SAFE FOOD COALITION

September 13, 2022

The Honorable Thomas J. Vilsack U.S. Department of Agriculture 1400 Independence Ave., S.W. Washington, DC 20250

RE: Poultry Food Safety Improvements

Dear Secretary Vilsack,

The undersigned members of the Safe Food Coalition write to express our support for the increased food safety protections described in your recent op-ed in *The Hill*. We appreciate your efforts to take important steps towards reforming the Department's antiquated regulatory approach to *Salmonella* in poultry, and urge you to move forward in developing new, enforceable, product-based standards that protect consumers from dangerous *Salmonella* contaminated poultry.

These reforms are urgently needed. *Salmonella* illness rates in the United States have not decreased in the last 20 years; and as you noted in your op-ed, nearly a quarter of foodborne *Salmonella* illnesses are due to eating chicken or turkey.² The Safe Food Coalition has long advocated for policy reforms at the Food Safety and Inspection Service (FSIS) to address this lack of progress, including updated testing standards, greater disclosure of establishment compliance with food safety standards, and improved foodborne illness outbreak surveillance tools. We strongly support a transition away from the current, unenforced, performance standard based system to one that ensures every product bearing the USDA mark of inspection meets food safety criteria. We also commend your commitment to mitigating *Salmonella* risk through "preharvest" measures, and exploring a *Salmonella* testing requirement for each flock of birds destined for slaughter.

We understand that you will face strong opposition to USDA's proposed interventions to reduce *Salmonella* in poultry products. Already, at least one industry trade group has voiced its objection to the announcement that FSIS will treat *Salmonella* as an adulterant in breaded and

¹ https://thehill.com/opinion/congress-blog/3614571-new-steps-to-protect-consumers-from-salmonella-in-poultry/

² https://www.fsis.usda.gov/inspection/inspection-programs/inspection-poultry-products/reducing-salmonella-poultry

stuffed raw chicken products.³ As you explain in your op-ed, these products have been a consistent source of *Salmonella* infections for decades—causing 14 illness outbreaks, including one just last year—precisely because their appearance misleads consumers to believe that the products are ready-to-eat. Prolonged efforts to warn consumers about these products through labeling have not worked. Common sense dictates that these products should be free of dangerous pathogenic contamination. However, to achieve real and sustainable progress in reducing the number of *Salmonella* infections, USDA will have to require stronger preventive measures for all raw poultry products, not just breaded and stuffed chicken products.

We stand ready to support USDA in achieving significant reforms to protect consumers from *Salmonella* in poultry. Thank you for your attention to this long neglected problem. We look forward to sharing our feedback on FSIS' proposed framework for a new comprehensive strategy to reduce *Salmonella* illnesses linked to poultry in the Fall. For questions or further assistance with respect to this letter, please contact Thomas Gremillion at tgremillion@consumerfed.org or (202) 939-1010.

Sincerely,

Center for Foodborne Illness Research and Prevention Center for Food Safety Center for Science in the Public Interest Consumer Federation of America Consumer Reports Food and Water Watch National Consumers League STOP Foodborne Illness

³ https://www.foodsafetynews.com/2022/08/national-chicken-council-objects-to-usda-plan-to-name-salmonella-as-adulterant-in-some-chicken-products/