



1152 FIFTEENTH STREET NW, SUITE 430
WASHINGTON, DC 20005
PHONE: 202-296-2622

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Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue SW
Mailstop 3758
Washington, DC 20250-3700

Dr. Justin Ransom
Administrator
Food Safety and Inspection Service
1400 Independence Ave SW
Washington, DC 20250-3700

Re: Docket No. FSIS-2025-0179: Exploring Practical Strategies to Reduce *Salmonella* in Poultry Products

Dear Dr. Ransom:

The National Chicken Council (NCC) appreciates the opportunity to provide comments regarding the United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS or the Agency) notice of public meeting – Exploring Practical Strategies to Reduce *Salmonella* in Poultry Products (Notice).¹ NCC wants to thank the Agency for hosting the public meeting on January 14, 2026, titled Exploring Practical Strategies to Reduce *Salmonella* in Poultry Products. This was a timely forum to gather input from all stakeholders, including representatives from establishments of various sizes, trade associations, consumer advocacy groups, and academics on how FSIS may consider advancing this important initiative. We appreciated the opportunity to share some ways in which the Agency could update the current regulatory structure for *Salmonella* in poultry that we believe will be implementable to establishments of all sizes and impactful to public health.

NCC is the national, non-profit trade association that represents vertically integrated companies that produce and process more than 95 percent of the chicken marketed in the United States. Our member companies are keenly interested in continued collaboration with FSIS to identify approaches to advance our collective food safety goals. NCC's members are committed to providing safe, high-quality, and wholesome products to consumers and have dedicated substantial resources to controlling *Salmonella* risk in raw poultry products. These efforts have included preharvest interventions, vaccine development, processing controls, and various other interventions implemented in the farm to fork continuum. These efforts have had a measurable impact on *Salmonella* prevalence in raw chicken and on public health. Salmonellosis rates attributable to raw chicken on a per-pound-consumption basis have decreased dramatically over time. Our members support science-

¹ FSIS, Exploring Practical Strategies to Reduce *Salmonella* in Poultry Products, 90 Fed. Reg. 55297 (Dec. 2, 2025).

based, legally sound, and implementable policies that seek to promote public health through continued reduction of *Salmonella* in poultry products.

In developing these comments, we have focused on solutions that will improve food safety and impact public health by cutting through red tape and unleashing American prosperity through deregulatory actions. NCC's members are committed to reducing the presence of *Salmonella* in raw poultry products and as described in these comments, we believe this can be achieved by modernizing the current performance standard system, which would not impose additional regulatory burdens, including on the small processors. Further, these comments identify areas where current data collection efforts could be streamlined to promote efficiencies that will help ensure poultry products remain a healthy, low-cost protein source for Americans. We appreciate FSIS's partnership in this process and the Agency's commitment to identifying practical, implementable solutions grounded in common sense and gold standard science.

Industry efforts to reduce *Salmonella* prevalence in raw chicken products have been largely successful, as noted by FSIS in the Notice. Since the implementation of performance standards, the number of poultry samples with *Salmonella* detections by FSIS has decreased, with the Agency noting a more than 50% decrease between 2017 and 2021.² However, these improvements have plateaued with no significant reductions in *Salmonella* contamination observed for any type of poultry products sampled by FSIS since 2021.³ We firmly believe that meeting the Agency's *Salmonella* performance standards has resulted in safer poultry products and that these performance standards served a meaningful purpose. Importantly, the performance standards have demonstrated a history of driving industry behavior without requiring burdensome regulations or significant Agency resources. With the availability of new technologies including *Salmonella* enumeration, we believe now is the appropriate time to reevaluate current performance standards and consider other regulatory strategies to further drive down human salmonellosis rates attributed to chicken.

Below we provide feedback on the four key topic areas presented in the Notice and look forward to continued engagement with FSIS to update current prevalence-based *Salmonella* standards based on the latest science and reflecting technological advancements in laboratory methods.

Alternative Parameters for Performance Standards

NCC appreciates the Agency's interest in alternative parameters for *Salmonella* performance standards. We believe that now presents the perfect opportunity to update existing prevalence-based performance standards for *Salmonella* by incorporating advancements in enumerative laboratory methods that we believe will further drive down *Salmonella* risk in poultry products. Whereas the current performance standards focus on whether *Salmonella* is present, an enumeration-based approach would focus on how much *Salmonella* might be present. Coupling the proven effectiveness of *Salmonella* performance standards in driving behavior with an enumeration-based approach would help the Agency and industry focus attention on driving down higher levels of *Salmonella* that might be present, leading to meaningful public health benefits.

Current enumeration methods provide more granular insight than prevalence alone, serve as useful for directional feedback to improve process control, and can support trend analysis. It is critical that updates to existing performance standards are implementable by establishments of all sizes and are based in science and backed by robust data. Further, while we support updating existing prevalence-based performance standards, it is imperative that updated performance standards are achievable with existing tools and technologies.

² *Id* at 55297.

³ Importantly, FSIS last updated performance standards in 2016.

Currently, the only intervention that is available to industry to impact certain *Salmonella* serotypes is vaccines, and vaccines alone are not a silver bullet. There is no certainty that flocks vaccinated for a specific serotype will be free of that serotype. Further, there are no tools available to industry that can eliminate virulence factors or antibiotic resistance of *Salmonella*. In fact, antibiotic use in broiler chickens is by far the lowest of all animal proteins.⁴

Salmonella performance standards work, as demonstrated through HACCP sampling results, current category standings, and the reduction in salmonellosis attributed to chicken (when considering total pounds of chicken consumed). We believe that technological advancements—specifically *Salmonella* enumeration platforms—now allow us to focus on how much *Salmonella* is present on poultry, rather than merely its presence. Although promising and useful to provide more granular insight than prevalence alone, these advances in laboratory methods are still being refined and cannot provide the certainty required for a traditional regulatory standard. Recent work by the Agricultural Research Service (ARS) demonstrated a high rate of false positives using commercially available methods, including the current FSIS method.⁵ Though this research demonstrated some limitations using the current enumeration method used by FSIS, the enumeration data collected by the Agency could provide a reasonable foundation for updating current performance standards when considering a shift to a threshold-based standard.

In particular, NCC supports pursuing an enumerative performance standard that uses two thresholds: an upper threshold and a lower threshold. A threshold-based standard is comparable to how FSIS currently monitors Public Health Regulations (PHRs). For example, a lower level for *Salmonella* would be the threshold at which FSIS inspection program personnel and industry would be notified via PHIS, and the establishment in question would be expected to review its process control program and supporting data, evaluate its interventions, and consider what corrective actions may be necessary. An upper level for *Salmonella* would be the threshold at which FSIS may consider conducting a Public Health Risk Evaluation (PHRE) or other similar action. Both upper and lower thresholds must be based on scientifically valid data that is operationally reliable, reproducible, and fair. Industry experts and academia have evaluated available FSIS data, and we are confident that the adoption of a performance standard with upper and lower enumerative thresholds for *Salmonella* would have an impact on public health.

While we support robust product testing by both FSIS and industry alike, testing alone will not make food safer. Testing acts as a verification of the activities an establishment has implemented to control its processes, and it is critically important that plants control their processes to prevent contamination in the first place. With this dynamic in mind, we recommend process control be included as an important component of a threshold-based standard. Process control should be grounded in microbial data and sanitary dressing as an essential element of an updated regulatory structure for *Salmonella*.

In addition to these broader principles, we strongly recommend that the Agency reconsider the current 52-week window for evaluating adherence to performance standards as it does not reflect the current performance of an establishment. Instead, we recommend utilizing a much shorter window such as a 13-sample window, which

⁴ FDA Releases Annual Summary of Sales and Distribution of Antimicrobials in 2024 for Use in Food-Producing Animals, FDA (Dec., 5, 2025), <https://www.fda.gov/animal-veterinary/cvm-updates/fda-releases-annual-summary-sales-and-distribution-antimicrobials-2024-use-food-producing-animals>.

⁵ Schmidt, J. W., Wu, W., Harhay, D. M. & Wheeler, T. L., (2025) "Identification of Chicken Component Samples Containing Salmonella Concentrations Greater Than or Equal to 1 CFU/g", *Meat and Muscle Biology* 9(1): 18993, 1-8. doi: <https://doi.org/10.22175/mmb.18993>. (If a sample contains *Salmonella* at a concentration of 0.9 CFU/g, there is a 75% chance the method will report ≥ 1 colony forming unit (CFU) per gram (g). If a sample contains *Salmonella* at a concentration of 0.5 CFU/g, there is a 40% change the method would report ≥ 1 CFU/g).

would ensure that establishments, regardless of sampling frequency, are treated equally by FSIS and more accurately reflect an establishment's current performance. This would ensure that small and very small plants are evaluated similarly by FSIS.

In conclusion, we support regulations to further reduce *Salmonella* in poultry products that are science-based, data-driven, implementable by establishments of all sizes, and impactful to public health. Further, it is important that regulatory updates keep poultry products affordable to all consumers.

Policy Options Beyond Current Performance Standards

As demonstrated by FSIS's continued engagement in this area, reducing the prevalence of *Salmonella* in raw poultry products is a complex and multifaceted issue. NCC is confident that a modernized performance standard approach that incorporates process control parameters will be the most effective method for reducing the prevalence of *Salmonella* in raw poultry products and thus foodborne illness rates associated with poultry products. As discussed at length in NCC's comments on the previous *Salmonella* Framework Proposal,⁶ *Salmonella* is not an adulterant in raw poultry because proper, customary cooking practices are effective for eliminating *Salmonella* present in raw poultry. We appreciate FSIS taking a fresh look at its *Salmonella* policy from a scientifically and legally supportable position. Although *Salmonella* is not an adulterant, there nonetheless are key regulatory steps the Agency could take within its legal authorities to enhance product safety.

Specifically, we recommend FSIS establish validated cooking instruction labeling requirements for all retail not-ready-to-eat (NRTE) breaded stuffed chicken products and NRTE par fried chicken products. Additionally, we encourage FSIS to explore initiatives to support consumer education regarding the safe use of air fryers for cooking poultry products. In 2016, NCC petitioned FSIS to establish labeling requirements and a related compliance guideline for NRTE breaded stuffed chicken products.⁷ The requested action would ensure that labels clearly communicate validated cooking instructions for these products. NCC updated this petition in 2022 to reference the 2021 National Advisory Committee on Meat and Poultry Inspection (NACMPI) report⁸ that recommended the adoption of NCC's petition.⁹ We reiterate our support for this petition and expand our request to also include all retail par fried chicken products. Currently, there are no labeling requirements that adequately distinguish retail ready-to-eat (RTE) chicken products from retail par fried NRTE chicken products. This poses a potential risk to the consumer that can be avoided if FSIS establishes labeling requirements clearly distinguishing retail RTE from retail NRTE products.

These labeling requirements are particularly important in light of the increase in popularity and use of air fryers. Almost 70% of U.S. households own an air fryer, which is commonly used to cook chicken and other meats. Given the expanded use of this appliance, it is imperative that FSIS expand consumer education on the

⁶ NCC Comments to Docket No. FSIS-2023-0028, Regulations.gov (Jan. 17, 2025), <https://www.regulations.gov/comment/FSIS-2023-0028-7009>.

⁷ NCC, *Petition to Establish Regulations for the Labeling and Validated Cooking Instructions for Not-Ready-to-Eat Stuffed Chicken Breast Products That Appear Ready-to-Eat*, FSIS (May 24, 2016), https://www.fsis.usda.gov/sites/default/files/media_file/2020-07/16-03-National-Chicken-Council.pdf.

⁸ National Advisory Committee on Meat and Poultry Inspection, *Subcommittee II: Stuffed Not Ready-to-Eat Poultry Products*, FSIS (Sept. 28, 2021), https://www.fsis.usda.gov/sites/default/files/media_file/2021-10/Subcommittee_II_Stuffed_Not_Read-to-Eat_Poultry_Products_9-28-21_final_Report.pdf.

⁹ NCC, *Re: Petition to Establish Regulations for the Labeling and Validated Cooking Instructions for Not-Ready-to-Eat Stuffed Chicken Breast Products That Appear Ready-to-Eat*, FSIS (Feb. 25, 2022), https://www.fsis.usda.gov/sites/default/files/media_file/2022-02/16-03-NCC-Supplement-02252022.pdf.

appropriate use of air fryers for poultry products. In addition to addressing consumer use of air fryers, there is currently significant variability in the wattage of air fryers, which complicates validating cooking instructions for these small appliances. Standardized wattage, required labeling, and validated cooking instructions would empower consumers to use this affordable and convenient technology safely in their homes.

FSIS Data Uses and Opportunities

Data analytics are a cornerstone in all business decision making and FSIS data provides additional information industry can utilize to inform its systems and processes. Industry continuously evaluates FSIS publicly provided data, including information made available to specific establishments through the Public Health Information System (PHIS) and data published by the Agency generated from sampling and inspectional activities. We recognize that the process of gathering data can be both time and resource intensive and therefore should be focused on areas where the most impact can be made. To this end, we recommend, as an overarching principle, that data gathering efforts be focused on ensuring the data being collected by both industry and FSIS is actionable. For data to be actionable, it must be accessible, standardized, and focused on areas that have tangible objectives and impact.

- **Data Accessibility.** For data to be usable, it must be generated and published in a manner that is conducive to study and analysis. The most impactful data, if generated in a form inaccessible to most users, will not be utilized regardless of its potential value. Our members find data published in excel or similar formats to be the most accessible and user friendly and therefore these datasets tend to be utilized most frequently. Other data formats, specifically JSON, are not as user friendly and therefore are utilized less frequently. We recommend that FSIS limit data publication to user-friendly formats only.
- **Data Standardization.** In order for data to be usable, it also must be in a form that allows for easy manipulation and comparison. For example, data collected across multiple years should be collected and distributed in the same manner each year to facilitate trend comparisons, and reports aggregating data should summarize information in the same manner at each publication (e.g., annual v. quarterly reporting).
- **Data Relevancy.** To make the biggest impact, data must be recent and relevant. Relying on outdated data that does not reflect the current state of play will create a lag in effective policy and decision making. It is important that FSIS continue valuable data collection efforts and push to publish this data in a timely manner to allow for this information to have a real-time impact.
- **Data Objectives and Impact.** In order for data to be gathered effectively, the objective or potential impact of the data collection exercise must be understood. The purpose behind a data collection exercise will drive the design, process, and structure of the information and will determine the appropriate resources to dedicate to the data collection efforts. Because of this, resources should be focused on data gathering and publishing efforts that will have the greatest impact on public health.

Based on these principles, FSIS should reevaluate certain data collection efforts currently being pursued to ensure resources are being expended in the areas where the greatest public health impact is possible. If resources are expended to collect and analyze microbiological organism samples, whether they are for *Salmonella*, *Campylobacter*, *Listeria spp.*, or indicator organisms, this information should be meaningful and actionable and not just an arbitrary requirement. For example, under the New Poultry Inspection System (NPIS), establishments are required to collect and test samples every 22,000 birds. For an establishment processing one

million birds per week, this equates to a total of around 52,000 samples over the last 12 years, which represents a significant commitment of resources. Despite the resources dedicated to this data collection, this effort has resulted in no clear public health impact. Data gathering efforts, such as this sampling effort, can disproportionately burden small processors and introduce regulatory burdens and red tape that prevent establishments from operating effectively. If data collected by FSIS is actionable, it should have a direct or indirect demonstrable impact on public health. We ask FSIS to reevaluate its data collection initiatives and eliminate those that add regulatory complexity without demonstrating a clear public health benefit.

Factors that Inform *Salmonella* Controls

NCC's members are committed to reducing the presence of *Salmonella* in poultry products. Consistent with this commitment, our members have been implementing numerous different *Salmonella* controls independent of regulatory requirements for years. These controls include preharvest interventions, vaccine development, processing controls, and various other interventions implemented in the farm to fork continuum. In implementing these controls, our members have identified barriers that prevent the widespread adoption of *Salmonella* controls by large and small processors alike.

For innovative new *Salmonella* controls to be quickly adopted, they must be efficiently approved for use, widely available, and effective at pathogen reduction. Currently, processors may hesitate to introduce new interventions, regardless of how promising they appear, due to concerns that doing so could open up additional regulatory scrutiny. For example, Directive 7120.1 outlines the list of substances that may be used in the production of poultry products.¹⁰ Upon approval of a substance by FSIS, we respectfully ask that the directive be updated to include reference to this approved product. One effective way to decrease barriers for the implementation of *Salmonella* controls is to increase industry's access to innovative pathogen control applications and allow these applications to be trialed during production without risk of penalty. This will foster innovations and result in more varied and effective approaches to *Salmonella* controls.

Barriers associated with regulatory compliance apply to both large and small producers alike. We recognize that small producers may face unique challenges implementing controls due to size and resources. In order to support small producers in implementing a new or updated system of *Salmonella* control, FSIS should invest resources in developing a series of best practice documents that outline the different pathogen control options available from live receiving to final packaging and shipping. These documents would provide a roadmap of options for small producers and lessen the time and resources needed to identify potential pathogen control options.

Additional Comments for Consideration

In addition to the above comments specific to driving down *Salmonella* in raw poultry products, we would like to highlight a related aspect of FSIS's poultry pathogen surveillance that should be reevaluated to promote efficiency and improve data collection efforts. Over the last 30 years, FSIS has collected and analyzed over 300,000 whole bird samples. Most whole birds are processed into chicken parts that go through subsequent antimicrobial interventions. Today, consumers purchase significantly more raw chicken parts than whole birds. We believe that FSIS should focus its sampling of raw poultry on finished products. This change would free up significant Agency resources to test parts which consumers buy with much greater frequency, while still ensuring the Agency samples whole birds when those are marketed to the consumer as the finished product. As part of

¹⁰ FSIS Directive 7120.1 *Safe and Suitable Ingredients Used in the Production of Meat, Poultry, and Egg Products*, FSIS (Jan. 27, 2026), https://www.fsis.usda.gov/sites/default/files/media_file/2021-09/7120.1.pdf.

verification testing, FSIS should also clearly identify the specific part sampled, which would provide more granular data for both the Agency and industry and allow this data to be used in more applications.

Conclusion

NCC looks forward to continued collaboration with FSIS to reduce the presence of *Salmonella* in raw poultry products. As discussed above, NCC supports the adoption of *Salmonella* performance standards that are science-based, data-driven, implementable by establishments of all sizes, and impactful to public health. We believe that an enumerative standard that establishes upper and lower thresholds that trigger regulatory action would effectively direct FSIS resources to areas where the biggest impact on public health can be made.

We appreciate the opportunity to provide comments on this important matter. If there are any questions regarding these comments, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ashley B. Peterson". The signature is written in a cursive, flowing style.

Ashley B. Peterson, Ph.D.
Senior Vice President, Scientific and Regulatory Affairs
National Chicken Council