

**American Federation of Government Employees – Center for Effective Government
Center for Food Safety – 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 – The Humane Society of the United States
National Consumers League – National Council of La Raza (NCLR)
National Council for Occupational Safety and Health
Nebraska Appleseed Center for Law in the Public Interest – Southern Poverty Law Center
STOP Foodborne Illness – United Food and Commercial Workers International Union
U.S. Public Interest Research Group – Worksafe, Inc.**

January 6, 2014

Senator Mark Pryor, Chair
Senate Subcommittee on Agriculture, Rural
Development, Food and Drug Administration
and Related Agencies Appropriations
255 Dirksen Senate Office Building
Washington, DC 20510

Senator Roy Blunt, Ranking Member
Senate Subcommittee on Agriculture, Rural
Development, Food and Drug Administration
and Related Agencies Appropriations
260 Russell Senate Office Building
Washington, DC 20510

Representative Robert Aderholt, Chair
House Subcommittee on Agriculture, Rural
Development, Food and Drug Administration
and Related Agencies Appropriations
2264 Rayburn House Office Building
Washington, DC 20515

Representative Sam Farr, Ranking Member
House Subcommittee on Agriculture, Rural
Development, Food and Drug Administration
and Related Agencies Appropriations
1126 Longworth House Office Building
Washington, DC 20515

Dear Senator Pryor, Senator Blunt, Representative Aderholt and Representative Farr:

We, the undersigned members of the Safe Food Coalition and the Worker Health and Safety Coalition, write in opposition to budget reductions for USDA's Food Safety Inspection Service (FSIS) which would reduce funding for federal meat and poultry inspection. We also urge you to remove language inserted into the report and adopted by the House Appropriations Committee, which urges the U.S. Department of Agriculture to move forward with its proposal to substantially change the poultry inspection program.

We have serious concerns about USDA's poultry inspection proposal and its impact on public health. A recent report by the U.S. Government Accountability Office (GAO) identified major deficiencies in the data and analysis of the poultry pilot program upon which FSIS based its poultry slaughter proposal. GAO stated that limitations in FSIS' evaluation of its young chicken pilot project "raise questions about the validity of FSIS' conclusion that an inspection system based on the pilot project would ensure equivalent, if not better, levels of food safety and quality than currently provided at plants not in the pilot program."

USDA's proposal does not require plants to test for *Salmonella* or *Campylobacter*, the two pathogens most frequently associated with raw poultry. The Centers for Disease Control and Prevention's most recent report card on foodborne illness showed a 14 percent increase in *Campylobacter* illness rates and no change in rates of *Salmonella* illnesses. Further, a study by the University of Florida ranked poultry contaminated with *Campylobacter* (#1) and *Salmonella* (#4) in the top five pathogen/food combinations

that cause the greatest disease burden to the public. A recent report by the Center for Science in the Public Interest found that more outbreaks were linked to chicken over the past 12 years than to any other meat or poultry product. And *Consumer Reports'* recent analysis of more than 300 raw chicken breasts purchased at stores across the U.S. found potentially harmful bacteria lurking in almost all of the chicken, including organic brands.

USDA's proposal also allows each plant to decide the level of bruises, feathers, bile or ingesta appropriate for birds going down the processing line, rather than setting uniform standards across the industry. Further, the rule removes inspectors from the slaughter line and turns over inspection activities, previously conducted by federal inspectors, to plant employees who are not required to be trained in their new duties. USDA also proposes to allow plants to increase their line speeds up to 175 chicken carcasses per minute, meaning that the lone remaining inspector on the slaughter line will have 1/3 of a second to examine each chicken carcass for problems.

USDA's proposed rule will also have a serious detrimental impact on the industry's workers. Fast line speed is already a major cause of high injury rates among poultry processing workers. A recent report based on more than 300 worker interviews by the Southern Poverty Law Center and the Alabama Appleseed Center for Law and Justice found that 72 percent of poultry workers had suffered a significant job-related injury or illness and that the workers, many whom are immigrants, are often silenced from reporting injuries or making complaints about working conditions by threats of deportation and firing.

Further, a recent Health Hazard Evaluation published by the National Institute for Occupational Health and Safety (NIOSH) found an alarming 42 percent of workers at one poultry plant in South Carolina had indications of carpal tunnel syndrome even before the scheduled line speed increase took effect at that plant. Workers of color, immigrants, and women are overrepresented in the poultry-processing industry and will bear a disproportionate share of the rule's likely negative health impacts. The worker health and safety community has implored USDA to withdraw the poultry rule until the agency, at a minimum, develops a comprehensive plan to mitigate the serious concerns about line speed and preventable injuries.

USDA's poultry inspection system does need to be modernized, but this proposal raises serious food safety and worker safety concerns. We urge you to remove the report language from the final appropriations report and to restore the budget cut of \$11.73 million.

Sincerely,

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