



U.S. DEPARTMENT OF AGRICULTURE

Food Safety and
Inspection Service

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

MEMORANDUM TO FILE

DATE: September 17, 2024.

PARTICIPANTS:

- **Food Safety and Inspection Service (FSIS):** Sally Ann Iverson, Deputy Chief of Staff, Food Safety and Inspection Service (FSIS) Office of the Administrator (OA); Denise Eblen, Assistant Administrator, FSIS Office of Public Health Science (OPHS); Haney Sidrak, Deputy Assistant Administrator, Office of Field Operations (OFO); Mary Porretta, FSIS Office of Policy and Program Development (OPPD)
- **USDA Office of Food Safety:** Emilio Esteban, Under Secretary for Food Safety; Sandra Eskin, Deputy Undersecretary for Food Safety
- **National Turkey Federation (NTF):** Lindy Chiaia, National Turkey Federation; Alice Johnson, Butterball; Angie Siemens, Cargill; Ben Roman, Prestage; Jeffrey Niedermeyer, Butterball; Kevin Atkins, Perdue; Michael Rybolt, Tyson Foods; Robin Kalinowski, Tyson Foods; Nick Travaglio, Jennie-O Turkey Store; Tom Smith, Jennie-O Turkey Store; Maria Wedel, Cargill

SUBJECT: Meeting with NTF members on *Salmonella* Framework for Raw Poultry Products; Proposed rule and Proposed Determination (89 FR 64678, Aug 7, 2024).

DISCUSSION:

NTF Lotting Workgroup presented data on potential lotting practices

- Their objective is to develop a common practice for lotting that can be used as best practices for the industry.
- The FSIS turkey risk assessment defined a lot as clean-up to clean-up. Industry wants to look at defining lots based on combo bins similar to ground beef model.

NTF requested that FSIS provide clarification on certain issues.

- Asked what products are subject to sampling if the final product is shipped to another establishment to be further processed into another product?
- FSIS noted that the proposal states that sampling would be conducted on an establishment basis and that FSIS would sample final product produced at both the shipping and receiving establishment.
- Asked for clarification on options for diverting adulterated product other than diverting to cooking.
- Requested more information on bringing adulterated product back into compliance.
- FSIS noted that the proposal said that FSIS would sample product after all interventions have been applied. NTF stated that sampling product that has undergone a lethality treatment, such as high-pressure processing (HPP), would be a waste of time.

- Asked what the appeals process will look like if FSIS inspection program personnel (IPP) do not agree with the establishment's support for lot determination? Products have a short shelf life. Will IPP respect the lot when they pull the sample?
- FSIS stated that usual appeals process would apply.

FSIS encouraged NTF to submit written comments on these and any other issues that NTF believes needs clarification.