



Consumer Federation of America

September 5, 2018

Carmen Rottenberg
Acting Deputy Under Secretary for Food Safety
United States Department of Agriculture
Office of Food Safety
331-E Jamie L. Whitten Building
12th Street and Jefferson Street SW
Washington, DC 20250

Re: Docket No.: 2018-15462, Notice of Request for a New Information Collection: (Consumer Research on the Safe Handling Instructions Label for Raw and Partially Cooked Meat and Poultry Products and Labeling Statements for Ready-to-Eat and Not-Ready-to-Eat Products)

Dear Acting Deputy Under Secretary Rottenberg:

The Center for Foodborne Illness Research & Prevention¹ and Consumer Federation of America² appreciate the opportunity to comment on the Food Safety and Inspection Service's (FSIS) ongoing efforts to bring the safe handling instructions (SHI) label on meat and poultry into the 21st Century. As we and other members of the Safe Food Coalition made clear in the petition we submitted over two years ago, the scientific research strongly supports updating the SHI label. The proposed information collection should help FSIS to expeditiously design and implement new labeling rules that better protect consumers.

The existing SHI label too often confuses consumers, or is simply overlooked. As we noted in our petition, research on how consumers understand labeling information, on common food handling practices and associated risks, and on the survival rates of pathogens at specific end-point temperatures, all point to the inadequacies of the SHI labeling rules adopted in 1994. We recommended that revised rules should continue to require that labels provide information about the potential risk of pathogenic contamination of USDA products, and should further require that

¹ The Center for Foodborne Illness Research & Prevention (CFI) is a national non-profit organization dedicated to advancing a stronger, more science-based food safety system that prevents foodborne illness and protects public health.

² Consumer Federation of America is a nonprofit association of over 250 consumer groups, representing more than 50 million Americans, that was established in 1968 to advance the consumer interest through research, education and advocacy.

labels provide more specific information about safe handling practices for meat, poultry and catfish products, including:

- An end-point temperature for raw and partially cooked product categories (intact meats, non-intact meats, poultry, catfish), as well as any “rest time” requirement.
- Instructions to use a thermometer to verify the product has reached the recommended internal temperature.
- Information on safe handling practices to minimize risks associated with improper sanitation, handling, storage, and temperature control for meat, poultry and catfish products.
- The four core “Check your steps” safe food handling graphics featured on the www.foodsafety.gov website, instead of the graphics currently displayed.
- A web address for additional information on meat, poultry and catfish cooking recommendations.³

In addition to these content requirements, we recommended that the revised rules should mandate that labels:

- Use easily legible type located away from curved or seamed areas of packages.
- Use bold or large font for end-point temperatures and “rest time” instructions.

We stand by these recommendations, and encourage FSIS to use the proposed research study to confirm the efficacy of these changes, and to identify the label content and format that will best motivate consumers to adopt safe food handling and preparation behaviors that reduce food safety risks.

We also encourage FSIS to use the proposed information collection to quickly design and implement rules that effectively prevent consumers from confusing raw and cooked products. We agree with the national advisory committee that FSIS should set mandatory rules for processed raw meat products, such as the chicken kiev and related products linked to an outbreak of *Salmonella Enteritidis* in 2015.⁴ We disagree with the committee, however, to the extent that it endorses using unclear terminology such as “Ready to Cook.” Rather, we believe a bold, large-font, front-of-package indication that these products are “raw” would better protect consumers, and we encourage FSIS to test that hypothesis with the proposed study.

³ FSIS should also consider featuring USDA’s chart of the recommended internal cooking temperatures at this website.

⁴ See CDC. “Multistate Outbreak of Drug-Resistant *Salmonella* Enteritidis Infections Linked to Raw, Frozen, Stuffed Chicken Entrees Produced by Barber Foods (Final Update),” (Oct. 16, 2015) <https://www.cdc.gov/salmonella/frozen-chicken-entrees-07-15/index.html>

What the proposed study should not become is an excuse to further delay long overdue updates to meat and poultry products. Consumers should not have to rely on labeling specifications designed nearly a quarter century ago. To the extent possible, FSIS should carry out work in tandem with the proposed research study to ensure that the process for proposing, finalizing, and enforcing new labeling requirements advances.

Thank you for your consideration of these comments.

Sincerely,

Patricia Buck
CFI Executive Director
Center for Foodborne Illness Research & Prevention

Thomas Gremillion
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Consumer Federation of America