

December 8, 2008

John Podesta
Presidential Transition Team
Washington, DC 20270

Dear Mr. Podesta,

Congratulations on your excellent work on President-elect Obama's campaign and your efforts leading the transition team. I am writing on behalf of People for the Ethical Treatment of Animals (PETA), our more than 2 million members and supporters, and everyone who cares about our nation's health and the global environment to suggest two policy areas that warrant new thinking (in keeping with the president-elect's promise of a "21st century government"): our nation's food policy as well as the way our nation deals with environmental and human health risks from toxic chemicals.

Both of these areas have proved challenging for existing agencies, both warrant a vigorous focus that is interagency, and both have been the subject of recent (largely ignored) reports by top experts in their respective fields (including the Johns Hopkins Bloomberg School of Public Health and National Academies of Science, as discussed in the attached documents).

Our suggestion is for the transition team to create two national councils—similar to the National Economic Council in composition and process—that would focus on policy issues concerning food and toxicology, respectively. If implemented, our suggestions would allow the president-elect to "leave our children a better world" in several key areas.

As detailed in the attached documents, which cite research from some of the top scientists in the U.S., the formation of a National Food Policy Council and a National Toxicity Council would protect human health and the environment, reduce waste and animal suffering, and save money. And, as noted, they represent a new way of creating policy that would improve our world in important ways for our children and our children's children.

PETA's scientists and I are at your disposal. I would be happy to meet with you or other members of the transition team to discuss our proposals at a time and a place of your convenience.

Sincerely,

Bruce G. Friedrich
Vice President, Policy & Government Affairs

cc: Valerie Jarrett, Pete Rouse



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AN INTERNATIONAL
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TO PROTECTING
THE RIGHTS OF ALL ANIMALS

In Support of a “National Food Policy Council”

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PETA has been impressed by the president-elect’s knowledge of and interest in agricultural policy, which was particularly evident in his October interview with Joe Klein from *Time* magazine and his statement last month denouncing the massive handouts that wealthy farmers receive because of a broken agricultural support system. Sadly, the problem is much, much worse than the GAO report (which focuses on just this one area) indicates. Two extensive reports released in April indicate that our current method of devising food policy is broken and that the current system is doing tremendous harm in many areas, including those that are of particular interest to the president-elect: human health, the environment, and global poverty.

The first of these reports, “Putting Meat on the Table: Industrial Farm Animal Production in America,” was produced by the Pew Commission on Industrial Farm Animal Production, a major project of the Pew Foundation and the Johns Hopkins Bloomberg School of Public Health. The Commission was comprised of 15 members, including ranchers and health-focused professors as well as a former governor of Kansas (John Carlin), a former secretary of agriculture (Dan Glickman), a former assistant surgeon general/chief of staff to the surgeon general, and the president of the Western Montana Stockgrowers Association. After more than two years of research, which included heavy lobbying by the meat industries, the Commission released its report, which explicitly compares the state of agriculture today to the “military industrial complex” feared by Dwight Eisenhower. Upon investigation, the Commission found what it calls an “agro-industrial complex—an alliance of agricultural commodity groups, scientists at academic institutions who are paid by the industry, and their friends on Capitol Hill.”

The results of the farmed-animal industry’s self-governance, according to the Pew Commission’s report, have been disastrous. As the Commission explains, “Our diminishing land capacity for producing food animals, combined with dwindling freshwater supplies, escalating energy costs, nutrient overloading of soil, and increased antibiotic resistance, **will result in a crisis unless new laws and regulations go into effect in a timely fashion. ... This process must begin immediately and be fully implemented within 10 years**” [*emphasis added*]. In its executive summary, the Commission writes, “Commissioners have determined that the negative effects of the [factory animal farming] system are too great and the scientific evidence is too strong to ignore. Significant changes must be implemented and must start now.”

A similar report (“CAFOs Uncovered: The Untold Costs of Confined Animal Feeding Operations”) by the Union of Concerned Scientists (UCS) was also released in April. This report addresses many of the same issues, suggests the same sense of urgency, and details the subsidies that prop up this polluting, unhealthy system. The authors explain, “The costs we pay as a society to support CAFOs—in the form of taxpayer subsidies, pollution, harm to rural communities, and poorer public health—[are] much too high. ...

For example, conservative estimates of grain subsidies and manure distribution alone suggest that CAFOs would have incurred at least \$5 billion in extra production costs per year if these expenses were not shifted onto the public. The figure would undoubtedly be much higher if truly adequate manure distribution was required. Although we do not have good national data for other costs ... and some that have not been quantified (such as water and energy use and water purification costs), they could amount to billions of dollars more per year.” In regard to subsidies, the Pew Commission found that American taxpayers essentially paid the pork industry nearly 12 cents for every pound of pig flesh produced between 1997 and 2005.

One specific policy initiative that the new National Food Policy Council (NFPC) should address is the placement of the National School Lunch Program (NSLP) in the USDA. The current situation represents a conflict of interests that is harming the health of our nation’s young people. Because the USDA exists to promote U.S. agriculture, not to improve human health, the NSLP has become a dumping ground for the meat and dairy industries at the expense of children’s health. As you know, young people in the U.S. are becoming more and more obese and are developing type 2 diabetes (previously called “adult-onset diabetes”) at an alarming rate. According to the American Dietetic Association, people who eat meat are more likely to develop heart disease, specific types of cancer, and diabetes and to be obese. However, the USDA consistently spends more than twice as much money on cholesterol- and fat-laden meat and dairy products for the school lunch program as it does on healthier plant-based foods. And a recent study by the Robert Wood Johnson Foundation found that a staggering 82 percent of commodity funds for school lunches were used to purchase meat and dairy products, compared to only 13 percent for legumes, fruit, vegetables, and juice. Shifting the NSLP into the Department of Education, a suggestion that we expect the NFPC would make, would help shift the program’s focus from propping up the U.S. meat and dairy industries to improving the health of our nation’s children.

A similar issue exists regarding alleviating poverty. Currently, the Women, Infants, and Children (WIC) program provides women with up to 28 quarts of milk or 4 pounds of cheese every month, both of which are high in saturated fat and cholesterol. However, the program skimps on vegetables, allowing a monthly total of only 2 pounds of carrots (for breast-feeding women only) and 1 pound of beans—no other whole vegetables or fruits are allowed. The WIC program should be administered by the Department of Health and Human Services, not the USDA, for reasons similar to those offered regarding a shift for the NSLP.

In addition to public health and the environment, the Pew Commission report also discussed animal welfare and the fact that current animal agriculture confines animals to systems that are inarguably abusive. The Commission—again, please consider its esteemed members, many with ties to animal agriculture—recommends “the phase-out, within ten years, of all intensive confinement systems that restrict natural movement and normal behaviors, including swine gestation crates, restrictive swine farrowing crates, cages used to house multiple egg-laying chickens, commonly referred to as battery cages, and the tethering or individual housing of calves for the production of white veal.” Just

last month, voters in California—the nation’s top agricultural state—voted overwhelmingly to ban battery cages for hens. In fact, more voters supported this animal welfare reform than supported any of the other 11 measures on the ballot, despite a multimillion-dollar opposition campaign. Battery cages confine hundreds of millions of hens nationally and are used in the production of about 95 percent of all eggs in the U.S. As the Pew Commission report notes, “Unbeknownst to most Americans, no federal regulations protect animals while on the farm. The Humane Methods of Slaughter Act was enacted to ensure that animals are rendered ‘insensible to pain’ before slaughter, but poultry are not included under its protection despite the fact that more than 95 percent of the land animals killed for food in this country are birds.”

The current system simply can’t function in a way that will protect the environment, the public’s health, and animals while also alleviating poverty. None of the many expert policy recommendations from the Pew Commission and UCS reports was included in the Farm Bill, and none of the recommendations has been advanced since these important reports were released. This refusal to reform the current system in a meaningful way can be attributed to the power of the agribusiness lobby, which largely writes the government’s farm policy and operates a revolving door for retiring members of Congress and members of the agencies that are supposed to be regulating it.

The president-elect has committed to implementing changes that will improve the nation’s health, protect the global environment, and address the problems of domestic and global poverty. Each of these areas is currently assigned to a different section of the federal government, yet they all relate to food production and consumption—and they are screaming out for change in the way the nation handles food policy. We hope that you will create a council to direct executive policy on food, perhaps even at a cabinet level—similar to your support for the creation of a “Department of International Development,” but food-focused.

In Support of a “National Toxicology Council”

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We have also been deeply impressed by the president-elect’s interest in health and environmental policy, and we would like to draw your attention to a 2007 landmark report from the National Research Council (NRC), “Toxicity Testing in the 21st Century: A Vision and a Strategy.” The report was written as a consensus document by our nation’s top toxicologists as a recommendation for future government toxicology testing policy.

Basically, the report argues that current methods of evaluating toxicity are inefficient, time-consuming, and expensive—they are based on science that is decades old, and they generate results that are of questionable value in predicting chemical toxicity in humans or the environment. According to the report, the massive failures of the current toxicology testing protocols lead to “longstanding problems, such as the backlog of untested or insufficiently tested chemicals.” The problems of slow and inefficient testing can not be overstated. The report continues, “The current approach ... is unable to meet those competing demands adequately. In 1979, about 62,000 chemicals were in commerce (GAO 2005). Today, there are 82,000, and about 700 are introduced each year (GAO 2005). The large volume of new and current chemicals in commerce is not being fully assessed (see the committee’s interim report, NRC 2006).”

One reason for the testing backlog is that current testing methods are extremely time-consuming and resource-intensive. In addition, data generated from whole-animal testing is often ambiguous and cannot be interpreted in the context of toxicological risk. Furthermore, current tests provide only limited mechanistic information regarding how chemicals produce adverse health effects, which limits the ability to predict toxicity in human populations that are typically exposed to much lower doses than those used in whole-animal studies. They also limit the ability to develop predictions about similar chemicals that have not been similarly tested. Remarkably, “co-exposures [i.e., exposure to multiple chemicals simultaneously] that commonly occur in human populations” are not currently tested at all.

The report then details how the authors’ suggestions for a 21st century toxicology strategy would address all the problems of the current testing methods by taking advantage of the currently neglected “on-going revolution in biology and biotechnology.” The report argues that this shift would “fundamentally transform” current methods by making “toxicity testing quicker, less expensive, and more directly relevant to human exposures.” Additionally, with the development of the latest technological advances, “Combinations of chemicals that interact with the same toxicity pathway could be tested over broad dose ranges much more rapidly and inexpensively. The resulting data could allow an intelligent and focused approach to the problem of assessing risk in human populations exposed to mixtures Moreover, the current approach is time-consuming and costly, resulting in an overburdened system that leaves many chemicals untested, despite potential human exposure to them.”

The report suggests that the shift will require “coordinated efforts and resources over the next several decades by scientists from government, industry, universities, consulting laboratories, and the public interest community.” It explicitly calls for “a new institution ... to foster the kind of cross-disciplinary research that will be required,” noting that “there would be far less chance of success within a reasonable timeframe if the research were dispersed among different locations and organizations without a core institute.”

In addition to the logistical issues, the sad fact is that the agencies currently in charge of overseeing toxicology testing are mired in their historical (and inefficient) ways. As the scientists explain, “Current toxicity-testing practices are long established and deeply ingrained in some sectors. ... Agencies typically have responded to scientific advances and emerging challenges by simply altering individual tests or adding tests to existing regimens.”

The report concludes that “the vision takes full advantage of current and expected scientific advances to enhance our understanding of how environmental agents can affect human health. It has the potential to greatly reduce the cost and time of testing and to lead to much broader coverage of the universe of environmental agents. Moreover, the vision will lead to a marked reduction in animal use and focus on doses that are more relevant to those experienced by human populations. The vision for toxicity testing in the twenty-first century articulated here is a paradigm shift that will not only improve the current system but transform it into one capable of overcoming current limitations and meeting future challenges.”

The NTC would coordinate an interagency approach, with the goal of achieving the NRC vision within a reasonable amount of time. As discussed in the vision document, stakeholders should include regulators that depend on toxicity testing for risk assessment, government and academic experts who are developing the technology, and a translational agency that can adapt and validate the methods for regulatory testing. Achieving the kind of effective toxicity platform described in the NRC report is essential to the future health of our people and our environment and should form the foundation for all existing and new testing programs.