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WHY WE SHOULD NOT RELAX FOOD INSPECTION RULES

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Food, it is a familiar topic to all. Everyone eats and most people also buy and prepare food. Therefore, most of us know something about food, and this is a good thing. Today there is a renewed interest in food production, preservation and preparation. This is also good, especially since many urban consumers have no concept of where food comes from or how it gets to the grocery store shelf. The great number of varied food shows currently on television is testimony to today's increased interest in food.

Food, when consumed in variety and moderation, is paramount to good health. Just as food is a source of nutrients for humans and other animals, however, it is also a source of nutrients for microorganisms. Therefore, when abused, miss-handled, or under-processed, food can cause foodborne illness or even death. **During the period from 2003 to 2008, over one thousand cases of foodborne illness were reported to the Wyoming Department of Health.** It is well known that foodborne illness cases are grossly under-reported, meaning many more cases actually occurred. **Interestingly, most cases of foodborne illness occur as a result of the food handling and preparation practices of persons in their own kitchen.**

Some individuals are proposing that Wyoming food processing regulations are too strict. Their goal is to pass legislation causing a relaxation of food regulations. Among other things, sale of unpasteurized milk, sale of farm-processed meat, and sale of other foods categorized as "potentially hazardous foods" to the general public would be allowed without regulatory oversight if the legislation passes. **Potentially hazardous foods are defined as those food products that require time-temperature control to keep them safe for human consumption.** Examples include: milk and dairy products, meat/poultry/fish, gravies and sauces, tofu and soy-protein foods, and heat treated plant foods (cooked rice, beans, or vegetables).

There are misconceptions about food production, processing, and preparation. A few of these are discussed below.

Misconception: *Clean cows from a clean environment produce clean milk and meat.* If "clean" is defined to include free of pathogenic microorganisms, then this statement is not true. **Foodborne pathogens have been isolated from free-ranging cattle and wild animals, such as deer and migratory birds (e.g. *Escherichia coli* O157:H7, *Salmonellae*).** Unfortunately, pathogenic organisms commonly associated with foodborne illness are considered ubiquitous, meaning they are seemingly everywhere. Although a

clean environment is important, especially a clean processing environment, it does not guarantee a pathogen free product.

Misconception: *Processing food in larger batches, as is necessary when selling to the general public, is no different than processing food at home for your family. When small recipes are scaled up to larger batch sizes, many changes need to be made in processing procedures.* Most importantly, close attention must be paid to heating times, target cooking temperatures, cooling times, and cold storage temperatures. Commercial sized equipment is necessary to properly heat and cool large batches of product. Specific organisms which are problematic include *Staphylococcus aureus* and *Clostridium perfringens*. *S. aureus* produces a heat stable toxin when growing which, therefore, is not denatured or deactivated even upon subsequent cooking. *C. perfringens* is a spore former. Spores and *S. aureus* toxin can withstand normal cooking temperatures, even boiling. When foods are not cooled quickly, the spores can grow making the food unsafe. Another organism of great concern in canned foods is *Clostridium botulinum*, the cause of botulism.

Misconception: *Pasteurization decreases milk nutritional quality. Pasteurization is a mild heat treatment, like cooking.* We “pasteurize” foods in our kitchens every day – meats, gravies, vegetables, and soups are common examples. **There is no credible data to support the notion that pasteurization decreases the nutritional quality of milk.** Centers for Disease Control data show that in the United States in one year (2006) 10 foodborne outbreaks were linked to raw milk consumption. These were caused by a variety of pathogenic bacteria including *Campylobacter jejuni*, *E. coli* O157:H7, *Salmonella*, and *Listeria monocytogenes*. In Wyoming, raw or unpasteurized milk is the leading cause of *Campylobacter* foodborne illness outbreaks.

In summary, **food regulations were developed based on sound scientific principles to decrease the incidence of foodborne illness and death.** This is the primary goal of the Wyoming Department of Agriculture – Consumer Health Services division. In addition, regular occurring food inspections serve an important educational role for processors. This is extremely valuable. **It does not make sense, from a scientific perspective, to allow processing and sale of potentially hazardous foods without regulation and inspection.** This is especially true when there are well documented cases of foodborne illness from consumption of home-produced food, including commercial sales of home produced foods.

In my opinion, we should base any changes to our food inspection laws on sound scientific evidence and credible data.