Comments of Betsy Booren, Ph.D., Director, Scientific Affairs

To the

Foodborne Illness Source Attribution Public Meeting

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I am Dr. Betsy Booren, Director of Scientific Affairs for the American Meat Institute. AMI’s 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 and its member companies support achievable public health objectives based on sound science that significantly improve public health through quantifiable metrics. The use of science and food safety metrics is critical for the food industry to design and implement preventive food safety processes and control systems.

In September 2010, the AMI Foundation – the research foundation supported by AMI members – sent a letter to Dr. Christopher Braden, the Director, Division of Foodborne, Waterborne and Environmental Diseases for CDC, stating that:

Accurate and more timely foodborne illness attribution data is critically needed to improve the safety of the U.S. food supply.

AMI reiterates that observation today.

Food attribution data is essential to understand better the relationship and associated risks between microorganisms and food. Dr. Braden had previously said, “Knowing more about what types of foods and foodborne agents have caused outbreaks can help guide public health and the food industry in developing measures to effectively control and prevent infections and help people stay healthy.” ¹ AMI agrees and believes food attribution data is critical in a preventive process management food safety system.

Having and utilizing objective data allows food safety stakeholders to allocate food safety resources appropriately and scientifically justify the decisions made in their food safety systems. By having timely, credible food attribution data, the food industry can accurately identify and improve any food safety gaps that may exist. It also may help identify emerging foodborne risks, especially when such risks have not been previously associated with specific foods. This rapid adjustment to improve food safety can only occur if accurate data is made available as soon as possible to all food safety stakeholders.

AMI recommends the following:

• Accelerating the release of food attribution data beyond current status of one to two year delay. This delay does not allow for rapid changes to food safety systems that may likely prevent future foodborne illnesses and events.
• Expand food attribution categories as needed to accurately characterize and report the causative agent in a foodborne event.
• There should be a yearly stakeholder briefing with CDC, FDA, FSIS, and the food industry to create a dialogue to exchange information and share “lessons” learned. There are many differences in processes each group goes through during an outbreak and those differences are not clearly understood by other groups. This knowledge may be key in improving the attribution process during a foodborne outbreak event.
• There should be clearer communication regarding changes and revisions to the CDC Foodborne Outbreak Database. AMI uses this resource as way of providing information to members to improve their food safety process management systems. AMI recommends that changes to this database or similar tools be communicated stakeholders in a clear, transparent process that is easily distinguishable.

AMI recognizes the challenges of accurately estimating the burden of foodborne disease and attributing these burdens to food types, but these metrics are essential. The last decade has shown the important role cooperation and communication among public health officials, regulators, the food industry, and other allied stakeholders have had on improving food safety.

AMI believes our recommendations have merit and are critical to improving the safety of the U.S. meat and poultry food supply.

Thank you for considering our views and we look forward to future collaborations.