September 3, 2020

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Ave, SW
Mailstop 3758 Room 6065
Washington, DC 20250-3700

Re: Expansion of FSIS Shiga Toxin-Producing *Escherichia coli* (STEC) Testing to Additional Raw Beef Products
Docket No. FSIS-2010-0023

Thank you for the opportunity to provide comments on the "Expansion of FSIS Shiga Toxin-producing *Escherichia coli* (STEC) Testing to Additional Raw Beef Products." We appreciate the work that FSIS has completed on the reduction of STEC adulterants in meat and poultry products. Given several previous large-scale outbreaks due to non-O157:H7 STEC in ground beef, we welcome the opportunity to work with the agency on preventing contamination and protecting public health.

**About FMI**

As the food industry association, FMI works with and on behalf of the entire industry to advance a safer, healthier and more efficient consumer food supply chain. FMI brings together a wide range of members across the value chain — from retailers that sell to consumers, to producers that supply food and other products, as well as the wide variety of companies providing critical services — to amplify the collective work of the industry. www.FMI.org

**Overview**

FMI appreciates the work that FSIS has done to protect public health, educate consumers about food safety and to reduce the risk of microbial contamination on

products under FSIS jurisdiction. We support expanded testing of beef to include other raw ground beef components as outlined in the notice in the *Federal Register* on June 4, 2020. Non-O157:H7 STEC have been a public health issue over the past few years with several major outbreaks as documented by FSIS in the notice. *E. coli* O157:H7 is not the only pathogen of concern in raw beef products. The industry and FSIS have made significant progress reducing the incidence of *E. coli* O157:H7 and we are optimistic that additional progress can be made to address all pathogens of concern.

The food retail and wholesale industries have strong food safety programs to source safe products, avoid contamination at the retail level and to protect the health and safety of their customers. Retailers and wholesalers work with their suppliers to have strong food safety management programs, comply with all regulatory requirements and maintain strong communication channels to allow for fast responses when needed.

**Sampling should be early in supply chain to protect public health**

We support the increased scope in testing for STEC for additional pathogens and in other additional ground beef components. We strongly encourage FSIS to evaluate the appropriate point in the supply chain to sample for STEC. Sampling at retail at the point of grinding is challenging because it is very likely that some product has already been sold to consumers at that point because it is from the same source material or lots from the supplier. Sampling earlier in the supply chain allows for product to be held and recovered before any of the implicated product is sold to consumers. We encourage sampling as close to the point of contamination as possible to quickly identify positive samples and to prevent further movement of product.

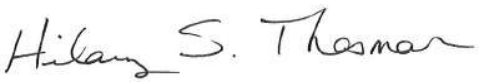
FSIS already has a strong in-commerce inspection program that includes sampling and FSIS investigators frequently visit retail stores to evaluate compliance with applicable laws and regulations. When FSIS samples at retail, FMI encourages members to segregate that product and hold or destroy the lot. If STEC sampling occurs at retail, we would follow with the same recommendation to members. Holding a lot is much less expensive than issuing a recall if that lot is positive for STEC or other pathogens. Most importantly, we want to prevent contamination and if contamination of pathogens occurs, we want to identify it and prevent it from entering commerce. Testing should be used as a verification step as part of a complete food safety management program.

**Methods to ensure accurate testing**

FSIS should continue to explore rapid and accurate methods to test for all pathogens of concern. The industry needs rapid and accurate tests with low false positive and false negative rates. We encourage FSIS to continue to work with industry and academia to develop rapid tests using the latest technology available to identify STEC and other pathogens in FSIS regulated products.

Thank you for including stakeholders and communicating your plans to expand existing testing programs. Please feel free to contact me should you have questions about these comments or need additional information from FMI.

Sincerely,



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