



October 16, 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: *Salmonella*—State of the Science
Docket Number - FSIS–2020–0025

Thank you for the opportunity to provide comments on the public meeting "*Salmonella* – State of the Science" held on September 22, 2020 and the document "Roadmap to Reducing *Salmonella*: Driving Change through Science-Based Policy" released in September 2020. We are pleased to see FSIS advancing the work on this important public health issue and using science as a foundation.

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

The document "Roadmap to Reducing *Salmonella*: Driving Change through Science-Based Policy" outlines a comprehensive plan to implement changes throughout all of the points of contact for FSIS and the meat and poultry industry. We support this methodical and comprehensive approach to addressing a problem and are very pleased to see the focus on science and risk in the planning, communications, research and policy decisions.

Prevention of contamination should be the primary focus of the comprehensive plan. We encourage the agency to continue to support research and innovation to prevent contamination of meat and poultry products throughout the supply chain, to adopt new technologies for interventions and to implement methods to help enhance detection of harmful *Salmonella* serotypes and subtypes associated with human illness. Pre-harvest control strategies should be emphasized to focus on serotypes and subtypes of public health significance. Preventing contamination is more effective than interventions applied during processing later in the supply chain.

FSIS should apply a risk-based model to evaluating *Salmonella* serotypes and subtypes that are relevant to public health outcomes related to meat and poultry products. There is a large body of research regarding the virulence of *Salmonella* serotypes and subtypes. With thousands of strains, focusing on the ones causing illness would allow for a comprehensive yet focused program. Advances in methods such as whole genome sequencing (WGS) facilitate the ability to obtain high quality data including meta data for isolates. It is imperative that the federal agencies have consistent evaluation methods and enhance the ability to share information between agencies, with the academic community and with industry.

In summary, we support the agency's approach to preventing *Salmonella* as outlined at the public meeting on September 22, 2020 and the FSIS document "Roadmap to Reducing *Salmonella*: Driving Change through Science-Based Policy." We encourage the agency to focus on prevention of contamination and use research and advances in technology to identify and prioritize areas where changes are needed to protect public health. We also encourage the agency to continue to include stakeholders in this process and use the expertise outside the agency to make an impact.

Sincerely,

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

Hilary Thesmar, PhD, RD, CFS
Chief Food and Product Safety Officer and SVP Food Safety