

Congress of the United States
Washington, DC 20515

March 13, 2014

The Honorable Mr. Brian Ronholm
Acting Under Secretary for Food Safety
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250-3700

Dear Acting Under Secretary Ronholm,

We are deeply concerned with the *Salmonella* Action Plan that the Food Safety and Inspection Service (FSIS) is planning to implement. The Action Plan's first and most important provision is the implementation of poultry slaughter modernization, but substantial concerns have been raised about the proposal and there is a conspicuous lack of evidence that the proposed changes will reduce foodborne pathogens. Considering the paucity of data and lack of comprehensive, external peer review, we are not convinced that this plan will either reduce *Salmonella* infection or promote public health.

The poultry slaughter modernization proposal is based on the HACCP Inspection Models Project (HIMP), and no data collected over the 15 year run of this project demonstrate any reduction in foodborne pathogens like *Salmonella* or *Campylobacter*. Other studies cited by FSIS have suggested a reduction in *Salmonella* when more offline, microbial testing is performed. However, there are no provisions in the modernization plan mandating microbial testing for *Salmonella* and *Campylobacter*, the two pathogens most commonly associated with raw poultry. Moreover, the proposed reductions in total numbers of inspectors belie the implication that there will be increased microbial testing. As USDA explores the very commonsense measure of increased scrutiny on chicken parts, which are consumed more often by Americans than whole carcasses, it is essential that effective, trained employees are retained for this purpose.

In 2013, CDC issued the report, *Antibiotic Resistance Threats in the United States*, and stated that two million Americans are sickened with antibiotic resistant pathogens each year, directly resulting in about 23,000 deaths. In fact, world health leaders "have described antibiotic resistant microorganisms as 'nightmare bacteria' that 'pose a catastrophic threat' to people in every country in the world."^[1] Further, the report organizes the threats into categories – urgent, serious and concerning – with *Salmonella*

^[1] Centers for Disease Control and Prevention. Antibiotic Resistance Threats in the United States, 2013. Accessed February 26, 2014 at: <http://www.cdc.gov/drugresistance/threat-report-2013/pdf/ar-threats-2013-508.pdf>.

appearing twice in the serious category and *Campylobacter* appearing once. The report continues to say that serious threats “will worsen and may become urgent without ongoing public health monitoring and prevention activities.”¹ Any modernization plan must include direct provisions to reduce the amounts of these pathogens in our food supply, not simply leave it to industry to set its own standards.

Another pernicious aspect of the plan is the increase in allowable line speeds at processing facilities. There is no evidence that the proposed increase in allowable line speeds at poultry processing plants will not be damaging to the health and welfare of the plant employees or FSIS inspectors, nor is there evidence that an increase in line speeds would promote food safety or public health. The National Institute for Occupational Safety and Health (NIOSH) released a preliminary report in 2013 on worker health in non-HIMP plants that showed that 42% of workers already have symptoms of carpal tunnel syndrome. Increasing line speeds can only make this worse.

In conclusion, we encourage USDA to halt implementation of poultry modernization until the following issues are addressed:

1. Each proposed change must be assessed independently and scientifically to identify its effects.
2. USDA must document and make public the number of microbial tests performed per bird; the impact of the frequency and specific type of off-line inspection can then be assessed with regard to microbial load.
3. There must be system-wide requirements for the testing of *Salmonella* and *Campylobacter* in poultry plants.
4. USDA has already collected data on the microbial contamination of chicken parts. Instead of waiting for industry to collect its own version of the same data and to implement its own, unenforceable standards, USDA must implement its own performance standards on chicken parts as soon as possible.

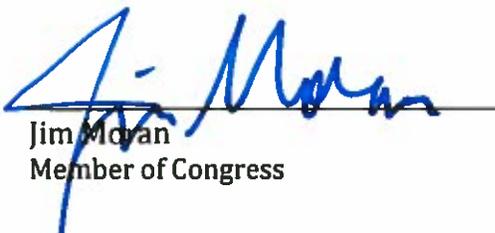
Sincerely,



Louise M. Slaughter
Member of Congress



Rosa DeLauro
Member of Congress



Jim Moran
Member of Congress



Madeleine Z. Bordallo
Member of Congress



Tony Cardenas
Member of Congress



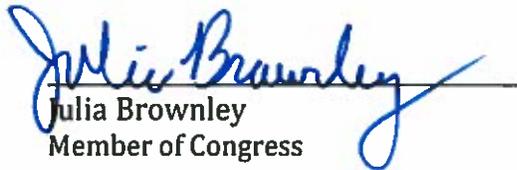
Raul M. Grijalva
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