August 11, 2011

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue SW  
Washington, DC 20250

Dear Secretary Vilsack,

In the wake of the recent antibiotic-resistant Salmonella (“ABR Salmonella”) outbreak and resulting recall of 36 million pounds of ground turkey, the undersigned members of the Safe Food Coalition write to urge your prompt consideration of a recent petition to declare certain strains of ABR Salmonella as adulterants and prevent meat and poultry products contaminated with those strains from being sold to consumers.

In May of this year, the Center for Science in the Public Interest (“CSPI”) petitioned the Agency to use its interpretive rulemaking authority to declare four separate strains of ABR Salmonella — Hadar, Heidelberg, Newport, and Typhimurium — as adulterants under both the Federal Meat Inspection Act and the Poultry Products Inspection Act. ABR 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.

Data analyzed by CSPI and detailed in the petition shows that outbreaks of antibiotic-resistant pathogens are becoming more common. Of the 36 documented outbreaks linked to antibiotic-resistant bacteria since the 1970s, 42 percent (15 out of 36) occurred in the last decade. Of the 36 outbreaks from antibiotic-resistant pathogens, 39 percent occurred in FSIS-regulated meat and poultry products. Those outbreaks were responsible for almost 1,400 illnesses, 93 hospitalizations and 5 deaths. In this most recent outbreak of ABR Salmonella Heidelberg, at least 107 consumers have been sickened in 31 states and one person has died; nearly half of those who are ill have been hospitalized.

Surveillance data from the National Antimicrobial Resistance Monitoring System (NARMS) retail meat surveillance program demonstrates the urgency of declaring these pathogens as adulterants in meat and poultry products. The NARMS program, which monitors the prevalence of ABR pathogens in food products at retail stores, found that Salmonella Heidelberg and Salmonella Typhimurium have been among the most frequent serotypes identified in retail meat products, occurring in the list of the ten most common serotypes from 2002 to 2008.

The Obama Administration has emphasized the importance of prevention in addressing food safety challenges. In order to help prevent additional outbreaks of these pathogenic strains, USDA should...
declare these strains of ABR *Salmonella* to be adulterants, test for these pathogens, and stop meat and poultry products contaminated with these strains from entering commerce. We urge you to take quick action on this important public health issue.

Sincerely,

Carol L. Tucker-Foreman  
Founder, Safe Food Coalition

Patricia Buck  
Center for Foodborne Illness Research & Prevention

Chris Waldrop  
Consumer Federation of America

Michael Hansen  
Consumers Union

Wenonah Hauter  
Food & Water Watch

Richard Wood  
Keep Antibiotics Working

Beatrice Edwards  
Government Accountability Project

Sally Greenberg  
National Consumers League

Nancy Donley  
STOP Foodborne Illness (formerly S.T.O.P.--Safe Tables Our Priority)

cc: Elisabeth Hagen, Under Secretary, Food Safety and Inspection Service