



TO: U.S. Department of Agriculture Transition Team
FROM: Consumers Union
RE: USDA Food Safety Responsibilities
DATE: December 19, 2008

The U.S. Department of Agriculture (USDA) faces enormous challenges with regards to food safety and nutrition. It is clear that USDA needs to make food safety a top priority: every year, one in four Americans contracts a foodborne illness, and 5000 people die from that cause. The last year saw the largest meat recall in U.S. history. Previously, Consumer Reports tests found that a majority of U.S. poultry is contaminated with disease-causing bacteria. USDA should have clear mandatory recall authority—something that can only be done through legislation. We also agree with recent suggestions that the Department should be renamed the Department of Food and Agriculture to better reflect its role and responsibility to make sure our food supply is safe.

Below are a number of other important steps that we believe can and should be immediately taken by the agency.

Meat and Poultry Safety. USDA should insure that all inspector vacancies are filled so that meat and poultry inspection is fully staffed. To improve chicken safety, USDA should develop and issue a standard for campylobacter as soon as possible (currently USDA has a standard for salmonella, but none for campylobacter, which contaminates much more of the chicken in supermarkets).

Mad Cow Disease Prevention. USDA should get out of the way of companies who want to go above and beyond what the government will do. USDA should immediately lift USDA's current prohibition on slaughter facilities doing their own testing for mad cow disease, which Creekstone has challenged in the courts. USDA's main argument against allowing testing has been that if one company started doing this, all would be forced to in order to stay competitive. Since when is it a bad thing for companies to compete on safety? USDA should also reconsider its open border for beef cattle with Canada, which is reporting a much higher incidence of mad cow disease than the US.

Organic, COOL, and Other Labeling Programs. There has been constant pressure in recent years to water down the standards for the USDA organic label, most recently for organic beef and fish. The “USDA organic” label must maintain its high standards. USDA should not allow “organic” salmon to be grown in ocean net pens, which are highly polluting; nor should USDA allow “organic” beef cattle to be finished in a manner that denies them access to pasture. USDA must also insure that labels such as “grassfed” and “natural” have real meaning for consumers. Finally, USDA has defined “processed” far too broadly in laying out exemptions to Country of



Origin Labeling (COOL). Actions such as cooking or smoking a product should not be classified as processing, and should not result in an exemption from COOL labeling.

Genetically Engineered Plants. USDA is in effect responsible for assuring that genetically engineered crops are safe in the environment. It is working on its policies for plants engineered to produce drugs, like insulin. The risks of producing drugs like insulin in food crops like safflower, as has been done in test plots in Washington State, is simply too great; nature is simply too unpredictable, and human error too common, to think that accidents can be prevented 100% of the time. Therefore, drug production should only be allowed in indoor facilities in non-food plants.