

April 30, 2013

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

Dr. Elisabeth Hagen, Undersecretary for Food Safety
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Secretary Vilsack and Dr. Hagen:

We are writing regarding the findings of a new *Consumer Reports* study of bacteria in ground turkey, which is being released on April 30, 2013 (see "Talking Turkey" in the June issue, <http://www.consumerreports.org/turkey0613>).

As you know, food borne illness from meat and poultry remains a serious problem in the United States. The health consequences of disease-causing organisms in meat and poultry are exacerbated by antibiotic resistance. Resistance can complicate efforts to treat foodborne illnesses. We commend the U.S. Department of Agriculture (USDA) for issuing a notice last December requiring Hazard Analysis and Critical Control Point (HACCP) Plan Reassessment to address salmonella in ground chicken and turkey products. However additional action is still needed.

Based on *Consumer Reports'* new ground turkey test findings, comparable to previous government findings, we are urging USDA to make several changes to its food safety regulations in order to better protect consumers. First, we urge USDA to reduce significantly its current performance standard ("passing" rate) of 49.9 percent contamination allowed in salmonella sets at ground turkey producing establishments, to 12 percent.

In addition, to further protect public health we urge the agency to classify as adulterants (1) any salmonella serotype that has been previously implicated in a disease outbreak and is antibiotic resistant; and (2) methicillin-resistant staphylococcus aureus. We found both in our tests. USDA should require companies to determine if these contaminants are currently present at their facilities and if so, to immediately address them in their HACCP plans.

Why *Consumer Reports* Tested Ground Turkey

As you are well aware, in 2011, USDA announced the recall of 36 million pounds of ground turkey produced at the Cargill Springdale, Arkansas facility, due to contamination

with salmonella resistant to four antibiotics. A total of 136 illnesses and one death were attributed to this outbreak. Prompted by this outbreak, *Consumer Reports* undertook a ground turkey test project in 2012.

***Consumer Reports* Test Results**

Consumer Reports' testing found very high levels of bacterial contamination in the turkey tested. The 257 turkey samples were purchased at retail in 21 states and included 27 brands. The samples were produced in 15 different USDA regulated establishments. We found the following four bacteria in these samples (percent contaminated in parenthesis): enterococcus (69%) generic e. coli (60%), staphylococcus (staph) aureus (15%) and salmonella (5%). We also tested for campylobacter but found none. Overall, 90 percent of the samples were contaminated with one or more of the bacteria for which we tested.

As you know, none of these bacteria are presently prohibited in ground turkey, or in any other meat and poultry. Salmonella and staph aureus are also classified by the U.S. Centers for Disease Control and Prevention as two of the leading causes of foodborne illness. E. coli and enterococcus are indicative of fecal contamination and can cause diseases such as urinary tract infections.

USDA has begun taking some steps to combat salmonella in ground turkey, for which we commend the agency. Consumers Union, the public policy and advocacy division of *Consumer Reports*, recently commented on the agency's December 6, 2012 Federal Register notice¹ informing ground turkey producers that they must reassess their HACCP plans regarding salmonella control.

Although the docket for this proposal closed on April 20, 2013, our findings on ground turkey are directly relevant to USDA's deliberations on HACCP plans for ground poultry products. We therefore respectfully request that they be taken into consideration. With this letter we are providing supporting materials, including additional details on our test results (See <http://www.consumerreports.org/turkey0613>).

USDA Should Reduce Its Salmonella Standard from 49.9 to 12 Percent

As you know, the current USDA performance standard for salmonella in ground turkey is 49.9 percent contaminated. This standard is based on industry averages from a decade ago. National Antimicrobial Resistance Monitoring System (NARMS) data indicate that the industry average is now approximately 12 percent, and our tests found an even lower prevalence of salmonella. We support the plan, detailed in the agency's December 6, 2012 HACCP Plan Reassessment proposal, to set a new performance standard. We believe this should be no more than 12 percent of samples contaminated in a salmonella set. Based both on NARMS data and our own test results, it appears industry should easily be able to meet this standard.

¹ "HACCP Plan Reassessment for Not-Ready-to-Eat Ground or Comminuted Poultry Products and Related Agency Verification Procedures," Docket ID: FSIS-2012-0007.

Companies Should Test for Salmonella Serotypes and Antibiotic Resistance

USDA suggests in its December 6 notice that establishments producing ground turkey should consider identifying the serotype for any salmonella found. We urge USDA to make this mandatory, and to require identification of antibiotic resistance as well. Our samples included 12 that were positive for salmonella. The serotypes found were Heidelberg, Hadar, St Paul and Reading. All have been previously reported to the CDC from human sources, and the first three are on CDC's list of "top 20" reported serotypes. (See Presence/Absence Table for establishments where salmonella was found at <http://www.consumerreports.org/turkey0613>).

We also urge USDA to require that any finding of a serotype that has previously caused illness should trigger immediate efforts to eradicate the contamination. One sample positive for salmonella in our tests, bought in late 2012, originated at P-963, the Cargill Meat Solutions Springdale facility, the source of the 2011 outbreak. This sample contained salmonella Heidelberg, the same serotype that caused the 2011 outbreak and although it did not have the same PFGE identification as the outbreak strain, it was resistant to the same four antibiotics. We believe this is noteworthy and the USDA should require HACCP to routinely identify salmonella serotypes, especially to document those that resemble strains from previous outbreaks.

Bacteria Causing Disease Should Be Adulterants, Regardless of Plant Origin

USDA says in its December notice that when salmonella or another bacterium is identified as causing an illness in people, it will classify that bacteria as an adulterant. We support that policy. However, the agency also states in this notice that if the very same pathogen is found at another facility, it will not classify it as an adulterant. Once a pathogen is identified as causing disease, it should not be allowed in food, regardless of who is processing it, assuming it matches the PFGE or DNA fingerprint of the outbreak strain. It should be an adulterant regardless of plant origin.

Salmonella Strains Causing Illness and Which Are Antibiotic Resistant Should Be Adulterants

Beyond what USDA has already proposed, the agency should classify as an adulterant any salmonella of a serotype that has previously caused human illness that is also multiple antibiotic resistant. The rationale and legal basis for doing so is well described in the petition submitted by Center for Science in the Public Interest on May 25, 2011.

Eleven of the 12 salmonella positives identified by *Consumer Reports'* tests were antibiotic resistant. These 11 samples were produced at six establishments: P 963 Cargill Springdale Ark., P157 Foster Farms Turlock, CA, P-286 Perdue Washington IND, P-190 Jennie O, Barron WS, and P-312A, Zacky's, Fresno,CA.

Four of them, including the salmonella Heidelberg mentioned above, were resistant to four antibiotics. An additional two were resistant to seven antibiotics, and two more were resistant to eight such drugs. All these salmonella pose special risks to anyone who may become sick as a result of consuming them. We believe it is vitally important to keep such bacteria out of the food supply.

MRSA Should Be An Adulterant

Methicillin Resistant Staph Aureus (MRSA) is a scourge in hospitals, and data is mounting that it can also be present in communities and in livestock production facilities. *Consumer Reports* found MRSA in three samples, two of which came from P-190 Jennie-O plant in Barron Wisconsin and one of which came from the P 286 Perdue facility in Washington, Indiana. We urge USDA to declare MRSA an adulterant in ground turkey and to insure that such contamination is addressed.

Over the longer term, we urge USDA to consider establishing a performance standard for staphylococcus aureus in ground turkey and other products where it is prevalent.

We appreciate your consideration of our views.

Sincerely,



Jean Halloran
Director, Food Policy Initiatives, Consumers Union



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