

September 2, 2021

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 coalition of food safety leaders, including public health and consumer advocates, scientists, and members of the food industry, request a meeting with you to discuss the United States Department of Agriculture's (USDA) regulatory approach to ensuring the safety of poultry.

Foodborne pathogens remain a significant threat to public health in the United States, sickening millions of Americans annually. *Salmonella* and *Campylobacter*, which are commonly found in poultry, account for over 70% of all foodborne illnesses tracked by the Centers for Disease Control and Prevention. Annually, these two pathogens cause approximately 3 million illnesses in the U.S. and cost over 6 billion dollars.

In 2010, the Department of Health and Human Services (HHS) included foodborne illness reduction in its Healthy People 2020 national public health goals, setting targets for lower *Salmonella* and *Campylobacter* illness rates. Unfortunately, these target rates were not met. Rather, recent surveillance data indicate that the rates did not decrease from 2010 to the present and have been persistently high for the last 20 years. Last year, HHS released the Healthy People 2030 goals and again included both *Salmonella* and *Campylobacter* illness rate targets, but they are essentially the same as in the 2020 goals. A better approach to meet these goals is needed.

While progress on reducing foodborne illness has been at a standstill, scientific knowledge of *Salmonella* has greatly increased and recognized best practices for *Campylobacter* and other pathogens have advanced. Science tells us that current performance standards do not effectively target the particular types of *Salmonella* and the levels of bacteria that pose the greatest risks of illness, and the overall regulatory framework does not adequately harness modern tools for preventing and verifying control of the bacteria that are making people sick.

This combination of stagnant illness rates, outdated USDA food safety standards and policies, and increasing scientific knowledge has led the undersigned parties to unite behind the following conclusions and principles:

- While current prevalence-based pathogen reduction performance standards are leading to reduced *Salmonella* levels in products, the performance standard method is broken and the standards are not producing the desired public health outcomes.
- Modernized standards should be objective, risk-based, achievable, enforceable, and flexible enough to adapt to emerging evidence and the latest science. Modernized standards should not stifle innovation. Instead, they should invite innovation and technology development.
- While the USDA Food Safety and Inspection Service (FSIS) cannot directly regulate food safety practices on the farm, a modernized Hazard Analysis and Critical Control Point (HACCP) framework should address risk reduction across the full production process from raw material to

finished packaging, including defining the responsibility of poultry processors to consider pre-harvest practices and interventions in their HACCP plans and verify that suppliers of live birds have implemented scientifically appropriate risk-reduction measures in accordance with modern best practices.

- *Salmonella* and *Campylobacter* should be addressed in parallel but separate proceedings as larger knowledge gaps exist for *Campylobacter* than *Salmonella* and different timelines and risk mitigation approaches may be necessary. The coalition strongly encourages USDA to review and reinvigorate programs around *Salmonella* that exist within the National Poultry Improvement Plan.
- While the science has advanced sufficiently to support regulatory improvements today, ongoing research is also needed to support continued progress towards reducing *Salmonella* and *Campylobacter* moving forward, including epidemiologic data and analysis to improve attribution of illness to specific commodities and products.

In order to finally make public health progress on *Salmonella* and *Campylobacter* illnesses and meet the Healthy People 2030 targets, significant change in the FSIS regulatory program is needed, guided by these principles.

We would appreciate the opportunity to meet with you to ensure that USDA prioritizes making meaningful changes in food safety regulation and policy.

Sincerely,

Mitzi D. Baum
Chief Executive Officer
Stop Foodborne Illness

Scott Brooks
Senior Vice President
Food Safety & Quality Assurance
Tyson Foods

Amanda Craten
Mother of *Salmonella* Illness Survivor
Gilbert, Arizona

David Clubb
Salmonella Illness Survivor
Houston, Texas

Scott Faber
Senior Vice President
Government Affairs
Environmental Working Group

Dianna Goodpasture
Salmonella Illness Survivor
Barberton, Ohio

Mary Graba
Campylobacter Illness Survivor
Dayton, Minnesota

Thomas Gremillion
Director of Food Policy
Consumer Federation of America

Craig W. Hedberg
Professor and Interim Division Head
Division of Environmental Health Sciences
University of Minnesota

Alice Johnson
Senior Vice President
Food Safety
Butterball LLC

Melissa and Ruby Lee
Mother and *Salmonella* Illness Survivor
Sandy, Oregon

Jerold R. Mande
Senior Advisor to the President
Center for Science in the Public Interest
Former USDA Deputy Under Secretary, Food
Safety

Steven Mandernach
Executive Director
Association of Food and Drug Officials

Bryan Miller
Vice President
Quality Assurance and Food Safety
Wayne Farms LLC

J. Glenn Morris, Jr.
Professor and Director
Emerging Pathogens Institute
University of Florida

Michael Robach
Chief Executive Officer
The Robach Group LLC

Brian Ronholm
Director of Food Policy
Consumer Reports
Former USDA Deputy Under Secretary, Food
Safety

Sarah Sorscher
Deputy Director
Regulatory Affairs
Center for Science in the Public Interest

Bruce Stewart-Brown
Senior Vice President
Technical Services and Innovation
Perdue Farms

Michael R. Taylor
Board Member
Stop Foodborne Illness
Former USDA FSIS Administrator and Acting
Under Secretary for Food Safety

Martin Wiedmann
Professor, Food Science
Cornell University