

# SAFE FOOD COALITION

1620 I Street, NW, Suite 200, Washington, DC 20006 202-797-8551

---

July 16, 2014

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20520

The Honorable Howard Shelanski  
Administrator  
Office of Information and Regulatory Affairs  
The Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Dear Secretary Vilsack and Administrator Shelanski:

The undersigned members of the Safe Food Coalition write regarding the U.S. Department of Agriculture's proposal to modify its poultry slaughter inspection program. We urge you to publish a revised version of the proposed rule, open the rule up for a comment period of 120 days and hold public meetings on the revised rule.

USDA officials have said that the proposed rule sent to the Office of Management and Budget has been significantly changed based on stakeholder feedback. However stakeholders have no information about what those changes entail. We have raised numerous concerns about the negative impact USDA's proposal will have on food safety and consumer protection. Many other public interest groups, members of Congress and even other government agencies have raised concerns as well. Considering the importance of this rule, the public should be given an opportunity to comment on the changes made to the proposal before the rule is finalized.

Such an action is not without precedent. The Food and Drug Administration published a proposed rule in 2013 implementing the produce safety provision of the Food Safety Modernization Act. Following the close of the comment period and in response to widespread stakeholder concerns, FDA announced that it would revise its proposal and re-publish it for public comment. FDA's approach would ensure that the public has an opportunity to comment on substantial changes to its proposed rule before it goes into effect.

We strongly urge USDA to publish a revised version of its poultry slaughter inspection proposed rule, open the rule up for a 120-day comment period and hold public meetings on the revised rule. This will enhance transparency and ensure that the public has an opportunity to comment on the revised version of the rule.

Sincerely,

Center for Foodborne Illness Research & Prevention

Center for Science in the Public Interest

Consumer Federation of America

Consumers Union

Food & Water Watch

Government Accountability Project

National Consumers League

STOP Foodborne Illness