William T. Flynn, D.V.M., M.S.
Deputy Director for Science
FDA Center for Veterinary Medicine
7519 Standish Place
Rockville, MD 20855

Dear Mr. Flynn,

As the Center for Veterinary Medicine (CVM) moves toward completion of its milk sampling assignment for violative drug residues, I am writing to remind you of consumer stakeholders’ interest in the assignment and results. The risk to human health from milk contaminated with drugs is a strong concern of the 850,000 consumer/subscribers of the Center for Science in the Public Interest (CSPI).

It is our understanding CVM will complete the assignment in September with a report to follow. This report will be prepared and made public in cooperation with stakeholders. During preparation of the report, CSPI anticipates being included in any stakeholder discussions on the presentation and content of the report. We would also anticipate that CVM will conduct any briefings or input opportunities in an open and transparent manner. You will recall that CSPI, on behalf of consumers, found the decision to hold closed-door stakeholder meetings with industry during design of the sampling assignment very disconcerting. That action continues to taint consumer opinion about the vitality and veracity of the sampling assignment. CSPI encourages you to employ an inclusive process for reporting the results of the assignment. This will avoid exacerbating the damage done by that earlier misstep.

Already the use of double-blind sampling shields dairies engaged in unsafe practices from detection. This means that illegal use of drugs at dairy farms continues to put consumers at risk. We expect, going forward, that CVM will continue to give appropriate weight to the interests of consumer stakeholders.

Sincerely,

[Signature]

David W. Plunkett, J.D., J.M.
Senior Staff Attorney

cc: Jeff Farrar, Associate Commissioner for Food Protection, FDA
Caroline Smith DeWaal, Director of Food Safety, CSPI