



AMERICAN
SOCIETY FOR
MICROBIOLOGY

Office of Public Affairs

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Division of Dockets Management
5630 Fishers Lane
Room 1061
Rockville, MD 20852

The American Society for Microbiology (ASM) is responding to the Food and Drug Administration (FDA) notice requesting comments concerning the establishment of program priorities in the Center for Food Safety and Applied Nutrition (CFSAN) for fiscal year 2005 (FY 2005) in the Federal Register, Vol. 69, No. 121 on June 24, 2004, Docket No. 1998N-0359. The following comments were developed by the ASM Committee on Agriculture and Food Microbiology, of the Public and Scientific Affairs Board.

The ASM is the largest single life science society with more than 42,000 members, including scientists in academic, industrial, clinical, and government institutions, working in areas related to basic and applied research, the prevention and treatment of infectious diseases, laboratory and diagnostic medicine, the environment, and water and food safety. The ASM applauds FDA efforts to reduce the incidence of foodborne illnesses, and to protect the safety of the food supply.

The ASM's recommendations are included under the appropriate sections within the Program Priorities:

?? Assuring Food Safety and Security

- a. Food Security: Emergency Preparedness
 - i. Laboratory Preparedness – Reevaluate sampling methods and sampling sizes in light of potential food threats.
- b. Imports and Foreign Inspections
 - i. Develop a means to “certify” foreign companies that supply food to the US as a “preferred” vender or as a company that has a better safety record, leading to evaluation on a less frequent basis.
- c. Seafood Safety
 - i. Develop improved methods for analysis of viruses (Hepatitis A, Norwalk virus) and parasites associated with seafood products.

- d. Fruits and Vegetables
 - i. Develop effective washing procedures and other intervention strategies. Understand attachment and biofilm formation on produce to reduce the likelihood of contamination.

 - e. *Listeria*
 - i. Examine the interrelationship between resident populations of *Listeria* in the environment and cross-contamination with food or food ingredients. Develop effective sanitation practices to eliminate endemic populations in food processing facilities.

 - f. Food Allergens
 - i. Develop guidance documents that clearly define the ways in which to process food not containing allergens with those that do within the same facility.

 - g. Education
 - i. In addition to the at-risk population of pregnant women, develop additional training materials for other at-risk subpopulations, e.g. transplant patients, immunosuppressive drug users, people with AIDs, chronic disease groups, etc. A majority of this information would be overlapping among the documents, but targeting to specific groups would be most helpful.
- ?? Other topics for consideration:
- a. Implementation of HACCP for fruits and vegetables
 - b. Assessment of stress response in bacteria
 - c. Predictive modeling of bacteria in mixed culture and within defined foods

We are pleased to have the opportunity to provide comments on CFSAN's program priorities for FY 2005, and hope that these recommendations are of assistance to the FDA.

Sincerely,

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Chair, Public and Scientific Affairs Board

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