June 13, 2011

Docket Clerk
US Department of Agriculture
Food Safety and Inspection Service
Room 2-2175 George Washington Carver Center
5601 Sunnyside Avenue, Mailstop 5272
Beltsville, MD 20705-5272

Re: Notice of Request for a New Information Collection (Food Safety Education Campaign – Tracking Survey) [Docket No. FSIS-2011-0011]

The Center for Science in the Public Interest¹ (CSPI) appreciates the opportunity to comment on the Food Safety and Inspection Service’s (FSIS) notice of request for a new information collection for the Food Safety Education Campaign Tracking Survey.

CSPI supports FSIS’s proposed collection of information as a necessary evaluation of the Food Safety Education Campaign. We are concerned, however, that certain statements used in the May 2011 Draft of the Tracking Survey to gauge attitudes regarding safe food preparation may unintentionally confuse and mislead consumers, and could potentially undo the efforts of the Campaign.

We are primarily concerned with the statements listed in Questions 13 and 14. Question 13 asks “For each action described below, please indicate which statement best describes you.” Question 14 asks “For each action described below, please indicate how important each is with regard to preventing food poisoning in your home.”

The first statement, “Cook meat, poultry and fish to a safe temp (e.g. 160 degrees for meat using a food thermometer),” is misleading to consumers, as meats have different cooking temperatures – beef, pork, and lamb are to be cooked to 145°F with a rest time of 3 minutes, ground beef to 160°F, and poultry to 165°F. This statement should be edited to accurately reflect proper internal cooking temperatures for different meats in order to avoid misinforming consumers.

The statement “Separate meat and dairy while cooking” is problematic for two reasons. Assessing consumers’ attitudes about separating meat and dairy seems irrelevant for this survey as it indicates whether consumers are keeping kosher, not whether they are preparing their food safely. The real concern is whether consumers separate meat and produce. Furthermore, it is important that these foods are kept separate in their raw forms before cooking, not “while” cooking, as the statement suggests.

The statement “Boil milk before drinking” is unnecessary for this survey as it may in fact mislead consumers to conclude that boiling milk is important for food preventing food-borne illness. This step

¹ CSPI is a non-profit consumer advocacy and education organization that focuses largely on food safety and nutrition issues. It is supported principally by the 900,000 subscribers to its Nutrition Action Healthletter and by foundation grants.
would only be important if consumers were drinking raw milk, which both USDA and FDA have concluded is extremely hazardous for consumers.

The statement “Wash meat or chicken before cooking” is also unnecessary and misleading as consumers are not encouraged to wash meat or chicken before cooking as they could potentially contaminate their own kitchen sink.

While we understand the Agency and Ad Council’s desire to assess consumer attitudes towards safe food preparation and self-reported behaviors, we discourage the use of the aforementioned statements on the Tracking Survey as they may misinform consumers.

When asked in the context of Question 14, indicating “how important” each statement is in regard to preventing food poisoning at home, consumers will assume that all of the statements are important to varying degrees, which in the cases of separating meat and dairy, boiling milk, and washing meat or chicken before cooking, is simply not true. None of these steps are necessary to prevent food poisoning at home, and in fact, may lead to food poisoning – by letting consumers think it is important to wash their meat and poultry in the sink, or insinuating that raw milk is a safe option.

We recognize the importance of this Campaign to educate consumers on safe food preparation and support FSIS’s attempts to evaluate the Campaign’s impact. It is critical, however, that in this evaluation, consumers are not misled or misinformed about food safety, as this would completely undermine the Campaign’s efforts. For this reason, we ask that the statements discussed above be edited or removed from the survey.

Sincerely,

Sarah Klein
Staff Attorney, Food Safety Program
Center for Science in the Public Interest