

SAFE FOOD COALITION

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December 21, 2011

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

RE: Docket No. FSIS-2010-0023; Shiga-Toxin Producing *Escherichia coli* in Certain Raw Beef Products

Dear Secretary Vilsack,

The undersigned organizations, representing consumers, union members, whistleblowers and victims of foodborne illness, support the Food Safety and Inspection Service's determination that six additional strains of Shiga-toxin producing *E. coli* (O26, O45, O103, O111, O121, and O145) should be considered adulterants in certain raw beef products. We respectfully urge you to resist efforts to delay implementation of this important public health measure.

In 1994 the Food Safety and Inspection Service (FSIS) declared *E. coli* O157:H7 an adulterant in raw ground beef and beef products. FSIS' decision was in reaction to the nationwide *E. coli* outbreak associated with Jack in the Box restaurants in which 650 persons were sickened and four children died. Since that time, both industry and government have invested significant energy and resources in addressing this deadly pathogen.

However, it is now well-recognized that additional strains of Shiga-toxin producing *E. coli* (STECs) can pose a similar public health threat as *E. coli* O157:H7. According to the Centers for Disease Control and Prevention, all non-O157:H7 STECs cause approximately 113,000 foodborne illnesses in the U.S. each year.¹ CDC also notes that in 2010, illnesses caused by all the other pathogenic forms of *E. coli* caused more illnesses than *E. coli* O157:H7.² The "Big Six" strains that FSIS has declared as adulterants cause approximately 70-83% of all non-O157 STEC infections in the U.S.

STECs have been found in a range of food products including the meat supply. In August 2010, FSIS announced a recall of 8,500 pounds of beef as a result of an outbreak of *E. coli* O26 that sickened consumers in Maine and New York. STECs have also been found in imported meat products. A 2006 Agricultural Research Service study found varying rates of STEC contamination in boneless beef trim

1 Scallon E, et al. "Foodborne Illness Acquired in the United States – Major Pathogens." Emerging Infectious Diseases, Vol 17, No 1, January 2011.

2 Centers for Disease Control and Prevention, "Vital Signs: Incidence and Trends of Infection with Pathogens Transmitted Commonly Through Food --- Foodborne Diseases Active Surveillance Network, 10 U.S. Sites, 1996—2010." MMWR 60(22);749-755, June 10, 2011.

samples from Uruguay, New Zealand, and Australia, all of which export beef to the United States.³ Beef cattle are a natural reservoir for STECs and meat can become contaminated during the slaughter process.

The Obama Administration has rightly identified prevention as a cornerstone of its approach to food safety. FSIS' decision to declare these six additional STEC strains as adulterants in non-intact raw beef products and product components is an appropriate preventive strategy to address these harmful pathogens. FSIS' goal should always be preventing illnesses, rather than waiting and reacting after illnesses have occurred. The agency's decision on *E. coli* O157:H7 spurred research and development into new methods of eliminating these pathogens from the food supply and has resulted in fewer illnesses and deaths. There is every reason to believe that a preventive approach to the other pathogenic STECs will also advance public health protection.

We appreciate the Administration's focus on reducing the burden of foodborne illness on consumers. We respectfully urge you to not delay implementation of this important public health measure.

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 (formerly S.T.O.P. – Safe Tables Our Priority)

United Food & Commercial Workers International Union

³ Bosilevac JM, Guerini MN, Brichta-Harhay DM, Arthur TM, Koohmaraie M, "Microbiological Characterization of Imported and Domestic Boneless Beef Trim Used for Ground Beef." *Journal of Food Protection*, 70(2), 2007, p. 440-449.