On behalf of the Center for Science in the Public Interest (CSPI), we appreciate the opportunity to comment on the continued development of the Healthy People 2020 (“HP 2020”) objectives and topic areas. CSPI is a non-profit food safety and nutrition organization that, since its founding in 1971, has represented consumers in key areas of food legislation and policy development. We are funded primarily by subscribers to our *Nutrition Action Healthletter* and by foundation grants. We accept no government or industry funding.

During the initial stages of development of the HP 2020 Objectives, CSPI was dismayed to find that Food Safety was not recognized as a discrete category. Our Comments to the Department in 2008 illustrated the extent to which that exclusion would have been a grave error in public health planning: because 48 million Americans become sick from foodborne illness each year, and 3,000 die, it is critically important that the country’s public health goals include specific and measurable objectives to control and minimize foodborne illness.

We are pleased that the final HP 2020 Objectives include a robust Food Safety section. As drafted, the Objectives cover many critically important topics in food safety prevention. There are, however, several areas that are ripe for improvement. In addition, we suggest the addition of Food Safety in strategic places throughout the Objectives to improve public health.

**Food Safety Objective FS-6: Restaurant and Retail Food Safety**

HP 2020 rightly lists “Improve food safety practices associated with foodborne illness in foodservice and retail establishments” as a key food safety objective, since as many as 40 percent of all foodborne illness outbreaks are linked to restaurant food.\(^1\) Repeated outbreaks and recalls also clearly illustrate that consumers are at risk from various practices commonly used by the retail sector, including in-house grinding, mechanical tenderization, and others. We note that a key purpose of the HP 2020 is the education of consumers on ways to protect themselves from public health risks. One way to begin accomplishing this objective in the food safety area, particularly as concerns restaurant and retail settings, is to provide consumers with information regarding the most recent health department inspection of the food establishment.

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Food establishment inspections (including restaurants, retail, school, nursing homes, and hospitals) are typically performed by state or local health departments. The information generated by these inspections is captured in an inspection report, which is used by the establishment to improve performance on critical food safety issues. However, in most jurisdictions, consumers are not given ready access to the results of these inspections, and thus have no simple way to ascertain the food safety performance of a given food establishment.

Access to inspection information, particularly in the form of a letter grade or score in the front window of the establishment, has been shown to have a significant positive impact on public health. Los Angeles County, which implemented a restaurant inspection grading program in 2001, completed a 10-year study of the program that revealed a significant improvement in restaurants’ food safety performance. A second study of the LA County program showed a significant decrease in the percentage of foodborne illness hospitalizations in the County since the adoption of the grading program. Importantly, that reduction was not mirrored elsewhere around the state where grading had not been established.

CSPI believes that HP 2020 Objectives should reflect the premise that providing consumers with access to food safety information—including the health department assessment of establishments—can provide a significant public health benefit and may reduce the overall incidence and severity of foodborne disease. Thus we recommend the addition of the following specific criteria to FS-6:

FS-6.1: Increase the proportion of jurisdictions that provide access to food establishment inspection information on-site.

Maternal, Infant, and Child Health Objectives

MICH-10 Increase the proportion of pregnant women who receive early and adequate prenatal care

CSPI urges the inclusion of food safety messaging for pregnant women under the objectives specifically related to maternal and infant health. Pregnant women are considered to be particularly at-risk for foodborne illness (as are children, immune-compromised, and older consumers). Particular foodborne pathogens, such as *Listeria monocytogenes*, can have more severe consequences for pregnant women, including miscarriage and stillbirth. It is crucial that women receive food safety messaging during pregnancy from their physician, and that such information is conveyed with the importance granted to other public health messages that impact the health and life of both mother and fetus. Thus we recommend the addition of the following specific language to MICH-10:

MICH-10.3: Increase the proportion of pregnant women who receive adequate food safety information for pregnancy and infancy.

Older Adult Objectives

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Prevention

CSPI urges the inclusion of food safety messaging for older consumers under the objectives specifically related to Older Adults. Consumers over the age of 50 are considered to be particularly at risk from foodborne illness. This risk may be exacerbated by consumer handling behaviors that are unique to older consumers, such as the use of food handling and preparation methods that are no longer considered safe, or the retention of food past advisable use dates. It is important that older consumers receive food safety messaging from physicians, elder care facilities, and in other appropriate educational settings, to reduce the risk of foodborne disease. Thus we recommend the addition of the following specific language to OA:

OA-8: Increase the proportion of older adults who receive age-appropriate food safety messaging.

Conclusion

CSPI appreciates the work of the Department in crafting the Healthy People Objectives, and recognizes the challenge of including all relevant public health objectives while simultaneously maintaining realistic goals of completion. Notwithstanding this difficulty, CSPI feels strongly that public health and the interests of consumers are best served by focusing efforts on attainable, critical food safety objectives. We look forward to working with the Department and other stakeholders to accomplish these objectives.

Sincerely,

Sarah Klein
Staff Attorney, Food Safety Program