

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

December 18, 2013

Dear Secretary Vilsack:

Consumers Union, the public policy and advocacy arm of *Consumer Reports*, is writing to share our concerns about the safety of the chicken that consumers purchase every day. *Consumer Reports* is releasing an article, “The High Cost of Cheap Chicken,” in its February 2014 issue, regarding the results of tests of 316 samples of raw chicken breasts for six different bacteria. Our testing found that 97 percent of the samples were positive for one or more of six bacteria that could cause disease. In light of these results, as well as the recent outbreak at Foster Farms, we urge the U.S. Department of Agriculture (USDA) to take significant new measures to improve chicken safety, including establishing a salmonella performance standard for chicken parts as soon as possible.

Our Test and Survey Results

Consumer Reports has been testing chicken for more than 15 years. In this test, for the first time we looked at the prevalence rates for six different bacteria that can cause illness – enterococcus, E.coli, campylobacter, klebsiella pneumoniae, salmonella, and staph aureus – and evaluated every bacterium for antibiotic resistance. Every one of the four major brands we tested (Perdue, Pilgrim’s, Sanderson Farms, and Tyson) as well as store brands, contained significant amounts of bacteria, even the chicken breasts labeled “no antibiotics” or “organic.” More than half of the chicken breasts were contaminated with fecal contaminants (enterococcus and E. coli). Enterococcus was the most common bacterium we found, occurring in 79.8 percent of our samples. Next was E. coli, in 65.2 percent of them; campylobacter, 43 percent; klebsiella pneumoniae, 13.6 percent; salmonella, 10.8 percent; and staphylococcus aureus, 9.2 percent. Of the 65.2 percent of samples testing positive for E. coli, 17.5 percent of the bugs were “ExPEC” bacteria, which are more likely than other E. coli to cause urinary tract infections.

Further, about half of our samples (49.7 percent) tested positive for at least one multidrug-resistant bacterium, and 11.5 percent carried two or more types of multidrug-resistant bacteria. The bacteria we found were significantly more resistant to classes of antibiotics approved by FDA for chicken production than those not approved for such use, raising legitimate concerns about the relationship between antibiotic use and the emergence of resistance in on-farm settings.

In addition, as part of this investigation, the Consumer Reports National Research Center recently conducted a nationally representative survey of 1,005 respondents about their understanding of labels and their handling and cooking habits for chicken. The survey found that more than half of respondents thought that “natural” chickens did not receive antibiotics or genetically modified feed and more than one-third thought “natural” was equal to “organic,” all of which are not true.

Consumers Union’s Recommendations for USDA Policy

Consumers Union is recommending specific agency actions to improve safety for consumers. Our recommendations are as follows:

- We urge USDA to classify strains of salmonella bacteria that are resistant to multiple antibiotics and known to have caused disease as “adulterants,” so that chickens tainted with those strains cannot be sold.
- We urge USDA not to proceed with its HACCP Inspection Models Project (HIMP) proposed rule, as we do not believe that increasing maximum line speeds and reducing the number of USDA inspectors at slaughter plants will help improve food safety.
- We call on Congress to give USDA the authority to recall meat and poultry products that are tied by DNA fingerprinting to disease outbreaks.
- We urge USDA to move quickly on its announced plans to set salmonella and campylobacter standards for chicken parts. We were glad to learn that the agency expects to put that proposal out for public review and feedback in 2014. We believe these levels should be stringent and set as soon as possible.
- We urge USDA to publish a complete list of meat products, like chicken parts, for which it has no salmonella performance standards, and to indicate a timetable for establishing them.
- We urge USDA’s National Organic Program, which generally requires meat to be raised without antibiotics, to eliminate the loophole allowing antibiotics to be used in the chicken eggs up until the first day of life in organic chicken broilers (see our separate letter to the Secretary outlining these concerns).
- We urge USDA to prohibit the use of the “natural” claim on meat products, in light of wide misinterpretation and misunderstanding of its meaning,
- We urge USDA to require that all claims on meat be certified and inspected.

Certainly, we are encouraging consumers to handle their chicken carefully from the store to their plates including cooking chicken properly and using a meat thermometer. However, while consumers can help mitigate their individual health, we believe that the agency needs to address systemic changes to improve overall poultry and meat safety for all consumers.

We appreciate your consideration of our concerns, and hope that these test results are helpful to the agency as it continues its mission of protecting the safety of our meat and poultry supply.

Should you have any questions about this data or want to discuss it further please feel free to contact us.

Sincerely,

A handwritten signature in black ink that reads "Urvashi Rangan Ph.D." in a cursive style.

Urvashi Rangan, Ph. D.
Executive Director
Consumer Reports Food Safety and Sustainability Center

A handwritten signature in black ink that reads "Jan Hillman" in a cursive style.

Director, Food Policy Initiatives
Consumers Union