



## POLICY & ACTION FROM CONSUMER REPORTS

August 24, 2015

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

Dear Secretary Vilsack:

Consumers Union, the public policy and advocacy arm of Consumer Reports, writes regarding the safety and sustainability of ground beef in the marketplace. According to a Consumer Reports investigation, conventional ground beef is twice as likely to contain multidrug-resistant bacteria – or “superbugs” – as ground beef that is more sustainably produced.

These findings were released today as part of “How Safe Is Your Beef?,” in which Consumer Reports examines potentially dangerous bacteria in different types of ground beef and advises consumers on what they can do to make better beef choices. This article explores the risk of foodborne illness, offers safe handling and cooking instructions, and indicates food labels to look for when shopping. Full results of the investigation are available at [ConsumerReports.org/cro/beefsafety](http://ConsumerReports.org/cro/beefsafety) and in the October issue of *Consumer Reports* magazine.

As you know, ground beef – which makes up about half of the 4.6 billion pounds of all beef bought at groceries and big-box stores over the last year – presents distinct risks. Bacteria can be distributed more widely as a result of the grinding process and because meat and fat trimmings often come from multiple animals. Moreover, Americans often prefer their beef on the rare side, which makes it less likely that meat is cooked properly through to the center.

For its investigation, Consumer Reports purchased 300 packages (458 pounds) of conventionally and sustainably produced ground beef from grocery, big-box, and natural food stores in 26 cities across the country. The samples were tested for five common types of bacteria associated with beef: *Clostridium perfringens*, *E. coli* (including O157 and six other toxin-producing strains), *Enterococcus*, *Salmonella*, and *Staphylococcus aureus*.

This testing, which is among the largest conducted to date, found bacteria on all samples. However, ground beef from cows raised more sustainably was significantly less likely to contain two potentially harmful bacteria (*S. aureus* and *E. coli*) than those raised conventionally. In

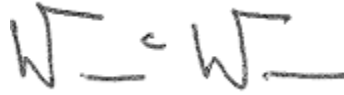
addition, 18% of the samples from conventionally-raised cows contained dangerous superbugs resistant to three or more classes of antibiotics used to treat illness in humans, compared with just 9% of samples from more sustainably-raised cows. In the Consumer Reports analysis, the sustainably-produced beef came from cows that were raised without antibiotics and in some cases were either organic, grass-fed, or both. Conventional cows can live on feedlots and be regularly fed antibiotics, as well as animal waste and other by-products.

Consumer Reports supports the important work of the U.S. Department of Agriculture (USDA) to monitor and enforce the safety of meat products. At the same time, we have long pushed to further strengthen the food safety system, including through additional funding and statutory tools and enhanced USDA oversight. While our specific findings from this investigation can be found in the enclosed report, our overall conclusions prompt us to make the following recommendations to USDA.

- **Beef up inspection practices.**  
By law, meat slaughter and processing plants are subject to continuous inspection by the government. But due to staff cuts, one inspector may have to shuttle between a dozen or more plants. USDA should ensure that every plant has a dedicated inspector. In addition, USDA conducts periodic random sampling for toxin-producing *E. coli* and *Salmonella*, but the plants are given notice at least a day in advance for these inspections. That practice should stop because it gives the plant a chance to make changes that improve their test results temporarily.
- **Better protect the public from *Salmonella*.**  
*E. coli* O157 and other toxin-producing strains of the bacteria are considered adulterants, which means it is illegal to sell raw ground beef that tests positive for them. *Salmonella* is different – beef passes inspection if up to 7.5% of the samples tested are contaminated with the bad bug. USDA should ban the sale of beef with disease-causing, antibiotic-resistant strains of salmonella.
- **Crack down on the “natural” label.**  
In June 2014, we filed a petition with USDA and FDA to ban use of the natural label on meat because it is misleading. According to a 2014 Consumer Reports national survey, 60% of consumers believe meat labeled “natural” was raised without antibiotics and that the animal wasn’t given artificial ingredients in its food; 68% think it means no artificial growth hormones. None of that is true. The word “natural” can be used on packages of beef from cattle that were raised on a feedlot, fed genetically modified grain or grain grown with pesticides, or given antibiotics or hormones.
- **Expand humane treatment to the requirements for “organic” labels.**  
In our survey, more than half of consumers think “organic” means that animals go outdoors and have plenty of indoor space, too. Although these cattle must have access to pastures for most of their lives, they can still be sent to feedlots before slaughter.

Thank you for your consideration of these recommendations. Consumer Reports stands ready to work with you to take action that would bolster food safety and provide consumers with the information they need to make healthy and sustainable choices.

Sincerely,

A handwritten signature in black ink, appearing to read "W.C. Wallace". The signature is stylized with a cursive-like flow and a horizontal line at the end.

William C. Wallace  
Policy Analyst  
Consumers Union