Consumers Union
POLICY & ACTION FROM CONSUMER REPORTS

November 27, 2012

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

Dear Secretary Vilsack:

We are writing to inform you of new findings on pathogens in pork products appearing in the January 2013 issue of *Consumer Reports*, released today, and to request that the United States Department of Agriculture's Food Safety Information Service (USDA/FSIS) take action to limit *Yersinia enterocolitica* contamination in pork. Specifically, we request that USDA/FSIS consider setting a performance standard for *Y. enterocolitica* in pork and requiring companies to include it in their Pathogen Reduction Hazard Analysis of Critical Control Point (PR/HACCP) plans. We urge USDA/FSIS to test *Y. enterocolitica* in the next Nationwide Market Hog Microbiological Baseline Survey (MHBS), to determine its prevalence, preliminary to setting a performance standard for *Y. enterocolitica*.

Consumer Reports tested some 198 pork chop and ground-pork samples, purchased at retail from six U.S. cities, for four pathogens: *Staphylococcus aureus*, *Salmonella*, *Listeria monocytogenes*, and *Y. enterocolitica*; and for one indicator organism, *Enterococcus*. More than two-thirds of these samples -- 69% -- tested positive for *Y. enterocolitica*.[1] As you know,*Y. enterocolitica* is a pathogen that causes an estimated 97,000 illnesses, called yersiniosis, annually, according to Centers for Disease Control and Prevention (CDC), and particularly affects children.[2] The large majority of these illnesses are associated with pork, particularly raw or undercooked pork.[3] Both the ground pork (74%) and pork chops (68%) we tested were contaminated with *Y. enterocolitica*.

Our testing also found *Salmonella*, *Staphylococcus aureus* and *Listeria monocytogenes* in 3 to 7 percent of the samples. *Salmonella* was twice as prevalent as that estimated by the USDA in its most recent MHBS.

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[1] Consumer Reports. 2013. What's in that pork? *Consumer Reports*, January, 2013. At: http://www.consumerreports.org/cro/pork0113.htm

[2] Table 2, pg. 11 in Scallan E, Hoekstra RM, Angulo FJ, Tauxe RV, Widdowson M-A, Roy SL, Jones JL and PM Griffin. 2011. Food borne illness acquired in the United Sates—Major Pathogens. *Emerging Infectious Diseases*, 17(1): 7-15. At: http://wwwnc.cdc.gov/eid/article/17/1/p1-1101_article.htm

[3] Sreedharan A, Jones C and K Schneider. 2012. *Preventing Foodborne Illness: Yersiniosis.* Publication #FSHN12-09. At: http://edis.ifas.ufl.edu/fs193

Our data demonstrating widespread occurrence of *Y. enterocolitica* in pork products suggests it may be more of a problem than previously thought. Adding urgency to this problem is the fact that 121 of the 132 samples, or more than 90 percent, that tested positive for *Y. enterocolitica* were also resistant to one or more antibiotics, with over 39 percent (52 of 132) being resistant to two or more clinically important antibiotics. Thus, these bacteria are serving as a source of multiple antibiotic resistance genes and may potentially spread antibiotic resistance, ultimately making infections more difficult to treat in humans.

We note that USDA/FSIS had previous determined that *Y. enterocolitica* was a pathogen and had originally included it in their planned 2010 Nationwide MHBS. As noted in the original study design, the "2010 MHBS will screen for *Salmonella sp*., *C. jejuni*, *C. coli*, and ***Yersinia enterocolitica*, because the transfer of these pathogens may occur to the carcasses or other surfaces during slaughter**"[4] (emphasis added). However, when the final 2010 MHBS was actually carried out, the only pathogen tested for was *Salmonella* sp.[5]; no reason was given for omitting *Y. enterocolitica*. We urge that it be included in the next MHBS. In addition, FSIS should test for the pathogenic strains of *Y. enterocolitica*.[6]

We also urge the USDA to require companies to test for *Y. enterocolitica* as part of their PR/HACCP program, and for USDA/FSIS to develop a performance standard, if need be, for *Y. enterocolitica*. As part of developing a performance standard, USDA/FSIS should include testing for *Y. enterocolitica*, including pathogenic strains, in the next MHBS.

We urge you to take action to address this issue. Please let us know how we may assist you in your efforts.

Sincerely,

Michael Hansen, PhD
Senior Scientist

Urvashi Rangan, PhD
Director of Consumer Safety and Sustainability

[4] Pg. 7 in USDA/FSIS. 2010. FSIS Nationwide Market Hogs Microbiological Baseline Data Collection Program, Study Design for Technical Consultation. August 2011[sic; should be dated 2010]. 32 pp. At: http://www.fsis.usda.gov/PDF/Baseline_Data_Market_Hogs_Study_Design.pdf

[5] Pg. 7 in USDA/FSIS. 2012. The Nationwide Microbiological Baseline Data, Collection Program: Market Hogs Survey, August 2010 – August 2011. 33 pp. At: http://www.fsis.usda.gov/PDF/Baseline_Data_Market_Hogs_2010-2011.pdf

[6] Lambertz ST and M-L Danielsson-Tham. 2005. Identification and characterization of pathogenic *Yersinia enterocolitica* isolates by PCR and pulsed-field gel electrophoresis. *Applied and Environmental Microbiology*, 71(7): 3674-3681. At: http://aem.asm.org/content/71/7/3674.full.pdf