

July 23, 2009

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Dear Secretary Vilsack,

On behalf of our millions of members, Food & Water Watch, S.T.O.P.—Safe Tables Our Priority, and Consumer Federation of America are writing to urge you to design a strong comprehensive program for catfish inspection. Our members expect the government to develop programs to assure the safety of the food supply, regardless of whether our food is produced domestically or is imported. We hope that you will use the new responsibility given to the USDA by the 2008 Farm Bill to design a program that requires specific safety standards for both domestic and imported catfish, as the agency currently does for meat and poultry.

Specifically, we urge you to include all the species commonly marketed as catfish in the new inspection program. This includes the Pangasiidae family, basa, and tra.

The intent of Congress in creating this new inspection program for catfish was to assure that catfish was safely produced and processed for consumers. Since the majority of the seafood consumed in the United States is imported, it is crucial that any new standards and inspection program for catfish apply to both domestic and imported species.

When writing the Farm Bill, the Agriculture Committees did consider the 2002 Farm Bill definition of “catfish” but found that this labeling restriction is commonly ignored. Basa and tra from Vietnam are regularly sold in this country as channel catfish despite the 2002 Farm Bill mandate. Even a Vietnamese news article on tra and basa explained that “[t]he two species are in fact members of the same fish family and taste very much like American catfish.”¹

Consumers have good reason to demand that imported catfish be raised and processed under similar safety standards as domestic catfish. Since June 1, 2008, the Food and Drug Administration has rejected catfish products imported from China, Thailand, and Vietnam a total of thirty-one times. Thailand was responsible for two refusals, China was responsible for thirteen, and Vietnamese catfish

¹ “The Hard Lot of ‘Tra’ and ‘Basa.” VietNamNet. June 22, 2009.
<http://english.vietnamnet.vn/biz/2009/06/854296/>

products were rejected a total of sixteen times. These countries sometimes use alternative names for catfish, including basa, swai, mystus fish, and pangasius hypothalmus. In the majority of the cases, FDA refused to allow the catfish products to enter the United States because they contained unsafe animal drug residues. Five of the imports from Vietnam were also prohibited from entering the U.S. because they were either filthy, putrid, or because they tested positive for *Salmonella*. Additionally, nine of the thirteen rejected catfish shipments from China contained unsafe food additives. It should be noted that less than one percent of imported fish is inspected when it enters the United States, so consumers cannot be assured that FDA is able to catch all instances of contamination. Consequently, an inspection program that requires imported catfish to meet the same safety standards as domestic catfish would benefit consumers.

Congress recognized the gaping holes in the food safety system that exist for catfish and charged the Food Safety and Inspection Service with the creation of a new inspection program to address this need. Such a program should be comprehensive and should require both domestic catfish and imported catfish to meet the same standards for safety, just as is the case for imported meat and poultry.

Much of the catfish that consumers eat is purchased in restaurants or other places where country of origin labeling is not required. This means that consumers don't have the information they need to determine whether something sold as catfish was raised domestically or in a foreign country. This makes it even more necessary for the USDA's new inspection program for catfish to hold imported products to the same standards as domestic. To do that, the program needs to cover species raised in other countries as well as those that are raised in the United States.

Please contact Tony Corbo of Food & Water Watch at (202) 683-2449 if you have any questions or need more information.

Sincerely,

Wenonah Hauter
Food & Water Watch

Nancy Donley
S.T.O.P.—Safe Tables Our Priority

Chris Waldrop
Consumer Federation of America