November 19, 2012

Docket Clerk  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
Room 2-2127 George Washington Carver Center  
5601 Sunnyside Avenue  
Beltsville, MD 20705


The Center for Science in the Public Interest (CSPI)\(^1\) appreciates this opportunity to comment on the Food Safety and Inspection Service’s (FSIS) intention to redesign its verification testing program for beef manufacturing trimmings to make the program more risk-based. CSPI strongly supports FSIS’ efforts to gather ongoing and statistically significant data that the agency can use to make sound, science-based policy decisions moving forward.

I. FSIS’ Baseline Should Include Additional Testing Antibiotic-Resistance within Salmonella Species

In responding to the 2011 Office of the Inspector General Audit, FSIS intends to initiate a beef carcass sampling baseline survey. CSPI agrees with the agency that such a baseline offers an opportunity to gather critical pathogen data with which to create estimates of occurrence that can be used to support future policy decisions. Although the agency notes its intention to include Salmonella species (as well as O157:H7 and the six non-O157 Shiga toxin producing E. coli) in that baseline, the agency does not specify an intention to do additional profiling for antibiotic resistance. CSPI believes that determining the prevalence of antibiotic-resistant pathogens is critically important to developing a comprehensive strategy to protect consumers.

In 2011, CSPI petitioned the agency to declare four separate strains of antibiotic-resistant Salmonella as adulterants under the Federal Meat and Poultry Inspection Act.\(^2\) Such a declaration would allow the agency to more vigorously monitor for the presence of these pathogens and prevent their entry into commerce. The agency has not yet acted on that petition, but the design of the upcoming trim baseline provides another opportunity for the agency to take action on this issue. By specifying that the upcoming baseline will include additional profiling for antibiotic resistance, the agency will indicate to all stakeholders—including industry—that the agency intends to face the issue of antibiotic resistance with appropriate intensity.

\(^1\) CSPI is a non-profit consumer advocacy and education organization that focuses largely on food safety and nutrition issues. It is supported principally by the 900,000 subscribers to its Nutrition Action Healthletter and by foundation grants.

\(^2\) http://cspinet.org/new/pdf/cspi_petition_to_usda_on_abr_salmonella.pdf
II. FSIS’ Proposal for Adjusted Sampling is an Improvement

CSPI agrees with the 2011 OIG recommendation that FSIS must focus sampling and testing resources at establishments that are likely to be of higher risk. It is both useful and practical to focus testing on those establishment classes that carry demonstrably higher risk. We therefore agree with the agency’s decision to revise the N-60 sampling program to provide for more frequent sampling at establishments that have exhibited problems with pathogen control. It is also important for the agency to take steps to ensure that full sample sets are achieved; the current response rate of below 50 percent is inadequate to present a complete picture of conditions inside the facilities under scrutiny. In addition, CSPI agrees with the agency that increased focus is warranted during the high prevalence seasons (May through October). Recognizing the resource constraints on the agency, CSPI nevertheless urges the agency to maintain robust verification testing even during the low prevalence season. Public health decisions must ultimately be made on the basis of public health, not as a reflection of budgets.

Sincerely,

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