



NORTH AMERICAN MEAT PROCESSORS ASSOCIATION

FROM NAMP'S COLLEGE OF EXPERTS **INDUSTRY NEEDS TO LEAD IN DEFINING THE NEXT** **GENERATION OF REGULATIONS**

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We are now closing in on a year without an Under Secretary for Food Safety at USDA - a circumstance that, depending upon one's point of view, can be considered as a tragedy, a comedy, a lucky break or some combination of the three. But there is no escaping the sense that some big changes in the regulatory landscape are looming.

In the meantime the policy vacuum that, as we were all taught, nature abhors is being filled from a variety of directions. Petitions have been filed by plaintiff's lawyers seeking a broader universe of pathogens to litigate over. Well-placed newspaper articles have garnered significant attention. Congressional offices are questioning the legitimacy of, among other things, N-60 testing, generally considered to be the industry's gold standard. And career regulators are regulating, concentrating on smaller bore issues, creative interpretation of HACCP requirements, and fostering the constant expansion of government by directive, uninformed as it is by any coherent public process.

Industry's contributions to this environment seem more muted. To be sure, a few interesting ideas such as carcass irradiation have been advanced but have gathered little momentum. But on the whole people seem to be in a defensive crouch, waiting for something bigger and more disruptive to happen and not entirely sure what to do about it.

Is this necessary or unavoidable? Not really. Now, as changes seem to be looming, would seem to be as good a time as any for the industry to be organizing some sort of template for defining the next generation of regulation, one which will continue to enhance both the reality and the perception of food safety with a minimum of unnecessary confusion and disruption.

What might this entail? Perhaps such things as:

- 1)** Better deployment of technology. What underlies the irradiation issue is the idea that if things do in fact work, some of the old impediments to their utilization need to be pushed away. This concept has much broader application.
- 2)** Elimination of red tape. If the government can move quickly by fiat when it comes to a directive or a recall, why can't it do so when someone has a new food safety innovation?
- 3)** Identification and trace back. Isn't it time to eliminate the double talk that surrounds the government's so-called support for this issue and its complete unwillingness to take on its most belligerent opponents?
- 4)** Coherent definitions of adulteration. We are probably at a point where it is more important to have some clear lines drawn here than anything else.

These are merely a few suggestions. Undoubtedly there are others. I would simply suggest that now is the time to get them on the table. The other guys certainly are.

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