



FOOD ANIMAL CONCERNS TRUST

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Food Animal Concerns Trust appreciates the opportunity to comment on the September 22, 2020 Food Safety Inspection Service Public Meeting (FSIS) “[Salmonella-State of the Science](#)” and on the concurrently released “[Roadmap to Reducing Salmonella](#).” Food Animal Concerns Trust (FACT) is a Chicago based national advocacy organization that promotes the safe and humane production of foods from animals. FACT’s Food Safety Program identifies and advocates for steps farmers should take to keep their food animals from being the cause of human disease. FACT supports requiring food producers to take appropriate steps to protect consumers from food safety risks that start on the farm.

By the most important measure, the number of people becoming sick, federal agencies responsible for protecting the safety of food have completely failed when it comes to *Salmonella*. In 2010, the federal government as part of the [Public Health Action Plan](#) set a modest goal for reducing the incidence of *Salmonella* infections from 15 per 100,000 people to 11.5 per 100,000 people by 2020. This was based on incidence rates in the period 2006 to 2008. The [latest data](#) from the Centers for Disease Control and Prevention (CDC) show that in 2019 the *Salmonella* incidence rate had risen to 17 per 100,000 people, so not only was the goal not met but instead the problem has grown worse. Now, ten years later, the Public Health Action Plan has [a new goal for 2030](#), 11.1 per 100,000. FACT expects that, without a greatly strengthened response that includes taking steps federal agencies have avoided so far, the most likely outcome is that another decade will pass and the incidence will continue to climb.

Given the failure of current policies to make measurable reductions in the incidence of *Salmonella*, FACT calls on FSIS, U.S. Food and Drug Administration (FDA), and the CDC to take additional steps to protect the public from *Salmonella*. If agencies do not have authority to take these steps then they should seek additional authorities from Congress. Federal agencies should:

- **Declare *Salmonella* serotypes that consistently cause human illness as adulterants and prohibit their presence in food.**
- **Declare *Salmonella* strains that are resistant to essential medicines and thus considered [serious public health threats by CDC](#) as adulterants and prohibit their presence in food.**

- **Require farms raising animals for food to implement *Salmonella* monitoring and control programs and create and set standards for the presence of *Salmonella* in animals.**
- **Identify through collaboration between USDA, FDA, and CDC serovars of *Salmonella* that cause the greatest burden of illness in food producing animals and humans, and prohibit their presence in animal feed.**
- **Share all federally controlled *Salmonella* data in real time between federal agencies to support outbreak identification, trace back, and root cause investigations.**
- **Identify, monitor, and actively take steps to keep internationally spreading strains of *Salmonella* such as [Salmonella enterica Serotype Kentucky ST198](#) from being introduced into the U.S.**
- **Seek or clarify existing federal agency authority to investigate *Salmonella* on farms where animals are raised for food.**
- **Prohibit the marketing of live animals (including companion animals and backyard poultry) that are actively shedding *Salmonella* of human health concern (i.e. strains known to cause illness in humans and/or resistant to essential medicines).**
- **Identify and promote farm management practices that reduce the incidence of *Salmonella* on farms.**

None of the above nine action items are included in the Roadmap. Clearly, what FSIS has done thus far has been ineffective in reducing the incidence of *Salmonella*, and the Roadmap just continues on the existing path. It is abundantly clear that trying to control *Salmonella* only at slaughter has failed. FSIS and other federal agencies need to pay much more attention to farms, including farm inputs such as feed. The spread of antibiotic resistance further increases the burden of *Salmonella* by increasing the overall number of infections and increasing the likelihood of worse outcomes such as hospitalization and death. Any comprehensive effort to control *Salmonella* also needs to address antibiotic resistance. Finally, the Roadmap does a very poor job in addressing the international component of *Salmonella* related to trade, travel, and the global spread of disease causing strains in animals (e.g. *Salmonella* Typhimurium DT104, and the CTX-M-65 *Salmonella* Infantis). Over a million people become ill with *Salmonella* in the U.S. each year and tens of thousands are hospitalized. Thus progress on reducing this high burden of illness will take much more decisive action than FSIS has been willing to take. FACT calls on FSIS, FDA, and CDC to prioritize the protection of public health and take these needed actions.