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Docket Clerk
U.S. Department of Agriculture
FSIS Docket Room
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Washington, D.C., 20250-3700

RE: Modernization of Poultry Slaughter Inspection (Docket No. FSIS-2011-0012)

The Center for Science in the Public Interest (CSPI) appreciates this opportunity to comment on the Food Safety and Inspection Service’s (FSIS) proposal for a new inspection system for young chicken and turkey establishments. 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 850,000 subscribers to its Nutrition Action Healthletter and by foundation grants. The proposed changes represent a significant overhaul of the existing system for poultry inspection and, as such, should be considered with great care.

The proposal intends to create a bifurcated inspection regime for young chickens and turkeys, wherein establishments select whether to operate under traditional inspection or under the new inspection system. These two options will replace other existing inspection regimes, including the current Streamlined Inspection System (SIS), the New Line Speed Inspection System (NELS), and the New Turkey Inspection System (NTIS). In addition, the agency has proposed changes to regulations that will affect all establishments regardless of chosen inspection regime. CSPI has studied these proposed changes and provides these comments on areas of particular concern to our consumer members.

CSPI believes that modernization of the poultry inspection system is both a reasonable and laudable goal for the agency, and presents an opportunity to truly examine where improvements can be made to leverage the most significant public health impact. CSPI has always held as a core principle that public health, sound science, and consumer safety must be at the forefront of any policy decisions. The new poultry inspection system proposal contains both positive steps forward and significant areas of concern. In this comment, CSPI will address primarily the sampling and testing portions of the proposal. Other consumer organizations, such as Consumer Federation of America and Consumers Union, may address additional issues of concern to consumers and public health, including the impact of line speed changes on workers and on rates of contamination. CSPI supports these organizations and echoes their concerns about these issues.

The shift to prevention-based poultry inspection proposed by FSIS is appropriate and was first proposed by USDA in 1995. It is well-settled that a preventive, HACCP-based approach is the most effective way to control food safety hazards. Despite the promise of the Pathogen
Reduction; Hazard Analysis and Critical Control Point Final Rule, for years the poultry industry has operated under a system that allows for far greater levels of contamination than are acceptable to consumers.\textsuperscript{1} FSIS should have reducing \textit{Salmonella} and \textit{Campylobacter} in poultry as the central tenet behind its changes, and should apply systems that monitor and measure contamination rates. In its current form, the proposal lacks specificity in key areas, and makes assumptions of outcomes that are not reasonably supported by currently available data. FSIS must correct these errors before moving forward.

A. Failure to Specify Required Elements of the Microbiological Testing Component of the New Poultry Inspection System is a Grave Error.

While CSPI supports modernization of the poultry inspection system, the first step to modernization is adoption of a uniform sampling system to monitor individual plant performance with respect to pathogenic contamination on a continuing basis. This system should be adopted before any other changes, so the plant and USDA can benefit from baseline performance data. As production changes are adopted by the facility, the company and the USDA inspection personnel can monitor the impact those changes are having on plant performance, and can rapidly reverse changes that increase contamination rates in their poultry products. Consumers would not expect, for example, that physicians would change treatment protocols without understanding the impact that change would have on public health. Similarly, we should not be exposed to random changes in poultry processing that might result in higher contamination rates. USDA needs to implement a uniform system across the poultry industry that will regularly monitor the public health impact of these changes – to do otherwise is to engage in experimentation with consumers as the guinea pigs.

USDA’s proposal fails to mandate specific and uniform microbiological testing requirements to monitor pathogen levels at various points along the production chain. This is a grave error that threatens to undermine any potential benefits of the proposed new system. Instead the agency allows each facility to establish its own testing regime, including identifying the target organism and the sampling frequencies. The variations in sampling that will necessarily occur under the proposed regime will make data analysis extremely difficult, both for facility managers, in-plant inspectors, and regulators attempting to study the data. The mandatory record-keeping proposed by the agency is important, but its value will be sharply limited without standardization of data collection. As drafted, FSIS proposes that each establishment would be responsible for developing and implementing its own microbiological sampling plan, which must include carcass sampling at pre-chill and post-chill. The proposed rule fails to prescribe a testing frequency, and instead indicates only that an establishment’s sampling program “should be adequate to monitor process controls.”

CSPI believes strongly and without reservation that the testing program described in the proposal is inadequate to protect public health. Measuring the effectiveness of process controls is best accomplished by standardized, mandatory sampling across the industry. Sampling and testing at key points during processing ensure that the establishment’s HACCP plan is operating effectively to control pathogens. Ongoing feedback can also provide an early warning system

when a component is not operating normally. Requiring all establishments to conduct testing for the same organisms, e.g., *Salmonella* and *Campylobacter*, at the same frequency and at the same points along the production route can provide invaluable data for the agency and stakeholders on the impacts of incremental changes in production on contamination levels both within a specific facility and industry-wide. A uniform sampling program can help to assess what further steps should be taken to combat hazards and modernize the system. Additionally, it can help ensure that facilities identify optimal line speeds, those that do not cause poultry contamination to rise.

An appropriate testing regime for poultry inspection will necessarily include:

- Mandatory, standardized testing for both *Salmonella* and *Campylobacter*;
- Required testing frequency per production day based on production volume;
- Continuous generation of baseline data for a period of at least 90 days prior to implementing other substantive changes to the poultry inspection system;
- Phased-in approach to production changes with a focus on ensuring contamination rates continue to improve under the new inspection system.

Mandatory, standardized testing for both *Salmonella* and *Campylobacter* should be an integral element of any effective modernization of poultry inspection. These are the two pathogens of greatest public health concern in the products affected by this proposal, and together account for nearly half of all poultry-related outbreaks in the U.S.⁡⁡¹ Since the advent of HACCP for poultry in the 1990’s, the industry has been permitted to sample product for generic *E. coli* as an indicator of fecal and potential pathogen contamination, rather than being required to test for *Salmonella* or *Campylobacter*. As a result of numerous public meetings held on the meat and poultry HACCP rule before it was adopted, USDA changed the sampling program from requiring industry-wide testing for the presence of *Salmonella* to testing for the levels of generic *E. coli* present on product.³

The agency should postpone any change to the requirement to test for generic *E. coli*, until it has established a system for collecting baseline and continuous monitoring data for each facility. Once such a system has been operating, and the agency has determined that the *E. coli* testing is redundant, then it might consider elimination of the requirement. But there is no evidence today that there is any redundancy, and replacing an existing program with one that is untested is unwise and could jeopardize consumer protection.

Therefore, CSPI opposes the proposed elimination of the mandatory *E. coli* testing program.

1. **Mandatory Testing for Indicator Organisms Should Continue.**

   We disagree with FSIS’ proposal to rescind 9 C.F.R. § 381.94. The following sections contain the essential elements of a testing regime. Paragraph (a) of the section requires sampling for *E. coli* and sets a performance standard to verify process controls for preventing fecal contamination in the end-product. Paragraph (b) establishes a regulatory pathogen reduction

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² CSPI Outbreak Alert Database, data accessed 5/21/12. Data includes only chicken and turkey outbreaks, not outbreaks linked to ratites or to multi-ingredient poultry dishes.
³ Remarks of Caroline Smith DeWaal at the Annual IAMFES Meeting, Orlando, FL (July 7, 1997).
performance standard for *Salmonella*. Each paragraph also specifies actions a poultry plant must take, and describes enforcement actions FSIS may take, if samples do not conform to the standards. FSIS proposes to replace § 381.94 with a general requirement in § 381.65(f) and (g) for poultry plant HACCP plans to include a sampling program for fecal and microbial contamination at the pre-chiller and post-chiller stages. We are very concerned that this will remove performance standards as a regulatory matter, expose consumers to greater risks from contaminated poultry, and reduce options for enforcement in cases of nonconformance.

2. FSIS Has Not Substantiated Its Decision to Rescind § 381.94(a).

FSIS clearly states that preventing contamination throughout the slaughter and dressing operation is critical to protecting consumers. For that reason, we support the proposal to require HACCP plans to include additional testing but recommend that these tests are uniform and implemented prior to other processing changes to verify that new modified controls are effective. FSIS can make this change, though, without rescinding the safeguards provided by the *E. coli* sampling program and *Salmonella* performance standard. In fact, FSIS has not adequately supported its decision to rescind the *E. coli* sampling program and *Salmonella* performance standard under § 381.94(a). The agency offers two unsubstantiated rationales for its proposed action.

FSIS relies on a 2004 report of the National Advisory Committee on Microbiological Criteria for Foods (NACMCF). The NACMCF report, however, is not an appropriate basis for rescinding the rule. The discussion FSIS points to is a comment on use of *E. coli* as an indicator organism. The report in general supports performance standards, recommends further data gathering with possible use of other index organisms and is silent on rescinding the *E. coli* testing program and performance standard. Other important advisory bodies, such as the National Academies of Sciences, have supported the use of generic *E. coli* as an indicator organism in both meat and poultry, such as in the 2003 report, Scientific Criteria to Ensure Safe Food:

Although the data collected by the industry are not in the public domain and therefore not available for review, the criteria for generic *E. coli* have been implemented in essentially all federally and state inspected establishments. The criteria have been used to detect problems and document acceptable control of the process, and anecdotal reports indicate that the criteria have served to document a reduction in the levels of carcass contamination and have led to process improvement. An additional benefit of the generic *E. coli* criteria has been an increased awareness in the meat and poultry industry of the importance and significance of process control on the microbiological status of carcasses.

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4 Motor Vehicle Manufactures Assn v. U.S. Dept. of Transportation, 463 U.S. 29, 42-43 (1983) (“[A]n agency changing its course by rescinding a rule is obligated to supply a reasoned analysis for the change” and “must examine the relevant data and articulate a satisfactory explanation for its action.”)


Furthermore, FSIS’ concern that false positives may result from infectious processes and airsacculitis caused by \textit{E. coli} is not a basis for this action. Neither study cited by FSIS is relevant to the validity of \textit{E. coli} testing as a measure of fecal contamination.\footnote{Gomis, S.M. et al., \textit{Phenotypic and Genotypic Characterizations of Virulence Factors \textit{Escherichia coli} Isolated from Broiler Chickens with Simultaneous Occurrence of Cellulites and Other Colibacillosis Lesions}, Can. J. Vet. Res. 2001 Jan; 65(1): 1-6, is a study on diseased broilers condemned prior to processing and studied virulence factors but not fecal contamination. Russell, S.M., \textit{The Effect of Airsacculitis on Bird Weights, Uniformity, Fecal Contamination, Processing Errors, and Populations of Campylobacter spp. and \textit{Escherichia coli}.}, Poult. Sci. 2003; 82:1326-1331, identifies higher rates of fecal contamination in infected flocks. This suggests that even if an infected bird made it to the chiller, that would not preclude fecal contamination as the reason for a positive test. Furthermore, the study concluded that infected flocks carry higher rates of campylobacter and detection of airsacculitis should emphasize the need for its control in flocks as a means of preventing subsequent foodborne infections. In the vertically integrated poultry industry, it is reasonable to expect a processor controlled the bird from egg to packaging and therefore should be responsible for preventive controls throughout the production, slaughter and processing of a poultry product. See, Nat’l Chicken Council, \textit{Vertical Integration: What it is – and why it’s good for the chicken industry… and you}, at \url{http://www.nationalchickencouncil.org/industry-issues/vertical-integration/} (noting that vertical integration allows producers to combine different sanitation practices to protect consumers from foodborne diseases). This would indicate that mandatory testing for \textit{E. coli}. \textit{E. coli} at the post-chiller stage is an entirely reasonable verification step.} Also, poultry plants are required to destroy infected birds before processing so that they should never be present at the chiller stage.\footnote{See, 9 C.F.R. §§ 381.84, 381.85 and § 381.86 (2011).} Whether the source of contamination is fecal matter or an infected carcass, the testing and performance standard remain relevant because detecting \textit{E. coli} would be evidence of serious problems in the plant’s process controls.

As grounds for removing \textit{E. coli} sampling, FSIS also relies on incidents of poultry plants that failed to take corrective actions after failing \textit{Salmonella} tests.\footnote{77 Fed. Reg. 4408, 4426-27 (Jan. 27, 2012).} Rather than demonstrating that these failures expose a weakness in the sampling program, those failures point to a need for in-line testing and better HACCP plans. The incidents do not establish a clear connection to FSIS’ assumption that they are the result of end-product testing under § 381.94. It is more likely the proposal to rescind \textit{E. coli} testing will create problems for inspectors and expose consumers to greater risks, as it will allow each poultry plant to adopt different indicator organisms, different tests, and set their own standards for verifying controls are effective. This means FSIS inspectors will have to understand on a case-by-case basis whether each specific test chosen is validated and suited to the purpose for which it is used, and whether the standard chosen by the plant is adequate, adding greatly to the complexity faced by inspectors in evaluating the HACCP plan’s effectiveness. In contrast, the \textit{E. coli} testing program provides an objective test and standard with which both the industry and regulators are familiar.

3. FSIS Draws the Wrong Conclusion Regarding the Enforceability of § 381.94(b).

FSIS should not rescind the \textit{Salmonella} performance standard under § 381.94(b). A performance standard provides a common benchmark against which FSIS can measure the effectiveness of any individual poultry plant’s food safety program. Additionally, the regulation places a legal duty on poultry plants to reassess their HACCP plans if they fail to meet the
standard. Guidance, meanwhile, as proposed by FSIS to replace § 381.94(b), is not legally binding. FSIS argues that it is rescinding the section because the court’s decision in *Supreme Beef Processors, Inc. v. USDA* limits its ability to enforce the standard.\(^\text{11}\) The agency fails to explain why it believes this. The case against a beef grinding operation involved the enforceability of a different section of the Code of Federal Regulations, 9 C.F.R. § 310.25(b), and that section is not affected by the action FSIS proposes to take in this regulation. The court clearly holds that performance standards are appropriate for assessing conditions within an establishment.\(^\text{12}\) FSIS cannot simply assume that *Supreme Beef Processors* applies to the *Salmonella* performance standard for poultry as justification for its arbitrary decision to repeal § 381.94(b).

While we support FSIS’ commitment to the *Salmonella* Verification Program that the agency intends to use in lieu of the enforcement provisions, we disagree with the agency’s plan to rescind § 381.94(b). That section provides an enforceable performance standard as a fallback for protecting the public from especially recalcitrant violators. The *Salmonella* performance standard is important because it informs poultry establishments of their responsibilities to control their processes, and the consequences of repeated failures to do so. Rather than dismissing the performance standards entirely, the agency should instead focus on updating the allowable levels in the regulation, thus recognizing the continuous improvement of the industry in controlling *Salmonella* and *Campylobacter* without weakening the regulatory requirement to do so.

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**4. FSIS Should Retain § 381.94 While Requiring Additional In-Line Verification Testing.**

In developing the rule, FSIS should have considered the alternative of retaining § 381.94 as a way of assuring a plant’s processes are under control and its products meet a minimum level of sanitation. FSIS has chosen the correct remedy for addressing failures in the current HACCP program that result in inadequate verification testing throughout slaughter and dressing operations. However, FSIS should retain its ability to monitor end-products for fecal and microbial contamination through mandated testing and performance standards. In rescinding the *E. coli* and *Salmonella* testing programs and their associated performance standards, FSIS is removing a useful verification check from the agency’s inspectional toolbox.

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**5. FSIS Should Require a Testing Frequency for *Salmonella* and *Campylobacter*.**

Under the proposal, establishments must sample carcasses at least pre- and post-chill. Despite this requirement, the agency does not mandate a testing frequency for the industry. CSPI urges the agency to revisit the framework of the testing component of the new poultry inspection proposal and to strengthen it by making testing for *Salmonella* and *Campylobacter* required at prescribed frequencies. In other countries, such as New Zealand, testing frequencies and

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\(^{12}\) The court rejected Supreme Beef’s argument that *Salmonella* testing can never be used as a proxy for conditions within a plant. *Supreme Beef Processors, Inc. v. USDA*, 275 F.3d 432, 440-41 (5th Cir., 2001). Instead, the performance standard was only invalid to the extent it regulated the procurement of raw materials. *Id.*
indicator pathogens are set by the government for the industry. A mandated testing frequency assures comparable data across the industry and provides the framework for ensuring compliance and enforcement. Required, standardized testing across the industry will generate a significant amount of baseline data on overall performance in controlling contamination rates during slaughter and processing. That data can inform additional policy changes moving forward, and can provide indicators of which changes produce positive or negative effects on rates of contamination.

Without mandating a testing frequency, FSIS estimates that large establishments will perform the prescribed tests 15 times a day, small establishments 7 times a day, and very small establishments 3 times a day. Notably, this estimate is provided in the Paperwork Reduction section of the Federal Register notice, and as such carries no description or additional information relative to how FSIS developed these estimates. CSPI urges the agency to provide additional clarification on the source of these estimates so that stakeholders can better ascertain whether they represent a reasonable estimate of testing frequency. FSIS should provide a written document for stakeholders outlining the justification for this presumed sample size, including all relevant assumptions and statistical analysis. In order to adequately assess the estimated sampling frequency, FSIS should explain what level of contamination is being tested, and how that level was determined. The agency should also describe whether and how sensitivity and specificity of sampling was taken into account, and whether the estimate accounts for variability in results at pre- and post-chill.

Once an appropriate sampling frequency has been determined and mandated, we urge the agency to implement a feedback system wherein establishments provide their testing results to FSIS periodically so that the agency can use that data to inform future decision-making. Establishments should provide sampling data to the agency – via the district office, for example – at reasonable intervals, such as every 60 days, so that the agency can better track establishments’ performance as additional changes are considered and implemented. Importantly, inspectors within the plants should be empowered to access these testing records at any time to determine whether testing data supports overall process control, and to help establishments and the agency to better understand which policy changes impact rates of contamination.

6. FSIS Should Adopt a Phased-in Approach to Poultry Slaughter Changes and Monitor Each for Its Effect on Contamination

The agency should implement this new mandatory testing system prior to implementing the other changes outlined in the proposal. While modernization of the poultry system is a laudable goal, the agency must ensure that, as changes are implemented, contamination rates

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15 A similar system of data collection was proposed by the Committee on the Review of the Use of Scientific Criteria and Performance Standards for Safe Food, Institute of Medicine National Research Council of the National Academies of Sciences in 2003, Discussing generic E. coli testing data, the committee “recommend[ed] that an anonymous national database be created to collect the available generic E. coli data on carcasses so that industry and regulatory and public health agencies have benchmarks available for comparative purposes.” (p.151).
continue to improve. To that end, CSPI urges the agency to begin the modernization with the implementation of the standardized, required testing regime outlined herein. Once that program has been operational for a period of at least 90 days, additional programmatic changes can be considered singularly. Each change can then be appropriately and adequately studied against the existing baseline data (generated by the 90-day implementation period) to ensure that individual changes do not negatively impact process controls. As each change is implemented and process control maintained, additional individual changes can be considered. A well-designed sampling program for example, should be able to generate useful data about what optimal operating/line speeds do not cause an elevation in contamination rates. This data would serve as a feedback loop to inform additional programmatic changes moving forward and could provide an ongoing evaluation tool for the success of the program.

CSPI urges the agency to consider this phased-in approach instead of the massive overhaul that has currently been proposed. We strongly believe that the public health and interests of consumers are best-served through an incremental modernization program that prioritizes data-gathering and ongoing tracking, rather than wholesale change without sufficient metrics to measure success. Regardless of when additional changes are implemented, many of the changes currently proposed must be clarified and strengthened as suggested below in order to most effectively ensure public health.

B. Recordkeeping Can Assist with Data Collection, and Should Be Used as a Tool for Ensuring Compliance

FSIS is proposing to require that all poultry slaughter establishments develop, implement, and maintain—as part of their HACCP or sanitation plans—written procedures to ensure that carcasses contaminated with visible fecal material do not enter the chiller. This action aims to strengthen the codified zero tolerance for visible fecal material that has been in place since 1997. At that time, the agency emphasized that the “zero tolerance policy for visible fecal contamination is an important food safety standard because fecal contamination is a major vehicle for spreading pathogenic microorganisms, such as Salmonella, to raw poultry”.

That same year, FSIS specified that the procedures a company used for preventing fecal contamination from entering the chiller must be incorporated into the establishment’s HACCP system. Notably, a requirement that the establishment maintain records to document compliance with this codified zero tolerance policy was never implemented.

CSPI agrees with FSIS that mandatory record-keeping to ensure compliance with the existing zero tolerance policy for visible fecal contamination entering the chiller can only help to improve industry performance on this key issue of process control. While mandatory record-keeping cannot in and of itself correct for process control lapses, it can—when enforced—provide a useful measure of compliance. Requiring establishments to keep written records of activities within their process that can have a significant impact on public health is a positive step forward. FSIS should ensure that recordkeeping methods are modernized so that data can be saved, collected, and analyzed electronically.

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17 Id.
In addition to this proposed requirement, FSIS has proposed that all poultry slaughter establishments develop, implement, and maintain written procedures to prevent contamination of carcasses with enteric pathogens (e.g. *Salmonella* and *Campylobacter*) and fecal material throughout the entire slaughter and dressing operation. This proposal indicates that FSIS understands a key failing of the current poultry inspection system—that verification checks performed at the end of the slaughter and chilling process encourage the industry to focus its activities not on prevention, but rather on post-process interventions to reduce contamination. As FSIS notes, interventions applied at the end of processing are less likely to be effective on carcasses that contain high levels of pathogens. Equally important, focusing on interventions to reduce contamination at the end of processing fails to provide the essential checkpoints on overall process control that underpin an effective HACCP system. Many establishments may have in place process control measures that attempt to address contamination by enteric pathogens and fecal material, but nothing currently requires that the establishments maintain documentation to verify the effectiveness of these procedures on an ongoing basis. Without this documentation, establishments can swiftly lose process control or develop a reliance on procedures that contribute to an ongoing risk of contamination. The documentation proposed by the agency will allow both the establishment and the agency to identify points of weak process control, and can provide a roadmap for corrective action.

C. When Implemented, Carcass Sorting by Company Employees Must Be Accompanied by Mandatory Training

FSIS’ proposal aims to shift responsibility for carcass sorting from the online federal carcass inspector to establishment employees. Under the proposal, establishments will be required to sort carcasses, to dispose of carcasses that must be condemned, and to conduct any necessary trimming or reprocessing activities before carcasses are presented to the online FSIS carcass inspector. That inspector will continue to do a carcass-by-carcass inspection as required by federal law. FSIS notes in its proposal that establishments’ responsibility for carcass sorting under the proposed new inspection system would include removing carcasses that exhibit septisemic and toxemic conditions from the processing line, since these carcasses are more likely to carry infectious bacteria and other pathogens. Under the proposal, FSIS would maintain its zero tolerance for septisemic and toxemic carcasses, and those carcasses would be removed by the online FSIS inspector if they have not already been removed by the company sorter. Despite FSIS’ acknowledgement that organisms from affected carcasses are a food safety risk to humans if permitted to enter the chiller, the agency has not outlined any mandatory training or qualification for company carcass sorters. CSPI finds the failure to include a required and enforceable training component to be unacceptable, and cannot support the transition of authority to company personnel without a robust training regime.

The agency indicates that it intends to enforce this new authority by assessing the effectiveness of the establishment’s HACCP system if FSIS inspection personnel observe septisemic or toxemic carcasses on the production line. CSPI believes that this evaluation will not provide a sufficient safety net to ensure that contaminated carcasses do not enter the chiller. Rather, such assessment should be performed routinely to monitor the establishment’s
effectiveness, but should not be the sole guarantor of compliance. CSPI believes that a safe and efficient carcass sorting program begins with adequate, systematic training for all establishments and plant inspection personnel on the specific conditions relevant to carcass sorting. The agency should require participating establishments to use standardized federal training materials—the same materials an FSIS online inspector would be trained with—prior to initiating a carcass sorting program.

FSIS has proposed that one offline verification inspector be assigned for each evisceration line in establishments operating under the new poultry inspection system. This verification inspector will conduct food safety related inspection activities and will monitor and evaluate establishment process control. CSPI believes that responsibility for ensuring that all establishments comply with required training should fall on the proposed offline federal inspector. If at any time that inspector finds that the training is insufficient or that other company procedures are hindering compliance, he is in the best position to take immediate action—including stopping the line. That responsibility should be specifically delineated in the performance expectations for the offline inspector.

D. Conclusion

CSPI appreciates the intent of the FSIS proposal and the effort to reform the poultry inspection system. However, an undertaking of this scope must be crafted with extreme care. The details of the system are what will drive improvement, and thus those details are of utmost importance. Leaving significant portions of the regime unspecified and open to interpretation by industry is inadvisable. The absence of a consistent testing program greatly increases the complexity of evaluating company HACCP plans and the burden on FSIS to train inspectors on how to interpret numerous sampling plans and results. In order to protect consumers and gather useful data for future-policy making, the agency must require uniform sampling and must aggregate and analyze that data to ensure continued improvement.

Sincerely,

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