RESOLUTION NUMBER: 17 and 18 Combined - APPROVED

SOURCE: COMMITTEE ON SALMONELLA
COMMITTEE ON TRANSMISSIBLE DISEASES OF
POULTRY AND OTHER AVIAN SPECIES

SUBJECT MATTER: OBJECTION TO SALMONELLA LINKED TO HUMAN
ILLNESSES BEING DECLARED ADULTERANTS

BACKGROUND INFORMATION:

In May 2011, The Center for Science in the Public Interest (CSPI) petitioned the United States Department of Agriculture (USDA), Food Safety Inspection Service asking them to declare antibiotic-resistant strains of Salmonella Heidelberg in ground meat and ground poultry products as adulterants. On October 17, 2013, CSPI, as part of a coalition of consumer activist groups (collectively known as the Safe Food Coalition), submitted a letter to Mr. Tom Vilsack, Secretary of the USDA, urging him to immediately act on the 2011 CSPI petition, but to expand it so as to declare all Salmonella serotypes linked to human illness as adulterants when found in all poultry products (including raw intact poultry meat and bone-in parts).

Because there are more than 2400 different serotypes of Salmonella officially recognized and because human virulence or pathogenicity and antimicrobial resistance determinants are not readily identifiable, this request would effectively result in all or nearly all Salmonella isolates being declared adulterants in poultry products that are intended to be fully cooked before being consumed. This action would likely lead to a crippling economic burden on the poultry industry resulting in a reduced supply of poultry meat and increased food cost to the consumer with little to no demonstrable reduction in salmonellosis rates nationwide.

The salmonellosis burden in the United States is not solely attributable to consumption of raw poultry meat, but can also be contracted from consuming a wide variety of fruits, vegetables, eggs, pork, beef, and even some processed food products as diverse as peanut butter, dry dog food, scraped tuna, and tahini sesame paste along with exposure to pet dogs, cats, hedgehogs, reptiles (turtles, water frogs and African dwarf frogs) and mail order chicks and ducklings. [Ref: http://www.cdc.gov/salmonella/outbreaks-2013.html]

In January 2013, the Centers for Disease and Prevention (CDC) released an analysis of the reported foodborne illness cases in the Foodborne Disease Outbreak Surveillance
System during 2009 – 2010. The pathogen-commodity pairs responsible for the most outbreak-related illnesses reported to CDC in 2009 – 2010 were *Salmonella Enteriditis* and eggs followed by *Salmonella sp.* in sprouts and *Salmonella sp.* in vine-stalk vegetables. *Salmonella sp.* in poultry meat was not identified as a significant contributor to the overall salmonellosis rate.

[Ref: CDC MMWR Vol 62 No 3 January 25, 2013 *Surveillance For Foodborne Disease Outbreaks – United States, 2009 - 2010*].

Therefore, unilaterally imposing such a draconian measure on the poultry industry alone creates an unfair economic burden that will likely result in little public health benefit.

**RESOLUTION:**

The United States Animal Health Association urges the United States Department of Agriculture to refrain from declaring any serotype of *Salmonella* an adulterant of raw poultry meat products, intact or ground, because this action is scientifically unwarranted and unlikely to result in measurable reductions in the national salmonellosis burden.