

March 25, 2015

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

Dear Secretary Vilsack:

According to the World Health Organization, the fight against antibiotic resistance is one of the most pressing public health issues facing the nation today and the Centers for Disease Control and Prevention estimates that resistant *Salmonella* from contaminated food causes 100,000 illnesses annually. President Obama has called for investing more than \$1.2 billion next year into research on antimicrobial resistance, and while this funding will provide momentum for identifying solutions, little is being done to protect consumers from the immediate impact of foodborne illnesses and deaths caused by antibiotic resistant *Salmonella*.

The undersigned organizations urge you to grant the petition (No. 14-06) to designate four strains of antibiotic resistant *Salmonella* as adulterants on both meat and poultry. The Center for Science in the Public Interest (CSPI) submitted the petition October 1, 2014, based on new information and continuing outbreaks linked to antibiotic resistant *Salmonella*. Since the original petition was filed by CSPI in 2011, several new outbreaks were linked to ground poultry and poultry parts, causing 800 illnesses. One outbreak went on continuously for 18 months due to the lack of an effective recall policy.

CSPI's petition asks the Food Safety and Inspection Service (FSIS) at USDA to recognize antibiotic resistant *Salmonella* as an adulterant under the Federal Meat Inspection Act and the Poultry Products Inspection Act. The 2014 petition addresses information gaps that led FSIS to deny the 2011 CSPI petition, and lays out a clear legal basis for taking the specific actions requested. Relatedly, we encourage USDA to issue broader adulteration declarations if additional antibiotic resistant strains are known to have caused human disease.

Favorable action on the CSPI petition will give USDA appropriate tools to recall products during an outbreak in order to reduce the number of illnesses and deaths from the four antibiotic resistant *Salmonella* strains most frequently associated with outbreaks. It will do this by making it illegal to market contaminated meat and poultry, but more importantly by giving FSIS leverage to demand a recall when contaminated product is found in an establishment rather than having to wait for reports of illnesses and completed epidemiological investigations, as is currently the practice.

We respectfully request that you consider our comments in your review of the petition and ask that USDA render a favorable decision in the interest of protecting consumers from antibiotic resistant *Salmonella* in the meat and poultry supply.

Food and Animal Concerns Trust (FACT)

Keep Antibiotics Working (KAW)

Natural Resources Defense Council (NRDC)

Waterkeeper Alliance