

May 16, 2013

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue  
Washington, DC 20250

RE: Petition for an Interpretive Rule Declaring Specific Strains of Antibiotic-Resistant *Salmonella* to be Adulterants

Dear Secretary Vilsack,

Foodborne illnesses from antibiotic-resistant strains of *Salmonella* present a public health problem that urgently needs to be addressed by the United States Department of Agriculture (USDA). Ground meat or poultry that is found to be contaminated with antibiotic-resistant strains of *Salmonella* should be declared adulterated and recalled from the marketplace or withheld from commerce. Two years ago, the Center for Science in the Public Interest (CSPI) filed a Citizen Petition<sup>1</sup> urging USDA to issue an interpretative rule, similar to what the agency has already done for *E. coli* O157:H7 and other Shiga toxin-producing *E. coli*, declaring specific strains of antibiotic-resistant *Salmonella* to be adulterants. The undersigned organizations are writing to support this petition, and urge USDA to act without delay to protect consumers from this continuing threat in the meat supply.

The USDA currently recalls products contaminated with antibiotic-resistant *Salmonella* only after illnesses or hospitalizations, and possibly deaths, have occurred. That reactionary approach continues to put consumers at undue risk from illnesses that are more complicated to treat, due to ineffective antibiotics; treatment failure increases the risk of death. The preventative approach that is requested by the petition would ensure a more rapid and effective response to mitigate this public health crisis.

All four *Salmonella* strains covered by the petition – *Salmonella* Heidelberg, *Salmonella* Newport, *Salmonella* Hadar, and *Salmonella* Typhimurium – have been linked to foodborne illness outbreaks, catalogued by CSPI.<sup>2</sup> Products regulated by the USDA that have been implicated in outbreaks from these four strains include chicken, ground beef, ground turkey, and pork.

The USDA is in a vital position to protect consumers from antibiotic-resistant strains of *Salmonella* bacteria that enter the food supply by responding favorably to the CSPI petition.

Sincerely,

Association for Politics and the Life Sciences  
Center for Food Safety  
Center for Foodborne Illness Research and  
Prevention  
Consumer Federation of America  
Food and Water Watch  
Food Animal Concerns Trust  
Government Accountability Project

Johns Hopkins Center for a Livable Future  
Keep Antibiotics Working  
National Consumers League  
National Research Center for Women & Families  
Organic Consumers Association  
STOP Foodborne Illness  
United States Public Interest Research Group

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<sup>1</sup> [http://www.fsis.usda.gov/PDF/Petition\\_CSPI\\_052511.pdf](http://www.fsis.usda.gov/PDF/Petition_CSPI_052511.pdf)

<sup>2</sup> [http://cspinet.org/new/pdf/outbreaks\\_antibiotic\\_resistance\\_in\\_foodborne\\_pathogens\\_2013.pdf](http://cspinet.org/new/pdf/outbreaks_antibiotic_resistance_in_foodborne_pathogens_2013.pdf)

cc:

Mr. Edward Avalos, Under Secretary for Marketing and Regulatory Programs

Dr. Elisabeth Hagen, Under Secretary for Food Safety

Dr. Gregory Parham, Acting Assistant Secretary for Administration

Mr. Kevin Shea, Acting Administrator of APHIS

Dr. John Clifford, Deputy Administrator of APHIS