

The Fox Guarding the Henhouse: Coregulation and Consumer Protection in Food Safety, 1946–2002

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Regardless of one's political persuasion, there are a few basic tasks that most citizens would consider to be "essential" functions of government, and food inspection counts among them. Publicly mandated inspections served various functions over the decades: to prevent fraud and establish confidence in the marketplace, to ensure orderly marketing through quality assessment and grading, and to protect consumers from potentially hazardous or unsafe products. From milk to meat, fertilizer to fruits, inspections of food and other agricultural commodities became a widely accepted—and important—function of governments well before the twentieth century.¹ Even in the infamous "America First" budget of 2017, which proposed billions in cuts across a swath of nonmilitary government programs, the Trump administration proposed a "fully funded" Food Safety and Inspection Service at the U.S. Department of Agriculture (USDA).²

Food inspectors have worked through government shutdowns and global pandemics; inspection is unquestionably "essential work." Yet citizens frequently disagree over what inspection should mean, who should carry it out, and how they should accomplish that task. In "The Fox Guarding the Henhouse," I analyze the prospects and limits of business self-regulation in food safety inspection through a study of the growth and development of the American poultry industry. Drawing on archival records, original field interviews, newspapers, periodicals, and government documents, I show how the debate over how to achieve "safe" and "inspected" chicken influenced not just the laws and regulations but also the organizational structure of firms, the nature of market competition, the trajectory of technological innovations, and even the biology of meat-type chickens. The project also reveals how an emerging system of international trade affected post-1945 developments in U.S. law and policy, and how American business leaders worked alongside regulators to reshape global standards at the turn of the twenty-first century.

The dissertation begins in the mid-1950s, when an unlikely coalition of consumer advocates, organized labor, and a nascent poultry industry mobilized their congressional representatives to establish mandatory government inspection of poultry products in interstate commerce. This broad consensus around the need for "government inspection" of food

1. Cronon, *Nature's Metropolis*; Balleisen, *Fraud*, 110–122; Booker, "Before the Jungle."

2. Executive Office of the President of the United States, "America First," 2017.

products only deepened in the 1960s, as the capacity, effectiveness, and even the major players in the consumer movement changed dramatically, in a transition from “second wave” to “third wave” consumerism.³ Within a decade, “consumer protection” evolved from an agenda item promoted by an emerging interest group to an explicit policy goal articulated at the highest levels of the executive branch.⁴ A new generation of muckrakers published exposés that rivaled the political heft of Sinclair’s *The Jungle*.⁵ Goaded by the public interest litigation movement and bolstered by a supportive executive branch, Congress revised the meat and poultry inspection acts to require state inspection programs be “equal to” federal inspection in 1967 and 1968.⁶

The “triumphs” of the consumer movement in the 1960s exacted a heavy reputational cost on the government agencies that benefited from expanded authority. The terms of the debate around the Wholesome Meat Acts, and the abandoned effort to establish a companion Wholesome Fish Act, reveal some of the practical limits of consumer—and federal—power.⁷ The meatpackers and poultry processors began to think of this new consumer movement—and the bureaucracy it created—as a threat to their livelihoods. In the coming decade, they worked with other like-minded “business conservatives” to reduce, or even roll back, what they began to perceive as unnecessary and overly burdensome regulations.⁸

Around the same time, a group of economists, bureaucrats, lawyers, and scientists determined that the existing “command-and-control” approach to food inspection failed to protect the public from emerging threats, such as residues from chemicals and pesticides as well as microbiological hazards. Bolstered by scientific studies and government-contracted reports, they argued for a new approach to food safety based on the principles of the emerging field of risk analysis.⁹ They proposed that the agency should turn over some responsibility for end product inspection to the regulated industry and pay much more attention to scientific testing for pathogens and verification of preventive measures. These strategies are recognized among social scientists as “coregulation” or “management-based regulation.”¹⁰

These proposals did not sit well with the inspectors themselves. Inspectors and consumers referred to attempts to modify continuous inspection of meat and poultry as “the fox guarding the henhouse.”¹¹ Where the existing regime of continuous inspection required little more than

3. Cohen, *Consumers’ Republic*.

4. Peterson, “Representing the Consumer Interest in the Federal Government.”

5. See, for example, Nader, *Unsafe at Any Speed*; Mitford, *American Way of Death*.

6. Wholesome Meat Act, U.S. Pub. L. No. 90-201, 81 Stat. 584 (1967); Wholesome Poultry Products Act, U.S. Pub. L. No. 90-492, 82 Stat. 791 (1968).

7. Wholesome Meat Act, Pub. L. No. 90-201, 81 Stat. 584 (1967).

8. Phillips-Fein, *Invisible Hands*; Waterhouse, *Lobbying America*.

9. Marcus, *Cancer from Beef*; National Research Council (U.S.), *Meat and Poultry Inspection*; Breyer, *Breaking the Vicious Circle*; Beck, *Risk Society*; Boudia, “Managing Scientific and Political Uncertainty.”

10. Balleisen, “Prospects for Effective Coregulation in the United States,” 443; Coglianese and Lazer, “Management-based Regulation”; Garcia Martinez, Verbruggen, and Fearné, “Risk-Based Approaches to Food Safety Regulation”; Sharma, Teret, and Brownell, “Food Industry and Self-Regulation”; Wengle, “Experimental Governance.”

11. Hughes, *Return to the Jungle*; Sheingate, “Still a Jungle,” 48; Pachirat, *Every Twelve Seconds*, 162–207; Silbergeld, *Chickenizing Farms & Food*; cf. Alfred V. Almanza, “Setting the Record Straight on the Proposed Chicken Inspection Policy,” *The Huffington Post*, April 13, 2012, http://www.huffingtonpost.com/alfred-v-almanza/chicken-inspection-new-policy_b_1424136.html.

acquiescence to the presence of government agents, coregulation involved more active cooperation between the regulated industry and regulators to ensure food safety. Government poultry inspectors warned that the industry could not be trusted with this level of responsibility. Other interested observers also regard the timing of coregulation in food as especially suspect. After all, the USDA attempted to change inspection rules during a broader political wave of deregulation, which gained momentum in the late 1960s and early 1970s. By the 1980s, what might have begun as a healthy skepticism about the size and shape of the bureaucracy morphed into an attack on its very foundations.¹²

Poultry inspection laws and regulations underscore an unusual division of labor in American food regulation: the U.S. Department of Agriculture inspects meat and poultry products using continuous, in-plant inspection of each and every carcass. Meanwhile, agents of the Food and Drug Administration (FDA) oversee almost all other food inspection in the United States—everything from fresh fruit juices to most seafood—using a combination of chemical testing, sampling, and auditing.

Especially in the last few decades, government officials, interest groups, and the general public have been engaged in a fierce debate over whether this divided system works for American producers, consumers, and particularly for workers.¹³ Regulators, legal scholars, industry representatives, and scientists often describe visual inspection as “archaic” and “outdated” because inspectors spend more time on visual defects as compared to the detection of microbial or chemical contamination.¹⁴ By contrast, most federal inspectors and a few consumer advocates characterize continuous inspection as a “gold standard” and posit that any shift away from continuous inspection equates to a “downgrade” of inspection services.¹⁵ The debate over safe food thus sheds light on the shifting boundaries between public and private interests, whose expertise matters in decision making, and what citizens can and should expect of their governments in a democratic society.

Chapter Outline

The first chapter, “Helping Poultrymen Help Government: From Interstate Commerce to International Markets in Poultry, 1945–1957,” explains how American poultry production

12. While the historical literature on deregulation is vast and growing, see McCraw, *Prophets of Regulation*, 224–309; Horwitz, “Understanding Deregulation”; Rodgers, *Age of Fracture*.

13. Good recent overviews of twentieth-century American food safety regulation include Lytton, *Outbreak*; Hamilton, *Supermarket USA*; Zeide, *Canned*; Nestle, *Safe Food*. Histories of industrial meat production include Ogle, *In Meat We Trust*; Specht, *Red Meat Republic*; Horowitz, *Putting Meat on the American Table*. For critical appraisals of the working conditions inside meatpacking and processing plants, see Silbergeld, *Chickenizing Farms & Food*; Striffler, *Chicken*; Horowitz, *Negro and White, Unite and Fight!* For investigative reporting on working conditions, see especially Tom Fritzsche, “Unsafe at These Speeds,” Oxfam America, “No Relief.”

14. Merck, “Fox Guarding the Henhouse.”

15. “Food Inspectors fight Butz legacy,” *The Government Standard* (American Federation of Government Employees), October 1977, 9. For consumer views on inspection, see Food & Water Watch, “Setting the Record Straight on the Obama Administration’s Privatized Poultry Inspection System”; “USDA Rushes to Deregulate Hog Slaughter Inspection, Puts Food Safety at Risk,” *Consumer Federation of America* [press release], https://consumerfed.org/press_release/usda-rushes-to-deregulate-hog-slaughter-inspection-puts-food-safety-at-risk/

went from a regional economic concern to a matter of foreign economic policy in the decade following the end of World War II. The chapter builds on prior historical research that details the shift toward vertically integrated production, the contract growing system, and the attendant technological and scientific transformations that enabled mass production of poultry. By 1956, a consumer-labor coalition began to lobby for poultry inspection to improve consumer and worker health. Meanwhile, a group of business entrepreneurs and bureaucrats landed on poultry inspection as a strategy to address their problems of agricultural surpluses amid falling prices. Through creative use of commodity disposal programs, these businesspeople lobbied for poultry inspection to access new foreign markets. This chapter traces how these two advocacy coalitions, in search of solutions to different problems and operating at cross purposes, nevertheless came to agree on the value of compulsory inspection of poultry in the 1950s. I argue that the establishment of a poultry inspection based on end product inspection also shaped the trajectory of future scientific and technological innovation in ways that prioritized biological uniformity to meet inspection standards at home and abroad.

The next chapter, “‘Made to Order for Government Inspection’: Ensuring Wholesome Poultry, Meat, and Fish, 1956–1968,” describes how food safety regulations fit into a larger agenda of consumer protection legislation in the 1960s. I focus on the legislative history of the Poultry Products Inspection Act to compare the debates in 1957 and 1958 with efforts to revise the meat inspection laws a decade later in 1968. This chapter outlines key legal developments in food safety during a critical period of consumer activism and expansion of the regulatory state, even as it foreshadows an emerging critique of the regulatory state led by business conservatives. In the decade between 1957 and 1967, an evolving consumer movement increasingly turned to federal solutions to resolve perceived weaknesses in businesses’ capacity to ensure health and safety for the general public. However, these improvements in consumer protection came at a high reputational cost for the agency, as journalists soon discovered that USDA agents exaggerated and even falsified some reports of unsanitary conditions that legislators used to justify the updates to the laws. The ensuing scandal and negative publicity foreshadowed later critiques of government regulatory agencies as inefficient, wasteful, and prone to aggrandizement, which eventually undergirded the turn to coregulation that I explore in the fourth chapter. In some cases, otherwise well-meaning reformers lacked an appreciation for scientific approaches, which narrowed their vision of what counted as “safe,” and it strained relationships with the regulated industries over the long term. This chapter illuminates emerging tensions over the relationship between government and business, federalism, expertise, and the optimal shape and size of an expanding bureaucracy.

The third chapter, “Hope in Trusts: *National Broiler Marketing Association v. United States* and the Limits of Countervailing Power, 1970–1978,” considers the economic factors that directed the course of “industrial” poultry production in the twentieth century. This chapter reconstructs an ill-fated association of poultry “integrators,” whose members tried to wrest back control over supply and counter the rising influence of grocery retailers and rising power of “consumerism” during the inflationary 1970s. A group of both larger and smaller players in the poultry industry formed an association that would control production and bolster the price of chicken by utilizing an antitrust exemption reserved for agricultural cooperatives. In so doing, they drew on the logic of “self-help” and “self-control” rather than rely on government

price and production controls. However, the U.S. Supreme Court struck down their cooperative as an illegal combination, primarily on the grounds that the integrators were not entitled to a legal exemption from antitrust laws afforded only to “farmers.” The integrators expressed far greater concerns about a parallel class-action suit brought by institutional and wholesale purchasers, which promised to further narrow their opportunity to marshal organized power against the retailers and buyers. Because of the suit, retailers began to set the agenda on price as well as quality standards in the ensuing decades. Left to compete on volume rather than quality, producers prioritized technological and scientific innovations that improved efficiency, throughput, and uniformity of birds—all of which challenged the feasibility and effectiveness of a continuous inspection service as volume increased dramatically.

The fourth chapter, “Who Guards the Henhouse? Coregulation, Command-and-Control, and Chicken Inspection, 1971–2002,” examines the historical circumstances under which regulators, beginning in the 1970s, attempted to shift U.S. policy away from physical “bird-by-bird” inspection to enforcement based on scientific sampling. In this section, I compare how two different American food safety regulatory agencies responded to new threats to the safety of the food supply, such as pesticides, chemical contaminants, and, increasingly, microbial pathogens. Where the FDA adopted a system of process controls known as Hazard Analysis and Critical Control Points (HACCP) to supplement periodic audits, the USDA’s food safety inspectors maintained their program of continuous inspection; through the 1980s, “quality control” programs to address these hazards remained strictly voluntary. Scholars of regulatory governance have come to refer to HACCP and similar measures as “coregulation” or “management-based regulation,” in which the state delegates authority to an industry, which then meets preestablished benchmarks. When the USDA adopted HACCP regulations in the 1990s, a robust debate ensued about the strengths and weaknesses of coregulation that did not occur with the same force when the FDA adopted similar rules. Regulators at both the FDA and USDA turned toward coregulation to balance a set of conflicting imperatives: the need to manage limited resources, a desire to maintain productive efficiency, and an interest in protecting the public health. Throughout, key disagreements about the appropriate role of science and expertise in policy decision making and what constituted “safe” food stymied progress in this debate. This is perhaps nowhere more evident than the last section, which explains the trajectory of the HACCP-Based Inspection Models Project, or HIMP.

The final chapter, “HACCP Is Taking Over the World! A Transnational History of Hazard Analysis and Critical Control Points (HACCP), 1976–2000,” evaluates how these developments impacted the contemporary landscape of international food governance. Here I recapitulate what political scientists refer to as a “hybridized” and globalized food safety system in which multinational food conglomerates are beholden to regulators in multiple countries as well as to a range of privately enforced food safety standards. This chapter reframes the important concept of countervailing power to describe the relationship between the modern supermarket and the integrated poultry firm, arguing that supermarket retailers extract not just price concessions but also safety and quality concessions from their suppliers. One can see this dynamic particularly clearly by focusing on the evolution of HACCP, which now comprises the foundation of basic food safety principles for domestic, international, and private standards for food safety. This chapter explains why decision makers turned to HACCP as the

preferred food safety protocol in the United States and across these various public, private, and global standard-setting institutions.

Conclusions

Despite an extensive literature in the broader social sciences, historians have only begun to analyze the complexities of risk regulation since the 1970s. My research findings complicate historical arguments about the pace of deregulation and raised new questions for social scientists who espouse more favorable views of coregulatory arrangements. While remaining attentive to theories of regulatory capture, I highlight the role of bureaucrats who act autonomously and drive regulatory innovation; the competition among interest groups who form advocacy coalitions around policy agendas; and the emergence of transnational and/or private regulatory institutions that take part in standard-setting, rulemaking, and enforcement.

This dissertation also offers a cautionary tale about progressive politics by subverting and expanding on an argument first made by Gabriel Kolko in 1963: key legislative victories associated with the Progressive Era—including meat inspection—should be understood as a “triumph” of conservative ideas directed by powerful business interests.¹⁶ Kolko’s arguments have since become a cornerstone in the scholarly literature—on both the left and the right—on the concept of regulatory “capture.”¹⁷ In the mid-1950s, a few years before Kolko published his ideas, consumer advocates generally assumed that the 1906 food and drug laws represented an unequivocally positive case of government intervention that noticeably improved public health. They likely imagined themselves as part of a corps of new Progressives fighting against the return of the proverbial *Jungle*. Ironically, these midcentury progressives’ understanding of their own history substantially narrowed their imagination when tackling new challenges during the 1970s and 1980s; and, I argue, still narrows many progressives’ understanding of those challenges in the twenty-first century. As this debate unfolded, the question of oversight and authority over food inspection remained a useful case as the peak of progressive policy making, the epitome of regulatory capture, or the definition of government overreach.

The construction and maintenance of the modern food system involved a series of decisions and compromises made between the powerful and the powerless, among individuals and groups that believed they were acting in their own interests, and, in other cases, when they had little choice in the matter. The resulting institutional arrangements compose an uneasy balance of tradeoffs in cost, safety, and quality with unintended, and sometimes deadly, consequences. “The Fox Guarding the Henhouse” reconstructs the process by which those institutional arrangements came about, with the hope that it might illuminate how that balance might shift in the future.

16. Kolko, *Triumph of Conservatism*.

17. Stigler, “Theory of Economic Regulation”; Posner, “Concept of Regulatory Capture”; Novak, “Revisionist History of Regulatory Capture.”

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