



Consumer Federation of America

U. S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Ave, SW
Washington DC 20250-3700

RE: FSIS-2015-0003

Notice of Request for New information: Gathering Sessions for Safe Food Handling Instructions

May 5, 2015

The Center for Foodborne Illness Research & Prevention¹ and Consumer Federation of America² appreciates the opportunity to comment on the Food Safety Inspection Service's (FSIS) proposal to collect data about consumer knowledge and perceptions related to the safe handling and preparation of raw or partially cooked meat and poultry products. FSIS will use this information to determine if a revision of the mandatory Safe Handling Instructions (SHI) label for meat and poultry products is warranted [Docket No. FSIS–2015–0003]. CFI and CFA agree that investigating the idea of revising the SHI label is warranted and encourages the approval of FSIS' plans to investigate this issue. These are initial comments and should not be considered complete.

Background:

In 1994, FSIS required all raw or partially cooked (*i.e.*, not considered ready-to-eat) meat³ and poultry⁴ products, destined for household consumers or institutional uses, to have a label with safe food-handling instructions affixed to the product. Since its adoption in 1994, this mandatory SHI label has not been revised.

¹ The Center for Foodborne Illness Research & Prevention (CFI) is a national non-profit organization dedicated to advancing a stronger, more science-based food safety system that prevents foodborne illness and protects public health.

² Consumer Federation of America is a nonprofit association of 300 consumer groups, representing more than 50 million Americans, that was established in 1968 to advance the consumer interest through research, education and advocacy.

³ Federal Register, Labels: Definition; Required Features. 35 FR 15580, Oct. 3, 1970.

⁴ Federal Register, Special Handling Label Requirements, 37 FR 9706, May 16, 1972, as amended at 39 FR 4569, Feb. 5, 1974; 59 FR 14540, Mar. 28, 1994; 64 FR 746, Jan. 6, 1999.

Recently, FSIS has received inquiries from consumer groups and other stakeholders for more information about potential changes to the mandatory SHI label on meat and poultry products. In November 2013, FSIS sent a letter to consumer groups, industry groups and academia asking for feedback about the messages on the current SHI label and requested suggestions on potential revisions. Later, in January 2014, FSIS presented a summary of these stakeholders' responses to the National Advisory Committee on Meat and Poultry Inspection (NACMPI) and a subcommittee discussed the pros and cons of a potential revision.

The NACMPI Subcommittee on Food Safety Handling Labels issued a report indicating that FSIS should collect feedback from consumers about the types of revisions (to the SHI label) that would or would not be effective for improving consumer safe food handling and preparation of raw or partially cooked meat and poultry products.⁵

NACMPI members agreed on these points:

- The SHI label is important as a tool in FSIS' efforts to prevent foodborne. If a new SHI label is warranted, then the development and implementation of that new label should become a FSIS priority and be completed in a timely fashion.
- The objective of the label should be to effectively motivate consumers to use safe food handling/preparation behaviors to reduce food safety risks.
- The SHI label should contain well-researched food safety information that is consistently communicated throughout FSIS' food safety messages and programs.
- FSIS' proposed focus group strategy is fine, but it should include representatives from vulnerable populations or people who prepare food for vulnerable populations.
- The launch of the revised label (if consumer feedback indicates that a revision is warranted) should be timely and concurrent with a new educational campaign to enhance consumer food safety practices.

NACMPI discussed these topics at the January 2014 meeting:

End Point Temperatures

The current label says that meat and poultry products need to be "cooked thoroughly." While that statement is correct, FSIS may want to consider replacing vague instructions, such as "cook thoroughly," with specific end-point temperatures. Over the past twenty years, extensive research has documented that color is not a good indicator to determine if a meat or poultry product has reached a state of "thorough cooking," but many consumers still believe color is a good indicator of doneness.

On the other hand, multiple research studies have shown that the following end-point temperatures need to be achieved to kill internal foodborne pathogens:

- Poultry (whole birds, poultry parts and ground poultry) – 165 °F
- Ground meats – 160°F
- Whole-muscle meats – 145°F plus a stand time of 3 minutes

⁵ NACMPI Subcommittee on Food Safety Handling Labels, January 7-8, 2014. Accessed on May 4, 2015 at <http://www.fsis.usda.gov/wps/wcm/connect/70d59a26-32bb-4d25-9050-462b0b0cacb5/Food-Safe-Handling-Labels-NACMPI.pdf?MOD=AJPERES>

To reduce the occurrence of foodborne diseases, consumers need to be aware of safe handling and preparation practices for meat and poultry products. Therefore, FSIS should consider listing the three end-point cooking temperatures on a revised meat and poultry SHI label. Consumers need to understand that temperature, not color, is the only way to determine if the product has been cooked thoroughly.

Thermometer Use

While the current label has a picture of a food thermometer on it, there is no text indicating that a thermometer must be used to determine if a meat or poultry product is cooked thoroughly. FSIS should consider adding information about thermometer use on a revised label.

Food Safety's Four Core Message Icons

Research conducted prior to the launch of USDA's 2012 *Food Safe Families* (FSF) campaign indicated that the new icons for the four core safe food practices (developed for the campaign) were preferred by consumers. Therefore, FSIS, in conjunction with other food safety agencies and stakeholders, should consider adopting FSF's icons or consider the benefits of conducting research on "icon effectiveness." The majority of NACMPI members, however, did not want "standardizing icons" to stand in the way of revising the SHI label. A revised SHI label will provide better meat and poultry safe handling information, which in turn will prevent the occurrence of foodborne illnesses.

Food Safety Contact Information

The current SHI label does not provide consumers with contact information for additional food safety information. FSIS should consider adding its website or a phone contact on the label, since some consumers may want more detailed information.

Comments

Each year in the United States, millions people are sickened, 128,000 are hospitalized and 3,000 die from foodborne illness. In addition, there are substantial economic costs incurred by the victims and retailers as they struggle to recover from food contamination events. Therefore, it is reasonable to plan and implement food safety education programs aimed at preventing foodborne disease.

Labels on food products have been effective in providing consumers with ingredient and nutritional information, so it is reasonable to also use labels on food to convey important food safety messages. Research conducted through the Centers for Disease and Prevention's Behavioral Risk Factor Surveillance System (BRFSS) showed that while less than half of consumers were aware of the safe food handling labels on meat and poultry products, 77% of the consumers who saw the label read it and 37% of those that read the label reported changing their handling and preparation practices based on the label instructions.⁶

⁶ Centers for Disease Control and Prevention. Multistate Surveillance for Food-Handling, (1998) Preparation, and Consumption Behaviors Associated with Foodborne Diseases: 1995 and 1996 BRFSS Food-Safety Questions; *MMWR* 47(SS-4); 33-54. Accessed May 5, 2015 at <http://www.cdc.gov/mmwr/preview/mmwrhtml/00054714.htm>

In addition, the Partnership for Food Safety Education (PFSE) has conducted research on consumer perceptions and behaviors with regard to meat and poultry.⁷ PFSE's research found consumers voicing these perceptions:

- Food safety, while important, is not as important as taste, i.e., cooks need to balance safety with the food's texture and moisture. Experience plays a big role in achieving this balance.
- Ground meat and poultry products are riskier foods than whole cuts.
- Food safety is more of a problem with pork and chicken because these products carry more "bacteria" or "pathogens" than beef does. Therefore, when determining if beef is completely cooked, there is more flexibility. Beef "doneness" is more of a preference decision, not a food safety one.
- Most consumers don't use a thermometer. While many consumers agree that thermometers are appropriate for large roasts or full birds, they also state that thermometers are not needed for other products. Experience and visual observations are other ways to determine doneness.
- USDA's recommended internal temperatures are higher than necessary for safety. Many consumers prefer the Food Network or other chefs' cooking recommendations.
- Allowing meat or poultry to "stand" after removing the food from its heat source is not related to food safety – instead, it is done to "seal the juices" and keep the product moist and tasty.
- "Stand time" does not complete the cooking process – once the product has been removed from the heat source, cooking stops. It is counterintuitive to think that cooking continues after removal from the heat source.

These perceptions reveal that consumers' knowledge about meat and poultry safety is limited and/or distorted. However, understanding the following key points about meat and poultry handling and preparation are critical in preventing foodborne illness:

- Cooking is the only "kill-step" that consumers have for destroying pathogens in raw and partially cooked meat and poultry products. Washing these products does not kill pathogens.
- Meat and poultry products need to reach a specific internal temperature for a specific amount of time in order to kill pathogens.
- Thermometers are the only method to determine if a meat or poultry product has reached a safe internal temperature. This is particularly important for foods containing ground meats (like hamburgers) or if the product has been tenderized (like is done with mechanically tenderized steaks and roasts).
- "Stand time" is required to ensure meat and poultry safety, since "stand time" completes the cooking process.

Given the major disconnects between consumer perceptions and verified safe handling information about meat and poultry products, it is likely that a revised SHI label would

⁷ Partnership for Food Safety Education. PFSE New Cook Time Messaging Focus Groups Final Report. *Brand Amplitude*®, LLC. September 2, 2009

improve consumers' knowledge about important safe handling of meat and poultry products, thereby encouraging more consumers to adopt safer food handling and preparation practices.

Further, since cooking is the only "kill step" available to consumers, it is important that specific cooking instructions be provided to purchasers of raw and partially cooked meat and poultry products. By having the end-point temperatures listed on the SHI label, consumers should come to better appreciate the importance of using a thermometer to determine meat and poultry doneness. Further, given that consumers do not always have immediate access to USDA's recommended internal temperatures at the point of preparation, a label could become a primary source in verifying meat and poultry safety information.

Conclusion

According to the Federal Register notice, *Notice of Request for New information: Gathering Sessions for Safe Food Handling Instructions*, FSIS has contracted with RTI International to conduct six consumer focus groups to gather information on consumers' understanding and use of the current safe-handling instructions and responses to possible revisions to the instructions. To provide geographic diversity, FSIS will conduct two focus groups in three different geographic locations each with two focus groups (for a total of six). Locations will be representative of three of the four main geographical areas of the country (East Coast, South, Midwest, and West Coast). In each location, FSIS will conduct one focus group with English-speaking adults and one focus group with Spanish-speaking adults. The focus groups will include individuals at-risk for foodborne illness (*i.e.*, older adults, parents of young children, immune compromised individuals or their caregivers) as well as from the general population.

CFI and CFA agree that FSIS should be granted approval to collect data about consumer knowledge and perceptions related to meat and poultry safety in order to ascertain if a revision of the SHI label is appropriate. We also agree that the plans outlined in the above mentioned Federal Register notice are consistent with good research practices.

CFI and CFA appreciates the opportunity to submit these comments and looks forward to continuing our work with USDA/FSIS to develop appropriate and effective food safety education programs and messages for consumers.

Sincerely,

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