

December 16, 2022

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue SW
Washington, DC 20250–3700

RE: Comment on Proposed Framework for Controlling *Salmonella* in Poultry (Docket No. FSIS-2022-0029)

To Secretary Vilsack, Deputy Under Secretary Eskin, and Dr. Emilio Esteban,

The undersigned members of the Coalition for Poultry Safety Reform¹ (the Coalition) appreciate this opportunity to comment on the Proposed Framework for Controlling *Salmonella* in Poultry. We welcome the USDA’s commitment to meaningful poultry safety reform aimed at reducing illnesses from *Salmonella*. We encourage USDA to engage thoughtfully with stakeholders in developing proposals for reform that will support public health and provide workable, effective solutions across the food chain.

The Coalition includes individuals and organizations representing consumers, victims of foodborne illness, food safety scientists, current and former food safety officials, and members of the poultry industry, united in the common aim of reducing *Salmonellosis* through poultry safety reform. We seek to provide effective, practicable, and science-based approaches that will reduce foodborne illness while ensuring continued consumer access to safe, affordable food.

Reducing *Salmonella* infections attributable to poultry is a top priority for members of the Coalition. *Salmonella* is a leading cause of foodborne illness, responsible for an estimated 1.35 million infections, 26,500 hospitalizations, and 420 deaths in the United States every year.² The incidence of illness due to *Salmonella* has also remained persistently high for the last 20 years, despite efforts by federal regulators aimed at reducing contamination in poultry products.³

To achieve better results, the Coalition has urged USDA to improve its approach to poultry regulation,⁴ including by shifting away from an approach that centers on meeting performance standards that do not effectively target the types of *Salmonella* contamination that pose the greatest risks of illness. We support new *Salmonella* standards for poultry that are objective, risk-based, achievable, enforceable, and flexible enough to adapt to emerging evidence and the latest science.

¹ Coalition for Poultry Safety Reform. https://www.afdo.org/coalition_for_poultry_safety_reform/

² Salmonella. The Centers for Disease Control and Prevention. Updated November 16, 2022. Accessed December 13, 2022. <https://www.cdc.gov/salmonella/index.html>

³ 12 charts explore America’s Salmonella problem-and steps to solve it. The Pew Charitable Trusts. December 10, 2021. Accessed December 13, 2022. <https://www.pewtrusts.org/en/research-and-analysis/data-visualizations/2021/12-charts-explore-americas-salmonella-problem-and-steps-to-solve-it>

⁴ The coalition for poultry safety reform welcomes the launch of a new USDA effort to reduce Salmonella illnesses associated with poultry products. Center for Science in the Public Interest. Updated October 19, 2021. Accessed December 13, 2022. <https://www.cspinet.org/news/coalition-poultry-safety-reform-welcomes-launch-new-usda-effort-reduce-salmonella-illnesses>

The agency should consider the results of risk assessments as it develops the components of the framework. Risk assessments can identify the public health benefits of proposed standards in reducing the burden of foodborne illness and are a core component of an effective risk analysis strategy. Such a strategy includes three critical components: risk assessment, risk communication, and risk management. FSIS should comprehensively develop the three components as it addresses *Salmonella* in poultry. We are encouraged that the agency has announced it is engaged in developing a risk assessment and ask the agency submit the assessment for peer review and incorporate reviewer feedback prior to finalizing its approach. Members of the Coalition are also developing a risk assessment and we request that the agency to take the results of this assessment into account as well as it seeks to understand the potential benefits of new standards in their risk analysis strategy for *Salmonella* in poultry.

Any such new standards must also be grounded in USDA's legal authority, to ensure the successful operation of the framework. It is essential that USDA maintain an open and transparent dialogue with stakeholders as it moves forward with this process and makes decisions regarding how to interpret its adulteration authority. FSIS should also consider feasibility, including what is achievable with current best practices and reasonably foreseeable innovation, as it considers potential new standards.

In addition to final product standards, the framework also proposes steps in preharvest and processing. The agency's approach to preharvest and processing should be grounded in the Hazard Analysis and Critical Control Point (HACCP) approach, which contemplates that an establishment will be responsible for considering food safety hazards that can occur before, during, and after entry into the establishment. These principles allow industry to experiment and innovate with practices to promote food safety from farm to fork. We encourage the agency to engage further with stakeholders to determine how to best apply this approach to the preharvest and processing elements of the framework.

The reform process would greatly benefit from outreach structured to better encourage conversation and sharing of perspectives between stakeholders and USDA. FSIS has initiated and conducted several efforts to engage in evidence collection and consult with experts and stakeholders as it considers the framework, including consulting the National Advisory Committee on Microbiological Criteria for Foods (NACMCF) and conducting a public meeting in November of 2022. However, both NACMCF and the November public meeting provided only limited opportunities for two-way dialogue between stakeholders and USDA. We encourage USDA to seek to create additional opportunities for multistakeholder dialogue, both before and after issuing its next regulatory proposal. USDA should consider varying the format of these sessions and organizing tabletop exercises, technical sessions on focused areas, and open small and large group discussions.

We look forward to further public dialogue with the agency on this topic. For questions about these comments, please reach out to James Kincheloe at jkincheloe@cspinet.org or (202) 777-8316.

Signed,

Mitzi D. Baum
Chief Executive Officer
Stop Foodborne Illness

Amanda Craten
Mother of Salmonella Illness Survivor
Gilbert, Arizona

Scott Faber
Senior Vice President, Government Affairs
Environmental Working Group

Thomas Gremillion
Director of Food Policy
Consumer Federation of America

Craig W. Hedberg
Professor
University of Minnesota

Alice Johnson
Senior Vice President, Food Safety
Butterball LLC

James Kincheloe
Food Safety Campaign Manager
Center for Science in the Public Interest

Barbara Kowalcyk
Director of the Center for Foodborne Illness
Research and Prevention
The Ohio State University

Jerold R. Mande
CEO, Nourish Science
Former USDA Deputy Under Secretary,
Food Safety

Steven Mandernach
Executive Director
Association of Food and Drug Officials

Barbara Masters
Vice President Regulatory Policy, Food and
Agriculture
Tyson Foods

Bryan Miller
Senior Vice President, Quality Assurance &
Food Safety
Wayne-Sanderson Farms

J. Glenn Morris, Jr.
Professor and Director, Emerging Pathogens
Institute
University of Florida

Michael Robach
Chief Executive Officer
The Robach Group LLC

Brian Ronholm
Director of Food Policy
Consumer Reports
Former USDA Deputy Under Secretary,
Food Safety

Angie Siemens
Vice President, Food Safety, Quality &
Regulatory
Cargill Protein North America

Sarah Sorscher
Deputy Director, Regulatory Affairs
Center for Science in the Public Interest

Matthew Stasiewicz
Assistant Professor
University of Illinois

Bruce Stewart-Brown
Senior Vice President, Technical Services
and Innovation
Perdue Farms

Michael R. Taylor
Board Member
Stop Foodborne Illness
Former USDA FSIS Administrator and
Acting Under Secretary for Food Safety

Craig Wilson
Vice President, Quality Assurance and Food
Safety
Costco Wholesale

Martin Wiedmann
Professor, Food Science
Cornell University