



FOOD ANIMAL CONCERNS TRUST

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Docket Clerk

U.S. Department of Agriculture, Food Safety and Inspection Service
1400 Independence Avenue SW Mailstop 3758
Washington, DC 20250-3700.

RE: Docket No. FSIS-2022-0029 comments by Food Animal Concerns Trust for public meeting on the *Proposed Regulatory Framework to Reduce Salmonella Illnesses Attributable to Poultry*.

Food Animal Concerns Trust strongly supports the United States Department of Agriculture Food Safety Inspection Service (USDA-FSIS) [*Proposed Regulatory Framework to Reduce Salmonella Illnesses Attributable to Poultry*](#). Food Animal Concerns Trust (FACT), a national not-for-profit organization based in Chicago, is creating a world where all food-producing animals are raised in a humane and healthy manner. We accomplish this by supporting humane farmers, promoting policies that make foods from animals safe and healthy to eat, and helping consumers make informed food choices.

Food safety begins at the farm level, with healthy animals. For this reason, we strongly support Component 1 of the proposed framework which would require farms to sample for pathogens like *Salmonella* and to take steps to reduce said pathogens in animals and on farms. While generally supportive of the framework, we also recognize that there is a huge diversity of farms and that most farms where poultry are raised are very small. Thus, the cost of required testing for small farms would likely be prohibitive. FACT recommends that farms that market less than 10,000 birds in a year be exempt from the testing requirement. These flocks produce much less than one percent of the poultry raised, therefore the vast majority of the chickens raised for food would still be subject to the testing requirements. The Centers for Disease Control and Prevention (CDC) considers drug-resistant non-typhoidal *Salmonella* to be a serious public health threat. FSIS in setting final risk-based product standards, as described in Component 3 of the proposed framework, should take into consideration the additional risk created by antibiotic resistance in *Salmonella*.

FSIS should require incoming flocks to be tested for *Salmonella*, a hazard that is likely to occur, under Component 1 of the Proposed Framework.

Salmonella is primarily introduced to poultry plants by the birds themselves and is a hazard that is likely to occur at receiving. FACT recommends on-farm testing as is already required for [laying flocks in the U.S.](#), and for broilers in the [European Union](#), and the [United Kingdom](#). These programs are serotype based and are compatible with thriving poultry production industries where they have been implemented. FACT believes the U.K. model that requires sampling by boot swabs within 3 weeks of harvest is a good starting point for FSIS. Sampling should be done early enough to get testing results, including serotyping, before transport to slaughter. The testing should have two primary goals: 1) ensure that poultry producers take steps

to reduce dangerous *Salmonella* on their farms and 2) provide samples that can be used to identify farms that are a source of an outbreak. Because of the second goal, FACT recommends that FSIS either require farms to submit cultures to FSIS or have FSIS do the culturing of submitted samples. FSIS should make clear that it is not considering a zero *Salmonella* standard for U.S. poultry flocks but is looking at serotypes, level of contamination, and antibiotic resistance.

FSIS should exempt flocks from farms that produce less than 10,000 birds in a year from testing requirements under Component 1 of the Proposed Framework.

While over half of the farms raising chickens for meat market less than 1,600 birds a year, over 99% of the birds marketed are from farms that market over 100,000 birds. Given the small number of birds harvested at a time by small farms, it would be a huge burden on them to require the same level of testing as required for the very large producers who would be able to spread the cost of testing over a much larger number of birds. Adding this burden to small scale producers would go against the USDA goals of supporting more local sustainable producers. FACT recommends that small producers be excluded from the pre-harvest testing requirements. Small producers were excluded from requirements by the Food and Drug Administration with the shell egg rule and by the U.K. National *Salmonella* Control Program. Through our work with small poultry producers, we believe that 10,000 birds marketed would be an appropriate limit; however, FSIS should seek more information to make an informed decision. FACT works with livestock farms so is not as familiar with the likely impact on small processors. As was done with the shell egg rule, FSIS should consider phasing in testing requirements for medium size processors. Finally, FACT recommends that FSIS create a program where small livestock producers can voluntarily submit samples for testing at no cost so that they are able to equally benefit from the increased testing.

FSIS should take into consideration antimicrobial resistance when creating an enforceable product standard under Component 3 of the Proposed Framework.

Antibiotic resistance threatens to overturn our entire modern medical system. Globally antibiotic resistant infections took the lives of over 1.2 million people in 2019 and in the U.S. at least 35,000 people die each year. Antibiotic resistance can affect anyone, however, the millions of people in the United States who are suffering from chronic illness, cancer, kidney failure, or are undergoing surgery are at a much higher risk of getting sick and subsequently dying from resistant infections. Without considerable action to preserve our antibiotics, the global death toll could reach 10 million by 2050.

The CDC considers drug-resistant *Salmonella* to be a serious public health threat. Drug-resistant *Salmonella* infections can be more severe and have higher hospitalization rates, leading to greater morbidity and mortality compared to non-resistant *Salmonella* infections independent of serotype. The CDC estimates there are 212,500 illnesses each year caused by resistant non-typhoidal *Salmonella*. Any risk-based enforceable *Salmonella* standard should be informed by this additional risk caused by resistance. FACT supports looking at serotypes that cause higher levels of human illness (e.g. *S. typhimurium*, *S. enteritidis*, and *S. infantis*) but also recommends that FSIS look at how resistance to the drugs used to treat serious *Salmonella* infections impacts health, regardless of serotype. This is critical in reducing the risk to patients infected by *Salmonella*, particularly the most vulnerable patients such as small children and the elderly.

FACT appreciates FSIS's determination to make progress on reducing the high numbers of *Salmonella* infections through the proposed framework. We hope that these comments will be considered as FSIS moves forward with strengthening its response to *Salmonella* and we hope to continue the discussion as FSIS further develops its plans.