



April 20, 2009

Docket Clerk
U.S. Department of Agriculture
Food Safety Inspection Service
FSIS Docket Room
1400 Independence Avenue SW
Room 2534
Washington D.C. 20250-3700

RE: USDA FSIS Docket No. FSIS-2007-0038: Notice of Request for a New Information Collection (Consumer Focus Groups)

To Whom It May Concern:

The American Meat Institute (AMI) is the nation's oldest and largest meat packing and processing industry trade association. Our members slaughter and process more than 90 percent of the nation's beef, pork, lamb, veal, and nearly 75 percent of the turkey produced in the United States. The American Meat Institute Foundation (AMIF) is a non-profit research, education and information foundation established by AMI that strives to investigate ways the meat and poultry industry can produce better, safer products for consumers. Since 1999, the AMIF research program has directly sponsored more than 60 food safety research projects at leading universities and research labs, totaling over \$6,000,000. Those projects have helped develop new technologies to reduce microbial hazards in raw and fully cooked food products, gain a better understanding of the taxonomy of microorganisms to select or create intervention microbicides, and maintain the highest level of employee training through continued education programs.

AMI and its industry partners have a vested interest in producing a safe and wholesome product for consumers, which includes maintaining the highest level of food safety through the use of effective processing interventions to proper product handling recommendations. On behalf of AMI and its member companies we appreciate the opportunity to offer comment on Docket No. FSIS-2007-0038, "Notice of Request for a New Information Collection (Consumer Focus Groups)."

AMI supports the Food Safety and Inspection Service (FSIS) decision to assess consumers' knowledge of FSIS's current consumer protection initiatives.

Consumer tests are common food industry practices used to assess the personal response of product characteristics, product preparation recommendations, and likelihood of purchase intent. They are a necessary tool to design products and services to match consumer needs. The most effective consumer tests are based on scientific protocols administered by highly trained personnel among carefully selected consumer subjects representing the entire population being evaluated. Researchers have the responsibility of ensuring the *most appropriate and scientific* methodologies are being utilized to accurately access the responses of consumers.

AMI recommends alternative affective methods other than the qualitative consumer focus groups as described in FSIS-2007-0038: Notice of Request for a New Information Collection (Consumer Focus Groups).

It is widely accepted in the consumer sciences community that focus groups are highly influenced by psychological factors of mutual suggestion, capriciousness, timidity, and expectation error. Understanding the consumers' articulated and unarticulated needs and behaviors are based on specific targeted definitions developed on facts and direct consumer information. Common affective testing techniques used by sensory scientists to uncover consumer needs are typically observational research, one-on-one interviews, point-of-purchase interviews and on-line surveys. In the scope of this docket, the consumer intention to perform safe food handling may not result in volitional control and the use of focus groups to gather this information may result in discrepancies in reported behavior and actual behavior.¹

The AMI Foundation funded research to assess and validate on-package handling and cooking instructions for uncooked, breaded meat and poultry products to promote consumer practices that reduce foodborne illness risks. This research, through video observation and self-report surveys, assessed the preparation practices of consumers using commercially available frozen, uncooked, breaded chicken products to determine if differences exist between consumers' intent and actual behavior. Consumers (n=41) were observed, via surveillance cameras, in one-of-two model kitchens designed for use as student food preparation kitchens at Kansas State University in Manhattan, KS.

Preliminary data² shows that 73 percent of participants believed they were unlikely to get food poisoning from food prepared in the home and 85 percent felt it was unlikely they would contract food poisoning from personal food preparation practices. Consistent with previous research¹ a clear discrepancy was identified between observational and self-reported data regarding hand washing behaviors and the use of food thermometers. Ninety percent of consumers reported washing their hands after every contact instance of raw poultry, but observational data reported only 52.4 percent of consumers actually washed their hands. Similar discrepancies were observed in the

¹ Clayton DA, Griffith CJ, Price P. 2003. An investigation of the factors underlying consumer's implementation of specific food safety practices. *British Food Journal*, 105, 434-453.

² Data reported is from draft copy of AMI Final Report scheduled for submittal in August 2009. Manuscripts of research are being developed and will be submitted to peer-reviewed journals.

use and behavior of food thermometers. Consumers reported owning (73.2 percent) and using (19.5 percent) food thermometers in their homes when preparing similar meat products used in this study, but only 12.2 percent were observed utilizing the food thermometer properly to determine product doneness. Only 54.9 percent of consumers were observed attempting to determine doneness of final product, despite more than 90 percent of consumers being observed reading the products label preparation instructions. Average reading time of product preparation instructions was 22 seconds and the instructions were read by the consumer an average of three times. After reading the product preparation instructions, 95.1 percent of consumers were observed using recommended preparation appliances listed on the product label with only 7.3 percent being observed following the product preparation instructions.

AMI recognizes the economic constraints of performing affective consumer testing. AMI believes the use of observation research will provide the most accurate and factual consumer data based on scientific principles and recommends the use of internet surveys. Internet research is beneficial because it is less time consuming for participants, can be performed in an environment comfortable to the participant, reduces expectation error and group bias, can be more cost effective to conduct and more easily executed, allowing for rapid dissemination of survey results. Consideration needs to be given when performing internet surveys, however, about exclusion of the population segment that does not have access to the internet.

In summary, AMI supports FSIS's intent to assess the effectiveness of its consumer protection initiatives through evaluating consumers' understanding of cooking instructions and existing public health messages. Based upon the data and analysis of AMIF funded research assessing on-package handling and cooking instructions for uncooked, breaded meat and poultry products, AMI strongly recommends the use of observational metrics when collecting consumer data because it reduces the discrepancy commonly reported by scientists in reported behavior and observed behavior. The use of consumer data to verify the effectiveness of public health message is appropriate, but should not replace FSIS decision-making based on scientific principles. AMI strongly supports and recommends the continued and future use of FSIS decision-making and policy formulation be fundamentally based on sound scientific principles.

Sincerely,

A handwritten signature in dark ink, appearing to read "Betsy Booren", with a stylized, flowing script.

Betsy Booren, Ph.D.
Director, Scientific Affairs