

**Summary of Testimony of
Keith Shoemaker, C.E.O., Butterball, LLC**

1. **BUTTERBALL TURKEY NOT IMPLICATED.** The food safety investigations regarding *Salmonella* in ConAgra turkey pot pies suggest that the Butterball turkey ingredient in those pot pies was NOT the source of product contamination.
2. **INGREDIENT CONTROL.** The turkey log Butterball provided to ConAgra was made from our own raw turkey, controlled to keep the level of bacterial growth at a minimum prior to the meat being cooked. Butterball facilities supplying the raw product have been identified by FSIS (USDA) as category one -- “demonstrating the best control for *Salmonella*.”
3. **SPECIAL PACKAGING.** Cooked in bag products are considered one of the lowest risk meat products because cooking destroys pathogens and the product is not subject to environmental exposure subsequent to cooking.
4. **FULLY COOKED.** Butterball cooks its turkey log to a higher temperature and holds that temperature longer than food safety requirements. Elaborate monitoring systems assure adherence to Butterball procedures to destroy pathogens.
5. **INVESTIGATIONS.** The food safety investigations regarding the pot pie recall confirmed the effectiveness of these systems. Further, no *Salmonella* of the serotype that contaminated the pot pies has ever been found in a Butterball facility. Indeed, only once has that *Salmonella* serotype been found in turkey.
6. **BUTTERBALL COOPERATION.** Butterball thanks the committee for its attention to food safety and invites Members and staff to tour a Butterball facility.

**Testimony of
Keith Shoemaker
Chief Executive Officer
Butterball, LLC
before the
Subcommittee on Oversight and Investigations
Committee on Energy and Commerce
“Contaminated Food: Private Sector Accountability”
February 26, 2008**

Thank you Mr. Chairman. My name is Keith Shoemaker, and I am Chief Executive Officer for Butterball, LLC (Butterball). Butterball was formed in 2006 when Carolina Turkey of Mt. Olive, North Carolina, purchased the Butterball Brand from ConAgra Refrigerated Foods. Butterball produces over 1.4 billion pounds of turkey meat annually.

At the outset, permit me to make clear that the food safety investigation regarding *Salmonella* in ConAgra turkey pot pies suggests that the Butterball turkey ingredient in those pot pies was NOT the source of product contamination.

All Butterball products bear the mark of Federal Inspection, noting compliance with all United States Department of Agriculture (USDA) regulatory requirements. USDA Food Safety Officers are present in all Butterball facilities on a daily basis. However, my company does not rely on Federal Inspection to ensure the safety of our products. At Butterball, we go beyond federal requirements by using the latest food safety technologies, comprehensive food safety practices, and stringent microbiological surveillance.

Food safety is top priority at Butterball, and I would like to focus my remarks today on our food safety practices. With specific reference to the turkey product used in the ConAgra turkey pot pies, permit me to explain how our food safety practices apply to ingredients, cooking, packaging, and handling. That should help explain why the investigations regarding the ConAgra recall have found no data to support the Butterball turkey meat is a likely source of the *Salmonella* identified in the pot pie illness outbreak. In short, the turkey log we provided to ConAgra

was made from our own carefully controlled raw turkey, thoroughly cooked to kill *Salmonella* and other bacteria that may be present and packaged prior to cooking to prevent possible contamination after cooking has made the product safe. The food safety investigations regarding the pot pie recall confirmed the effectiveness of these systems. Further, no *Salmonella* of the serotype that contaminated the pot pies has ever been found in a Butterball facility. Indeed, only once has that *Salmonella* serotype been found in turkey.

INGREDIENT CONTROL

Our requirements include stringent food safety practices for the handling of the raw materials. It is generally recognized that raw meat, especially poultry, may contain *Salmonella*. Scientific literature states *Salmonella* does not show growth below 44° F and will not typically grow below 50° F. That is why our company monitors and controls the temperature of the meat (<40F) and the room (<44F). This is a common industry practice and has been recognized to slow or stop growth of bacteria in raw turkey. The fact that Butterball raw materials are received from our own slaughter and debone operations allows us to assure temperature control throughout the supply chain, serving to keep the level of bacterial growth at a minimum prior to the meat being cooked.

USDA data confirms the effectiveness of Butterball *Salmonella* control procedures. Raw materials coming from our own slaughter facilities undergo USDA *Salmonella* testing. Data generated from Butterball facility indicate a very low presence of *Salmonella*. In fact, facilities supplying the raw product have been identified by FSIS as category one -- “demonstrating the best control for *Salmonella*.”

SPECIAL PACKAGING

The turkey product supplied to ConAgra is fully cooked, ready to eat, cooked in bag turkey log. To make this product, raw turkey meat is stuffed into the log packaging material and fully cooked in steam ovens. Packaging material for the turkey log is of a special design to allow the product to be fully cooked in the packaging without disrupting package integrity. Thus, it is called cooked-in bag product.

Cooked in bag products are generally considered one of the lowest risk meat products because pathogens (bacteria that cause illness) that may commonly be found on raw product are destroyed by cooking. Possible contamination of the product after cooking is prevented by the fact that the product is protected from environmental exposure subsequent to cooking. *Listeria monocytogenes* is generally considered the leading risk for environmental bacteria contamination from exposure after cooking.

FULLY COOKED

With the cooked in bag product, the cook step is critical to the safety of the product. The leading pathogen risk for raw poultry is *Salmonella*. All cook temperatures of products are targeted at reducing *Salmonella* 7 logs (a “log” is 10 organisms per centimeter squared; 7 logs is 10,000,000 organisms per centimeter squared). Studies conducted by industry, USDA, FDA, and other scientific bodies, both internationally and domestically, recognize this as the necessary safety level to destroy the maximum amount of organisms. To achieve a 7 log reduction in products like turkey logs, USDA requires a minimum of 160° F <1 min. At Butterball, we do more. We cook our turkey logs to a higher internal temperature for a longer period of time. Specifically, our turkey logs are exposed to 162° F for between 15-20 minutes. This extra time and temperature is actually destroying far more than 7 logs of *Salmonella* required.

To be sure we actually meet our cooking specifications, our ovens include four computerized temperature probes that provide continuous read-out. Alarms sound on the oven when all probes reach 162° F. A calibrated hand-held thermometer serves to verify product temperature, as well.

PRODUCT HANDLING

Immediately after cooking, the cooked in bag turkey log is then taken into coolers and chilled to the appropriate temperature and maintained at that temperature as long as we have it.

FOOD SAFETY INVESTIGATIONS

From the time the foodborne disease outbreak was first identified, Butterball cooperated with ConAgra Foods and USDA to investigate the possible source of the *Salmonella*. Several audits of records, facility, cooking, and food safety practices were conducted.

A review of the inspectional record was reassuring.

- August 2007 -- The Jonesboro facility had only recently undergone the USDA Food Safety Assessment, completed, with no major finding.
- October 6, 2007 --USDA came back into the facility for another review, again with no findings reported.
- October 25, 2007 -- USDA took fifteen microbiological swabs of the processing environment, all reported negative for the presence of the *Salmonella*.

In our own inquiry, Butterball conducted intensified microbiological testing including turkey logs ready for shipment, combo bins used for shipping the log and the trailers used for shipping again, all results were negative.

A ConAgra review team came to the facility October 14 and 15 to review records and production practices. No adverse findings were identified. On October 31 another team of ConAgra representatives, including outside experts, came to the facility to further investigate production practices associated with the oven operation. Butterball routinely calibrates the ovens and shared this information and the finding with the ConAgra review team. Again, there were no adverse findings noted.

Additionally, at the request of ConAgra, a third party, went into Jonesboro and validated each oven in the facility. The results of the third-party testing indicated that the ovens were functioning as they should, and the cooking cycles were far exceeding the lethality targets outlined in the food safety plan.

Finally, a review of *Salmonella* testing data serotypes from USDA illustrates that no *Salmonella* of the serotype that contaminated the ConAgra turkey pot pies (*Salmonella* I 4,[5],12:i:-) has ever been identified in a Butterball facility.

Scientific literature available on this particular serotype notes it is commonly associated with chickens. USDA data shows only one incident of this serotype in turkey over several years of testing. That was not a Butterball turkey.

In short, the conclusion of the investigation: the logs were fully cooked, and the product in the package was likely not the source of the outbreak.

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Mr. Chairman, we at Butterball are eager to take every practical step to assure food safety for our consumers. We have worked cooperatively with this committee and all other investigators and highly respected experts. We remain eager to continue such efforts in the interest of further improving food safety.

Finally, Mr. Chairman, I would like to thank the committee for its efforts to advance food safety and interest in learning about the food science principles that guide our practices. We at Butterball would be pleased for you to tour one of our facilities to learn more about our operations.

Thank you.