



U.S. DEPARTMENT OF AGRICULTURE

Food Safety and
Inspection Service

1400 Independence
Avenue, SW.
Washington, D.C.
20250

MEMORANDUM TO FILE

DATE: September 5, 2024.

PARTICIPANTS:

- **Food Safety and Inspection Service (FSIS):** Melissa Hammar, Office of Policy and Program Development (OPPD), Mary Porretta, OPPD.
- **Office of Food Safety:** Sandra Eskin, Deputy Under Secretary.
- **American Pastured Poultry Producers Association (APPPA) members:** Greg Gunthorp, Gunthorp Farms; Matt Cadman; Roseanna Bauman; Kim Schroeder, Natural State Processing; Alex Bates, Chapelford Farms; Bruce Hennesy; Connie Hale, Meadows Farms.

SUBJECT: Meeting with APPPA members on the proposed rule and proposed determination “*Salmonella* Framework for Raw Poultry Products. (89 FR 64678, Aug 7, 2024).”

DISCUSSION:

APPPA members expressed their views on the proposed “*Salmonella* Framework for Raw Poultry Products.”

- Questioned how they can get results to labs, especially in rural/remote areas.
- Expressed concerns about effects on food access, food security.
- Asserted that the rule did not include the real costs for small and very small processors.
- Stated that small and very small processors do not have access to cooking establishments. Noted that cost-benefits analysis (CBA) did not include costs associated with in-house cooking facilities.
- Stated that there is horizontal transmission from chicks. Concerned they have no ability to change their source of chicks.
- Asked about grants for small processors of pasture raised poultry. Interested in grant program to allow small processors to use new technologies.
- Expressed concern that USDA is trying to get to sterile product.
- Asserted that because *Salmonella* is endemic in poultry, the proposed levels are too hard to meet.
- Asserted that *Salmonella* should not be considered an adulterant because it comes in on the birds.
- Expressed concern that the proposal discriminates against small processors and that small processors will be over-tested.
- Recommended that FSIS change the proposed verification sampling frequency for the proposed final product standards based on establishment size/volume.
- Recommended that FSIS exempt small plants.

- Expressed concern that the proposal will provide a precedent to say that processor can reduce *Salmonella* on poultry, which would make the processors liable for condemned product.
- Claimed that they will need to shut down some services for liability reasons.
- Questioned why the rule is not limited to comminuted poultry. Noted that whole muscle beef is not considered adulterated if contaminated with STEC, but under the proposal, whole muscle poultry would be considered adulterated if it contains *Salmonella* at certain levels.
- Asked whether FSIS is looking into partnering with APHIS National Poultry Improvement Plan (NPIP) to provide exemptions for processors that participate in NPIP or that vaccinate flocks
- Expressed concern that proposal does not exempt poultry that does not enter commerce, e.g., fee-for-service slaughter for family- owned birds.

Melissa Hammar, OPPD, recommended that they submit specific cost information and examples in their written comments.