



Consumer Federation of America

FOR IMMEDIATE RELEASE
December 4, 2013

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CFA Statement on FSIS' Salmonella Action Plan

CFA is pleased that FSIS is focusing attention and efforts on reducing illnesses from *Salmonella* in meat and poultry products. The CDC estimates that over 1 million cases of salmonellosis occur each year in the U.S. Unfortunately, the U.S. has made almost no progress in reducing illnesses from *Salmonella* in the past decade. The incidence of *Salmonella* infections is nearly the same level as it was in 2002. In 2012, the incidence of salmonellosis was 16.42 cases per 100,000, well above the 2020 National Health Objective of 11.4 cases. A dedicated and sustained effort to reduce illnesses from *Salmonella* is essential.

Following the *E. coli* O157:H7 outbreak linked to ground beef from Jack in the Box in the mid-90s, the federal government and the meat industry focused their efforts and invested considerable resources in reducing *E. coli* contamination. Over time, those efforts have started to pay off in a reduction of illnesses from that pathogen; however much work remains to be done to further reduce illness rates.

CFA urges FSIS to maintain a dedicated and sustained focus on reducing illnesses from Salmonella and to expand its Action Plan to undertake additional activities. Reducing Salmonella illnesses will take a substantial investment of time, effort, and resources if we are to see real progress. CFA looks forward to working with the agency as it focuses its activities on Salmonella.

FSIS' Salmonella Action Plan is a first step in a comprehensive approach to address *Salmonella* in meat and poultry products. However a number of the items listed in the plan are future possibilities rather than concrete actions. The agency says that it will *explore* developing a new sampling program or *consider* implementing new standards. While CFA understands that several items listed in the plan may require multiple steps, it would be helpful to know that these are specific activities that the agency intends to undertake rather than potential steps that may occur sometime in the future.

CFA agrees with FSIS that establishing new standards for comminuted poultry products and poultry parts is necessary. Outbreaks linked to ground poultry products highlight the importance of reducing Salmonella in those products. And the recent *Salmonella Heidelberg* outbreak linked to Foster Farms raises concerns about the extent of contamination on chicken parts, which consumers frequently purchase at the supermarket. An FSIS baseline study on raw chicken parts found that rates were far too high, estimating a national prevalence of 24.02% for Salmonella and 21.70% for Campylobacter. FSIS also recently proposed analyzing ground beef, beef trimmings, bench trim and other raw ground beef components for Salmonella in order to develop new standards for ground beef, an action CFA supports.

CFA also supports FSIS' efforts to investigate the contribution of lymph nodes to Salmonella contamination and to encourage ongoing dialogue on pre-harvest related activities that can reduce

Salmonella loads on animals coming to the slaughterhouse. These actions can make important contributions. Unfortunately, FSIS has limited capacity in these areas, particularly in the pre-harvest area as the agency does not have jurisdiction on the farm to mandate action. The agency could, however, establish standards at slaughter establishments for incoming pathogen loads on animals to promote improvements on the farm.

FSIS' Action Plan needs to go further to protect consumers from Salmonella illnesses. Numerous groups and members of Congress have urged FSIS to withdraw the agency's proposed rule on poultry slaughter until critical food safety and worker safety issues can be adequately addressed. The Action Plan also does not address a consumer group petition urging the agency to declare antibiotic-resistant strains of Salmonella as adulterants. Antibiotic-resistant strains of *Salmonella* are a particular threat to human health because they are resistant to many of the drugs normally used to fight infection, which reduces the medical treatment options available. Finally, FSIS does not include a request that Congress provide the agency with enforceable performance standards, which are essential for the agency to effectively enforce its standards for Salmonella and other pathogens.

One additional note of caution – both Salmonella and Campylobacter are closely associated with raw poultry. There is insufficient data to inform how efforts to reduce Salmonella in raw poultry might affect Campylobacter levels. FSIS should pay close attention to both pathogens and make sure that efforts to reduce Salmonella contamination do not have an inverse affect on contamination rates from Campylobacter.

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Consumer Federation of America is an association of nearly 300 non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, education and advocacy.