February 26, 2008

U.S. Department of Agriculture
Food Safety and Inspection Service
Docket Clerk
1400 Independence Ave. SW Rm. 2534
Washington, DC 20250

RE: Comments on *Salmonella* Verification Sample Sampling Program: Response to Comments and New Agency Policies (Docket No. FSIS-2006-0034)

The Center for Science in the Public Interest (CSPI) appreciates this opportunity to comment on the United States Department of Agriculture’s (USDA) new policies on the *Salmonella* Verification Sampling Program. 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.

CSPI supports the improvements made to the *Salmonella* testing program—in particular the posting of test results—by FSIS, and encourages the agency to expand the program to include the posting of results from Category 1 plants. Additional improvements, such as reducing line speeds, should also be considered to protect public health.

**Background**

*Salmonella* infections cause an estimated 1.4 million illnesses and 400 deaths annually in the United States.\(^1\) While the incidence of several other foodborne pathogens has decreased significantly from 1996 to 2006, the incidence of *Salmonella* infections has only seen a modest

The overall incidence of cases in 2006 per 100,000 people was 14.81, down from 16 cases per 100,000 compared with 1996-2000. But certain strains—such as *Salmonella Enteritidis*, *Salmonella Newport*, and *Salmonella Javiana*—have increased dramatically.

Healthy People 2010 set a goal of 6.8 cases per 100,000 persons, less than half the 2006 rate. *Salmonella* contamination in raw meat and poultry is a significant source for this pathogen.

If the Healthy People 2010 goal is going to be met, the United States Department of Agriculture’s (USDA) Food Safety Inspection Service (FSIS) has to significantly improve its *Salmonella* verification sampling program. As of 2006, the U.S. was not on track to meet Healthy People 2010 goals for *Salmonella* reduction.

FSIS has proposed several changes on how it uses the results from the *Salmonella* verification sampling program for meat and poultry establishments. This includes concentrating resources at establishments with higher levels of *Salmonella* and changing the reporting and utilization of FSIS *Salmonella* verification test results. While verification sampling is not designed to estimate national prevalence of *Salmonella*, CSPI supports FSIS’s efforts to enhance public health protection by focusing on controlling the pathogen in the plant.

CSPI strongly supports FSIS’s decision to categorize plants by their demonstrated level of process control, thus allowing the agency to focus resources on potentially higher-risk products. We continue to disagree, however, that the best performing plants should be sampled at a rate of “no more than once a year, but at least once every two years.” Annual sampling should be performed in every plant.

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5 Federal Register, Vol. 73, No. 18, Docket No. FSIS-2006-0034.
FSIS should also consider reducing line speeds in plants that do not meet the *Salmonella* standard. As line speeds increase, it becomes more difficult for workers to do their jobs properly. Faster speeds can also mean sloppy processing, which when not caught by USDA inspectors can exacerbate contamination from pathogens like *Salmonella*. Reducing the line speed in plants that do not meet the standard is an incentive-based approach to improving process control. Plants should not be able to maintain high-speed production unless they can document that their food safety controls are effective.

**Posting Completed Sampling Results for Categories 2 and 3 by Plant Name and Number**

We strongly support FSIS’s decision to post set results from the completed *Salmonella* sets for each establishment producing the product, identified by establishment name and number. This information would give all consumers and smaller retailers (not just the fast food giants) more timely information on plant performance, so when they are making a meat purchase, they can use “real-time” test results to choose products from the safest plants.

In 2002, CSPI was able to obtain, through FOIA, information on the performance of a large number of turkey plants, and we were able to share with consumers the relative performance of these plants. See [http://www.cspinet.org/new/200211211.html](http://www.cspinet.org/new/200211211.html), especially the *Field Guide to Safer Turkeys*. The results disclosed that a quarter of the plants had very high levels of process control (2% positive or less), and half had results that would have met USDA Category 1 criteria. The other half would have fallen into Category 2 or 3 and the really poor performers were as high as 30-50% positive for *Salmonella*.

While we support giving plants their test results in real-time, consumers and retailers should be accorded a similar benefit of having access to full set results when those results first become available. This is when they are really the most meaningful. This type of customer disclosure provides the strongest incentives for individual plants to improve performance.
Posting Completed Sampling Results for Category 1 Facilities

CSPI appreciates FSIS’s continued consideration of the publication of verification sampling data from Category 1 facilities. We strongly support this additional publication for several reasons. First, we believe that publication of sampling data helps to ensure consistent process controls by serving as an incentive to Category 1 establishments. Second, the inclusion of Category 1 establishments creates a more comprehensive picture of the industry for consumers, and provides additional critical information to consumers and retailers. Since all establishments are responsible for process control and pathogen prevention, we see no reason to limit the dissemination of the sampling results to Categories 2 and 3 only. We encourage FSIS to expand the posting to Category 1 to ensure a comprehensive picture of salmonella data from all young chicken slaughter establishments.

Prototype Web Posting Table

CSPI appreciates the simplicity of the prototype table for Web posting of the verification testing results. It is critically important that consumers be able to not only access but also understand the public health data now being provided for them, and we are gratified to see that the prototype table appears to be both comprehensive and understandable.

Conclusion

CSPI supports the changes proposed by FSIS, and encourages the agency to expand the program to include the posting of results from Category 1 plants. Greater transparency through the prompt disclosure of Salmonella test data will benefit consumers, retailers, and the industry.

Respectively submitted,

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