

NACCHO

National Association of County & City Health Officials

The National Connection for Local Public Health

May 29, 2012

Docket Clerk
U.S. Department of Agriculture (USDA), FSIS
Patriots Plaza 3
355 E. Street, SW, 8-163A
Mailstop 3782
Washington, DC 20250-3700

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to urge the United States Department of Agriculture (USDA) to withdraw the proposed rule "Modernization of Poultry Slaughter Inspection" (Docket Number FSIS-2011-0012). This rule will severely weaken the process for inspecting chickens for disease-causing bacteria, as well as undermine the health and safety of more than 200,000 workers in the poultry industry.

NACCHO is the voice of the approximately 2,800 local health departments across the country. City, county, metropolitan, district, and tribal health departments work every day to ensure the safety of the water we drink, the food we eat, and the air we breathe. Local health departments work with state, local, and national partners to prevent, identify, and respond to outbreaks of foodborne illness.

Despite the best efforts of public officials, over 48 million cases of preventable foodborne illness occur every year in this country. Many of these cases cause pain and suffering, high medical bills, disability, lost productivity, lower life expectancy and death. Foodborne illness causes an estimated 128,000 hospital visits and 3,000 deaths annually. Foodborne illness has significant costs associated with direct medical expenses, lost productivity, and decreased revenue for food manufacturers and retail establishments. Salmonella, which causes 1 million cases of foodborne illness, costs \$365 million a year in direct medical expenses.

In 2011, the United States experienced the deadliest foodborne illness outbreak in 90 years, an outbreak of *listeria* that killed 32 people and infected 146 people in 28 states. This outbreak was quickly contained and the loss of life limited because of coordinated action between local, state and federal public health agencies, including local and state health departments. However, the best way to protect the public's health is to prevent foodborne illness from occurring in the first place.

This new rule would weaken the process by which federal agencies inspect chicken by decreasing the number of federal inspectors in poultry processing plants and potentially increasing processing line speeds by more than 90 percent. Ultimately, it would increase the public's risk of eating chicken contaminated with disease-causing bacteria like Salmonella.



NACCHO

National Association of County & City Health Officials

The National Connection for Local Public Health

Local health departments are partners with federal agencies like the USDA's Food Safety and Inspection Service in ensuring that food is safe to eat and workers who inspect food are safe in their workplaces and supporting standards and safeguards designed to protect all Americans from harm.

On behalf of the nation's local health departments, I respectfully ask that the USDA choose not to move forward with the proposed "Modernization of Poultry Slaughter Inspection" rule (Docket Number FSIS-2011-0012) and withdraw it immediately.

Sincerely,



Robert M. Pestronk
Executive Director

