

April 8, 2025

The Honorable Brooke Rollins
Secretary
United States Department of Agriculture
1400 Independence Ave S.W.
Washington, DC 20250

Dear Secretary Rollins,

As a coalition of consumer, industry and public health stakeholder groups with a vested interest in food safety, nutrition and chronic disease, we urge you to reinstate the U.S. Department of Agriculture's (USDA) National Advisory Committee on Microbiological Criteria for Foods (NACMCF) and National Advisory Committee on Meat and Poultry Inspection (NACMPI).

The NACMCF, established by the Reagan Administration in 1988, provides impartial, scientific advice and recommendations to USDA on microbiological and public health issues relative to the safety of the U.S. food supply^[1] while NACMPI, established by the Nixon Administration in 1971, advises on matters affecting federal and state inspection program activities.^[2]

Over their decades of operation, both committees have had substantial and lasting impacts on food safety policy, regulatory effectiveness, industry practices, and consumer protection. Notably:

- **NACMCF** provided foundational scientific guidance leading to the adoption of the **Hazard Analysis and Critical Control Point (HACCP)** system, now the cornerstone for preventive food safety across industries. This has significantly reduced outbreaks linked to pathogens such as **E. coli O157:H7, Salmonella, and Listeria monocytogenes**, protecting millions of American consumers annually. Additionally, NACMCF's guidance on pathogen testing protocols, microbial risk assessment, and microbiological standards has directly enhanced regulatory effectiveness and industry practices nationwide.
- **NACMPI** has played an instrumental role in strengthening inspection processes, leading to substantial improvements in meat and poultry safety oversight. For example, its recommendations informed USDA's regulatory updates on inspection modernization, significantly decreasing contamination rates in poultry products and driving down the incidence of foodborne illnesses. NACMPI's input has also facilitated more streamlined federal-state inspection coordination, leading to more effective resource allocation and greater consumer protection.

These advisory committees are comprised of volunteer representatives from across the stakeholder spectrum -- industry, consumers, public health, academia -- who provided impartial, scientific advice and recommendations to USDA, the FDA, and the CDC. According to one reference, the budget for NACMCF is \$225,000 and NACMPI is \$75,000, and the return on investment to the American taxpayer is enormous.

For decades, the work of NACMCF has been widely influential and referenced within many other documents, policies and programs. Regardless of the questions posed to the Committee by the federal agencies, the committees have been responsive and thorough, working quickly, transparently, and analyzing science as the basis of the committee reports. The vetting process for

NACMCF and NACMPI members is rigorous, ensuring appropriate range of perspectives to avoid the undue influence of any particular stakeholder group. These principles: reliance on science over politics, transparency, and efficiency- are consistent with the Administration's priorities. The void left by the absence of these committees will limit our public health and food safety agencies from responding to future crises or, better yet, preventing them from happening in the first place.

Given their substantial contributions and minimal relative costs, we strongly encourage you to reinstate both NACMCF and NACMPI promptly. Doing so will help USDA, FDA, and CDC continue their critical missions to safeguard the U.S. food supply and protect public health.

Thank you for your consideration.

Respectfully submitted,

Alliance for Recall Ready Communities
American Frozen Food Institute
Antibiotic Resistance Action Center (at GWU)
Center for Environmental Health
Center for Food Safety
Center for Science in the Public Interest
Consumer Brands Association
Consumer Federation of America
Consumer Reports
Food & Water Watch
Food Animal Concerns Trust
Friends of the Earth
Government Accountability Project
Institute for Food Safety & Nutrition Security (at GWU)
International Association for Food Protection
International Dairy Foods Association
National Consumers League
National Pasta Association
National Turkey Federation
NSF
Public Interest Research Group
Recall InfoLink
San Francisco Bay Physicians for Social Responsibility
STOP Foodborne Illness

Dr. Darin Detwiler
Bill Marler
Dr. Susan Mayne
Dr. Jennifer McEntire
Sharon Natanblut
Dr. Stephen Ostroff
Michael Taylor

Cc: Mr. Kyle Diamantas, FDA
Dr. Donald Prater, FDA
Dr. Megin Nichols, CDC

[1] "National Advisory Committee on Microbiological Criteria for Food (NACMCF).

<https://www.fsis.usda.gov/policy/advisory-committees/national-advisory-committee-microbiological-criteria-foods-nacmcf>

[2] <https://www.fsis.usda.gov/policy/advisory-committees/national-advisory-committee-meat-and-poultry-inspection-nacmpi>