



September 29, 2003

Secretary Ann Veneman
U.S. Department of Agriculture
Jamie L. Whitten Building
14th Street & Independence Avenue, S.W.
Room 200-A
Washington, D.C. 20250

Secretary Tommy Thompson
Department of Health and Human Services
200 Independence Ave, SW
Washington, DC 20201

Dear Secretary Veneman and Secretary Thompson:

A major opportunity exists to improve the quality of the nation's food supply. On-farm management practices and new technologies are being developed that can reduce the hazards in the food supply and protect consumers. These represent the next frontier in food safety improvements. We are seeking your leadership to take advantage of this opportunity.

Many of the 76 million food-borne illnesses contracted each year in the United States result from eating food that is contaminated with *E. coli* O157:H7, *Listeria monocytogenes*, *Salmonella*, and other pathogenic bacteria that reside in live animals. Those hazards occur not only in meat and poultry products, but in fresh fruits and vegetables as well. The farm environment can provide a reservoir for pathogens that can enter the food supply. Reducing the incidence of food-borne illness must begin on the farm, where better controls are urgently needed.

The Center for Science in the Public Interest urges the Bush Administration take the following actions to improve the safety of the food supply, starting on the farm or ranch:

First, commission and fund the National Academy of Sciences to study and report on on-farm methods to improve food safety. In 1990, Congress enacted an amendment to the National Agricultural Research, Extension and Teaching Act of 1977 that directed USDA to commission a study of animal care and disease-prevention strategies and assess opportunities to achieve food-safety goals. Unfortunately, USDA never commissioned that study. An

expert, independent evaluation is needed to identify the impact that on-farm production and herd/flock-management practices have on animal health and welfare and the introduction of pathogens into the environment and, ultimately, into the human food supply.

Second, designate the government agency that should take lead responsibility for implementing on-farm food-safety improvements. No federal agency today is responsible for overseeing food safety at the production level. While the Animal and Plant Health Inspection Service can quarantine farms or ranches due to disease outbreaks affecting the animals or plants, they have no authority when it comes to human infections that originate in live animals or plants. The Administration should designate one agency within USDA or DHHS to lead the on-farm effort. Then, the Administration should ask Congress for a specific grant of authority to foster and, when appropriate, approve new on-farm technologies and to require farmers and ranchers to implement those new systems to improve food safety.

Third, adopt new regulations to reduce the incidence of *Salmonella enteritidis* in eggs, by requiring egg producers to test their flocks and their eggs. These regulations have been pending at the Food and Drug Administration since 2000 and enjoy widespread support from consumer groups, the egg industry, and members of Congress.

Fourth, increase federal research to develop on-farm approaches to reducing human health hazards carried by animals, including the use of competitive exclusion, immunizations, bacteriophages, sanitation strategies, reduced crowding, and improved transportation.

Those measures would help modernize our food-safety regulatory system and enable it to address today's issues while preparing us for future challenges.

In the interim, the USDA should support S. 1103/HR 2203, the Meat and Poultry Pathogen Reduction and Enforcement Act. This bill would give USDA specific authority to set strict limits for *E. coli* O157:H7, *Listeria monocytogenes*, *Salmonella*, and other hazards in meat and poultry products.

Improving food safety must begin on the farm, where interventions can prevent pathogens from getting into or onto the livestock or poultry. Your leadership on this issue could greatly improve the safety of our nation's food supply.

Respectfully submitted,

Michael Jacobson, Ph.D.
Executive Director

Caroline Smith DeWaal
Director of Food Safety

cc: Dr. Elsa Murano, Undersecretary for Food Safety
Edward B. Kipling, Acting Administrator, Agricultural Research Service
Bobby R. Acord, Administrator, Animal and Plant Health Inspection Service
Dr. Mark B. McClellan, Commissioner, U.S. Food and Drug Administration