



By Electronic Submission

March 2, 2026

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

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

Dear Sir or Madam,

Thank you for the opportunity to comment on the USDA FSIS Notice, "Exploring Practical Strategies to Reduce *Salmonella* in Poultry Products." As the food industry association, FMI works with and on behalf of the entire industry to advance a safer, healthier, and more efficient consumer food supply chain. FMI brings together a wide range of members across the value chain — from retailers that sell to consumers, to producers that supply food and other products, as well as the wide variety of companies providing critical services — to amplify the collective work of the industry. More information about our organization is available at [www.FMI.org](http://www.FMI.org).

FMI- The Food Industry Association supports FSIS's commitment to protect public health through the use of data and science-based policies. We encourage the agency to continue to focus on prevention of contamination in pre and post harvesting activities. We encourage the agency to continue to support research and innovation to prevent contamination of meat and poultry products throughout the supply chain including pre-harvest, to adopt new technologies for interventions, and to implement methods to help enhance detection of harmful *Salmonella* serotypes and subtypes associated with human illness.

In the information request and public meeting, FSIS requested information on four broad categories. In our comments below, we offer suggestions for each topic.



## 1. FSIS Data Uses and Opportunities

### *Speed and completeness of data sharing*

Commit to expedited turnaround for releasing sampling and serotype/WGS results and accompanying metadata in formats suitable for data capture and analysis. Timely surveillance data is very useful and enables the industry to incorporate into supplier approval programs and specifications, as well as supports continuous improvement of food safety management programs.

### *Utilize surveillance data for timely decisions*

Leveraging various public health surveillance data is beneficial to identify serotypes of greatest public concern associated with specific poultry products in order to implement effective control measures as well as monitoring progress.

### *Method transparency and harmonization*

Publish approved analytical methods and harmonize evaluation criteria across federal agencies. Consistent, transparent, validated methods and criteria improve comparability, enable clear interpretation of results, and help industry align internal testing and quality-assurance practices with FSIS expectations.

### *Open, secure sharing channels*

Expand routine, two-way data sharing between FSIS, industry, and academic partners to speed joint analysis and coordinated response. Facilitate and incentivize information and data sharing between private and public partners.

Robust data that spans all stages of processing (preharvest through final products) across various poultry products is critical for conducting a comprehensive analysis to determine risk management approaches, evaluate intervention strategies and implement targeted control programs.

Advances in methods such as whole genome sequencing (WGS) facilitate the ability to obtain and analyze high-quality data, including metadata for isolates. It is imperative that the federal agencies have consistent evaluation methods and enhance the ability to share information between agencies, with the academic community and with industry.

## **2. Factors that inform *Salmonella* Controls**

Preventing contamination is more effective than relying on interventions applied later in the supply chain. Pre- and post-harvest prevention measures will have the greatest impact on reducing *Salmonella* in poultry. Furthermore, pre-harvest control strategies should target serotypes and subtypes of public-health significance.

*Salmonella* prevalence, levels and serotypes vary across poultry product categories, establishments and production lots. Establishing baseline data on *Salmonella* prevalence, levels, and serotypes across poultry product categories and at various processing stages is essential to identify where additional controls will have the greatest public-health impact. FSIS should also account for the cost and complexity of validation studies—particularly for small producers—and continue outreach and technical assistance to ensure smaller establishments can implement validated and effective controls.

## **3. Alternative Parameters for Performance Standards**

### *Transparent, accessible performance data availability*

Federal agencies should adopt consistent evaluation methods and strengthen information sharing with other agencies, academia, and industry. Industry requires clear, achievable goals, access to advanced sampling and testing methodologies, and rapid response timelines that drive timely decisions and corrective actions. Testing programs must rely on sampling plans and assays that are fit for purpose, reliable and accurate. We also encourage expanded research and broader use of validated methods specific to serotype identification, enumeration, and genomic factors (i.e., pathogenicity, virulence and antimicrobial-resistance).

## **4. Policy Options Beyond Current Performance Standards**

FSIS should prioritize pre-harvest prevention by emphasizing upstream controls proven to reduce risk at the source. Key measures include breeder flock management, vaccination when supported by science, feed and water hygiene, and rigorous litter and pest control. Strengthening these controls will decrease pathogen loads entering establishments and reduce downstream risk.

FSIS should improve source attribution for *Salmonella* by more accurately determining the number and rate of change of salmonellosis cases linked to raw poultry per product class on a per-capita basis. Clear, reliable illness attribution and

quantification are essential for measuring progress and for making prevention the central strategy for illness reduction.

The agency should adopt targeted serotype risk management as part of its policy strategy. Use surveillance and whole-genome sequencing should be used to identify and prioritize serotypes and subtypes associated with human illness, with transparent methodologies, defined prioritization criteria, practical review cycles, and broad stakeholder input.

FSIS and industry should continue to invest in detection method innovation. We encourage continued collaboration with USDA ARS, USDA NIFA, academic partners, and industry to develop validated rapid enumeration, serotyping, and WGS workflows that are suitable and practical for fresh poultry products.

Regulatory focus should be at the point of control for the identified hazard. Microbiological standards are most effective when enforced at the harvest/slaughter establishment—where operators have the greatest ability to control conditions and take timely corrective actions—while maintaining transparent performance metrics that drive continuous improvement across the supply chain.

### **Consumer Food Safety Education**

Consumers play a vital role in preventing foodborne illness. We commend FSIS for its longstanding commitment to science-based consumer education and encourage continued leadership in this area. Prioritizing and expanding outreach on proper handling, preparation, cooking, and storage practices for poultry and poultry products is another important tool to help reduce illnesses and protect public health.

### **Summary**

FMI shares FSIS's commitment to reducing Salmonellosis and supports science-driven, risk-based, prevention-first approach. We encourage the Agency to

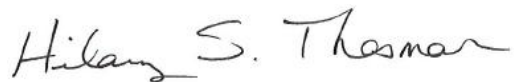
- (1) maximize the practical value and timeliness of FSIS data for operational decision-making;
- (2) resolve key scientific and legal questions in collaboration with the research community and stakeholders;
- (3) align any standards with validated methods and demonstrable public-health impact; and,

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(4) emphasize upstream prevention and adaptive, risk-based management strategies that are cost effective and scalable for industry.

We are pleased the agency has included stakeholders in this process and encourage FSIS to continue to include all interested parties and to leverage expertise outside the agency to make an impact and reduce foodborne illness. We look forward to working with the agency and the industry on this important initiative.

Sincerely,

A handwritten signature in black ink that reads "Hilary S. Thesmar". The signature is written in a cursive, flowing style.

Hilary S. Thesmar, PhD, RD  
Chief Science Officer and SVP Food and Product Safety