

December 1, 2016

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

Dear Secretary Vilsack:

We, as scientists who study diet and health, are writing in support of the Center for Science in the Public Interest's (CSPI) petition for a label that warns consumers that frequent consumption of processed meat, such as bacon, hot dogs, and ham, increases the risk of developing colorectal cancer.¹ The suggested label would state:

USDA Warning: Frequent consumption of processed meat and poultry products may increase your risk of developing cancer of the colon and rectum. To protect your health, limit your consumption of such products.

The petition is based in part on the large body of research reported on in the International Agency for Research on Cancer (IARC, a division of the World Health Organization) monograph evaluating the carcinogenicity of consumption of red and processed meat.² In October 2015, IARC classified processed meat as being "carcinogenic to humans."³ IARC's conclusion was preceded by advice to consumers from other leading cancer authorities, including the American Cancer Society⁴ and World Cancer Research Fund International,⁵ to reduce consumption of processed meat because it is associated with an increased risk of cancer.

People want clear and accurate information about potential health hazards in the foods they eat to help them make wise choices at the grocery store and restaurants. Food that is associated with cancer risks is certainly a matter of great public concern. Research reviewed by IARC indicates that consuming 50 grams per day of processed meat is associated with an 18 percent increased risk of developing colorectal cancer.⁶ That level

¹ Center for Science in the Public Interest. Petition requesting FSIS to issue a label on processed meat. 2016.

² International Agency for Research on Cancer. Volume 114: Consumption of red meat and processed meat. IARC Working Group. Lyon; 6–13 September, 2015. IARC Monogr Eval Carcinog Risks Hum (in press). Press release. Oct. 26, 2015. https://www.iarc.fr/en/media-centre/pr/2015/pdfs/pr240_E.pdf

³ Bouvard V, Loomis D, Gyton KZ, Grosse Y, et al, Carcinogenicity of consumption of red and processed meat. The Lancet. 2015;16:1,599-1,600.

⁴ Kushi LH, Doyle C, McCullough M, et al. American Cancer Society guidelines on nutrition and physical activity for cancer prevention. CA Cancer J Clin. 2012;62:30–67.

⁵ World Cancer Research Fund International. Our cancer prevention Recommendations: animal foods. [cited 2016 Oct 28]. Available from <http://www.wcrf.org/int/research-we-fund/cancer-prevention-recommendations/animal-foods>.

⁶ Doris S, Chan M, Lau R, et al. Red and processed meat and colorectal cancer incidence: meta-analysis of prospective studies. PLoS ONE 2011;6(6): e20456. doi:10.1371/journal.pone.0020456.

of risk is highly significant as it may have contributed to as many as 5,000 deaths from colorectal cancer in the United States in 2015.⁷

The federal government has an obligation to inform the public about risky foods, such as processed meats, and ways to mitigate those risks. The causes of many cancers are unknown or unavoidable. However, here epidemiological studies have identified a clear-cut cause of thousands of cases of colorectal cancer annually and the prevention measure that people could take to reduce their risk. USDA, in its important public health role, has the jurisdiction and authority to require a label informing the public about this risk. For example, USDA has used its authority to protect public health by requiring labels warning about pathogenic bacteria on meat and poultry products⁸ and risks associated with mechanically tenderized beef.⁹ The CSPI petition requests that USDA take similar action with regard to processed meat, which poses a much greater risk.

Please give the petition submitted by CSPI your careful attention and consider acting on its request for a label on processed meat that informs the public about the risk of developing colorectal cancer from its frequent consumption and how to mitigate that risk.

Sincerely,

(Affiliations listed for identification purposes only.)

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⁷ Institute for Health Metrics and Evaluation (IHME). GBD Compare Data Visualization. Seattle, WA: IHME, University of Washington, 2016. Available from <http://vizhub.healthdata.org/gbd-compare>.

⁸ Food Safety and Inspection Service (US). Mandatory safe handling statements on labeling of raw meat and poultry products. Fed. Reg. 1994;59(59):14,528-14,540.

⁹ Food Safety and Inspection Service (US). Descriptive designation for needle- or blade-tenderized (mechanically tenderized) beef products. Fed Reg. 2015;80(95):28,153-28,172.

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