August 2, 2001

The Honorable Ann Veneman
Secretary of Agriculture
U.S. Department of Agriculture
14th Street and Independence Ave., SW
Washington, DC 20250

Dear Secretary Veneman:

Thank you for your leadership in proposing a regulation to strengthen U.S. Department of Agriculture’s (USDA) food-safety program for ready-to-eat meat. The Center for Science in the Public Interest (CSPI) is very concerned about food-safety problems such as *Listeria monocytogenes*, *Salmonella*, *Campylobacter*, and *E. coli* O157:H7, which are estimated to cause millions of cases of illnesses each year.

We are writing today to ask for your leadership on another food-safety issue with fewer victims, but still severe public health consequences, bovine spongiform encephalopathy (BSE). BSE -- mad cow disease -- is a cattle disease that has caused a fatal human brain infection called variant Creutzfeldt-Jakob Disease or vCJD. More than 100 people in Europe have died of vCJD. The disease causes progressive brain damage that results in difficulty walking and speaking, memory loss, decreased mental function, and invariably death. BSE and vCJD are transmitted from cattle to other cattle and to humans through feed and food contaminated with small amounts of cattle brain, spinal cord, or other nervous system tissue.

While BSE has never been documented in U.S. cattle, recent events in Europe, where infected cattle were discovered in a number of previously BSE-free countries, point to the value of taking precautions to protect the human food supply prior to finding BSE in the cattle herds. However, many USDA regulations and buying specifications were drafted prior to BSE becoming a human health concern, and they allow small bits of spinal cord in processed meat products.

CSPI recently discovered that current USDA buying specifications allow the presence of
spinal cord in beef intended for the National School Lunch Program and other Federal Food Assistance Programs. For example, in the Agricultural Marketing Service’s (AMS) June 1997 specification for boneless beef intended for grinding into ground beef, the presence of pieces of spinal cord less than 0.5 by 0.2 inches is allowed. Spinal cord is allowed in many other cuts of beef purchased for those programs, which may be destined for grinding, including carcasses, bone-in ribs, boneless ribs, bone-in forequarters, boneless forequarters, bone-in short rib/beef bones, bone-in loins, boneless hindquarters, boneless round, boneless strip loins, and boneless sirloins.

Scientists have documented that if a cow has BSE, consuming small portions of its brain, spinal cord and other central nervous system tissue is a pathway for the human infection vCJD.

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2IMPS QA Table 100 I.

3Institutional Meat Purchase Specifications for Fresh Beef Products, Series 100, effective June 10, 1996, p. 47, ("Unless otherwise specified, ground beef shall be prepared from any portion of the carcass (graded or ungraded)").

4IMPS QA Table 100 A (Pieces of spinal cord smaller than 1.0 inch by 0.2 inch are permitted on carcasses).

5IMPS QA Table 100 B.

6IMPS QA Table 100 C.

7IMPS QA Table 100 D.

8IMPS QA Table 100 E.

9IMPS QA Table 100 G.

10IMPS QA Table 100 K.

11IMPS QA Table 100 L.

12IMPS QA Table 100 M.

13IMPS QA Table 100 N.

14IMPS QA Table 100 P.
Since vCJD is such a devastating disease and protecting public health and confidence in the meat supply is mandatory under the Federal Meat Inspection Act (21 U.S.C. §602), we urge the USDA to immediately amend AMS’s purchasing specifications for the National School Lunch Program and other Federal Food Assistance Programs to ensure that Americans, and especially schoolchildren, are not consuming bovine spinal cord, dorsal root ganglia, and other potentially infectious materials. This action is needed regardless of any other USDA regulation or inspection practice that may cover these defects in meat.

While USDA officials have told us that the AMS standards are not being used, clearly spinal cord should not be an allowable “defect” -- even on paper -- for beef destined for the school lunch program. Such inconsistencies could lead to confusion and possible contamination of the foods eaten by children and other participants in federal feeding and food programs. All other applicable regulations and purchasing requirements should also be amended to ensure that spinal cord and other potentially infectious materials are kept out of the human food supply. Finally, we urge that you begin a total public review of USDA’s meat and poultry purchasing specifications to ensure that these standards provide safe and wholesome food for schoolchildren and other participants in food and feeding programs.

Sincerely,

Michael F. Jacobson, Ph.D.  
Executive Director  

Caroline Smith DeWaal  
Director, Food Safety Program