



## Consumer Federation of America

July 17, 2019

The Honorable Richard Shelby  
United States Senate  
Chair, Committee on Appropriations  
Washington, DC 20510

The Honorable John Hoeven  
United States Senate  
Chair, Appropriations Subcommittee on  
Agriculture, Rural Development, Food and  
Drug Administration, and Related Agencies  
Washington, DC 20510

The Honorable Patrick Leahy  
United States Senate  
Ranking Member, Committee on  
Appropriations  
Washington, DC 20510

The Honorable Jeff Merkley  
United States Senate  
Ranking Member, Appropriations  
Subcommittee on Agriculture, Rural  
Development, Food and Drug  
Administration, and Related Agencies  
Washington, DC 20510

Dear Chairmen Shelby and Hoeven and Ranking Members Leahy and Merkley:

On behalf of Consumer Federation of America (CFA), I am writing to request your assistance in stopping plans to relocate the United States Department of Agriculture's (USDA's) National Institute of Food and Agriculture (NIFA) and Economic Research Service (ERS) outside of the Washington, D.C. metropolitan area. Work at ERS and NIFA includes vital food safety research, and the disruptive proposal to move these agencies will put consumers at greater risk of foodborne illness.

CFA is an association of nearly 300 non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy and education. Member organizations include local, state, and national consumer advocacy groups, senior citizen associations, consumer cooperatives, trade unions and food safety organizations. CFA's Food Policy Institute was created in 1999 and engages in research, education and advocacy on food safety, food and agricultural policy, agricultural biotechnology, and nutrition.

ERS and NIFA research plays a vital role in helping CFA and other consumer advocates to advance the consumer interest. For example, when USDA's Food Safety and Inspection Service (FSIS) recently suspended its practice of web-posting category establishment data for poultry processors, consumer advocates were able to point to ERS research demonstrating that this data improves food safety. In particular, ERS researchers documented a "strong correlation" between the availability of the establishment data—which shows which poultry processors are struggling or failing to meet microbiological performance standards—and the industry's success in meeting food safety goals. As ERS noted, web-posting this data provides a "tool for

encouraging compliance with food safety” that does not “require costly regulatory oversight and labor devoted to compliance,” but rather creates a market where “buyers determine the appropriate level of food safety and costs.”<sup>1</sup> Without the ERS analysis, FSIS might have persisted, at the behest of the bottom-dwelling industry performers, in denying the public information about which poultry processors are meeting food safety standards.

There are many other examples of how ERS and NIFA research promotes better food safety. ERS research has helped to understand the magnitude of the economic impacts associated with foodborne illness,<sup>2</sup> demonstrated the feasibility of stronger *Salmonella* standards through analysis of the school lunch program,<sup>3</sup> and provided a reality check against arguments that the U.S. livestock industry cannot afford to restrict antibiotic use and its contribution to antibiotic resistant infections.<sup>4</sup> Stakeholders across the board can have confidence in the scientific integrity of this research, and they rely on it to both improve public health and contribute to a thriving, innovative food economy.

For the reasons enumerated by other stakeholders, the proposed relocation of ERS and NIFA is ill-conceived and would unacceptably compromise the mission of these agencies in a lasting manner. A cost-benefit analysis informed by OMB circular guidance, a detailed budget plan, the Office of the Inspector General report on the proposed move, and a clear stakeholder engagement plan to reduce the minimize the disruptions caused by such a move, are all conspicuously absent from this plan.

In light of these deficiencies, and the critical contribution of these agencies to protecting the safety of the U.S. food supply, CFA requests that you include bill language stating that no funding be used for relocation or reorganization of ERS and NIFA in FY20, and that you further withhold approval of any and all reprogramming requests.

Thank you for your consideration of this testimony.

Sincerely,

Thomas Gremillion  
Director of Food Policy  
Consumer Federation of America

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<sup>1</sup> See Michael Ollinger, James Wilkus, Megan Hrdlicka, and John Bovay. “Public Disclosure of Tests for Salmonella: The Effects on Food Safety Performance in Chicken Slaughter Establishments.” Economic Research Report No. (ERR-231), (May 2017), <https://www.ers.usda.gov/publications/pub-details/?pubid=83660>

<sup>2</sup> <https://www.ers.usda.gov/amber-waves/2015/september/quantifying-the-impacts-of-foodborne-illnesses/>

<sup>3</sup> <https://www.ers.usda.gov/amber-waves/2015/januaryfebruary/strict-standards-nearly-eliminate-salmonella-from-ground-beef-supplied-to-schools/>

<sup>4</sup> <https://www.ers.usda.gov/amber-waves/2015/november/restrictions-on-antibiotic-use-for-production-purposes-in-us-livestock-industries-likely-to-have-small-effects-on-prices-and-quantities/>