

# FDA on how it uses WGS Plus, Cost – Benefit - Budget

"Whole Genome Sequencing (WGS) for food safety and its uses in prevention and response of foodborne outbreaks",

The Pathogen Surveillance in Agriculture, Food and the Environment (PATH-SAFE) Programme conference

London UK

Feb. 28<sup>th</sup> and 29th, 2024

Marc Allard PhD, Ruth Timme PhD, and Eric Stevens PhD.

FDA Center for Food Safety and Applied Nutrition

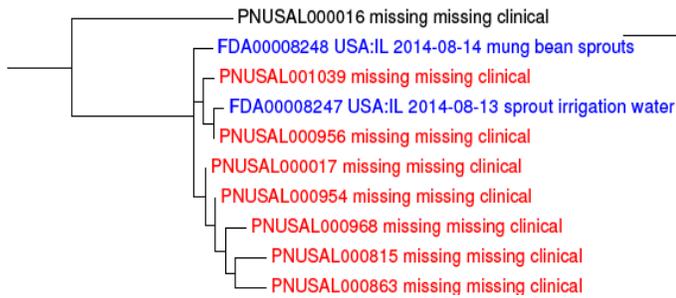
[Marc.allard@fda.hhs.gov](mailto:Marc.allard@fda.hhs.gov)



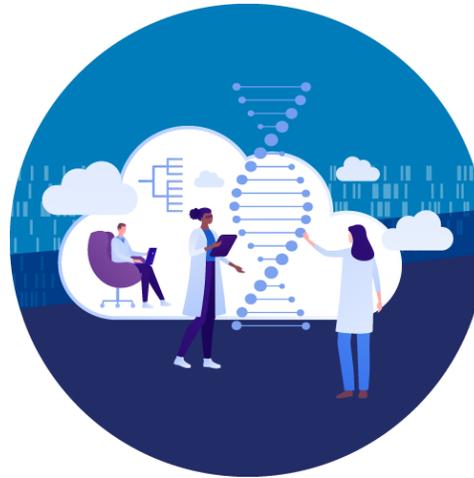
# New Field: Genomic Epidemiology



## Genomic Signal



## Epidemiological Signal



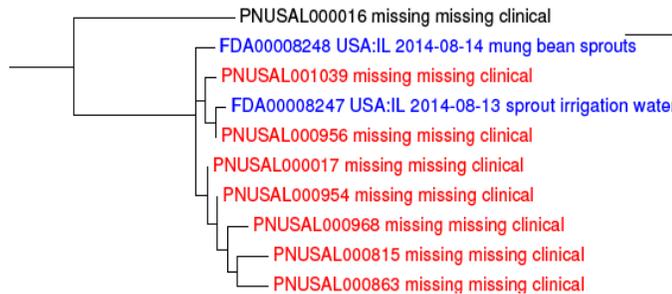
## Investigation



# Gen Epi regulatory communication



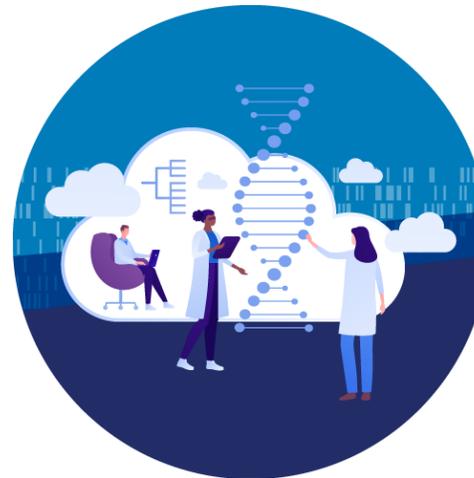
ORA / LFFM-funded laboratories  
upload genomic data to NCBI



ORA Office of Regulatory Affairs  
Regulatory arm of FDA  
Inspections, sequencing

OAO: watches for signal

CORE and OC: to communication to  
CDC, USDA-FSIS and State DOH + Ag



OAO Office of Analytics and Outreach  
Data interpretation and Risk assessment  
CORE Outbreaks, OC Compliance

CORE and OC:

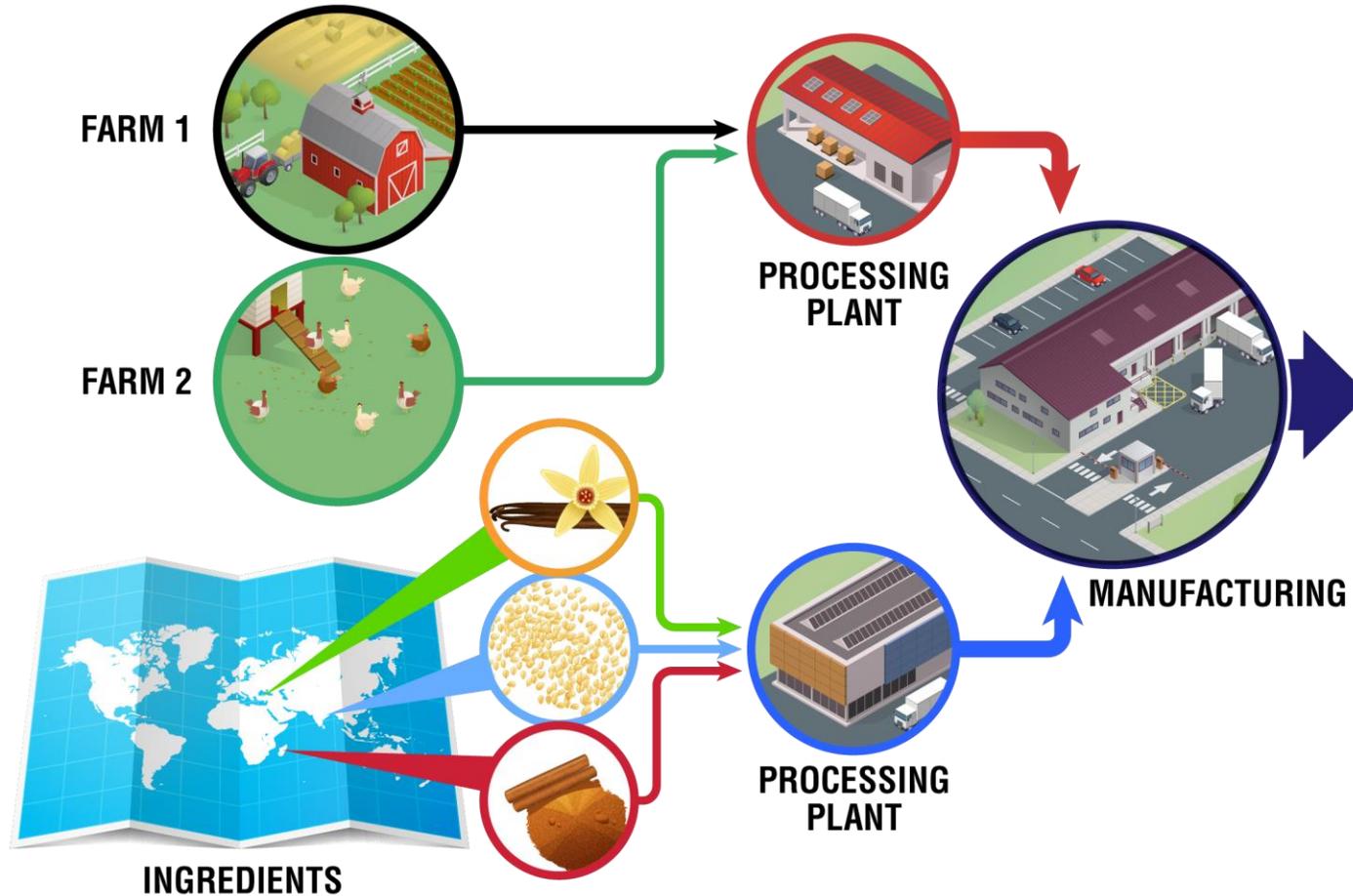
Facility/farm Inspections or  
product testing by ORA Consumer  
Safety Officers



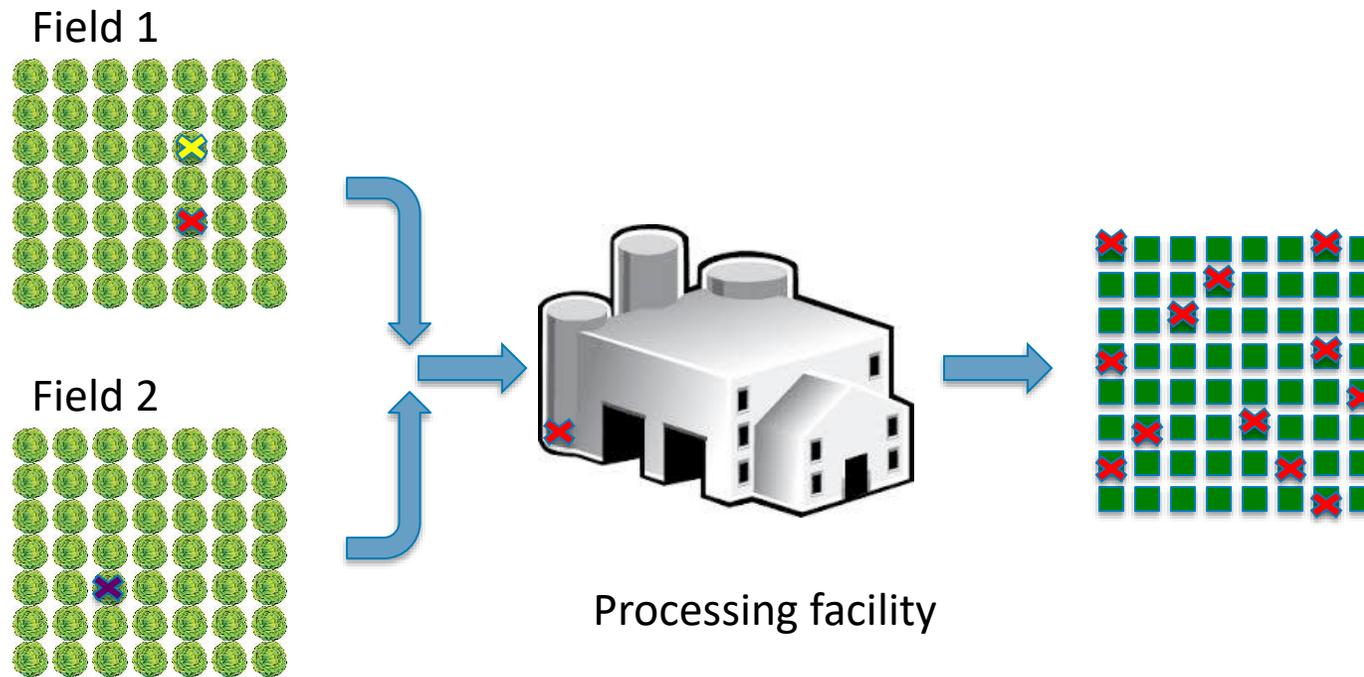
OFS Office of Food Safety, policy  
OIE Office of International  
Engagement  
ORS Office of Regulatory Science,  
research

Current FDA workflow works for all pathogens and all genomic methods, collected under FDA surveillance and inspection activities (virus, parasite, shellfish, filth, supplement botanicals).

# Identifying an Outbreak Vehicle: Trace Forward and Trace Backward



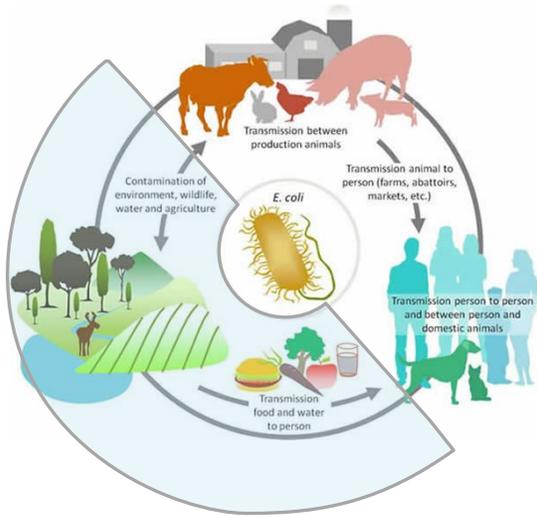
# Identifying an Outbreak Vehicle: Determining Resident or Transient pathogen



# FDA's GenomeTrakr program



- Sequencing the genomes of foodborne pathogens found in food, food processing facilities, farm environment, water, etc.
- Collaborate with other US agencies and international counterparts to integrate our data with genomic data collected from animals and human clinicals – data made public in real-time.
- Clustering at NCBI Pathogen Detection helps FDA identify causes of foodborne outbreaks and identify other events, like harborage.



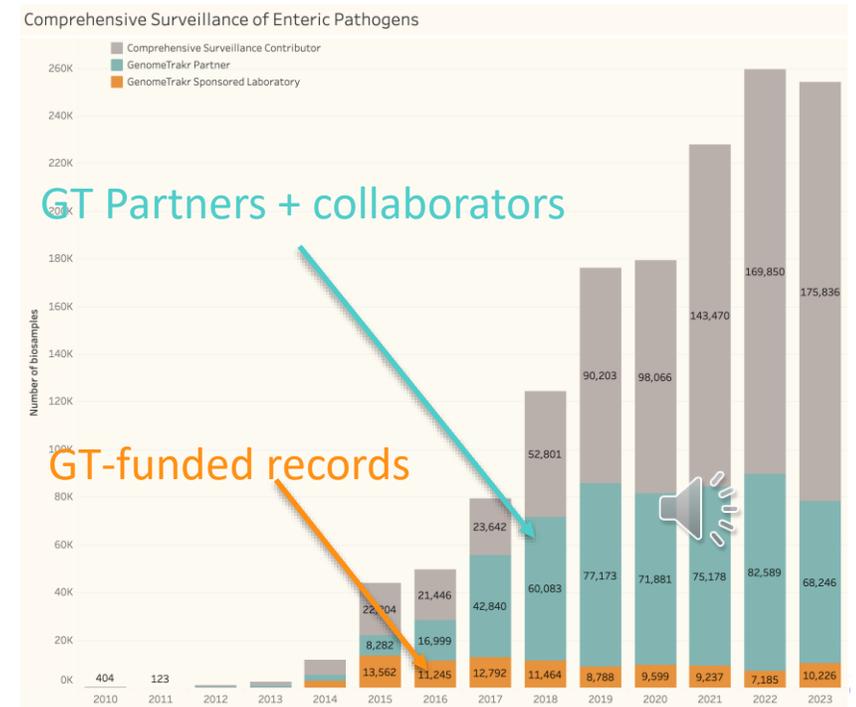
45 funded laboratories:



- CFSAN
- FDA field laboratory
- ★ GenomeTrakr Sponsored Laboratory

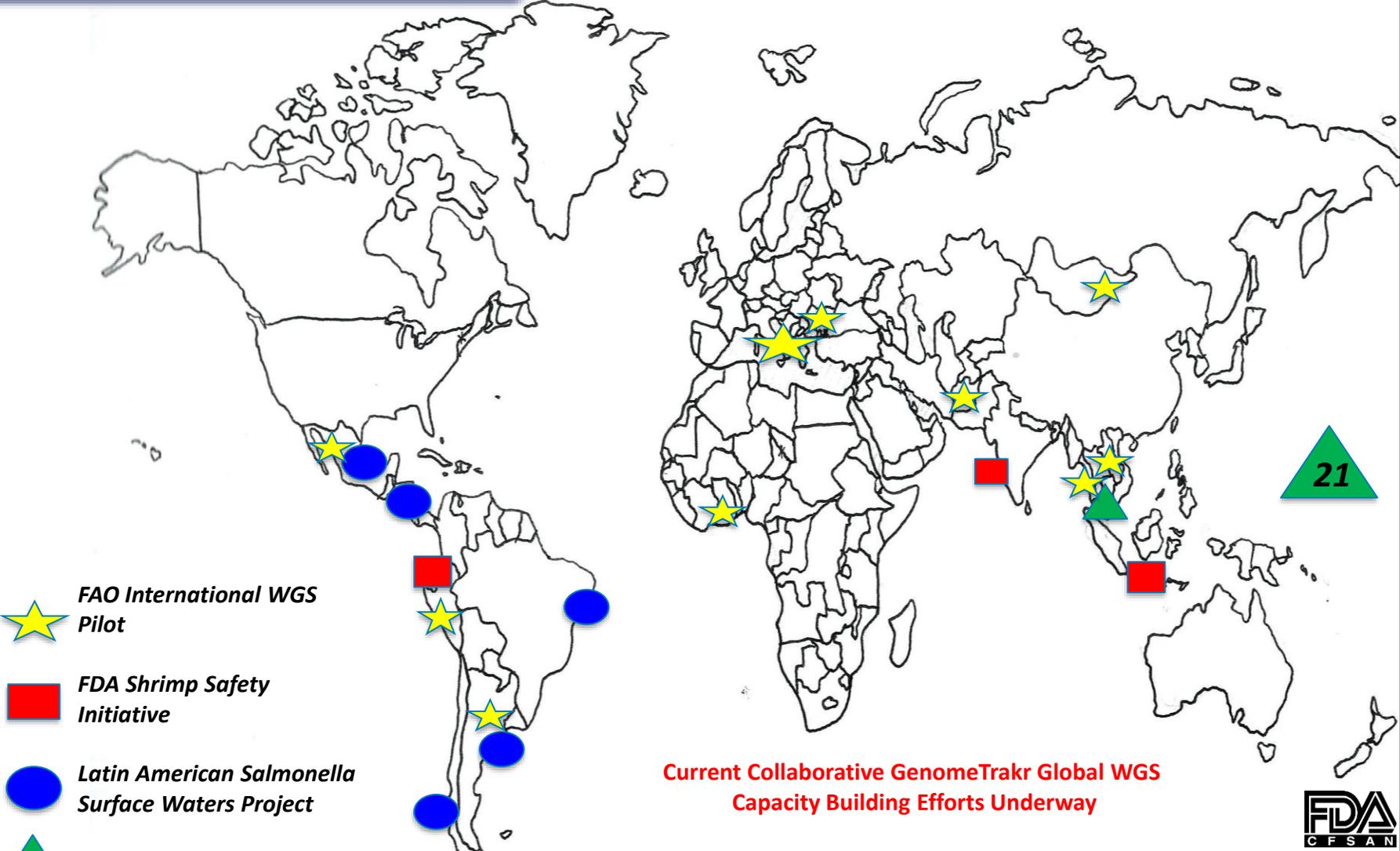
**Numerous GT partners and collaborators:**

- Public health, Ag, and academic labs
- US agency partners: GenFS and others
- International counterparts

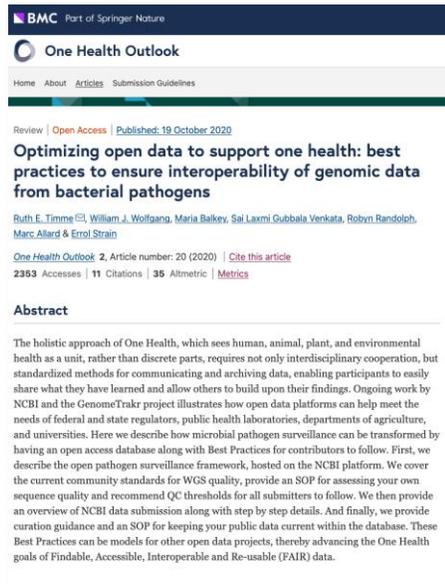


Increase environmental sampling across the US, and abroad.  
Meeting Nov. 19 - 21, 2019 College Park, MD and FAO, Rome, 2024

**International WGS Capacity Building**



# Best Practices from GenomeTrakr



Standard metadata required for interoperability

- FAIR = Findable, accessible, interoperable, reusable



Public, version-controlled protocols

- GenomeTrakr workspace:



Open-access analysis platform

- “MicroRunQC”: QC workflow for microbial pathogens



Open data repository for hosting genome + metadata

- Enables public/private collaboration



Timme, R.E., Wolfgang, W.J., Balkey, M. *et al.* *One Health Outlook* **2**, 20 (2020).

<https://doi.org/10.1186/s42522-020-00026-3>

<https://www.protocols.io/workspaces/genometrakr1/publications>



# One Health Enteric package:

## US Interagency Collaboration for Genomics for Food and Feed Safety (Gen-FS)



National Center for Biotechnology Information (NCBI)  
Centers for Disease Control and Prevention (CDC)  
Food and Drug Administration (FDA)  
U.S. Department of Agriculture (USDA)



## OHE package scope:



### CORE attributes

- Isolate identifiers
- Collected by
- Date of collection
- Geographic location
- Sampling purpose
- Sampling device
- Project name
- IFSAC category
- Source type
- sequenced by



### Human/animal host

- Host
- Host disease
- Host sex + age
- Host tissue sampled
- Animal environment
- Antimicrobials in food
- Animal housing system



### Food samples

- Geographic origin
- Intended consumer
- Collection site description
- Food product type
- Food source
- Food processing types
- Food preservation process
- Food cooking process
- Food additives
- Food contact surface
- Food container wrapping
- Food quality date



### Food facility

- Facility type
- Building setting
- Food processed
- Facility location
- Monitoring zone
- Indoor sampling surface
- Surface material
- Surface material cond.
- Surface orientation
- Surface temperature
- Biocide used
- Animal intrusion



### Farm and Environment

- Environmental material
- Farm type
- Plant growth medium
- watering method
- Relative loc of sample
- Fertilizer administration
- Food cleaning process
- Sanitizer used
- Farm equip. used
- Water samples
- Extreme weather event
- Mechanical damage

Generic template available at NCBI B

## Preview BioSample Types and Attributes

★ Select the package that best describes your samples.

All packages Packages for MAG submitters Packages for metagenome submitters

### (Optional) Filter packages by organism name

Enter the full scientific name of your samples, e.g., Escherichia coli

Reset and show all packages

To filter for relevant BioSample packages, enter the full scientific name of the organism of your samples.

- If your BioSamples are derived from a species **not represented in NCBI's Taxonomy database**, enter the genus-level name, e.g., *Escherichia*
- If your BioSamples are derived from **more than one organism**, enter the common species, genus, or family, e.g., *Enterobacteriaceae*
- If your BioSamples are **metagenomic/environmental**, or **metagenome-assembled genomes (MAG)**, select the appropriate tab above
- For more information about organism names, see [Organism information](#).

### NCBI packages [More...](#)

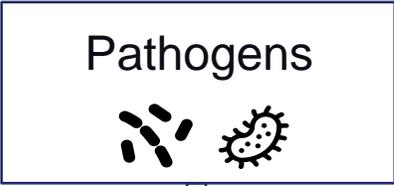
- SARS-CoV-2: clinical or host-associated**  
Use for SARS-CoV-2 samples that are relevant to public health. Required attributes include those considered useful for the rapid analysis and trace back of SARS-CoV-2 cases.
- SARS-CoV-2: wastewater surveillance**  
Use for SARS-CoV-2 wastewater surveillance samples that are relevant to public health. Required attributes include those considered useful for the rapid analysis and trace back of SARS-CoV-2 cases.
- Pathogen**  
Use for pathogen samples that are relevant to public health. Required attributes include those considered useful for the rapid analysis and trace back of pathogens.
- One Health Enteric**  
Use for microbial isolates that are collected for genomic surveillance of enteric pathogens. Sample spaces include the following: 1. human/animal hosts; 2. food samples; 3. food facilities; 4. environmental samples (farm, water, and the environment).  
US public health agencies have created customized versions of this package that include more specific guidance, controlled vocabulary picklists, and sub-packages for each of the 4 sample types.
  - [GitHub repository](#)
  - [Validation for the OHE package](#)
- Microbe**  
Use for bacteria or other unicellular microbes when it is not appropriate or advantageous to use [MIGS](#), [Pathogen](#) or [Virus](#) packages.

### GSC [MIGS](#) packages for genomes, metagenomes, and marker sequences [More...](#)

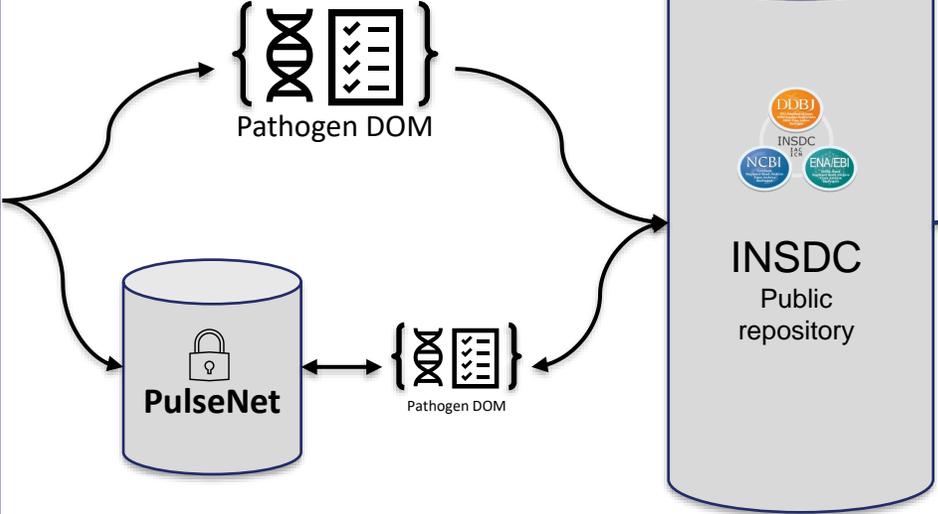
- MIGS Cultured Bacterial/Archaeal**  
Use for cultured bacterial or archaeal genomic sequences. Organism must have lineage [Bacteria](#) or [Archaea](#).
- MIGS Eukaryotic**  
Use for eukaryotic genomic sequences. Organism must have lineage [Eukaryota](#).
- MIGS Viral**  
Use for virus genomic sequences. Organism must have lineage [Viruses](#).
- MIMAG Metagenome-assembled Genome**  
Use for metagenome-assembled genome sequences produced using computational binning tools that group sequences into individual organism genome assemblies starting from metagenomic data sets. Organism cannot contain the term 'metagenome'. Use the [MIUVIG](#) package for virus genomes. Before creating BioSamples for prokaryotic and eukaryotic MAGs, please read and follow the [MAG submission instructions](#).
- MIMARKS Specimen**  
Use for any type of marker gene sequences, eg, 16S, 18S, 23S, 28S rRNA or COI obtained from cultured or voucher-identifiable specimens. Organism cannot contain the term 'metagenome'.
- MIMARKS Survey related**  
Use for any type of marker gene sequences, eg, 16S, 18S, 23S, 28S rRNA or COI obtained directly from the environment, without culturing or identification of the organisms. Organism must be a metagenome, where lineage starts with [unclassified sequences](#) and scientific name ends with 'metagenome'.
- MIMS Environmental/Metagenome**  
Use for environmental and metagenome sequences. Organism

New links to GenomeTrakr resources!

# US enteric pathogen surveillance



- Academia**
- US Federal Agencies**
- Public health labs**
- Government Research**
- Agriculture labs**
- Hospitals**
- Veterinary Clinics**
- Industry**



## NCBI Pathogen Detection

The screenshot shows the NCBI Pathogen Detection interface. At the top, a phylogenetic tree displays the relationship between various samples. Below the tree, a table lists the results, including sample names, accession numbers, and other metadata. The interface also includes search filters and options to download data.

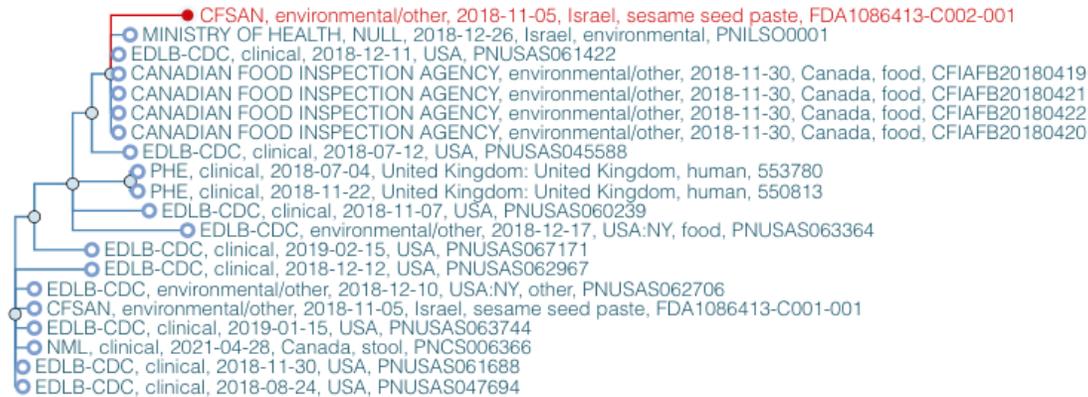
#	Scientific name	BiSample	Contig	Start	Stop	Strand	Element name	Type	Scope	Subtype	Class
1	Escherichia coli	SAH8476262	LNK921000072.1	7	1156	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
2	Escherichia coli	SAH8476263	LNK921000061.1	2745	2994	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
3	Escherichia coli	SAH8476260	LNK921000052.1	3447	5056	+	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
4	Escherichia coli	SAH8476266	LNK921000008.1	16129	17017	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
5	Escherichia coli	SAH8476265	LNK921000004.1	2	1162	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
6	Escherichia coli	SAH8476267	LNK921000020.1	10314	11039	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
7	Escherichia coli	SAH8476265	LNK921000071.1	1074	3599	+	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
8	Salmonella enterica	SAH8476265	AAK3201000001.1	2095	3595	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
9	Salmonella enterica	SAH8476265	AAK3201000001.1	6621	7628	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
10	Escherichia coli	SAH8476263	AAK3201000001.1	33	1463	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
11	Escherichia coli	SAH8476269	AE_A927962.1	104333	1042156	-	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN
12	Escherichia coli	SAH8476269	DAH9941000001.1	4701	4856	+	MCR-1 family phosphotransferase- $\beta$ -lactamase	AMR	core	AMR	COLISTIN

## FDA public dashboards



# Salmonella tahini clusters highlight global contribution

130,935 Clusters currently tracked.



- United Kingdom (PHE)
- United States (GenomeTrakr, PulseNet)
- Canada (CFIA, NLM)
- Israel



- United Kingdom
- United States (GenomeTrakr)



- United Kingdom (PHE, GBRU)
- United States (GenomeTrakr, PulseNet)



- United Kingdom (PHE)
- United States (GenomeTrakr, PulseNet)
- Poland



## Case study area

	APHA (UK)	FLI (DE)	EMC (NL)	IZSLER (IT)	INEI-ANLIS (ARG)	MDH (US)	PHAC (CAN)	PHE (UK)
<b>Institution</b>								
Outbreak or routine surveillance	Outbreak	Outbreak	Routine surveillance					
Number of samples in reference period	26	30	630	175	320	1,767	8,630	15,791
	in 8 months	3 months	5 months	12 months	12 months	12 months	12 months	12 months
<b>WGS</b>								
Sequencer used	Illumina MiSeq	IonTorrent PGM	Nanopore GridION	Illumina MiSeq	Illumina MiSeq	Illumina MiSeq	Illumina MiSeq	Illumina HiSeq
Batch size for sample processing/sequencing	1–2	6	30	24	12	24	32	Processing: 40 Sequencing: 96
Equipment	€ 58.53	€ 210.71	€ 2.50	€ 163.49	€ 43.02	€ 29.53	€ 75.90	€ 35.23
Consumables	€ 830.97	€ 254.88	€ 33.52	€ 165.37	€ 104.62	€ 104.40	€ 69.75	



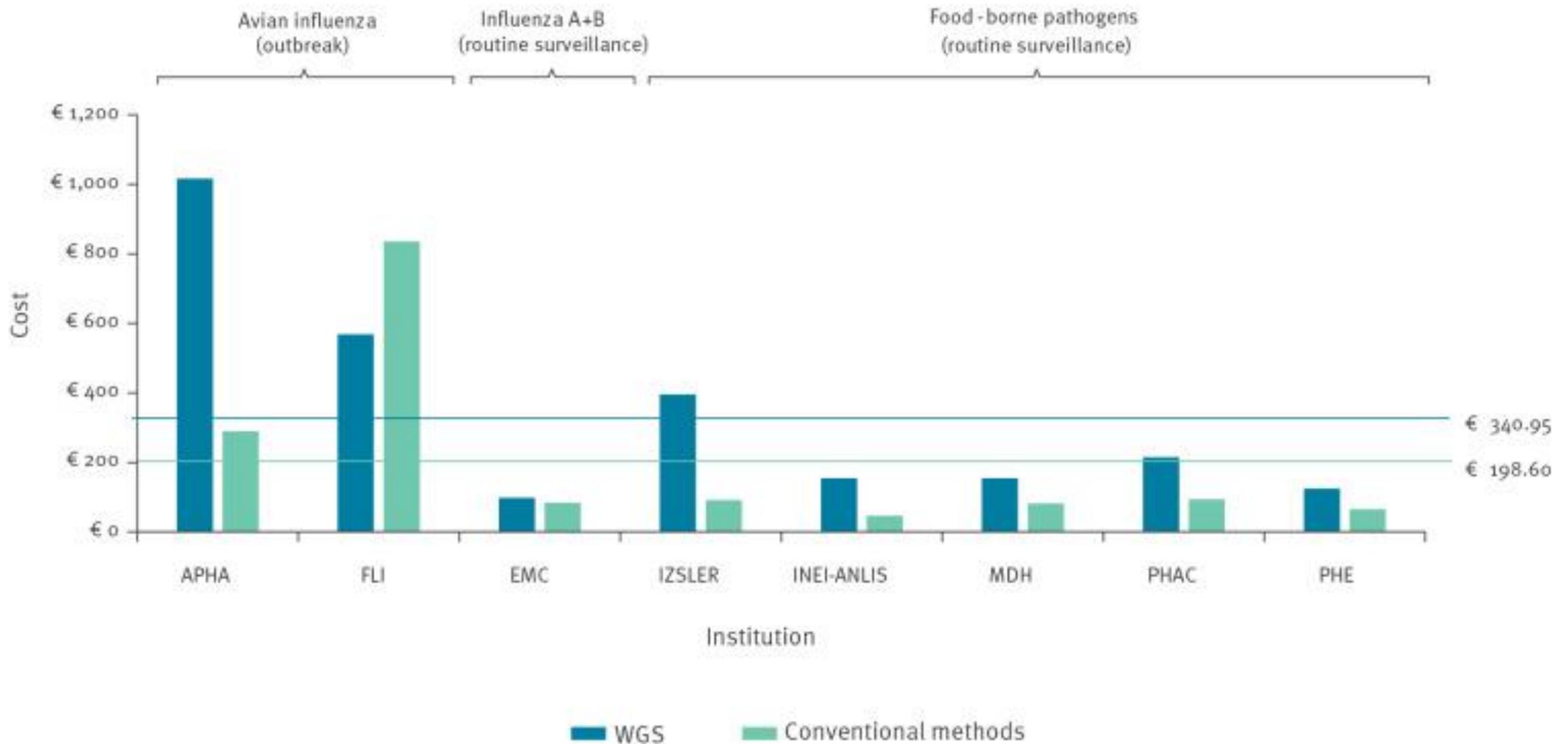
## Economic impact studies

Overview of per-sample costs of whole genome sequencing vs conventional methods, by cost type, case studies covering a specified reference period between 2016 and 2019 (n = 8 institutes)

**INEI-ANLIS Dr Carlos G Malbrán, Buenos Aires, Argentina**

**Alleweldt et al. Economic evaluation of whole genome sequencing for pathogen identification and surveillance—results of case studies in Europe and the Americas 2016 to 2019. Euro. Surveill. 2021 Mar 4; 26(9): 1900606** **\*\*[Celine Nadon](#),**





Over-all per-sample costs of whole genome sequencing vs conventional methods, case studies covering a specified reference period between 2016 and 2019 (n = 8 institutes).



Case study institution	IZSLER (IT)	INEI-ANLIS (ARG)	MDH (US)	PHAC (CAN)	PHE (UK)	Average
Cost per sample (WGS)	€ 395.14	€ 154.49	€ 154.51	€ 215.36	€ 124.59	€ 208.82
Cost per sample (conventional methods)	€ 91.87	€ 46.61	€ 81.16	€ 94.29	€ 65.46	€ 75.88
Differential cost of WGS compared with conventional methods	€ 303.27	€ 107.88	€ 73.35	€ 121.07	€ 59.13	€ 132.94
Number of samples per year ( <i>Salmonella</i> )	110	128	1,010	8,273	10,147	3,934
Total additional costs per year due to the use of WGS	€ 33,360	€ 13,809	€ 74,084	€ 1,001,623	€ 599,992	€ 344,573
Average cost per reported case of salmonellosis	€ 12,124	€ 11,821	€ 13,225	€ 12,174	€ 12,401	€ 12,349
Number of reported cases of salmonellosis that need to be avoided to break even	2.8	1.2	5.6	82.3	48.3	28.0
Number of cases of salmonellosis reported annually <sup>a</sup>	276 <sup>b</sup>	758	906	7,665	8,770	4,404
Percentage of total number of reported cases of salmonellosis that need to be avoided to	1.0%	0.2%	0.6%	1.1%	0.6%	0.7%

Results of break-even analysis, whole genome sequencing vs conventional methods, case studies covering a specified reference period between 2016 and 2018 (n = 5 institutes).

Istituto Zooprofilattico Sperimentale della Lombardia e dell'Emilia Romagna, Parma, Italy





## Results

On a per-sample basis, WGS was between 1.2 and 4.3 times more expensive than routine conventional methods. However, WGS brought major benefits for pathogen identification and surveillance, substantially changing laboratory workflows, analytical processes and outbreaks detection and control. **Between 0.2% and 1.1% (on average 0.7%) of reported salmonellosis cases would need to be prevented to break even** with respect to the additional costs of WGS.

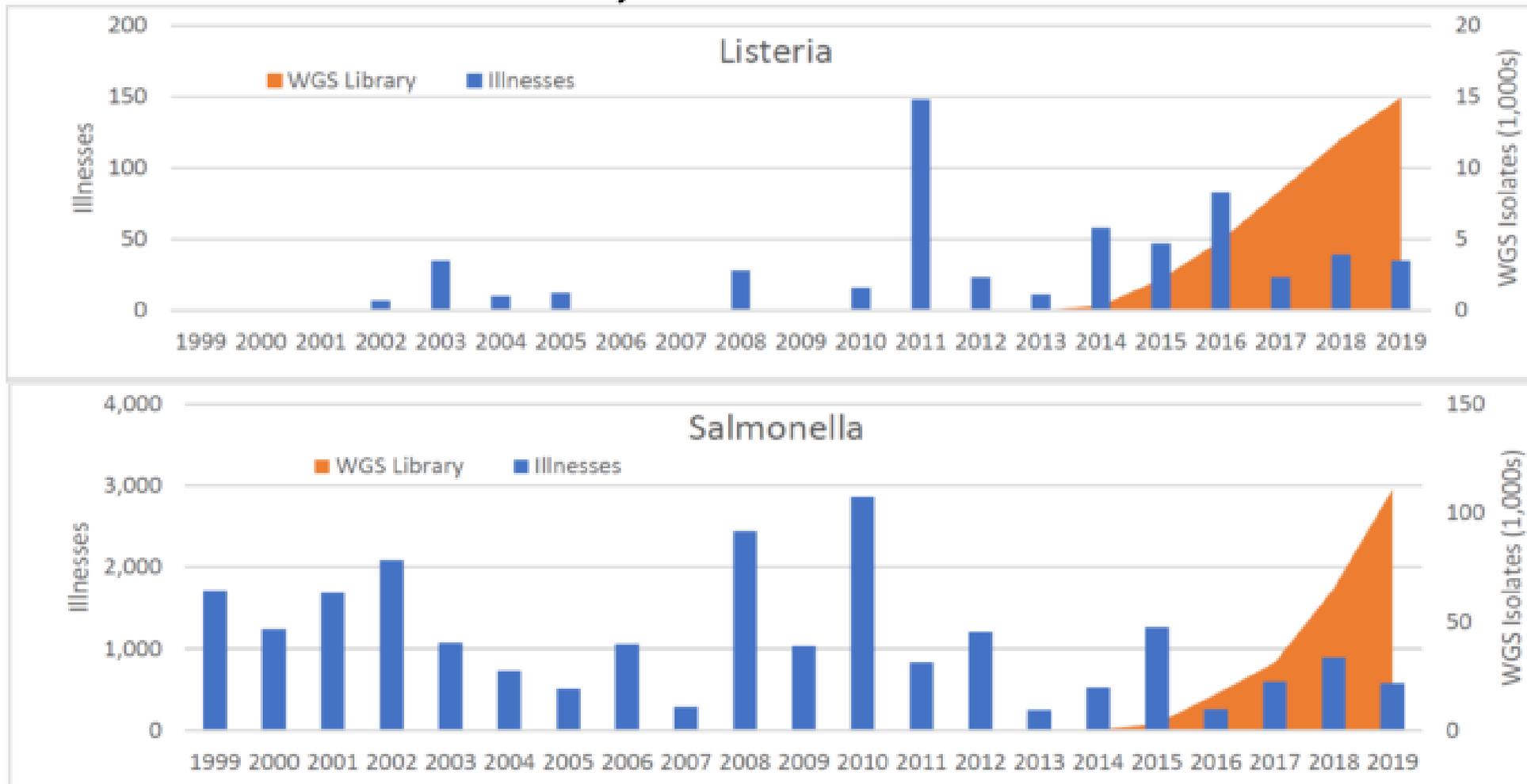
## Conclusions

Even at cost levels documented here, WGS provides a level of additional information that more than balances the additional costs if used effectively. The **substantial cost differences for WGS between reference laboratories were due to economies of scale, degree of automation, sequencing technology used and institutional discounts for equipment and consumables,** as well as the extent to which sequencers are used at full capacity.

Ford et al. Cost of whole genome sequencing for non-typhoidal *Salmonella enterica*. PLoS ONE 2021; 16(3):e0248561 For Australia break even is **1.9%**



# Data and Summary Statistics



Brown et al. (2021) An economic evaluation of the Whole Genome Sequencing source tracking program in the U.S. PLoS ONE 16(10): e0258262.

$$SV = \underbrace{[p_x * x - (c_x(x) + c_e(e(WGS)))]}_{\text{profit Function}} - \underbrace{[C_I * x * \gamma_I(e(WGS)) * n_I(WGS)]}_{\text{public health externality function}} - \underbrace{[c_{WGS}(WGS)]}_{\text{implentation cost}}$$

$$I_O = \underbrace{x * \gamma_I(e(WGS))}_{\text{probability outbreak occurs}} * \underbrace{n_I(WGS)}_{\text{number of illnesses in outbreak}} * \underbrace{\alpha_O(WGS)}_{\text{probability illnesses are observed}}$$

$$Y_{p,t} = \beta_0 + \beta_1 WGS\_library_{p,t} + \epsilon_{p,t}$$

$$Y_{p,t} = \beta_0 + \beta_1 WGS\_library_{p,t} + \beta_2 X_{p,t} + \epsilon_{p,t}$$

$$Y_{p,t} = \beta_0 + \beta_1 WGS\_library_{p,t} + \beta_2 X_{p,t} + \beta_3 FSMA_t + \epsilon_{p,t}$$

$$\text{Benefits} = \hat{\beta}_1 \times WGS \text{ Isolates} \times \text{Underreporting Multiplier} \times \text{Monetary Loss}$$



If you want to do these kinds of calculations, please let our PhD economist talk to yours.

# Economic Evaluation of WGS Reduces the Burden of Illness

## Total Burden Averted (in millions)

	Listeria	E. coli	Salmonella	Yearly Total	Total 90% CI
<b>2014</b>	\$7.43	\$0.12	\$0.39	\$7.94	(\$2.96 - \$13.61)
<b>2015</b>	\$50.95	\$1.68	\$2.83	\$55.46	(\$20.79 - \$94.89)
<b>2016</b>	\$114.23	\$6.13	\$14.69	\$135.04	(\$51.03 - \$229.39)
<b>2017</b>	\$197.39	\$15.24	\$27.46	\$240.09	(\$90.87 - \$406.78)
<b>2018</b>	\$280.62	\$29.94	\$57.30	\$367.86	(\$139.56 - \$620.41)
<b>2019</b>	\$348.48	\$51.03	\$97.47	\$496.98	(\$188.62 - \$835.92)



# Economic Impact



- GenomeTrakr program was likely cost effective by its second year of implementation
- \$100 M -> \$450 M in net annual health benefits (est. from 2019). >\$ Billion estimated benefits.

**PLOS ONE**

OPEN ACCESS PEER-REVIEWED  
RESEARCH ARTICLE

### An economic evaluation of the Whole Genome Sequencing source tracking program in the U.S.

Brad Brown, Marc Allard, Michael C. Bazaco, Joseph Blankenship, Travis Minor

Published: October 6, 2021 • <https://doi.org/10.1371/journal.pone.0258262>

Article	Authors	Metrics	Comments	Media Coverage
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**Abstract**

**Introduction**

The U.S. Food and Drug Administration (FDA) created the GenomeTrakr Whole Genome Sequencing (WGS) Network in 2013, as a tool to improve food safety. This study presents an analysis of Whole Genome source tracking implementation on potential food contamination and related illnesses through theoretical, empirical, and cost benefit analyses. We conduct empirical tests using data from FDA regulated food commodity outbreaks garnering FDA response from 1999 through 2019 and examine the effect of the National Center for Biotechnology Information (NCBI) Pathogen detection program of source tracking WGS isolates collected in the U.S. on outbreak illnesses for three pilot pathogens (*E. coli*, *Listeria*, and *Salmonella*). Empirical results are consistent with the theoretical model and suggest that each additional 1,000 WGS isolates added to the public NCBI database is associated with a reduction of approximately 6 illnesses per WGS pathogen, per year. Empirical results are connected to existing literature for a Monte Carlo analysis to estimate benefits and costs. By 2019, annual health benefits are estimated at nearly \$500 million, compared to an approximately \$22 million investment by public health agencies. Even under conservative assumptions, the program likely broke even in its second year of implementation and could produce increasing public health benefits as the GenomeTrakr network matures.



**Return on Investment:** \$10 dollars in averted human health costs for every \$1 dollar invested. For each additional 1,000 WGS isolates added to the public NCBI database is associated with a reduction of approximately 6 illnesses per WGS pathogen, per year.



Price et al. 2023 A systematic review of economic evaluations of whole-genome sequencing for the surveillance of bacterial pathogens. *Microb Genom* 2023; 9(2). Discussion of 9 different economic impact studies.

There were significant variations in the research questions addressed in the various publications yet, most studies demonstrated cost savings due to WGS that were largely attributed to averted cases of infection.

For this benefit to be realized maximally, WGS needs to be employed early in the analytical pipeline. Conversely, delay in the use of WGS reduces the benefits, as early detection of outbreaks enables timely implementation of interventions to interrupt transmission.

More economic evidence of WGS in public health settings is required to foster wider applications of WGS as a surveillance tool in public health.



We dedicate  
this work to  
Robert Stones  
FERA

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