

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This combination of stagnant illness rates, outdated USDA food safety standards and policies, and increasing scientific knowledge has led the undersigned parties to unite behind the following conclusions and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

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