

UNITED STATES ANIMAL HEALTH ASSOCIATION – 2004

RESOLUTION NUMBER: 5 **APPROVED**

SOURCE: COMMITTEE ON SALMONELLA
COMMITTEE ON TRANSMISSIBLE DISEASES OF POULTRY AND
OTHER AVIAN SPECIES

SUBJECT MATTER: SALMONELLA PERFORMANCE STANDARDS

DATE: OCTOBER 27, 2004

BACKGROUND INFORMATION:

The United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) issued the Pathogen reduction: Hazard Analysis and Critical Control Point (PR/HACCP) Systems final rule on July 25, 1996. To verify that industry PR/HACCP systems are effective in controlling the contamination of raw meat and poultry products with disease-causing bacteria, the PR/HACCP rule sets *Salmonella* performance standards (SPS) that slaughter establishments and establishments that produce raw ground products should meet.

The SPS have been in effect for large establishments since January 26, 1998, and the results of this testing were published in the Progress Report on *Salmonella* testing of Raw Meat and Poultry Products, 1998-2003. The data reported for 2003 showed that *Salmonella* prevalence in all product categories, for all sizes of establishments combined, was lower than agency baseline studies and surveys conducted before PR/HACCP implementation. In addition, most categories showed marked improvements over the six-year period in both the percentage of samples testing positive and the percentage of sample sets meeting the performance standard criteria.

The Centers for Disease Control and Prevention (CDC) published Preliminary FoodNet Data on the Incidence of Infection with Pathogens Transmitted Commonly Through Food --- Selected Sites, United States, 2003 on April 30, 2004. This report detailed the surveillance results for nine FoodNet sites representing approximately 41.5 million persons. *Salmonella* cases represented 38.6 percent of laboratory-diagnosed cases of foodborne illness. Among the 5,455 *Salmonella* isolates serotyped, five serotypes accounted for 59 percent of infections: 20 percent Typhimurium, 14 percent Enteritidis, 12 percent Newport, 6 percent Heidelberg, and 6 percent Javiana.

During 1996—2003, the estimated incidence of several infections declined significantly. The estimated incidence of *Salmonella* decreased 17 percent (95 percent CI = 26 percent to 7 percent decrease); incidence of *S. typhimurium*, typically associated with meat and poultry, decreased 38 percent (95 percent CI = 47 percent to 27 percent decrease). The decline in human *Salmonella* infections during 1996—2003 accompanies a decline in the isolation of *Salmonella* from meat and poultry by FSIS.

RESOLUTION:

The United States Animal Health Association (USAHA) recommends that the United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) and The United States Department of Health and Human Services (DHHS), Food and Drug Administration (FDA) continue efforts to improve the safety of U.S. meat, poultry, and egg products and protect public health.

These efforts should be based on rigorous science-based initiatives that are proven effective in reducing pathogen contamination and should include adequate funding for research and development of new and innovative control strategies.

The USAHA also recommends that USDA-FSIS establish informal performance standards, rather than regulatory standards, using these as “benchmarks” to determine whether establishments are appropriately controlling pathogens in their operations. In addition, the establishment of any new performance standards or changes to existing performance standards should be tied to scientifically

supportable measures of human health outcome directly related to that standard.

Finally, the USAHA recommends that government and industry strive to work cooperatively toward the common goal of improving food safety related to meat, poultry, and egg products. The establishment of a confidential third-party data repository intended to collect and store government, industry, academic, and other pertinent food safety data that would be accessible to all affected parties should be pursued. Communication between industry and government should be improved with additional opportunities for combined training developed.

RESPONSE:

FOOD AND DRUG ADMINISTRATION (FDA)

FDA supports the USAHA'S recommendation that U. S. Department of Agriculture (USDA), Food Safety Inspection Service (FSIS), and the Department of Health and Human Services (HHS), FDA continue to use science-based measures to enhance the safety of the U.S. meat, poultry, and egg production, and to protect public health. The agency also agrees with the USAHA recommendation for a third party database. Both FDA and USDA currently support the Joint Institute for Food Safety and Applied Nutrition's Food Safety Risk Analysis Clearinghouse. The purpose of this clearinghouse and Web site is to assist those professionals involved with the many aspects of risk analysis as it pertains to the safety of our food supply. The clearinghouse provides data, tutorials, tools, and links to many sources of information. In addition to providing resources for the food safety risk analysis professional, the clearinghouse provides consumer-oriented links. The agency has a brief introduction to the field of food safety risk analysis, which is available at: <http://www.foodrisk.org/index.cfm>.

FOOD SAFETY AND INSPECTION SERVICES (FSIS)

Food Safety Inspection Services(FSIS) wholeheartedly agrees with the United States Animal Health Association's (USAHA) observations about the encouraging data from the Centers for Disease Control and Prevention's (CDC) Foodborne Diseases Active Surveillance Network (FoodNet). We can now add to that body of evidence that foodborne illnesses due to common bacteria are continuing to decline. On April 15, CDC released its 2005 FoodNet report that continues to show significant declines in foodborne illnesses. The new data show reductions from the 1996 to 1998 baseline in illnesses caused by *E. coli* 0157 (42%), *Listeria monocytogenes* (40%), *Yersinia* (45%), *Campylobacter* (31 %), and *Salmonella* (8%). CDC attributes the changes in the incidence of these infections in part to the control measures implemented by government and industry leaders, enhanced food-safety education efforts, and increased attention by consumer groups and the media. We believe that continuing on our current course will result in more reductions in illnesses caused by these pathogens. It should be noted that 2004 marked the second year in a row that we did not have a multi-million pound recall of meat or poultry in the United States. The decline in the number of recalls is another indicator that highlights the improvements that can be achieved in our food safety system when government, industry, and all interested parties work together and use science as a guide.

FSIS recognizes, however, that there are areas of concern in our progress to control foodborne pathogens. One of these is the challenge of *Salmonella*. If we look at the percentage of regulatory samples positive for *Salmonella* from our Hazard Analysis and Critical Control Point (HACCP) verification testing program, we see an overall aggregate downward trend, but even though the prevalence of *Salmonella* has declined in many of the raw products we regulate, human illness caused by *Salmonella* remains far above the Healthy People 2010 objective of 6.8 cases per 100,000 people. In 2003, there were 14.5 cases of *Salmonella* infections per 100,000. We still have quite a way to go to reach the 2010 goal. There is a substantial reduction in *Salmonella* prevalence to be achieved in ground chicken and turkey. In addition, we are giving further emphasis to fresh broilers because this category has seen a gradual upward trend of *Salmonella* prevalence over recent years. Careful consideration needs to be given to what is causing this

upward trend in order to improve existing interventions and implement new technologies to reverse it. The FSIS performance standard for fresh broilers is 20 percent; however, we still expect a downward trend in prevalence. We encourage USAHA to fully participate in reaching our goals in this *Salmonella* challenge.

FSIS agrees with your resolution that FSIS and the Food and Drug Administration (FDA) should continue efforts to improve the safety of meat, poultry, and egg products and protect public health through science-based initiatives, development of new control strategies, and improved communication. One way to better protect public health is to anticipate and predict food safety risks. A significant way to accomplish this is through the analysis of FSIS regulatory sampling data, as well as other sources of data, including baseline studies, in order to detect trends and identify connections among persistence, prevalence, and other factors such as practices employed by plants, seasonal variations, and establishment size. Including data collected by the establishment would add to FSIS' information and improve the quality and validity of decisions that are made. Ensuring the availability of data to FSIS from industry, academia, States, consumers, and others will be necessary to help us to protect against food safety risks. We are examining the establishment of a repository to provide data integrity and confidentiality. We will have more details on this initiative available in the near future. USAHA' s support for achieving this goal would be appreciated.

Another FSIS initiative we believe addresses the above resolution is to improve the association of program outcomes to public health surveillance data. We are working closely with FDA and CDC to improve our ability to link foodborne illness estimates with different food groups. Data on foodborne illnesses due to specific pathogens needs to be connected with prevalence data for different pathogens in specific foods. FoodNet allows FSIS and our Federal, State, and local food safety partners to integrate this data by determining the burden of foodborne disease, monitoring foodborne disease trends, and determining the extent of foodborne diseases attributable to specific foods. By comparing and contrasting the characteristics of pathogens recovered from food samples with those recovered from foodborne illness patients, we are able to estimate the risk of foodborne illness attributable to specific foods. We continue to significantly support FoodNet as a full-pledged partner.