Mr. ROSENTHAL. In your opinion, does USDA do enough and com-

petent enough bacteriological inspection?

Dr. Lewis. I am not familiar with the details of the USDA inspection program. While I know some of the people, I have no basis for answering that question factually. I could say, though, that the problem of sampling commercial lots of food is a very substantial one in relation to frozen foods, because I happen to be involved in one of the committees that has been trying to extend the Frozen Food Code to add to it microbiological criteria.

Considering the statistics representative sampling and the fact that the organisms are not uniformly distributed through the product, then the detection of a low level of hazardous contamination becomes a very difficult matter, and I can understand the problem that USDA or FDA face in trying to do enough sampling—this is destructive sampling, very often—to get a reliable estimate of these low levels.

Industry finds this difficult to do likewise, because it reduces the margin of profit. There is also some problem about getting adequate laboratory examinations. For this reason, I certainly would not recommend that laboratory tests be made a primary determining factor, but rather a means—in the case of Salmonella contamination, for example—a means of monitoring what is considered a safe system.

Now, there is, of course, a considerable demand these days for tests that can be applied to final products. Where receiving areas are getting products from jurisdictions that they are not able to visit and inspect, they have no way of knowing the sanitary history of the food

from the farm to the point of final distribution.

The local health agencies and some consumer groups have advocated very strongly that we develop microbiological standards by which finished products could be evaluated for safety. There are, as indicated in my prepared statement, a substantial number of international

and national organizations attempting to do this job.

There has been progress, and I believe there will eventually be microbiological standards for certain foods. The AFDOUS committee that I mentioned, is in the process of developing proposals—recommendadations, if you will-with regard to frozen pot pies, turkey pot pies, beef pot pies, and similar products.

The report has not been issued yet, but I believe it will contain a

recommendation on numbers of bacteria and other.

I can extend these remarks in any direction you would like, I think there is a problem not only of the technical side of this, to make food safe, but one of training the people who work in the food business and education of the consumer.

As was mentioned this morning, the problem of consumer abuse does occur, and in the food plants the problem is one of getting the workers to do what is right; that is, what would be good sanitary practice. Many of these people do not have much formal education or much sense of motivation to do anything more than getting their hands in and doing their work the easiest way possible.

Training them and getting them to adhere to sanitary practices is a problem that involves millions of people, and we don't necessarily understand the techniques of accomplishing it. There is a large turnover in this industry. In the food service industry, for example, 250,000 to 300,000 people a year are now coming into it all the time.