



UNITED STATES ANIMAL HEALTH ASSOCIATION

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November 21, 2013

Honorable Tom Vilsack
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack:

The United States Animal Health Association (USAHA), this nation's premier animal health forum since 1897, approved the following resolutions requesting involvement from the U.S. Department of Agriculture. The resolutions were approved during its 117th Annual Meeting in San Diego, Calif. Copies of both resolutions are enclosed.

2013 Resolutions:

- Resolution 16: "National Review of Research Needs for Chronic Wasting Disease"
- Resolution 17: "Objection to Salmonella Linked to Human Illnesses Being Declared Adulterants"

USAHA is a science-based, voluntary organization of official state and federal animal health agencies, national allied organizations, regional representatives and individual members founded to protect animal and public health. USAHA serves as a forum for communication and coordination among state and federal governments, universities, industry and other groups on issues of animal health and disease control, animal welfare, food safety and public health.

USAHA appreciates your consideration of these Resolutions. Please let us know of any questions, concerns, or additional support we may provide. We respectfully request a response to this matter in a timely manner. We thank you for the leadership of USDA and the opportunity to provide collaborative input.

Sincerely,

Stephen K. Crawford, DVM
President, USAHA

118th Annual Meeting
Oct. 16-22, 2014
Kansas City, MO



UNITED STATES ANIMAL HEALTH ASSOCIATION

2013 RESOLUTION

117TH ANNUAL MEETING

OCTOBER 17-23, 2013.- SAN DIEGO, CA

RESOLUTION NUMBER: 16 - APPROVED

**SOURCE: COMMITTEE ON CAPTIVE WILDLIFE AND
ALTERNATIVE LIVESTOCK**

**SUBJECT MATTER: NATIONAL REVIEW OF RESEARCH NEEDS FOR
CHRONIC WASTING DISEASE**

BACKGROUND INFORMATION:

In the absence of an approved live animal test, vaccine, or recognition of genetically resistant animals, depopulation and indemnity of the herd mates is our only method of prevention to stop the spread of Chronic Wasting Disease (CWD) to other animals.

A Federal CWD Rule has been implemented with the purpose of controlling the spread of CWD versus eradication. To insure a successful program more tools are needed to manage this disease.

RESOLUTION:

The United States Animal Health Association (USAHA) requests that the United States Department of Agriculture, and United States Department of Interior arrange a diversified blue-ribbon panel (including: industry stakeholders, university and federal researchers, Federal and State regulatory agencies) to determine research needs and identify and prioritize intervention strategies for the control of Chronic Wasting Disease.



UNITED STATES ANIMAL HEALTH ASSOCIATION

2013 RESOLUTION

117TH ANNUAL MEETING

OCTOBER 17-23, 2013 - SAN DIEGO, CA

RESOLUTION NUMBER: 17 and 18 Combined - APPROVED

**SOURCE: COMMITTEE ON SALMONELLA
COMMITTEE ON TRANSMISSIBLE DISEASES OF
POULTRY AND OTHER AVIAN SPECIES**

**SUBJECT MATTER: OBJECTION TO SALMONELLA LINKED TO HUMAN
ILLNESSES BEING DECLARED ADULTERANTS**

BACKGROUND INFORMATION:

In May 2011, The Center for Science in the Public Interest (CSPI) petitioned the United States Department of Agriculture (USDA), Food Safety Inspection Service asking them to declare antibiotic-resistant strains of *Salmonella Heidelberg* in ground meat and ground poultry products as adulterants. On October 17, 2013, CSPI, as part of a coalition of consumer activist groups (collectively known as the Safe Food Coalition), submitted a letter to Mr. Tom Vilsack, Secretary of the USDA, urging him to immediately act on the 2011 CSPI petition, but to expand it so as to declare *all Salmonella serotypes linked to human illness* as adulterants when found in *all poultry products* (including raw intact poultry meat and bone-in parts).

Because there are more than 2400 different serotypes of *Salmonella* officially recognized and because human virulence or pathogenicity and antimicrobial resistance determinants are not readily identifiable, this request would effectively result in *all or nearly all Salmonella* isolates being declared adulterants in poultry products that are intended to be fully cooked before being consumed. This action would likely lead to a crippling economic burden on the poultry industry resulting in a reduced supply of poultry meat and increased food cost to the consumer with little to no demonstrable reduction in salmonellosis rates nationwide.

The salmonellosis burden in the United States is not solely attributable to consumption of raw poultry meat, but can also be contracted from consuming a wide variety of fruits, vegetables, eggs, pork, beef, and even some processed food products as diverse as peanut butter, dry dog food, scraped tuna, and tahini sesame paste along with exposure to pet dogs, cats, hedgehogs, reptiles (turtles, water frogs and African dwarf frogs) and mail order chicks and ducklings. [Ref: <http://www.cdc.gov/salmonella/outbreaks-2013.html>]

In January 2013, the Centers for Disease and Prevention (CDC) released an analysis of the reported foodborne illness cases in the Foodborne Disease Outbreak Surveillance System during 2009 – 2010. The pathogen-commodity pairs responsible for the most

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2013 RESOLUTION 17 & 18 COMBINED (PAGE 2)

outbreak-related illnesses reported to CDC in 2009 – 2010 were *Salmonella Enteritidis* and eggs followed by *Salmonella sp.* in sprouts and *Salmonella sp.* in vine-stalk vegetables. *Salmonella sp.* in poultry meat was not identified as a significant contributor to the overall salmonellosis rate.

[Ref: CDC MMWR Vol 62 No 3 January 25, 2013 *Surveillance For Foodborne Disease Outbreaks – United States, 2009 - 2010*].

Therefore, unilaterally imposing such a draconian measure on the poultry industry alone creates an unfair economic burden that will likely result in little public health benefit.

RESOLUTION:

The United States Animal Health Association urges the United States Department of Agriculture to refrain from declaring any serotype of *Salmonella* an adulterant of raw poultry meat products, intact or ground, because this action is scientifically unwarranted and unlikely to result in measurable reductions in the national salmonellosis burden.

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Secretary of Agriculture
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