September 2, 2008

Healthy People 2020 Objectives
Office of Disease Prevention and Health Promotion
U.S. Department of Health & Human Services
1101 Wootton Parkway, Suite LL100
Rockville, MD 20852

Re: Comments on the Development of Healthy People 2020 Objectives (FR Doc. E8-18299 Filed 8-7-08).

On behalf of the Center for Science in the Public Interest (CSPI), we appreciate the opportunity to comment on the development of the Healthy People 2020 Objectives. CSPI is a nonprofit health advocacy and education organization focused on food safety, nutrition and alcohol issues. CSPI is supported principally by the 900,000 subscribers to its Nutrition Action Healthletter and by foundation grants. We accept no government or industry funding.

CSPI is very concerned by the exclusion of food safety from the list of potential topic area categories to organize the 2020 Healthy People Objectives. Food safety was identified as one of 28 Focus Areas in the Healthy People 2010 Objectives, and these objectives have been widely used to analyze and measure the effectiveness of federal food safety programs. Recent food safety problems indicate that now is not the time to turn attention away from this critical issue.

The current proposal lists 12 potential topics, ranging from physical activity to preventive services by life stages, but fails to recognize food safety as a discrete issue. We see this as a critical oversight. While we appreciate the desire to streamline the document—as evidenced by the Draft Model objective to reduce topic areas and objectives—food safety cannot be ignored.
Each year 76 million Americans get sick, 325,000 are hospitalized, and 5,000 die from foodborne hazards in the United States, according to the Centers for Disease Control and Prevention (CDC). Cost provides another measure for recognizing the critical state of food safety and foodborne illnesses. The Department of Agriculture Economic Research Service estimated the economic costs of hospitalizations, lost productivity and death from the five most common pathogens as $6.9 billion in 2000. The greatest percentage of this cost is from premature death, which occurs primarily in people over age 65 for *Salmonella* and children under age five for *E. coli* O157:H7. The elderly, people with compromised immune systems, pregnant women, children and infants are most at risk of serious illness from foodborne illnesses. Many pathogens, including *Salmonella*, *Campylobacter* and pathogenic *E. coli* can lead to chronic illness and reduced life expectancy.

The Government Accountability Office (GAO) designates food safety as a high risk federal government program. Agriculture, including all food production, is about 13 percent of the gross domestic product, and is the largest industry and employer in the country.

Further, the inclusion of food safety as a Healthy People 2010 objective has provided important benchmarks for measuring food safety improvements and failures. The public health agencies tasked with ensuring food safety—including FDA, CDC, and USDA—routinely cite Healthy People 2010 and compare the progress made in relation to the objectives in support of their work.

For example, the CDC’s FoodNet Data reports track diseases caused by common pathogens and compare rates of occurrence to previous years. The success of various preventive programs is measured by progress toward the Healthy People 2010 goals. Similarly, PulseNet is a national network of public health laboratories that performs DNA "fingerprinting" on bacteria
that may be foodborne, and measures rates of infection against Healthy People 2010 objectives. USDA’s Food Safety and Inspection Service *Salmonella* standards and agency budget requests also regularly reflect the food safety emphasis evidenced by Healthy People 2010.

Food safety is an issue of critical importance to American consumers, one that is frequently highlighted in the media with press reporting on outbreaks and recalls. Examples of this over the last two years include outbreaks from pathogenic *E. coli* in spinach and ground beef, *Salmonella* in peanut butter, tomatoes and Serrano peppers, botulism in canned foods, among others. Public health officials, consumers, and food safety advocates need the Healthy People 2020 metric to measure the effectiveness of regulatory controls and it has been regularly used by CDC, FDA and USDA in evaluating and reporting to the public on their programs. Important data and attention can be gained from the inclusion of food safety among the objectives highlighted by Healthy People 2020.

The absence of food safety in the Healthy People 2020 objectives represents a failure to adequately acknowledge this critical public health need. We therefore urge the drafters to include food safety among the other important issues to be addressed in the forthcoming document.

Sincerely,

Caroline Smith DeWaal

Director, Food Safety
Center for Science in the Public Interest