



## Consumer Federation of America

June 17, 2022

Sandra Eskin  
Deputy Under Secretary for Food Safety  
Food Safety and Inspection Service  
U.S. Department of Agriculture

*SUBMITTED VIA REGULATIONS.GOV*

**RE: Addition of FSIS Number and Modification of Allele Code Data Fields in the Laboratory Sampling Results Datasets (Docket No. FSIS-2014-0032)**

Dear Under Secretary Eskin:

The Consumer Federation of America (CFA) appreciates the opportunity to comment on the above-referenced USDA Food Safety and Inspection Service (FSIS) action to disclose genetic data describing pathogens found in the agency's microbiological sampling program. CFA is an association of over 250 non-profit consumer organizations that was established in 1968 to advance consumer interest through research, advocacy, and education. Member organizations include local, state, and national consumer advocacy groups, senior citizen associations, consumer cooperatives, trade unions, and food safety organizations.

We applaud FSIS for taking this action to increase transparency and further understanding of the root causes contributing to foodborne illness. As the agency's data documentation explains, starting in July of this year, FSIS will make available whole genome sequencing (WGS) data on *Listeria monocytogenes*, *Salmonella*, *Campylobacter*, and Shiga toxin producing *Escherichia coli* (*E. coli*) pathogens found in FSIS inspector collected samples.<sup>1</sup> These new disclosures will allow researchers to better "connect the dots" between contamination events and human illnesses. We further support FSIS' plans to disclose genetic data both through the addition of the "FSISNumber" field and through modification of the allele code data field, as the two data elements represent distinct approaches to analyzing the evolutionary relationships between individual clinical, food, or environmental isolates, and both can allow public health researchers to better detect and respond to the causes of foodborne illnesses.<sup>2</sup> Going forward, we encourage FSIS to increase the frequency with which it updates datasets on laboratory sampling results, from a quarterly basis to as close to "real time" as possible.

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<sup>1</sup> FSIS. "Data Documentation for Addition of FSIS Number and Modification of Allele Code Data Fields in the Laboratory Sampling Results Datasets." Available at: <https://www.fsis.usda.gov/news-events/publications/sample-datasets-and-documentation>

<sup>2</sup> See Stevens et al. "Use of Whole Genome Sequencing by the Federal Interagency Collaboration for Genomics for Food and Feed Safety in the United States." *J Food Prot* 1 May 2022; 85 (5): 755–772. doi: <https://doi.org/10.4315/JFP-21-437>.

WGS represents a powerful tool for reducing foodborne illness. As FSIS and other federal public health officials have explained, WGS is more specific and sensitive than previous technologies, namely Pulse-Field Electrophoresis (PFGE), for identifying when different foodborne illness victims are part of a cluster or outbreak caused by a common source. Moreover, “when the strain causing illness is also identified in a food or processing environment, the greater sensitivity and especially specificity of WGS means a higher likelihood that this particular food, firm, or establishment could be related to the illnesses.”<sup>3</sup> As the FSIS data documentation notes, WGS analysis alone is “not sufficient to determine an association with human illnesses.” However, WGS analysis can help to direct efforts to collect epidemiological or traceback information that may establish causality. It can also help researchers, including those advising meat and poultry companies, to better understand the causes of pathogen contamination.

The causes of *Salmonella* contamination in chicken may be particularly illuminated through more widespread availability of WGS data. The proliferation of various multi-drug resistant *Salmonella* strains, such as the *S. Infantis* strain that has sickened thousands of people each year since 2017, suggests that the root cause of the contamination may lie high up in the supply chain.<sup>4</sup> *Salmonella* bacteria is vertically transmitted from breeding stock to the “broilers” raised for food, and so if a new common strain is found in multiple processors across the country, one possibility is that a common supplier of breeder hens has introduced the pathogen. Indeed, one recent analysis of *Salmonella* Enteritidis concluded that “infected breeding stocks” likely drove that pathogen’s rapid dispersal across the globe. WGS data will help to evaluate similar hypotheses as new pathogens emerge, and improve accountability across the supply chain.

In general, greater transparency leads to greater accountability, and that is why FSIS should seek to post WGS data as soon as possible, not just on a quarterly basis. Just a few days elapse from the time that an FSIS inspector collects a sample, to the time that WGS data is generated. With the current quarterly reporting, however, WGS data is not available until at least four months after a sample is collected. As new pathogens emerge, having close to real-time data may enable some companies to change suppliers or make other changes that mitigate food safety risk. FSIS should help to accommodate that behavior.

In conclusion, CFA commends the agency for its decision to disclose WGS data. The new policy represents an important contribution to greater transparency and we look forward to working with FSIS to continue to create greater accountability for food safety in the meat and poultry industry.

Sincerely,

Thomas Gremillion  
Director of Food Policy  
Consumer Federation of America

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<sup>3</sup> *Id.* at

<sup>4</sup> See Yeung et al. “America’s Food Safety System Failed to Stop a Salmonella Epidemic. It’s Still Making People Sick.” *ProPublica* (Oct. 29, 2021), <https://www.propublica.org/article/salmonella-chicken-usda-food-safety>