

Lessons from the Latest Botulism Outbreak

By ACSH Staff — August 1, 2007

An interstate outbreak of botulism has occurred, comprising two cases in Indiana and two in Texas, with others under investigation in California, Hawaii, and Ohio. The U.S. Centers for Disease Control and Prevention's *Morbidity and Mortality Weekly Report* has a posting dated July 30, 2007 describing the outbreak. It says that the illnesses are due to botulinum toxin type A associated with Castleberry's hot dog chili, and that this is the first outbreak involving a commercially canned product since 1974. The limited, voluntary recall has been extended by Castleberry to approximately ninety brands of human and dog foods that were distributed to forty-nine U.S. states.

This event has not received all the publicity it deserves, and it seems likely that some of what should be learned from the incident will go unnoticed.

Recent outbreaks and recalls have evoked a clamor from the public and our legislators for a unified food safety agency and ever more inspection. In fact, the U.S. food safety system has a remarkable record, especially as regards low-acid ($\text{pH} > 4.6$), canned food. Because the Castleberry's products contained a good deal of meat, the establishment was surely operating under continuous inspection by the USDA Food Safety and Inspection Service (FSIS).

"Continuous inspection" means that an establishment cannot operate without one or more FSIS inspectors present. Furthermore, the retorts, processes, and operators in these establishments must be certified. No matter how U.S. food safety agencies might be organized, it is hard to imagine any food product being subject to more intense scrutiny than this, which seems to me to show that systems operated by human beings are inherently imperfect and that the insistence on a zero-risk food supply is unrealistic.

The recall to date has not gone as well as could be hoped. Some would say that this indicates the inadequacy of voluntary -- as opposed to mandatory -- recalls. In fact, the recall system depends strongly on the public communications media, which tend not to put great emphasis on events in which no deaths have occurred. Beyond this, recalls are not especially newsworthy because the public has been bombarded with recalls due to allergens in foods that threaten a limited portion of the population and because the media insist on using the word tainted, which seems to connote spoilage rather than a real threat to health.

When an outbreak is detected, the authorities use a trace-back system to find the source of the food. These have worked well for canned foods. When the source is located, the challenge involves doing a valid trace-forward of the distribution of that food. Trace-forward actions present special problems in that many food items are sold through very small-scale retail establishments, and some canned foods are given away via food banks to homeless people who are hard to find after-the-fact. It should also be noted that Castleberry voluntarily expanded the recall to include

many products that were not known with certainty to be at risk. A mandatory recall might well have been much narrower.

The political approach to enhanced food protection seems to entail making the relationship between government and the food industry as adversarial as possible. In point of fact, the food industry and government have cooperated rather well, and this gives the consumer a great deal of food protection at low cost. Creating a single federal food safety agency and staffing it with more inspectors than there are employees in the food industry would probably not have prevented this outbreak. Americans spend proportionately less of their disposable income on food than anyone else in the world. The minuscule gains that could be achieved by a high-profile, adversarial inspection system would cost everyone huge amounts both in higher food prices and in taxes.

A putative zero-risk system that enhances hunger more than safety would be detrimental to public health. Over any reasonable period, not eating is more hazardous than eating.

Dean O. Cliver, Ph.D., is Professor of Food Safety at the University of California-Davis and an ACSH Advisor.

On another food-safety front, see ACSH's report on [Irradiated Foods](#) [1].

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