## SAFE FOOD COALITION

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November 15, 2018

The Honorable George "Sonny" Perdue III Secretary of Agriculture U.S. Department of Agriculture 1400 Independence Avenue, SW Washington, DC 20250

Dear Secretary Perdue,

The undersigned members of the Safe Food Coalition write to request that you immediately publish a public health alert with the names of the turkey slaughter and processing establishments linked to the ongoing multistate outbreak of antibiotic resistant *Salmonella* Reading infections. With the Thanksgiving holiday fast approaching, providing this information now is critical to protect public health.

Thus far, the *Salmonella* Reading outbreak has sickened 164 people in 35 states, resulting in at least 63 hospitalizations and one death. The first cases were reported nearly a year ago in November 2017. So far, USDA's Food Safety and Inspection Service (FSIS) has detected the outbreak strain in 22 turkey slaughter facilities and 7 raw turkey processing facilities. The agency has even detected the outbreak strain in product recovered from the homes of illness victims, <u>according to the Centers for Disease Control and Prevention (CDC)</u>. Yet despite all of this information, the agency has not requested a recall, nor taken any enforcement action to prevent turkey products adulterated with the outbreak strain from reaching consumers.

FSIS has emphasized that the presence of the outbreak strain in various turkey products, production facilities, and even live birds, indicates that the pathogen may be widespread in the turkey industry. As a result, the agency appears to believe that disclosing the names of establishments found to have harbored the outbreak strain would not provide "actionable information" that would be helpful to consumers. We disagree. Providing this information would allow some consumers to avoid turkey products more likely to be contaminated with dangerous *Salmonella*. For others, who may have already purchased a Thanksgiving turkey or other raw turkey products from one of the implicated establishments, the information would provide a heightened awareness of the foodborne illness risk associated with the products, and offer motivation to learn and put in practice good food safety practices.

According to the National Turkey Federation's statement in response to CDC's outbreak update, "all turkey is safe when properly cooked and handled." That claim, however, subjects consumers to an unrealistic standard for "proper" handling and cooking. In particular, preventing cross-contamination of a virulent *Salmonella* strain may require a level of care that exceeds what most consumers consider to be "proper" handling. That is why the World Health Organization has estimated that cross-contamination causes ten times as many *Salmonella* infections as eating undercooked poultry. Indeed, in a recent FSIS <u>observational study</u>, faulty handwashing after handling turkey burgers contributed to 6% of participants contaminating a salad that they prepared in a test kitchen.

FSIS has indicated that when raw meat or poultry products are "<u>associated with an illness</u> <u>outbreak</u>," the agency will consider the products "adulterated," and the establishment producing them "insanitary," until the establishment demonstrates that it has fixed the problem. In practice, however, the agency has employed an <u>unreasonably high standard</u> for determining which products are "associated" with a given outbreak. As a result, companies have inadequate incentives to address the root causes of contamination, such as infected breeder flocks, as the mounting toll of victims in this outbreak makes clear.

Unfortunately, this is <u>not the only ongoing outbreak</u> that requires a stronger regulatory response and more transparency. Federal regulators have similarly failed to take action to protect consumers from a multi-drug resistant strain of *Salmonella* Infantis, which FSIS testing has detected in 58 chicken slaughter and processing facilities. So far, this *Salmonella* Infantis outbreak has sickened 92 victims in 29 states, resulting in 21 hospitalizations. The victims are disproportionately female and, according to CDC, many have developed antibiotic resistant urinary tract infections as a result of exposure. FSIS should similarly issue a public health alert warning consumers about this outbreak and disclosing the names of the chicken processing establishments that have been found to harbor the outbreak strain.

Consumers deserve better protection against *Salmonella* in meat and poultry. Over the last decade, while salmonellosis rates have <u>plummeted</u> in Europe and other countries that have adopted sensible controls, the incidence of the illness has remained as <u>high as ever</u> in the United States. Ultimately, FSIS must reconsider when it considers *Salmonella*-contaminated food to be "adulterated." It must also take a hard look at how inspection "modernization" championed by industry—such as the New Poultry Inspection System—has affected public health, and enact reforms that actually improve food safety. For now, however, regulators can help to avoid illness and death by simply refusing to shield the industry from public scrutiny.

Thank you for your consideration.

Sincerely,

Center for Foodborne Illness Research & Prevention Center for Food Safety Consumer Federation of America Consumer Reports Food & Water Watch Government Accountability Project National Consumers League