



October 9, 2020

Submitted electronically via www.regulations.gov

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

Re: Food Safety: Consumer Outreach and Education Today and for the Future; Public Comment Docket Number FSIS– 2020–0026.

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 service – to amplify the collective work of the industry. The reach and impact of our work is extensive, ultimately touching the lives of over 100 million households in the United States and representing an \$800 billion industry with nearly 6 million employees. www.FMI.org

Overview

FMI appreciates the opportunity to provide comments to the United States Department of Agriculture Food Safety and Inspection Service (USDA FSIS) on consumer food safety education and outreach to establish a comprehensive understanding of how consumers handle and prepare food today in order to develop the most effective approach for consumer outreach and education in the future. We fully support FSIS's science-based, data-driven approach to food safety and food safety education. We support USDA's inclusion of consumers in its efforts to help promote food safety throughout the supply chain.

These comments will address the (1) current state of consumer food safety education; (2) opportunities for future consumer food safety research; and (3) engagement to close the gap between food safety messages and consumer action.

Current state of consumer food safety education

Safe food is fundamental to a healthy diet and the food industry is committed to keeping food safe along the entire supply chain. Companies who make and sell food care deeply about food safety and put forth significant effort to sell safe and wholesome products to their customers, friends, neighbors and families. Consumers are the final step in the chain of prevention and their role is important when it comes to food safety and preventing foodborne illness.

Therefore, FMI supports the food industry in helping consumers safely prepare food at home through the support of the [Partnership for Food Safety Education \(PFSE\)](#). As a founding member of PFSE, FMI works with PFSE to bring food safety information to consumers by promoting the "[Core Four Practices](#)" of safe food handling—Clean, Separate, Cook and Chill—to a variety of audiences and networks of food safety educators and thought leaders.¹

The food industry aims to encourage and enable consumers to implement safe food handling behaviors in the store, during transport and while at home. Though, as recent USDA observational research studies show, opportunities exist to strengthen national education efforts on proper handwashing, cleaning and sanitizing practices to prevent cross contamination and safe preparation of frozen, raw products that are not-ready-to-eat (NRTE).^{2, 3, 4}

¹ Partnership for Food Safety Education. (2020). "The Core Four Practices". Retrieved from <https://www.fightbac.org/food-safety-basics/the-core-four-practices/>

² United States Department of Agriculture. (2018, May). "Food Safety Consumer Research Project: Meal Preparation Experiment Related to Thermometer Use". Retrieved from <https://www.fsis.usda.gov/wps/wcm/connect/1fe5960e-c1d5-4bea-bccc-20b07fbfde50/Observational-Study-Addendum.pdf?MOD=AJPERES>

³ United States Department of Agriculture. (2019, August). "Food Safety Consumer Research Project: Meal Preparation Experiment Related to Poultry Washing". Retrieved from https://www.fsis.usda.gov/wps/wcm/connect/b6c7ebc5-3ef5-43d7-85fa-8d957badf398/Observational_Study_Year_2_Executive_Summary.pdf?MOD=AJPERES

⁴ United States Department of Agriculture. (2020, September 23). "Food Safety Consumer Research Project: Meal Preparation Experiment on Raw Stuffed Chicken Breasts". Retrieved from <https://www.fsis.usda.gov/wps/wcm/connect/438f1631-ced4-4315-99ff-17f28dae911f/fscrp-yr3-nrte-final-report.pdf?MOD=AJPERES>

Consumer preferences and behaviors surrounding food are constantly changing. These changes surround the types of food consumers are eating, the technology being utilized to prepare food, how food is being purchased and where food is being purchased. Despite ever-changing consumer preferences, one thing remains unchanged: consumers expect the food they purchase to be safe. Food safety is at the heart of the food industry and is critical to maintaining the trust of consumers and their confidence in the food supply. According to the FMI's *2020 U.S. Grocery Shopper Trends Report (Trends Report)*, 91% of shoppers trust their grocery store to ensure the food they purchase is safe.⁵

The COVID-19 pandemic has also affected consumer food behavior and is a recent example of consumers changing their behaviors. As a result of the pandemic, people are cooking more at home and eating out less. FMI's supplemental trends report, *Home Cooking in America 2020*, published during the COVID-19 pandemic found that 40% of adults are preparing more meals at home, 48% of adults expect to continue cooking more meals at home after the COVID-19 pandemic and 27% have increased their ordering of food and groceries online since the pandemic.⁶

Furthermore, FMI's *Trends Report* also signifies how consumers are increasingly reliant on, and comfortable with, digitally connected technologies and platforms. Consumer acceptance of technology provides opportunity for the food industry to connect with customers through apps, such as [SmartLabel®](#) and [FoodKeeper](#), to share important food safety and product information, such as information relating to allergens, recalls, nutrition, ingredients, product certifications and shelf-life. Evolving consumer behaviors present opportunities and challenges for consumer food safety education and achieving lasting food safety behavior changes, but the food industry is committed to continuously engaging with consumers to strengthen food safety knowledge, regardless of where they receive information.

Opportunities for future consumer food safety research

Future food safety research and outreach strategies should focus on empowering consumers on what they can do to prevent foodborne illness and why it is important. FMI supports FSIS's consumer research efforts and the use of observational studies,

⁵ FMI and the Hartman Group. (2020). "U.S. Grocery Shopper Trends 2020". Retrieved from <https://www.fmi.org/forms/store/ProductFormPublic/u-s-grocery-shopper-trends-2020>

⁶ FMI Foundation. (2020). "Home Cooking in America 2020, a Special Report based on U.S. Grocery Shopper Trends". Retrieved from <https://www.fmi.org/forms/store/ProductFormPublic/home-cooking-in-america-2020-a-special-report-based-on-u-s-grocery-shopper-trends>

focus group research and consumer surveys as the foundation of the Agency's consumer food education outreach. Data from research should be utilized to develop an innovative and forward-thinking approach to achieving sustained behavior changes.

Consumer food safety outreach efforts should take a multi-pronged approach that is tailored to the target audience. A recent FSIS survey showed that consumers have varying preferences when it comes to how they would like to receive food safety information.⁴ Food labels, websites, cookbooks, cooking shows, television, and apps on smartphones or tablets are just a few of the channels that consumers are citing as their preferred method to receive food safety information.

FMI's *2020 US Grocery Shopping Trends Report* showed similar findings.⁵ According to the report, consumers prefer to receive food safety information, specifically information about recalls, from a wide variety of channels. Furthermore, generational differences play a key role in which sources consumers prefer to learn about recalls. Generational differences in the use of media continue to imply a need to disseminate information about recalls through a variety of channels to ensure it reaches all consumers. Older generations continue to be heavily dependent on traditional news sources, such as television, print newspapers, magazines and email. Younger consumers, on the other hand, may learn about a recall faster from more real-time sources, such as social media, text messages and conversations with friends and family. The importance of appropriate food safety messages for at risk consumers should be researched and evaluated in order to provide information in health care settings, long term care facilities, day care centers and other facilities reaching these important populations.

The findings from both the FSIS consumer survey and FMI *Trends Report* highlight the need for FSIS to leverage partnerships by collaborating with a wide network of public health partners that develop and disseminate food safety information to consumers in order to achieve maximum effectiveness. Therefore, FMI encourages FSIS to coordinate its efforts with other federal agencies (i.e., FDA and CDC) and partner with stakeholders such as the Partnership for Food Safety Education and Cooperative Extension, which already have an established network and resources, to amplify the work that is being done, academia, health care providers and the food industry, as well as education leaders to incorporate food safety into school competencies and curricula.

Engagement to close the gap between food safety messages and consumer action

FSIS should consider new and creative approaches to encourage consumers to adopt food safety practices at home. The agency should look into new opportunities to

engage consumers to close the gap between food safety messages and consumer action, for example leveraging national initiatives, such as [Family Meals Movement](#) and adoption of the [Safe Recipe Style Guide](#).

The FMI Foundation proudly engages with communities and organizations across the nation via *Family Meals Movement* to encourage and help families share more meals together by promoting the overall health and well-being benefits of family meals prepared at home. This initiative provides a unique opportunity to educate consumers on basic food safety steps while preparing food in their homes.

According to USDA observational research studies, consumers are more likely to follow standard food safety practices within recipes when they are given simple instructions.³ A recent *Journal of Food Protection* study showed when consumers use recipes that contain food safety instructions written into the text, they were more likely to adhere to safe food handling in their home kitchens.⁷ To support the need for embedding food safety instructions within recipes, PFSE and the FMI Foundation worked together, along with prominent food, nutrition and recipe writers, to develop the [Safe Recipe Style Guide](#). This guide, released in March 2019, helped establish standards for recipe text that address four major areas where food safety violations are most likely to occur in home kitchens: (1) handwashing; (2) cross-contamination; (3) safe cooking/storage temperatures; and (4) produce safety. The Safe Recipe Style Guide is important because it provides a mechanism for consistent food safety messaging by embedding food safety steps within recipes. Regardless of how a recipe is delivered—text, audio or video—providing a standardized approach for disseminating food safety information encourages proper food handling and increases the likelihood of achieving lasting behavior change.

Appropriate messages for at-risk consumers should be evaluated based on behavioral outcomes. It is possible these messages differ from messaging for the general public and given the importance of food safety practices for at-risk populations, identifying effective messages that result in action is critical.

Conclusion

⁷ J. Food Prot. 2016 Aug;79(8):1436-9, Recipe Modification Improves Food Safety Practices during Cooking of Poultry. Maughan C, Godwin S, Chambers D, Chambers E IV. <https://pubmed.ncbi.nlm.nih.gov/27497133/>

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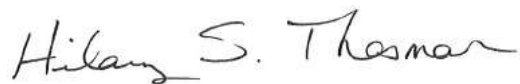
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On behalf of all FMI members, we reiterate our enthusiastic support in USDA FSIS working with strategic partners to help establish a data-driven approach to consumer food safety education and outreach through the dissemination of consistent food safety messaging to all consumers. Empowering consumers to make long-lasting behavior changes based on science is critical to maintaining public confidence and trust in the food supply, as well as reducing the risk of foodborne illness.

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If you have questions about these remarks or would like additional information, please feel free to contact me at hthesmar@fmi.org or 202-220-0658.

Sincerely,

A handwritten signature in cursive script that reads "Hilary S. Thesmar".

Hilary S. Thesmar

Chief Food and Product Safety Officer and SVP Food Safety