



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

Mr. Paul Kiecker
Administrator
Food Safety and Inspection Service
1400 Independence Ave SW
Washington, DC 20250-3700

Re: Docket No. FSIS-2023-0028: *Salmonella* Framework for Raw Poultry Products

Dear Mr. Kiecker:

The National Chicken Council (NCC) appreciates the opportunity to provide comments on the United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS or the Agency) proposed rule and proposed determination – *Salmonella Framework for Raw Poultry Products*. 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. All NCC member companies will be significantly impacted by this proposed rule and proposed determination and given the complexity and sheer length of the proposal, a sixty-day comment period is simply unworkable. The risk assessments alone will take months to analyze and provide constructive feedback on, in addition to the substantial amount of time that will be required to understand and seek clarification on the myriad of topics throughout the document.

The Agency's proposed *Salmonella Framework for Raw Poultry Products*, similar to the *Salmonella* Framework proposed by the Agency in 2022, continues to raise numerous questions about complex topics, including risk assessment and public health modeling, detailed applications of highly technical Hazard Analysis and Critical Control Point (HACCP) systems, current and future laboratory testing technologies, and legal and technical considerations, to name but a few. NCC member companies will be significantly impacted by the Agency's proposal, and the sixty-day comment period provides insufficient time to develop and provide meaningful comments to the Agency.

The industry has attempted to engage with FSIS since the original *Salmonella* Framework was proposed by the Agency in 2022 through public meetings, written comments, and technical sessions. Given that much of this information appears to have been disregarded in the formulation of the recent proposal, it is critical that all of this information be brought forth again for consideration. The industry's approach – one that was shared at length with the Agency – to improving public health is backed by sound science, robust data, and will be implementable by the entire industry from the largest to the smallest of broiler companies without creating a competitive disadvantage. However, the proposal, as written, will do just the opposite, and we believe it is important that a level playing field be created for the success of the entire industry.

While we appreciate the Agency's interest in receiving comments on the over 1,000 of pages of text and hundreds of thousands of datapoints included as "Supporting and Related Materials" that were also published along with the proposed *Salmonella Framework for Raw Poultry Products*, this task is insurmountable in a short sixty days. Further, given the significant and unclear changes that are being proposed, it is imperative that the regulated industry be provided with adequate time to provide meaningful input and receive answers to many complex questions. These answers will be critical to aiding in robust feedback by the regulated industry. It is also our understanding that FSIS is considering hosting a series of webinars in September 2024 to walk through the proposal and to answer questions. We appreciate and welcome webinars and other stakeholder outreach – this will be of benefit to all stakeholders. It is likely that this information will help with the crafting of comments to assure robust feedback to the Agency. As a result of the voluminous amount of information required to be read, digested, and responded to as well as the pending September 2024 webinar series, we respectfully request that the Agency extend the comment period by an additional 120 days. This time will allow for the regulated industry to provide robust and meaningful comments and take into consideration the discussion and information obtained during the September 2024 webinars.

Conclusion

NCC appreciates the opportunity to provide comments on the proposed rule and proposed determination – *Salmonella Framework for Raw Poultry Products*. NCC also appreciates the Agency's consideration of this request to extend the comment period by 120 days. It is imperative that the chicken industry – the industry most significantly impacted by the proposal – is afforded adequate time to provide meaningful comments. Please feel free to contact us with any questions regarding the above request. Thank you for your consideration.

Respectfully submitted,



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