

October 15 2020

**Re: FSIS-2020-0025**

The Association of Public Health Laboratories (APHL) appreciates the opportunity to comment on the Food Safety and Inspection Service's (FSIS) *Roadmap to Reducing Salmonella*. We applaud FSIS efforts to decrease *Salmonella* in meat, poultry, and egg products using science-based approaches, thereby working towards a common goal of meeting Healthy People (HP) 2030 objectives for *Salmonella* related illnesses.

Our members, state and local governmental laboratories, conduct foodborne disease testing for *Salmonella* and other important pathogens, often under ISO 17025 accreditation or an ISO-like quality management system. APHL members monitor the safety of the U.S. food supply by conducting outbreak and surveillance testing on human and animal food, including FDA and USDA regulated products. Our members are at the technical forefront of laboratory science, utilizing cutting edge technologies such as whole genome sequencing (WGS) as participants in the GenomeTrakr and PulseNet networks. Public health laboratories will play a vital role in reaching the HP 2030 objectives, and the inclusion of state laboratory members in the National Advisory Committee on Microbiological Criteria for Foods (NACMCF), a federal advisory committee called out specifically in the FSIS Roadmap, is a valuable and appreciated decision.

We appreciate FSIS's emphasis on the need to lead with science to create a safer food supply. We encourage policies to advance the development of new testing technologies that will help speed up detection of *Salmonella* and identify strains of concern. We support the Roadmap's desire to decrease the time it takes to generate and share WGS data and will be interested to see what improvements and support FSIS offers to achieve these goals. The roadmap broadly outlines the FSIS approach to novel testing, continuing "to explore more efficient methods to enumerate pathogens in samples, detect virulence factors in pathogens for potential risk ranking, and investigate new pathogen characterization methods". While we support FSIS advancing novel testing methods and mining new data to inform risk, we believe the current science supports regulatory testing that focuses on broad control of *Salmonella*, as opposed to controlling specific serotypes or strains in the production environment that carry specific virulence factors.

Given the important first responder role our members play in foodborne disease outbreaks, APHL supports FSIS's recent revisions to Directive 10,000.1, *Policy on Use of Results from Non-FSIS Laboratories*, and encourages the utilization of state and local governmental laboratory data whenever appropriate. Through the Partnership for Food Protection, APHL has contributed to various guidance documents for human and animal food laboratories to build confidence among stakeholders in the integrity and scientific validity of laboratory analytical data. Broader data utilization will help monitor foodborne disease trends, speed investigations, inform and evaluate food safety policies and more efficiently utilize critical federal, state and local resources. APHL also appreciates FSIS plans to expand the Agency's Accredited Laboratory Program (ALP). We would be happy to support any outreach and communication on these programs and suggest that FSIS include laboratory and epidemiology outbreak investigators as an audience to receive communications, as recommended in the 3rd Edition of the Council to Improve Foodborne Outbreak Response (CIFOR) Guidelines<sup>1</sup>.

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<sup>1</sup> <https://cifor.us/downloads/clearinghouse/CIFOR-Guidelines-Complete-third-Ed.-FINAL.pdf>

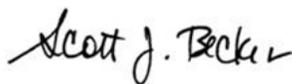
Improving the cross-agency collaboration described in the Roadmap is vital. The *Prioritizing Zoonotic Diseases for Multisectoral, One Health Collaboration in the United States*<sup>2</sup> report listed *Salmonella* as one of the most important zoonotic diseases. APHL urges FSIS, and USDA more broadly, to continue to engage in interagency partnerships to advance the next steps, including the continued development of a national One Health framework, improved knowledge and data sharing for laboratory, surveillance, and response activities and strengthen joint investment for prioritized zoonotic diseases.

A laudable desire to improve communication and data sharing with public health, industry and other stakeholders is apparent in the roadmap. FSIS is already to be commended for posting their after-action reviews on-line, allowing for public review of lessons learned from past outbreaks, which has been a key unmet goal of CIFOR. In collaboration with CDC, FDA and other public health stakeholders, FSIS could help better inform industry of the preventative potential of current federal government programs that monitor for *Salmonella* such as PulseNet, GenomeTrakr and the National Antimicrobial Resistance Monitoring System (NARMS). These surveillance systems can serve as valuable tools for industry by providing an early warning system of emerging trends both locally and abroad, such as *Salmonella infantis* contamination of poultry in Europe<sup>3</sup>. Similarly, industry testing data would be illuminating if shared with government and could help shape a new round of FSIS directives. More data, including integration of WGS data, will lead to the development of sound regulation and policy. New regulations should include effective ways to build trust between the Agency and regulated industry, including consideration of novel incentives that will encourage industry to share data on key commodities. APHL members, like FSIS, have welcomed industry representatives to visit their laboratories for outreach and education, and would be pleased to extend this invitation where appropriate.

APHL looks forward to collaborating with FSIS on the innovative strategies and initiatives outlined in the Roadmap, and working with our members and partners to reach the HP 2030 goals to protect the safety of the U.S. food supply.

Please contact Kirsten Larson, Manager Food Safety Program ([kirsten.larson@aphl.org](mailto:kirsten.larson@aphl.org)) with any questions.

Sincerely,



Scott Becker, MS

Chief Executive Officer



Dave Boxrud, MS

Chair, APHL Food Safety Committee

*APHL works to strengthen laboratory systems serving the public's health in the US and globally. APHL's member laboratories protect the public's health by monitoring and detecting biological, chemical and radiological agents of infectious and foodborne diseases, environmental contaminants, terrorist agents, genetic disorders in newborns and other diverse health threats.*

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<sup>2</sup> <https://www.cdc.gov/onehealth/pdfs/us-ohzdp-report-508.pdf>

<sup>3</sup> <https://www.pewtrusts.org/en/research-and-analysis/articles/2020/08/25/effective-coordination-needed-to-identify-and-respond-to-emerging-foodborne-pathogens>