my situations. I view my work with S.T.O.P. and my work on food safety issues as trying to take back some control I didn't have with my own family's safety."

Donley is a member of USDA's National Advisory Committee on Meat and Poultry Inspection

**Q:** *You suspect that maybe it is?*

There is concern about that. Part of the reason FSIS is conducting the pilot studies is to maximize resources. We want to make sure that these pilot studies will be considered a success only if the end result is improved food safety. If food safety remains status quo after the pilot studies are said and done, that's not a success in S.T.O.P.'s mind. So FSIS and industry have to be willing to say that if the studies have not raised food safety, it's over with and we're back to business as usual.

With the pilot studies on livestock and poultry, it has to be recognized that these are very different industries that are being looked at and what might make very good sense for the poultry industry will not be acceptable by any stretch of the imagination for the beef industry.

**Q:** *How do you then respond to the clamor by some industry groups for uniformity in inspection systems between meat and poultry? You're saying that's not the way to go?*

No. Industry often raises the issue of fairness. I've heard industry say many times over the years that it's not fair to inspect our animal one way and this critter another way. I'm sorry, but it just doesn't make sense to be looking at a cow the same way you're going to be looking at a chicken or a



**“We will not accept** an inspection system that simply inspects paper work and not the product itself. We want government inspected meat and poultry, not government inspected paper work.” – S.T.O.P. President Nancy Donley

turkey. Both industry and government have to step outside that boxed way of thinking and say: “Wait a minute, let’s do what makes sense, what stands up to the test of logic and to the test of science on how we inspect these different species.” They have to become more species oriented and less uniformity oriented.

**Q: How likely is it that HACCP will be extended to retail and foodservice establishments?**

It’s very doable in the sense that they could develop and implement a HACCP program, absolutely. There is a strong resistance, however, by many retailers and foodservice establishments in having to do that. No one likes to be told what to do. No one likes change. Sorry, but that’s not good enough for consumers any more. We want and expect foodservice and retail establishments to do everything they can to put preventive measures into place for safer food. There also is much resistance by their trade associations and by retailers in general.

**Q: Are all livestock and poultry industry trade associations on the HACCP bandwagon?**

They certainly say they are. I challenged the trade associations on a couple of occasions to stop protecting their “bottom feeders.” They have members who cover the spectrum from very good companies to very bad and they feel a responsibility to all their members. What’s happening is that some of these “bottom feeders,” the really bad players, are being protected at the expense of the good, responsible companies. Consequently, good companies get tainted by bad companies within an industry. Trade associations have a responsibility to work with their small companies to help them get with the HACCP program.

We are not going to go backward with food safety, not over my dead body.

**Q: Is there anything to the belief held by some consumers that government and industry have attempted to transfer responsibility for meat and poultry contamination by focusing on inadequate cooking, improper food handling, most of the problems are in the kitchen, etc.?**

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We certainly still hear that. We never have said that consumers don’t have a responsibility to handle foods safely. Consumers do have a responsibility. But we cannot and will not accept responsibility to decontaminate toxic substances in our kitchens. That just is not acceptable. Take the ‘cook it’ message. You can cook it but you’d have to decontaminate your kitchen down to a single microbe in the case of *E. coli O157:H7* to prevent illness from cross-contamination.

Our kitchens are not sterile nor can we be expected to have them sterile. Neither can foodservice establishments which is why we often challenge retail and foodservice establishments to say ‘we don’t want to be handling these substances either.’

**Q: What more should government be doing to detect pathogens in meat and poultry?**

Government definitely should establish additional microbial standards based on species specific testing. Looking for salmonella in beef, as a for instance, is fine, but that is not going to address the *E.coli O157:H7* problem. Looking for salmonella in poultry is not going to solve the campylobacter problem.

We have to do more microbial testing for pathogens of concern and have performance standards in place. Companies should be mandated to do their own testing for *Listeria monocytogenes*, campylobacter and salmonella. There’s a zero tolerance level in place for listeria in ready-to-eat product. But that doesn’t do any good if companies aren’t mandated to test for it. Same for *O157:H7*. It’s only being found through the random testing program of FSIS.

Meat and poultry inherently are sterile. The muscle tissue itself is sterile. Pathogens get into the food supply through contamination as a result of fast line speeds, sloppy processes and cross contamination within plants. If we really are serious about controlling these pathogens, they should be controlled at the farm and processing level, not when they’ve gotten into retail stores and customers’ hands.

Manure is another big item that long has been overlooked. There are no federal regulations on manure, but it’s time to address that problem. These pathogens that once were thought of as being confined to meat and poultry now are contaminating other food crops such as vegetables and fruits via manure.

**Q: You are on record as favoring a single, independent food safety agency rather than having responsibility for food safety divided among several agencies. Correct?**

Yes. Right now we have a very haphazard food safety inspection system through FDA, USDA and the Department of Commerce, and there are some conflicts of interest. USDA is a marketing department as well as a regulatory agency. It can’t do both well even if FSIS is broken off as a separate agency. That’s why I stress an *independent* food safety agency.

One that is free-standing, meaning not moving all food safety programs into USDA, as a for instance, or into FDA which is a part of Health and Human Services. FDA and FSIS are just little parts of much larger entities. They can be overlooked, under funded and under resourced because they’re just little pieces of much larger pies. We as a nation need to give food safety the status it needs, the tools it needs and set it up on its own.

**Q: To what degree do you believe government food safety policies are based on science?**



**Addressing the FSIS pilot plant studies,** Donley says S.T.O.P. is concerned that the end result is not already predetermined by FSIS.

Their professed agenda is to move to a science-based, risk-based system. There's nothing wrong with that, but we don't necessarily have all the science to address all the issues. You can't rely strictly on science at the expense of common sense and logic. We have to be very, very careful that the science we are relying on is interpreted properly, peer reviewed and very clean.

**Q:** *To what degree does politics enter into federal food safety policy?*

Unfortunately, it's very political by lobbyists from industry with deep pockets, particularly in the budgeting and appropriations areas. It should not be political but the reality of it is that it is.

**Q:** *How would you evaluate the political influence of S.T.O.P.?*

We have political influence in the sense that our organization represents consumers, voters who can and are saying "this is important to us." Otherwise, we have no political agenda, whatsoever. We want anybody and everybody in government, including Congress to do the right thing. We don't care to which political party they belong. When my six-year old son, Alex, died of O157:H7 infection, he didn't understand what the words Republican or Democrat or partisan meant. Pathogens have no political orientation so it should not be a political issue, but it is.

**Q:** *Who is fighting S.T.O.P.?*

I'm sure everyone would say no one is fighting us. We're a hard one to fight, because how do you look at the mother of a dead child in the eye and say: "Mrs. Donley, we don't understand. We do everything we can." But the fact of the matter is my son is dead and our challenge is no, you haven't done everything that can and should be done.

Those most resistant to S.T.O.P., those most challenged by S.T.O.P. are entities that feel most vulnerable themselves. They are companies resistant to change, companies which may know they are not doing things cor-

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rectly, maybe cutting corners that could affect food safety. Those are the ones we are out to get. Some companies should not be in business. Purely and simply.

Companies should make food safety their Number One priority. It will come back to them in spades through increased business and greater consumer confidence. It's a win/win situation.

**Q:** *You recently were appointed to USDA's National Advisory Committee on Meat and Poultry Inspection. Why do you think you were appointed?*

I think USDA is attempting to right a wrong that has gone on for a long while, that of an unbalanced representation on its advisory committees, by trying to get input from all stakeholders, including the consumer community. I've also been very active on the meat and poultry inspection issue and, as President of S.T.O.P., I think USDA thought it was a good move and I agree.

**Q:** *Did it ever occur to you that you might have been appointed just to hush you up?*

That thought crossed my mind. It certainly did. But I won't be silenced. Because, if I'm not in agreement with a majority report that comes out of the committee, I will state for public record that I do not agree with a decision.

We are trying to be part of the process and part of working toward solutions. S.T.O.P. will give input. Because with our track record we have, I hope, garnered the respect of industry and government alike. I say that because, in our earliest founding days there was this tendency: "Oh, just ignore them and they will go away. They're just a group of angry moms." 'They' have learned since that that is not the situation and that we really are smart, angry moms and very educated angry moms who also are very, very interested in not just pointing fingers but very interested in working on solutions.

**Q:** *A few questions on irradiation. What's your position on use of ionizing radiation on meat and poultry as an added measure to improve food safety?*

The concerns S.T.O.P. has with irradiation are these:

It is very effective in certain instances against certain pathogens but its effectiveness depends on the original microbial load. It absolutely cannot be used to replace sanitation standards and good manufacturing practices.

It's a reduction technology. Manufacturers have educated the public to expect irradiated products to be sterile. That's not the case. Irradiation has no effect against oocysts and certain viruses. It will have an effect on bacteria, but only if the ionizing dosage is suitable for the microbial load coming in.

In the proposed USDA regulations for red meat irradiation, it does not have to be irradiated in its final packaging. So irradiation is good only for the moment it is irradiated. After that all sorts of recontamination can take place. Until product is irradi-

"S.T.O.P. strongly believes that the burden of improving food safety belongs squarely on the shoulders of food producers and government.....It is both maddening and extremely sad that some industry, government and public health representatives continue to deny the fundamental point: Food is arriving in grocery stores, homes and food service establishments already contaminated by potentially deadly microbes. The problem isn't improperly cooked meat or poultry. The problem isn't insufficiently cleaned fruits and vegetables. The problem isn't an inadequate HACCP plan. The problem is that there is animal feces in our food." - Nancy Donley

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ated in its final packaging, it is the responsibility of government and industry to explain to consumers that it was not and therefore subject to recontamination. If it has been irradiated in final packaging, it should say so on the packaging.

**Q:** *Would Nancy Donley buy irradiated turkey and chicken?*

I would be interested in irradiated product for family members who are immuno-compromised in some way and for high risk groups such as children, the elderly and pregnant women, if it is irradiated in its final packaging.

Irradiated product should be clearly labeled on top of the package, not buried on the bottom, that it is irradiated, and, again, it must state if it was irradiated in final packaging or if it was irradiated prior to final packaging and therefore subject to recontamination.

**Q:** *Final question. How do you rate the success of S.T.O.P. since it was organized?*

We are very effective in keeping the focus of government on the ultimate consumer and industry, as well as trying to keep them focused on the fact that their decisions impact real people. What we are all about is to put faces, stories and lives behind the statistics. S.T.O.P. has been instrumental in making the food safety issue as large an issue as it is and keeping it in the forefront.

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In addition to Nancy Donley, the following members of the National Advisory Committee on Meat and Poultry Inspection were named in early 1999 by Secretary of Agriculture Dan Glickman:

Terry Burkhardt, Wisconsin Bureau of Meat Safety and Inspection

Caroline Smith-DeWaal, Center for Science in the Public Interest

Cheryl Hall, Zacky Farms, Inc.

Daniel E. LaFontaine, South Carolina Meat-Poultry Inspection Department

Rosemary Mucklow, National Meat Association

Dale Morse, New York Office of Public Health

Carol Tucker Foreman, Safe Food Coalition

Kathleen L. Hanigan, Farmland Foods, Inc.

Collette Schultz Kaster, Premium Standard Farms

Gary Weber, National Cattleman's Beef Association

Alice Johnson, National Turkey Federation

Michael M. Mamminga, Iowa Department of Agriculture and Land Stewardship

Lee C. Jan, Texas Department of Health

Walter E. Juzenas, American Public Health Association

James Denton, University of Arkansas