



Consumer Federation of America

September 15, 2008

Advisory Committee

National Health Promotion and Disease Prevention Objectives for 2020

Federal Interagency Workgroup on Healthy People 2020

U.S. Department of Health and Human Services

200 Independence Avenue, S.W.

Washington, D.C. 20201

Dear Members of the Advisory Committee:

Consumer Federation of America is pleased to provide comments on the Health Promotion and Disease Prevention Objectives for Healthy People 2020.

CFA is a non-profit association of over 300 organizations, with a combined membership of over 50 million Americans. Member organizations include local, state, and national consumer advocacy groups, senior citizen associations, consumer cooperatives, trade unions and anti-hunger and food safety organizations. Since its founding in 1968, CFA has worked to advance the interest of American consumers through research, education and advocacy. CFA's policy positions are determined by vote of member representatives at board meetings and the annual meeting. CFA's Food Policy Institute was created in 1999 and engages in research, education and advocacy on food and agricultural policy, agricultural biotechnology, food safety and nutrition.

Food Safety Should Be a Focus Area in the 2020 National Health Objectives

CFA has serious concerns about the proposed list of focus areas that have been developed for the 2020 National Health Objectives. The focus areas have been limited to approximately ten to fifteen, down from twenty-eight focus areas in the 2010 Objectives. These topic areas are critically important because the federal government develops its disease prevention and health promotion objectives for the United States around these key areas.

The 2010 list of focus areas included the area of Food Safety. This was appropriate because foodborne illness has a serious impact on the people of this country. The inclusion of food safety helped focus federal government activities in developing important measurable objectives for reducing the impact of foodborne illness on the population. These objectives provide an important marker against which federal agencies measure progress in their efforts to improve the safety of the food supply for consumers.

Unfortunately, the 2020 National Health Objectives do not include Food Safety among its list of focus areas. There is no substantive justification for the Department of Health and Human Services to drop food safety as a focus area. In fact, it is particularly inappropriate to do so at this time for three reasons. First, foodborne illness is a serious public health problem in the United States. Second, progress in reducing the rate of illness associated with major foodborne pathogens has stalled. Third, the recent spate of nationwide foodborne illness outbreaks has demonstrated the need for increased vigilance in reducing the impact of foodborne illness.

Given this, both the media and the American people might interpret dropping food safety as a focus area for Healthy People 2020 as an effort to direct attention away from a record of failure. CFA strongly urges the advisory committee to include food safety as one of its focus areas for the 2020 National Health Objectives and to set goals to be met by 2020.

Food Safety is an Important Public Health Issue

Foodborne illness is a considerable public health problem. Each year in the United States, 76 million people are sickened by a foodborne disease, 325,000 are hospitalized and 5,000 die¹. Although foodborne disease can afflict anyone, those most at risk include children, pregnant women, the elderly and persons with compromised immune systems. The economic toll on society is large as well. The U.S. Department of Agriculture's Economic Research Service estimates that the annual economic cost of medical care, productivity losses and premature death for just five foodborne pathogens is \$6.9 billion².

Foodborne illness is primarily a preventable problem. But an adequate prevention system requires comprehensive and measurable goals and objectives set out by the federal government. Comprehensive strategies can then be developed to meet those goals and objectives. Setting measurable goals and objectives is essential to developing the necessary strategies that will reduce the risk to consumers of pathogenic contamination of the food supply.

Progress on Reducing Foodborne Illness is Far From Complete

Another reason to include Food Safety in the 2020 National Health Objectives is because efforts to improve food safety are far from complete. Data from the CDC in 2007 shows that much of the progress in reducing the impact of foodborne illness on the U.S. population has now stalled, particularly for *E. coli* O157:H7 and *Salmonella*. The rates of illnesses from these pathogens remain close to the original baseline data of 1996-98. (MMWR, 2008) While there were major reductions in foodborne illnesses in the late 1990s, there has been little progress since 2001. *Salmonella* infections are more than double the National Health Objective of 6.8 cases per 100,000 population. The U.S. actually reached its National Health Objective for *E. coli* O157:H7 in 2004, but was unable to sustain that success and illness rates have increased in subsequent years.

¹ Mead, P. S., Slutsker, L., Dietz, V., McCraig, L. F., Breese, J. S., Shapiro, C., et al. (1999). Food Related Illness and Death in the United States. *Emerging Infectious Disease*, 5 (5), 607-625.

² Crutchfield, S. R., & Roberts, T. (2000). Food Safety Efforts Accelerate in the 1990s. *Food Review*, 23 (3), 44-49.

Progress in reducing *Campylobacter* infections has stagnated. Most concerning, the U.S. government has failed to meet its National Health Objective for *Listeria* for three years in a row. The illnesses from this pathogen are so serious that, in 2000, President Clinton moved forward the goal of reducing *Listeria* related foodborne illness to 2.5 cases per million to 2005 and the U.S. has not been able to meet that goal.

These statistics demonstrate that substantial progress is not being made in efforts to control foodborne illness. Although various government and food industry resources and efforts are focused on reducing the potential for contamination, exposure to foodborne pathogens continues to result in a high foodborne illness burden among the U.S. population. In January 2007, the Government Accountability Office, Congress' investigational arm, designated the U.S. food safety system as a "high risk" area of the federal government and recommended a fundamental reevaluation of the federal food safety system³. This only underscores the importance of maintaining Food Safety as a key topic area in the 2020 National Health Objectives. Without such emphasis, we will continue to lose ground in the fight against foodborne illness.

Recent Foodborne Illness Outbreaks Demonstrate Need for Increased Vigilance

Additional evidence of the need to maintain a strong focus on food safety has been seen in the recent spate of nationwide foodborne illness outbreaks linked to a wide variety of foods. The extent and frequency of these outbreaks over the past two years indicate a broken food safety system that needs greater attention and focus. A brief highlight of major foodborne illness outbreaks demonstrates the importance of maintaining a strong emphasis on food safety.

- September 2006: 204 people were sickened and three died as a result of an *E. coli* O157:H7 outbreak linked to bagged spinach that was produced in California and distributed across 26 states and parts of Canada;
- November and December 2006: 152 persons were sickened and 79 persons hospitalized as a result of two *E. coli* O157:H7 outbreaks linked to leafy greens at Mexican fast food restaurants;
- March 2007: the CDC reported that 425 persons in 44 states were sickened after eating a national brand of peanut butter contaminated with *Salmonella*;
- September 2007: Topps Meat Company recalled 21.7 million pounds of frozen ground beef products because of *E. coli* contamination linked to 40 illnesses in 8 states;
- October 2007: 272 persons in 35 states were sickened in an outbreak of *Salmonella* I 4,[5],12:i: linked to Banquet brand pot pies;
- February 2008: USDA announced the recall of 143 million pounds of raw and frozen beef products from Hallmark/Westland Meat Packing Company as a result of violations of human handling requirements. A large portion of this meat had been sent to the National School Lunch Program;

3 GAO. (2007). High Risk Series: An Update. Washington, DC: U.S. Government Accountability Office.

- August 2008, Nebraska Beef recalled 1.36 million pounds of meat because of possible contamination of *E. coli* O157:H7, related to an outbreak that resulted in at least 26 illnesses in 10 states;
- May – August, 2008: In one of the largest foodborne illness outbreaks in recent years, 1442 persons in 43 states were infected with *Salmonella* Saintpaul. At least 286 persons were hospitalized and the infection may have contributed to two deaths. Jalapeño peppers, Serrano peppers and tomatoes were identified as sources of the outbreak.

Outbreaks such as these will only continue unless we repair our broken food safety system. This requires increased vigilance and attention to food safety at the highest levels of government. It is crucial that the federal government maintain, if not increase, its emphasis on food safety in its National Health Objectives.

Inclusion of key topic areas in the 2020 National Health Objectives is instrumental in helping the federal government focus on important public health problems. From these focus areas flow strategies and programs designed to reduce the impact of these problems on the population. It is critical that the advisory committee include food safety as one of its focus areas for the 2020 National Health Objectives. Foodborne illness is an important public health problem and it is vitally important that the 2020 National Health Objectives maintain the focus on food safety that was in the 2010 Health Objectives. Without such a focus, the federal government and other stakeholders will be hindered in combating what is largely a preventative disease.

Sincerely,

Chris Waldrop
Director, Food Policy Institute

CC: Mike Leavitt, Secretary, Department of Health and Human Services;
Jonathan Fielding, Chair, Advisory Committee on Health Promotion and Disease Prevention Objectives for 2020;
Shiriki Kumanyika, Vice Chair, Advisory Committee on Health Promotion and Disease Prevention Objectives for 2020