

Congress of the United States
Washington, DC 20515

September 3, 2015

The Honorable Brian Ronholm
Chair, National Advisory Committee on Microbiological Criteria for Foods
Acting Under Secretary for Food Safety
U.S. Department of Agriculture
Room 227-E
1400 Jefferson Drive, SW
Washington, DC 20250

Dear Chairman Ronholm,

We welcome the National Advisory Committee on Microbiological Criteria for Foods (NACMCF) meeting on Effective Salmonella Control Strategies for Poultry. As the latest *National Antimicrobial Resistance Monitoring System for Enteric Bacteria (NARMS)* report shows, the contamination of poultry products with *Salmonella* is unacceptably high and has remained relatively unchanged over the previous decade. The high incidence of contamination and the numerous foodborne disease outbreaks linked to poultry products make it clear that current *Salmonella* control strategies are less than effective. New approaches are long overdue.

As the NACMCF considers how to move forward the Food Safety Inspection Service (FSIS) must demonstrate to producers, and consumers, that it is serious about ensuring the microbial safety of poultry products. One way to do this is to make clear that *Salmonella*, *Campylobacter* and any multidrug resistant pathogens are adulterants and that contaminated products will be subject to recall. Investigations into recent outbreaks have made clear that additional consumers were exposed to food borne illness when the USDA ignored the advice of local food safety officials and delayed action to recall contaminated products. Continued reluctance to recall contaminated products will undermine efforts to institute stricter *Salmonella* controls.

We urge the Committee to consider any proposed interventions in the context of multi-drug resistant strains of bacteria. Over 20 percent of isolates from poultry are routinely resistant to 3 or more classes of antibiotics. Figure 8 of the recent NARMS report shows that the percentage of isolates which are multidrug resistant increases as meat moves from the farm to the table; indicating that current control strategies are least effective at killing the pathogens we most need to keep away from consumers. Recent research from Harvard Medical School has shown that antibiotic resistance also increases bacterial fitness and virulence. Taken together these observations suggest it is time to reconsider the reliance on antibiotics in the poultry production system and also implement control strategies specifically effective against multi-drug resistant bacteria.

We cannot continue to shift the burden of prevention onto consumers particularly when some strains of *Salmonella* are known to be heat resistant and may not be killed by regular home cooking. Keeping *Salmonella* out of the food supply is a better approach than relying on processing steps to reduce the bacterial load. We know bacteria spread easily between food animals and their environment. To that end, the committee should go beyond the processing plant and consider control steps throughout the production environment. The country of Denmark has rid *Salmonella* from its entire chicken flock through aggressive control efforts, in part by focusing on a bottom up approach including better on-farm sanitation and improved barn design. Unless the U.S. adopts a similar strategy we must rely on much more aggressive monitoring and enhanced biosecurity.

This Committee has a Congressional mandate to provide evidence-based scientific advice to our federal food safety agencies to inform the development of an integrated national food safety systems approach to protect public health. We look forward to working with you to ensure we accomplish the goal to improve and preserve public health and the integrity of our food safety system.

Sincerely,



Louise M. Slaughter
Member of Congress



Rosa L. DeLauro
Member of Congress

cc: Dr. Susan T. Mayne