

# SAFE FOOD COALITION

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

---

March 4, 2015

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

Dear Secretary Vilsack,

The Safe Food Coalition (SFC) strongly agrees with your comments to the House Appropriations Subcommittee on Agriculture on February 25 that we should implement the final rule on the labeling of mechanically tenderized (MT) beef in 2016. As you know, the rule is currently at the Office of Management and Budget (OMB) for a final review, but we are hopeful that it will be returned to USDA soon. Once that happens, we urge you to immediately finalize the rule and suspend FSIS' uniform compliance regulation so implementation can begin in 2016.

There is a strong public health justification for implementing the rule in 2016 rather than waiting until 2018. Multiple scientific studies show that mechanically tenderized beef is not an intact beef product, and as such, the interior portions of treated steaks and roasts can be contaminated with deadly pathogens. Products with internal contamination – like ground beef and MT beef – are higher risk and pose a serious health threat to consumers, but especially to those individuals in the vulnerable populations.

Over the past decade, we have learned much about the risk from mechanically tenderized beef. We now know that translocation of external pathogens to the interior does occur when tenderizing beef. We also know that *E. coli* O157:H7 is not the only pathogen of concern for beef products; other Shiga Toxin-Producing *E. coli* strains as well as *Salmonella* (including antibiotic resistant strains) – can contaminate beef. And we know that CDC has linked six foodborne illness outbreaks to MT beef products. Additionally, we know (from USDA's 2007 Beef Operations Survey) that a significant amount of MT beef is being produced and sold in retail markets. Finally, we know that non-intact MT beef products look no different from intact steaks and roasts, so consumers or retail purchasers have no visual clue that MT beef products are different and require specific handling and preparation instructions. Taken together, these facts support the need for labeling MT beef products.

Labeling MT beef provides consumers and retail purchasers with necessary information about this higher risk product. Beef purchasers have a right to know important details about the product being bought, and they are entitled to have safe handling and cooking instructions on the label, so they can prevent illness. The public health benefits gained from labeling MT beef are significant, while the cost to industry for applying this label is low. We strongly support your intention to implement a final rule on MT beef in 2016 and urge you to work with OMB to finalize the rule immediately.

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