



March 4, 2026

Dr. Justin Ransom
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U.S. Department of Agriculture
1400 Independence Ave SW
Washington, D.C. 20250

Exploring Practical Strategies To Reduce Salmonella in Poultry Products; Public Meeting
Docket No. FSIS–2025–0179

Dear Dr. Ransom,

Consumer Reports appreciates the opportunity to submit comments on the United States Department of Agriculture’s (USDA) Food Safety Inspection Service (FSIS) Public Meeting on Exploring Practical Strategies to Reduce Salmonella in Poultry Products.

In addition to our comments at the Public meeting, we urge FSIS to take the following actions:

- i) Reverse the decision to indefinitely delay verification activities related to *Salmonella* in not ready-to-eat (NRTE) breaded stuffed chicken product and pledge to begin such verification activities in 2026;
- ii) Set enforceable *Salmonella* product standards for NRTE all processed chicken and turkey products at the same level as for NRTE breaded stuffed chicken products, e.g., 1 CFU/g or higher;
- iii) If FSIS opts-out of setting an enforceable standard for all processed chicken and turkey products, the agency should reconsider the *Salmonella* framework and have product standards for specific highly virulent serotypes (limit of 1 CFU/g or higher) and higher loads of *Salmonella* spp. (10 CFU/g or higher).

Poultry products containing *Salmonella* represent unreasonable foodborne risk to consumers

In the Federal Register [notice](#) for the public meeting, FSIS argues that *Salmonella* illnesses attributable to poultry have declined over the past 25 years: “While poultry remains a significant source of *Salmonella* illnesses, a separate analysis of reported illnesses found that illnesses caused by poultry-associated *Salmonella* serotypes declined between 1996 and 2019”. Unfortunately, this study is misleading because other data show that overall *Salmonella* illnesses have increased over that time period. According to the Centers for Disease Control and Prevention’s (CDC) FoodNet Fast site, the incidence of *Salmonella* illnesses in people actually

increased between 1996 and 2022, going from 14.5 illnesses per 100,000 population in 1996 to 16.3 illnesses in 2022.¹ In addition, according to the Interagency Food Safety Analytics Collaboration (IFSAC), the percentage of all *Salmonella* infections attributed to poultry has increased between 2013 and 2022, going from 17.3% of all *Salmonella* infections in 2013 to 24.9% in 2022, for an increase of roughly 44%.² The percentage of all *Salmonella* infections attributed to chicken almost doubled, going from 10.4% to 19.7%, while those attributed to turkey declined by almost 25%, going from 6.9% to 5.2%.

According to the CDC, *Salmonella* is a leading cause of foodborne illness—1.3 million illnesses and 238 deaths annually³—and poultry account for roughly 25%, according to Interagency Food Safety Analytics Collaboration (IFSAC)⁴. Presently, it is estimated that *Salmonella* contaminated poultry results in 260,225 illnesses and costs Americans over \$3.7 billion per year.⁵ The public health burden of *Salmonella* in foods has not changed much in more than 25 years since the FSIS published their pathogen reduction and hazard analysis and critical control point (PR-HACCP) final regulation for all meat and poultry plants in 1996.

The PR-HACCP final regulation involved sampling of establishments for the presence of *Salmonella*, with the idea that establishments had to meet performance standards that specify a maximum number of *Salmonella*-positive samples within a set of samples collected at each establishment. FSIS data show that in 1994/1995, 20% of the chicken carcass sampled were *Salmonella* positive.⁶ By 2023, only 3% of chicken carcasses sampled were *Salmonella* positive,⁷ showing that the PR-HACCP regulation and associated performance standards had led to a significant reduction in *Salmonella* contamination of chicken carcasses.

In spite of the sharp decline of chicken carcasses testing positive for *Salmonella* over the last 30 years, there hasn't been a decline in human illnesses associated with chicken. Presently, chicken alone accounts for more *Salmonella* infections than any other food category and has been steadily increasing over the past 10 years.

Thus, the *Salmonella* performance standards, which are not enforceable product standards, have clearly failed to reduce human *Salmonella* infections attributed to chicken. Consequently, to reduce human *Salmonella* illnesses attributed to poultry, there must be enforceable product standards.

¹ <https://www.cdc.gov/foodnetfast/>

² See 2013 and 2022 reports at: <https://www.cdc.gov/ifsac/php/data-research/annual-reports/index.html>

³ <https://cdc.gov/food-safety/php/data-research/foodborne-illness-burden/index.html>

⁴ <https://www.cdc.gov/ifsac/php/data-research/annual-report-2022.html>

⁵ See Table 5, p. 966 in <https://www.sciencedirect.com/science/article/pii/S0362028X22103248>

⁶ <https://www.sciencedirect.com/science/article/pii/S0362028X22106253>

⁷ See Table 3 in https://www.fsis.usda.gov/sites/default/files/media_file/documents/FSIS-2023-0028.pdf

FSIS should reverse their decision to indefinitely delay verification activities related to *Salmonella* in not ready-to-eat (NRTE) breaded stuffed chicken product

FSIS has taken a step towards enforceable product standards for *Salmonella* in poultry products by setting a limit of 1 Colony Forming Units per gram (aka 1 CFU/g) of *Salmonella* in not ready-to-eat (NRTE) breaded stuffed chicken products. Thus, any NRTE breaded stuffed chicken products that contain 1 CFU/g or more of *Salmonella* is adulterated within the meaning of the Poultry Products Inspection Act (PPIA). FSIS finalized this determination in a Federal Register Notice on May 1, 2024⁸. This is the first poultry product with an enforceable product standard for *Salmonella*. This final determination became effective on May 1, 2025 and FSIS was set to begin sampling and testing NRTE breaded stuffed chicken or other verification activities for *Salmonella* on November 3, 2025.

However, on December 2, 2025 FSIS posted a notice in the Federal Register explaining that verification sampling of NRTE was being delayed because the “current available test methods have accuracy limitations and have resulted in findings of false positives, especially at low levels of contamination”,⁹ e.g., at 1 CFU/g. FSIS goes on to cite an Agricultural Research Service (ARS) about a new test method that does have problems with false positives when testing at low levels, such as 1 CFU/g. However, the notice clearly states that all current available test methods have accuracy limitations at low levels of contamination. But this assertion is not correct.

In fact, the May 2024 Final Determination for *Salmonella* in NRTE breaded stuffed chicken products did have a discussion of the testing issue and confirmed the existence of a validated test that did not have problems with false positives at low levels. FSIS noted that a number of industry groups had said that tests that were accurate at low levels (e.g., 1 CFU/g) had not been validated to be accurate at those levels: “Poultry products trade associations, a meat products research institute, a member of the poultry products industry, a trade group representing the frozen foods industry, and a society of meat industry professionals raised some issues regarding the laboratory methods FSIS intends to implement. Generally, they stated that *Salmonella* enumeration testing technology is still under development, that current methods are limited, and that FSIS needs to ensure that its methods are validated prior to implementation of this determination. Specifically, they noted that available *Salmonella* enumeration methods are not currently validated for NRTE breaded stuffed chicken products or at a detection level of 1 CFU/g.”¹⁰

FSIS responded that a validated test did exist: “FSIS laboratories performed a thorough verification of validated methods by independent organizations. FSIS’ current qPCR method is

⁸ <https://www.govinfo.gov/content/pkg/FR-2024-05-01/pdf/2024-09393.pdf>

⁹ Pg. 55299 in <https://www.govinfo.gov/content/pkg/FR-2025-12-02/pdf/2025-21737.pdf>

¹⁰ Pg. 35044 in <https://www.govinfo.gov/content/pkg/FR-2024-05-01/pdf/2024-09393.pdf>

validated for 1 CFU/g in NRTE breaded stuffed chicken.”¹¹ That method is the BioMerieux GENE-UP QUANT *Salmonella* Test Kit. As FSIS notes, the current validation for this test is the BioMerieux GENE-UP QUANT *Salmonella*, AOAC Performance Tested Methods Certification Number 082104.¹² So, there is a validated method that does not have accuracy problems at 1 CFU/g.

Furthermore, at the public meeting, Exploring Practical Strategies to Reduce *Salmonella* in Poultry Products, held on January 14, 2026, Dr. Milan Patel, CEO and co-founder of PathogenDx, a molecular diagnostics company, made it very clear that molecular techniques do indeed exist to detect *Salmonella* in poultry at low levels, e.g., 1 CFU/g: “I want to emphasize one point clearly: the science and technology needed to support alternative parameters already exist today. FSIS has appropriately recognized both the public health value and the regulatory challenges of numerical *Salmonella* thresholds. Recent delays in verification sampling of not-ready-to-eat breaded stuffed chicken products highlight a critical reality: the issue is not enumeration itself. The issue is legacy methods. Conventional approaches like MPN were not designed to reliably discriminate at low CFU thresholds, do so quickly or cost effectively, or avoid false positives near decision limits, which create enforcement risk and inequity. Today that limitation is resolved. *Modern molecular enumeration technologies can accurately quantify Salmonella at very low levels, including one CFU per mil., one CFU per gram, perform across higher process relevant concentration ranges, and deliver faster, more precise near absolute quantitation. This enables enumeration to function not just as an enforcement tool, but as a preventative control and continuous improvement metric*”¹³ italics added.

We agree fully and urge FSIS to reverse their decision to indefinitely delay verification activities related to *Salmonella* in NRTE breaded stuffed chicken products and commit to begin such verification activities in 2026.

Enforceable *Salmonella* product standards for NRTE breaded stuffed chicken product should be applied to all processed chicken and turkey products, e.g., 1 CFU/g or higher

In 2024, FSIS set an enforceable limit to *Salmonella* levels in NRTE breaded stuffed chicken products, stating that such products that contain *Salmonella* at levels of 1 CFU/g or higher are adulterated within the meaning of the PPIA.¹⁴ As FSIS noted, the PPIA provides FSIS with the authority to regulate poultry to ensure that adulterated products do not enter commerce. Indeed, Congress, at 21 U.S.C. 453(g)(1), defined adulteration and declared two standards for

¹¹ *Id.*

¹² *Id.*

¹³ Pg. 43 in

https://www.fsis.usda.gov/sites/default/files/media_file/documents/USDA_Salmonella_Public_Meeting_Transcript.pdf

¹⁴ https://www.fsis.usda.gov/sites/default/files/media_file/documents/FSIS-2022-0013F.pdf

determining whether a product is adulterated. First, if the substance is an “added substance” the product is adulterated if the substance “may render” the product injurious to health. Second, if the substance is not added, the product is adulterated “if the quantity of such substance in or on” the product makes it “ordinarily injurious to health.”

FSIS argued that levels of 1 cfu/g or higher in NRTE breaded stuffed chicken products meet the definition of “added substance.” FSIS cited *United States v. Anderson Seafoods* (622 F.2d 157 (1980)). The *United States v. Anderson Seafoods* case involved hazardous levels of mercury in swordfish. The issue in this case was whether all mercury in swordfish should be considered an “added substance” when some mercury in swordfish occurs naturally and some is the result of man-made pollution. The court decided that the “may render it injurious to health” standard applies to the food product, not the added substance and therefore, “where some portion of the toxin present in a food has been introduced by [humans], the entirety of that substance present in the food will be treated as an added substance.”

The meat and poultry industry argued that *Salmonella* exists naturally in chicken and that FSIS did not adequately support their argument that cross contamination during further processing is responsible for the presence of *Salmonella* in chicken components used to create NRTE breaded stuffed chicken products. FSIS responded in some detail, but noted that poultry skin is a known source of *Salmonella* contamination due to bacteria trapped in the skin folds and feather follicles and that these areas may not be accessible until they are disturbed during cutting and grinding. The processing exposes and releases the pathogen which can spread and lead to higher contamination levels in the product.

In addition, *Salmonella*-negative raw poultry parts and comminuted poultry may become cross-contaminated by contact with *Salmonella*-contaminated equipment or when they are commingled with *Salmonella*-positive products, such as when they are collected in combo bins for further processing. Since such cross contamination is the result of human activity, that would mean that *all* the *Salmonella* in the product would be considered an “added substance”, consistent with the determination of *United States v. Anderson Seafoods* (622 F.2d 157 (1980)). Finally, FSIS sampling data clearly show that *Salmonella* poultry rates rise as poultry is further processed, from chicken carcasses at 4.14% to chicken parts at 7.62% to comminuted chicken at 24.2% in FY2022.¹⁵ Indeed, all *Salmonella* sampling that has happened over the years consistently show that *Salmonella* poultry rates increase as the product becomes more processed, e.g., from chicken carcasses, to chicken parts to comminuted chicken. Clearly, this means that cross contamination is happening at processing, making all the *Salmonella* in processed products an “added substance.”

¹⁵ https://www.fsis.usda.gov/sites/default/files/media_file/documents/FSIS-2022-0013F.pdf

Salmonella at levels of 1 CFU/g or higher in NRTE breaded stuffed chicken products meets the more stringent “ordinarily injurious to health” standard. FSIS noted that their CFU/mL(g) determination was not based on a single study, but on multiple studies. FSIS cited seven *Salmonella* outbreak papers where the infectious dose was found to be very low, i.e., 10 or fewer *Salmonella* organisms. They cited an additional nine papers where the infectious dose was between 11 and 420 organisms.¹⁶ They also cited a study by the World Health Organization (WHO) and Food and Agriculture Organization (FAO) that did a risk assessment for *Salmonella* in eggs and broiler chickens, which estimated a 13% chance of becoming ill if ingesting 100 organisms, and a 0.25% chance of becoming ill if ingesting just 1 organism.¹⁷

We believe that many of the arguments of FSIS made in the decision on setting an enforceable limit to *Salmonella* levels in NRTE breaded stuffed chicken products of 1 CFU/mL(g) or higher are applicable to other poultry products. The argument that *Salmonella* in NRTE breaded stuffed chicken products meets the “added substance” due to cross contamination is also applicable to other processed products, e.g., chicken parts, comminuted chicken and comminuted turkey. As with NRTE breaded stuffed chicken products, these other processed products can be cross contaminated via processing, contaminated equipment, or when collected in combo bins for further processing and so, *Salmonella* in these products would also meet the “added substance” provision of the PPIA.

The argument as to why the 1 CFU/mL(g) or higher level of *Salmonella* in NRTE breaded stuffed chicken products meets the more stringent “ordinarily injurious to health” standard should also be applicable to other poultry products. As FSIS noted, there are numerous studies that show that very low doses of *Salmonella* can cause illness. Those studies are not done on NRTE breaded stuffed chicken products, so should be applicable to other processed poultry products as well as chicken carcasses. Indeed, the WHO/FAO risk assessment on *Salmonella* in eggs and broiler chickens found that very low doses of *Salmonella* in these products can cause illness. This should be applicable to chicken carcasses, chicken parts, comminuted chicken and comminuted turkey. Thus, all these products would meet the more stringent “ordinarily injurious to health” standard.

Having an enforceable product standard of 1 CFU/mL(g) or higher level of *Salmonella* in these other products (chicken carcasses, chicken parts, comminuted chicken and comminuted turkey) should not be too burdensome for the industry, because the amount of poultry products impacted would be very small. As the proposed *Salmonella* framework for raw poultry products notes, only 3.1% of chicken carcasses test *Salmonella* positive and only 9% of those positive samples exceed the 1 CFU/mL or /g level, which means that less than one-third of one percent (0.28%) of chicken carcasses would be affected by this standard.

¹⁶ https://www.fsis.usda.gov/sites/default/files/media_file/documents/FSIS-2022-0013F.pdf

¹⁷ <https://iris.who.int/bitstream/handle/10665/342257/9291562293-eng.pdf?sequence=1>

For chicken parts, 6.7 percent are *Salmonella* positive and only 2% of those exceed the 1 cCFU/mL(g) level, which means that some one-thirteen of one percent (0.13%) of chicken parts would be impacted. For comminuted chicken, 27.1% are *Salmonella* positive and only 12% of those exceed the 1 CFU/mL(g) level, which means that 3% of comminuted chicken would be impacted. For comminuted turkey, 15.7% are *Salmonella* positive and only 12% of those exceed the 1 CFU/mL(g) level, which means that some 1.9% of comminuted turkey would be impacted.¹⁸ Thus, only 3% or less of the impacted poultry products would be impacted by a 1 CFU/mL(g) limit.

One argument against having a 1 CFU/mL(g) limit for these poultry products (chicken carcasses, chicken parts, comminuted chicken, comminuted turkey) is that there is no commercially available testing methodology to detect *Salmonella* at these low levels. For the NRTE breaded stuffed chicken, FSIS has the BioMerieux GENE-UP QUANT *Salmonella* test, which is a qPCR (quantitative polymerase chain reaction) method that has been validated for 1 cfu/mL(g) in NRTE breaded stuffed chicken.¹⁹ Although there is no test yet available for chicken carcasses, chicken parts, comminuted chicken, comminuted turkey, if FSIS were to use this level, BioMerieux or other companies should readily be able to develop this test, as long as there is a market for it. Note that BioMerieux got the validation for their new method in December 2022, as FSIS was developing the standard for NRTE breaded stuffed chicken. Also, Dr. Milan Patel, CEO and co-founder of PathogenDx, a molecular diagnostics company, clearly stated at the January 14, 2026 FSIS meeting on *Salmonella* that such testing methodology does exist, as noted previously.

FSIS should reconsider the *Salmonella* framework and have product standards for specific highly virulent serotypes and higher loads of *Salmonella* spp.

We urge FSIS to reconsider the proposed *Salmonella* framework that was withdrawn last year. The proposed rule that FSIS withdrew defined adulterated chicken or turkey products as those that “contain any type of *Salmonella* at or above 10 colony forming units/per milliliter or gram (10 cfu/mL(g)) ... and contain any detectable level of at least one of the *Salmonella* serotypes of public health significance identified for that commodity.”²⁰ This standard is too lax. We urge FSIS to set enforceable product standards for these poultry products that contain any type of *Salmonella* at 1 CFU/g as they did for not ready-to-eat (NRTE) breaded stuffed chicken products.

¹⁸ https://www.fsis.usda.gov/sites/default/files/media_file/documents/FSIS-2023-0028.pdf

¹⁹

https://members.aoac.org/Common/Uploaded%20files/RICertifiedMethodsCertificates/2024/24C_082104_BioMQantSal.pdf

²⁰ https://www.fsis.usda.gov/sites/default/files/media_file/documents/FSIS-2023-0028.pdf

If the agency opts against using the 1 CFU/mL(g) enforceable standard, then we urge FSIS to set enforceable product standards for these poultry products (chicken carcasses, chicken parts, comminuted chicken, comminuted turkey) that contain any type of *Salmonella* at 10 CFU/mL(g) OR that contain specific *Salmonella* serotypes (not just the three serotypes listed for chicken) at 1 CFU/mL(g).

The withdrawn proposed rule only listed 3 *Salmonella* serotypes of public health significance for each product type. For raw chicken products, the three serotypes are Enteritidis, Typhimurium, and I 4,[5],12:i:-. For comminuted turkey, the three serotypes are Hadar, Typhimurium and Muenchen. This withdrawn proposal would allow *Salmonella* at any level in these products as long as the product did not contain any of the three targeted serotypes. Since the proposal would also get rid of *Salmonella* verification testing, that could set up a perverse incentive to not try to improve sanitation. If the companies developed vaccines for the three serotypes, they could use those vaccines to control the three serotypes of public health significance and then not focus on trying to decrease *Salmonella* levels in their establishments. Thus, FSIS should continue with *Salmonella* verification testing, even if they implement the proposed *Salmonella* framework.

While we agree with FSIS that it should target the most dangerous *Salmonella* strains, we think that limits should also apply to *Salmonella* spp. FSIS's own risk assessment found that the probability of illness from eating poultry products contaminated with 100 or 10 cfu/mL(g) of "low virulence" *Salmonella* is comparable to the risk of eating the same products contaminated with 10 or 1 cfu/mL(g), respectively, of "high virulence" *Salmonella*.²¹ Thus, even "low virulence" *Salmonella* can become a public health risk. Consequently, FSIS could set a limit for *Salmonella* spp of 10 CFU/mL(g), while setting a limit of 1 CFU/mL(g) of "high virulence" *Salmonella*, to define the product as "adulterated" as per the PPIA.

FSIS should expand the list of targeted serotypes

While we commend FSIS for targeting the most dangerous *Salmonella* serotypes, we do have questions about their risk analysis. Their risk assessment bases the identification of "high virulence" *Salmonella* serotypes, in significant part based on the presence of various virulence genes/genetic elements. While this is a step forward from just considering serotypes, the science is not well developed in this area, and even FSIS recognizes this.

In their final determination on setting an enforceable limit for NRTE breaded stuffed chicken products, FSIS responded to a comment from the poultry industry to delay the action on NRTE breaded stuffed until they gathered more information on *Salmonella* virulence, by noting problems with this approach. As FSIS stated, "the basis for *Salmonella* is not fully understood. Many virulence factors have been identified that contribute to *Salmonella* pathogenicity. The

²¹ Table 29, p. 88 in https://www.fsis.usda.gov/sites/default/files/media_file/documents/Chicken_SRA_July2024.pdf

interactions of these factors and the resulting strain virulence and pathogenicity has not been completely elucidated, but single genes and pathogenicity islands have been identified as key virulence traits. However, there is currently no agreed-upon definition of virulence genes presence/absence profile that can reliably predict the severity of disease.”²²

According to their risk analysis, the three serotypes designated as “high virulence” for chicken are Enteritidis, Typhimurium, and I 4,[5],12:i:-. These three serotypes account for only 43% of all outbreak-associated illnesses. We note that strain Heidelberg is considered a “low virulence” strain like Infantis, yet it was responsible for second most outbreak-associated illnesses in the FSIS risk analysis, being second behind Enteritidis, representing 22.7% (1,290 illnesses) of all outbreak-associated illnesses.²³ However, those chicken-related *Salmonella* infections are for a 22 year period, 1998-2020. We note that strain Heidelberg is considered a “low virulence” strain like Infantis, yet it was responsible for the second most outbreak-associated illnesses in the FSIS risk analysis, being second behind Enteritidis, representing 22.7% (1,290 illnesses) of all outbreak-associated illnesses. If FSIS had designated the serotypes Enteritidis, Typhimurium and Heidelberg as the strains of “public health significance,” they would have accounted for 58.2% of all outbreak-associated illnesses.

Salmonella Infantis does not make the list of “high virulence” serotypes aka stains of “public health significance,” but that is in part due to the fact that it doesn’t appear in chicken until 2012. In the FSIS poultry risk analysis, Infantis is only responsible for 3.7% (211 illnesses) of the estimated chicken-related *Salmonella* infections between 1998-2020.²⁴ If we look at just the last 5 years of data (2017-2021), a CDC study found that Infantis is the second leading source of chicken-related *Salmonella* infections, being responsible for 15.7% (209 illnesses) of the estimated chicken-related *Salmonella* infections, while Enteritidis is responsible for 51.2% (679 illnesses) of the estimated chicken-related *Salmonella* infections.²⁵ In addition, the third leading source of chicken-related *Salmonella* infections is Blockley, responsible for 11% (146 illnesses) of the estimated chicken-related *Salmonella* infections. Yet Blockley didn’t cause outbreaks in chicken until the 2017-2021 period, and so is considered an emerging strain.

Thus, when considering which strains to label as “high virulence” or of “public health significance,” more weight should be given to epidemiological data and should focus more on the serotypes that have caused the most outbreaks illnesses in the last five years, regardless of the “virulence level.” FSIS should be targeting the strains that are causing the most chicken-related

²² Pg. 35042 in https://www.fsis.usda.gov/sites/default/files/media_file/documents/FSIS-2022-0013F.pdf

²³ Table 11, pp. 88-89 in https://www.fsis.usda.gov/sites/default/files/media_file/documents/Risk_Profile_for_Pathogenic_Salmonella_Subtypes_in_Poultry.pdf

²⁴ Table 11, pp. 88-89 in https://www.fsis.usda.gov/sites/default/files/media_file/documents/Risk_Profile_for_Pathogenic_Salmonella_Subtypes_in_Poultry.pdf

²⁵ Table 1, p. 3 in <https://www.sciencedirect.com/science/article/pii/S0362028X24001157>

illnesses, not just the serotypes with the highest “virulence level.” Thus, if Infantis was added to the list of “high virulence” strains, then those serotypes (Enteritidis, Typhimurium, I 4,[5],12:i:- and Infantis) would be responsible for 72.9% of the estimated chicken-related *Salmonella* infections in the last five years. A serotype can be considered of “high virulence”, but might not be very widespread or causing more illnesses, compared to a lower virulence strain that is more widespread and causing more outbreak-associated illnesses.

We particularly urge FSIS to at least add Infantis to the list of serotypes of “public health significance.” A single strain of persistent multidrug resistant *Salmonella* Infantis, called REPJFX01, has caused at least 11 outbreaks and 3,442 reported illnesses since being first detected in 2012.²⁶ It is very widespread in chicken, with FSIS sampling from 2015-2021 finding it to be the second most widespread serotype in chicken, just behind serotype Kentucky, which is rarely associated with human illnesses.²⁷

Conclusion

- We strongly urge FSIS to take action to set enforceable product standards for *Salmonella* for various poultry products which will improve public health by dramatically reducing the presence of dangerous *Salmonella* in poultry and the number of foodborne illnesses that result from consumption of these products.
- We strongly urge FSIS to reverse their decision to indefinitely delay verification activities related to *Salmonella* in not ready-to-eat (NRTE) breaded stuffed chicken product
- We urge FSIS to reconsider the proposed rule on *Salmonella* that they withdrew last year. That withdrawn proposed rule defined adulterated chicken or turkey products as those that “contain any type of *Salmonella* at or above 10 colony forming units/per milliliter or gram (10 cfu/mL(g)) ... and contain any detectable level of at least one of the *Salmonella* serotypes of public health significance identified for that commodity.” This standard is too lax. We urge FSIS to set enforceable product standards for these poultry products that contain any type of *Salmonella* at 1 CFU/g as they did for not ready-to-eat (NRTE) breaded stuffed chicken products.
- If the agency opts against using the 1 CFU/mL(g) enforceable standard, then we urge FSIS to set enforceable product standards for these poultry products (chicken carcasses, chicken parts, comminuted chicken, comminuted turkey) that contain ***any*** type of *Salmonella* at 10 CFU/mL(g) OR that contain specific *Salmonella* serotypes (not just the three serotypes listed

²⁶ <https://www.cdc.gov/salmonella/php/data-research/repjfx01.html>

²⁷ Table 14, pp. 92,93 in

https://www.fsis.usda.gov/sites/default/files/media_file/documents/Risk_Profile_for_Pathogenic_Salmonella_Subtypes_in_Poultry.pdf

for chicken) at 1 CFU/mL(g). We particularly urge FSIS to at least add Infantis to the list of serotypes of “public health significance” for chicken.

Yours,

Michael Hansen, Ph.D.
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