



July 13, 2010

Docket Clerk
U.S. Department of Agriculture
Food Safety Inspection Service
Room 2-2127
George Washington Carver Center
5601 Sunnyside Avenue
Mailstop 5474
Beltsville, MD 20705-5474

RE: USDA FSIS Docket No. FSIS-2009-0034: New Performance Standards for Salmonella and Campylobacter in Young Chickens and Turkey Slaughter Establishments

To Whom It May Concern:

The American Meat Institute (AMI) is the nation's oldest and largest meat packing and processing industry trade association. AMI members slaughter and process more than 90 percent of the nation's beef, pork, lamb, veal, and a majority of the turkey produced in the United States. AMI has and will continue to support the use of sound science as the foundation for regulatory programs for the U.S. meat and poultry industry and to achieve the intended food safety objective associated with these regulatory programs. On behalf of AMI and its member companies, we appreciate the opportunity to offer comment on the above-referenced docket.

Performance standards should be based on sound science, be achievable, and have a significant and quantifiable positive impact on public health.

The Food Safety and Inspection Service (FSIS or the agency) is the public health regulatory agency responsible for ensuring that U.S. meat and poultry products are safe and wholesome. As part of its public health mission, the agency established a new regulatory program in 1996 by promulgating *Salmonella* performance standards for raw meat and poultry products. The agency's stated goal was to improve public health by reducing the prevalence of *Salmonella* on raw meat and poultry products. AMI respectfully suggests that the agency's goal of improving public health through the use of performance standards has not been achieved.

Indeed, publicly available data show the prevalence of *Salmonella* on raw meat and poultry products has been significantly reduced since the standards were implemented, but the incidence of salmonellosis in the human population show no quantifiable improvement during the same time period. The agency's belief that implementing stricter performance standards will decrease human illnesses is theoretical. The lack of improvement in human illness since the

performance standards were fully implemented in 2000 does not support the agency's theory. Therefore, AMI believes it is incumbent on the agency to conduct a comprehensive scientific and technical review of the new performance standards for *Salmonella* and *Campylobacter* in young chickens and turkey to determine the impact of the revised standards on public health before they are implemented in federal establishments.

Data show existing *Salmonella* performance standards have not improved public health.

Examining the data in FSIS's "*Progress Report on Salmonella Testing of Raw Meat and Poultry Products, 1998–2009*"¹ the prevalence of *Salmonella* in broilers has decreased to 7.2% in 2009 from a high of 16.3% in 2005. And when compared with the current performance standard, the chicken industry reduced the prevalence of *Salmonella* by 64%. The average *Salmonella* prevalence rate in broilers from 1998 – 2009 was 11.1% for an overall 44.5% reduction from the performance standard. A similar prevalence rate reduction was measured in turkeys with 46.5% reduction from the 7.1% prevalence of *Salmonella* in 2006 to 3.8% in 2009.

While these improvements in *Salmonella* prevalence rates demonstrate a commitment by FSIS and the meat and poultry industry, the agency believes that the lower the percent positive rate, the lesser the potential for the public to consume a product that can be attributed to foodborne illness. AMI continues to seek the science used to support this belief.

The Centers of Disease Control and Prevention (CDC) illness data as reported in the "*Preliminary FoodNet Data on the Incidence of Infection with Pathogens Transmitted Commonly Through Food --- 10 States, 2009*"² has seen no significant decrease in *Salmonella* related illnesses. This trend is not new as *Salmonella* related illnesses have remained virtually stagnant since 1996 and did not achieve the Department of Health and Human Service's (HHS) Healthy People 2010 goal of 6.8 illnesses per 100,000 people.

FSIS should conduct a study to determine why the *Salmonella* performance standards have not improved public health.

While CDC data incorporates all food categories, one logically questions what impact of FSIS implementation of performance standards has had on improving public health. AMI encourages the agency to examine why performance standards have not been successful in having a significant and quantifiable improvement of public health. AMI is hopeful such an examination could deliver a practical means to convert food safety objectives into targets that can be used by FSIS and the meat and poultry industry to improve public health. Having specific targets, instead of meeting a prevalence percentage that seemingly appears to have no link to improved public health, would allow industry to design control processes that would be quantifiable.

¹ Percent Positive *Salmonella* Tests in the PR/HACCP Verification Testing Program by Product Class and Calendar Year, 1998–2009. Accessed July 5, 2010:

http://www.fsis.usda.gov/Science/Progress_Report_Salmonella_Testing_Tables/index.asp

² Morbidity and Mortality Weekly Report (MMWR). April 16, 2010 / 59(14): 418-422. Accessed July 5, 2010:

<http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5914a2.htm>

In summary, AMI supports achievable performance standards based on sound science that significantly improve public health through quantifiable metrics. Standards that do not meet these criteria could place unnecessary hardships on businesses and may not be the best focus and application of food safety resources. The agency should understand the possible improvement and impact on food safety as measured by the HHS's Healthy People goals before proposing changes to the *Salmonella* performance standards and in the development of the *Campylobacter* performance standards.

Again, AMI appreciates the opportunity to provide comment on these performance standards. Thank you for your consideration of the comments provided above. If there are any questions about the above comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Betsy Booren". The signature is fluid and cursive, with a long horizontal line extending to the left from the start of the name.

Betsy Booren, Ph.D.
Director, Scientific Affairs

cc: J. Patrick Boyle
Jim Hodges