
From: Tull, Whitney [wtull@asmusa.org]
Sent: Wednesday, May 17, 2006 10:56 AM
To: FSIS RegulationsComments
Subject: FSIS Docket No. 04-026N

Attached, please find the American Society for Microbiology's (ASM) response to the Food Safety and Inspection Service's (FSIS) request for comments on whether and how the FSIS policy on *Salmonella* verification sample result reporting can be improved (Docket No. 04-026N). The following comments were developed by the ASM Committee on Agriculture and Food Microbiology (Committee), of the Public and Scientific Affairs Board.

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AMERICAN
SOCIETY FOR
MICROBIOLOGY

Public and Scientific Affairs Board

[Docket No. 04-026N]

May 26, 2006

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW, Room 102 Cotton Annex
Washington, DC 20250

The American Society for Microbiology (ASM) is responding to the Food Safety and Inspection Service's (FSIS) request for comments on whether and how the FSIS policy on *Salmonella* verification sample result reporting can be improved (Docket No. 04-026N). The following comments were developed by the ASM Committee on Agriculture and Food Microbiology (Committee), of the Public and Scientific Affairs Board.

The ASM is the largest single life science society with more than 42,000 members, including scientists in academic, industrial, clinical, and government institutions, working in areas related to basic and applied research, the prevention and treatment of infectious diseases, laboratory and diagnostic medicine, the environment, animal health, and water and food safety. The ASM applauds the FSIS's efforts to enhance public health protection through changes in how it uses the results from its *Salmonella* verification sampling program for meat and poultry establishments.

The Committee agrees with the general approach being taken by the FSIS to focus resources on potentially higher risk products and considers the categorization of processing plants in one of three categories based on process control a positive approach to providing greater public health protection. The Committee also regards the reporting of data sets back to individual companies as the results become available important for companies to make timely corrective actions and should be implemented immediately. This will enable companies to aggregate both internal and external *Salmonella* data, effectively increasing sample size and making data analysis through statistical process control more robust. Furthermore, FSIS is encouraged to carefully interpret the quarterly data for the public since these results may not correlate to last year's results, and any seasonal or geographical influences may need to be explained.

Although, food attribution data are not available to definitively conclude that most human *Salmonella* infections are from poultry or other contaminated meat products, the trend in prevalence of *Salmonella* in fresh poultry is suggestive that there may be a correlation.

Owens, Julie

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However, rates do not take into consideration factors that can influence the risk to human health, such as the levels of *Salmonella* present, whether particular products have been epidemiologically linked to outbreaks, whether specific illness-associated serotypes are present, and whether the product is destined for cooking vs. being sold raw. The Committee urges more research be done to better attribute cases of salmonellosis to specific groups of food, including poultry.

FSIS would make a major scientific step forward by enumerating *Salmonella*, rather than only reporting the percentages of *Salmonella*-positives. There is a wealth of data demonstrating that there is no relation between *Salmonella*-positives and chickens that appear to be clean or those that are visibly contaminated. Thus, there is no discrimination in efficacy of pathogen reduction without enumeration. Enumeration is the best method to provide data capable of establishing process control (target value) and capability (ability to remain in control). Without a quantitative measurement, it is difficult to assess the efficacy of a pathogen reduction process. This is supported by the National Advisory Committee on Microbiological Criteria for Foods (NACMCF) who, on October 8, 2002, responded to questions posed by FSIS regarding performance standards with particular reference to ground beef products. NACMCF stated that the use of quantitative performance standards may be more appropriate than qualitative performance standards in achieving certain public health goals, (e.g., reducing the concentration of a pathogen may not alter the detection of that pathogen).

While performance standards may set an industry target for *Salmonella* control and foster the adherence to food safety management systems, such as Hazard Analysis and Critical Control Point (HACCP), Pre-requisite Programs, and Sanitation Standard Operating Procedures (SSOP's), it is unreasonable to regulate ever lower performance standards without validated and practical interventions in animal husbandry and processing. It is incumbent upon FSIS to acknowledge the entire range of factors that may lead to raw chicken products being *Salmonella* positive. FSIS should set forth directives to fairly interpret the relations between public health risk assessments, 'state-of-the-art' process capability, and individual plant adherence to food safety management systems. The poultry processing line needs to incorporate the best designs, interventions and hurdles, to ensure that the end product has the best overall microbial quality.

To this end, the Committee urges FSIS to conduct data sharing in a manner that promotes adoption of best industry practices. This would necessitate FSIS analyzing its data of corrective actions taken by the industry and identify which corrective actions have most successfully reduced the prevalence (and counts) of *Salmonella*. This information should then be shared with the industry to increase efficient reduction of *Salmonella* prevalence. It is important to define, publish, and potentially codify what plants have done to implement reliable *Salmonella* controls. Furthermore, FSIS is urged to base enforcement of *Salmonella* Enforcement Standards on more rigid scientific-based information such as the correlation of *Salmonella*/counts/prevalence rates/specific *Salmonella* serotypes on poultry and meat products to risk using a formal risk assessment.

The Committee urges FSIS to continue to focus on working collaboratively with the industry to ensure the most effective interventions and *Salmonella* process control procedures will be

published and educate consumers in proper food handling, the number one defense in protecting family and community public health.

We are pleased to have the opportunity to provide comments on FSIS's changes in how it uses the results from its *Salmonella* verification sampling program for meat and poultry establishments, and hope that these recommendations are of assistance to the USDA.

Sincerely,

Ruth Berkelman, M.D.
Chair, Public and Scientific Affairs Board

Michael Doyle, Ph.D.
Chair, Committee on Agriculture and Food Microbiology