FARMFORWARD

October, 2025

How the USDA & the US Poultry Industry Fail to Protect Americans from Foodborne Disease

TABLE OF CONTENTS

EXECUTIVE SUMMARY

Salmonella bacteria are a leading cause of foodborne illness in the United States, resulting in 1.28 million illnesses and 238 deaths each year. At the heart of this ongoing public health crisis is the poultry industry, which accounts for at least a quarter of all salmonella infections. A recent investigation by Farm Forward sheds light on how this problem persists. By analyzing USDA salmonella regulations and inspection records, federal purchasing data for nutrition assistance programs, and humane handling reports, our findings reveal how regulatory failures, industry practices, and government procurement policies together undermine food safety.

Key Findings:

- **USDA permits significant salmonella contamination levels in poultry:** USDA's Food Safety and Inspection Service (FSIS) sets standards for salmonella in poultry, allowing for high percentages of salmonella contamination in meat.
- **FSIS lacks authority to enforce its salmonella standards:** The agency cannot shut down plants for repeated contamination, stop contaminated products from entering the food supply, or issue recalls—even when plants repeatedly fail its standards for contamination.
- **Major poultry companies sell contaminated products:** Companies like Perdue, Foster Farms, Cargill, Butterball, and Costco's supplier (Lincoln Premium Poultry) have repeatedly received the USDA's worst rating (Category 3) for excessive salmonella contamination in certain products across multiple years without consequences.
- **Meat from contaminated plants has likely been purchased for federal nutrition assistance programs like school lunches:** USDA's Agricultural Marketing Service's (AMS) commodity procurement program has knowingly supplied poultry products from plants that have repeatedly failed salmonella standards to federal nutrition assistance programs, like the National School Lunch Program and the Emergency Food Assistance Program.
- **Inhumane treatment of birds may contribute to higher salmonella risk:** Birds raised in crowded, stressful conditions are more likely to shed bacteria. Some facilities with frequent humane handling violations also have Category 3 salmonella records.
- **Regulatory reform efforts have stalled:** FSIS proposed a rule in August 2024 to limit salmonella in raw poultry, but withdrew the proposal in May 2025.
- **Inspection records lack transparency:** Although inspection reports are public, the data is difficult to access and incorporate into purchasing decisions.

Despite clear risks to health and mortality, current regulations fail to protect the public. The federal government's inability to enforce the standards it sets underscores **a systemic failure to align food policy with public health and animal welfare standards**. Against this backdrop, it's no wonder that the poultry industry has consistently failed to adopt responsible practices to control salmonella.

To reverse this trend, the USDA must be empowered to enforce stronger standards, eliminate contaminated meat from public programs, ensure humane handling, hold poultry producers

accountable, and improve transparency so the public can make informed choices about what they eat. Until these reforms are enacted, the poultry industry will continue to operate with minimal accountability—putting millions of Americans at unnecessary risk of illness from a preventable and dangerous pathogen.

BACKGROUND

Salmonella is one of the most prevalent foodborne illnesses in the United States, annually infecting 1.28 million people and causing 12,500 hospitalizations, most of which are caused by eating contaminated food.[1] It is also the leading cause of death from foodborne illness, resulting in 238 deaths each year.[2] Animal-based foods (chicken, turkey, pork, eggs, beef, dairy, and seafood) are some of the most commonly contaminated foods, followed by fruits and vegetables contaminated with farmed animal manure, wildlife scat, or adulterated water.[3] Salmonella is now considered endemic to animal agriculture globally,[4] contributing to the industry's "infectious disease trap," where high-density confinement housing, poor waste management, and unsanitary practices create breeding grounds for zoonotic diseases.[5] Salmonella has the ability to "survive for long periods in feed, litter, and the environment, increasing the risk of future outbreaks."[6] Consequently, industrial poultry production—which typically overcrowds tens of thousands of birds in poorly ventilated and unhygienic facilities—is responsible for a great deal of ongoing salmonella contamination.[7]

Chicken and turkey meats alone account for 25% of all salmonella outbreaks[8] (or 320,000 cases each year), and the CDC estimates that "1 in every 25 packages of chicken at the grocery store are contaminated with salmonella."[9] In a recent study by Consumer Reports, however, researchers found that the number is likely much higher: one-third of samples of ground chicken they tested from grocery stores across the country were contaminated with salmonella, and more than one-third of these were from Perdue (one of the top chicken companies in the country).[10] More disturbing than that, 91% of those samples tested positive for one of three salmonella strains that pose the greatest threat to human health, and all identified strains were resistant to one or more antibiotics.[11]

The federal government has long recognized the dangers of salmonella contamination in the food system. Every decade, the Department of

1 CDC, "Estimates: Burden of Foodborne Illness in the United States," March 19, 2025..
2 CDC, "Estimates: Burden of Foodborne Illness in the United States."
3 World Health Organization (WHO), "*Salmonella* (non-typhoidal)," February 20, 2018.
4 S. Shaji, R.K. Selvaraj, R. Shanmugasundaram," *Salmonella* Infection in Poultry: A Review on the Pathogen and Control Strategies," *Microorganisms* 11, no. 11: 2814.
5 Matthew N. Hayek, "The Infectious Disease Trap of Animal Agriculture," *Scientific Advances* 8, no. 44 (2022).
6 L. Kovács, et al., "Biosecurity Implications, Transmission Routes and Modes of Economically Important Diseases in Domestic Fowl and Turkey," *Veterinary Sciences* 12, no. 391 (2025).
7 L. Kovács, et al., "Biosecurity Implications."
8 CDC Interagency Food Safety Analytics Collaboration, "Foodborne Illness Source Attribution Estimates for *Salmonella*, Escherichia coli O157, and Listeria monocytogenes – United States, 2022," GA and D.C.: U.S., December 13, 2024. Salmonella infections occur in backyard poultry in addition to commercial poultry, but the number of cases in backyard poultry is comparatively very low; out of the total number of cases linked to poultry each year (320,000), backyard poultry outbreaks accounted for 1,230 confirmed cases in 2022, 1,072 in 2023, and 470 in 2023. CDC, "*Salmonella* Outbreak Linked to Backyard Poultry - June 2022," November 10, 2022; CDC, "*Salmonella* Outbreak Linked to Backyard Poultry - May 2023," September 9, 2024; CDC, "*Salmonella* Outbreak Linked to Backyard Poultry -May 2024," October 22, 2024.
9 CDC, "Chicken and Food Poisoning," Apr 29, 2024.
10 Lisa L. Gill, "Is Our Ground Meat Safe to Eat?" *Consumer Reports*, June 30, 2022.
11 Gill, "Is Our Ground Meat Safe to Eat?"

Health and Human Services' Healthy People initiative sets goals for reducing salmonella infections among Americans. However, the two most recent salmonella targets (for 2010 and 2020) were not met.[12] The Healthy People target for 2030 is to reduce salmonella contamination from all sources by 25%.[13]

In an effort to meet these targets and address the serious shortcomings in regulating salmonella, in August 2024 United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS)—the government agency responsible for preventing contamination and reducing the overall risk of foodborne illnesses like endemic salmonella outbreaks in the poultry sector—proposed a significant step forward: a rule that would have allowed USDA to classify salmonella as an adulterant, which would give the agency the authority to recall, condemn, or stop the sale of poultry products contaminated with certain levels of salmonella.[14]

However, in April 2025, USDA withdrew that proposed rule, citing comments from stakeholders (many of them industry entities) about regulatory overreach and the economic impacts of such a program.[15] This withdrawal further cements USDA's failure to address longstanding gaps in effective salmonella control, leaving the agency powerless to enforce standards, and drastically reducing the chances of achieving the 2030 reduction targets.

One of the challenges in regulating salmonella in the poultry industry is that there is no single point source of contamination: "Poultry and poultry meat can become contaminated with salmonella during the entire poultry production chain, that is from the breeder farm, production farm, transportation, slaughterhouse, and retail."[16] As such, FSIS oversight is imperative to identify sites at every point along the supply chain where contamination occurs. **And yet, the "performance standards" set by FSIS to track** salmonella **in the industry allow for a significant level of** salmonella **contamination, and the agency does not have the authority to enforce even these anemic standards. As a result, a substantial amount of chicken and turkey remains contaminated with** salmonella**, putting the public at risk.**

12 USDA-FSIS, "*Salmonella* Framework for Raw Poultry Products: A Proposed Rule by the Food Safety and Inspection Service," *Federal Register,* 9 CFR Part 381, August 8, 2024.
13 USDA-FSIS, "*Salmonella* Framework for Raw Poultry Products: A Proposed Rule by the Food Safety and Inspection Service."
14 USDA-FSIS, "Proposed Rule and Proposed Determination: *Salmonella* Framework for Raw Poultry Products," *Federal Register*, Vol. 89, No. 152, April 25, 2025, 64678-64748.
15 USDA-FSIS, "Notice of Withdrawal: *Salmonella* Framework for Raw Poultry Products," *Federal Register*, Vol. 90, No. 79, Apr 25, 2025; USDA, "Press Release: Secretary Rollins Announces New Plan to Bolster Meat and Poultry Safety," July 15, 2025.
16 H. Zeng, et al., "*Salmonella* Prevalence and Persistence in Industrialized Poultry Slaughterhouses," *Poultry Science* 100, no. 4 (2021): 100991.

USDA PERMITS DANGEROUS LEVELS OF SALMONELLA & *LACKS NECESSARY AUTHORITY TO ENFORCE STANDARDS FOR CONTAMINATION LIMITS*

In early 2018, chicken consumers on the East Coast were falling ill with a then-rare, multidrug-resistant strain of salmonella (*Salmonella infantis*). Soon, the strain began appearing across the country in places like Texas, Missouri, and West Virginia, mystifying the experts from the Centers for Disease Control and Prevention (CDC) and USDA trying to trace its origin. In the summer of 2018, they found evidence that contaminated poultry was behind the growing number of infections. Consumers infected with the strain reported purchasing poultry from a number of companies, but Perdue products emerged as the most common source of the illness; of samples tested, more than 25% were found to have originated in Perdue plants.[17] By early 2019, 129 cases had been confirmed, resulting in 25 hospitalizations and one death. In February of that year, despite new cases of salmonella Infantis continuing to surface across the country, the CDC closed the investigation and issued its final report on the outbreak: "This investigation is over. Illnesses could continue because this salmonella strain appears to be widespread in the chicken industry."[18] USDA did not take action to control the outbreak, even as the CDC identified it as an "epidemic," and even as it continued to spread through the poultry industry.[19]

This response to the outbreak is illustrative of the federal government's ongoing inability to prevent, accurately track, and control the public health threat of foodborne illnesses like salmonella. Decades of incremental policy reforms to regulate salmonella levels in chicken and turkey products (see Appendix A) have largely fallen short of reducing consumers' risk of consuming contaminated products.

FSIS's existing approach to controlling salmonella is based on "performance standards" that the agency sets for maximum allowable percentages of salmonella contamination in a given poultry plant. FSIS samples poultry at select slaughter and processing plants on a schedule dictated by plant size and product volume: the largest establishments are typically sampled up to five times per month; smaller establishments are sampled less frequently; and very low-volume establishments are not subject to sampling requirements.[20]

17 Bernice Yeung, Michael Grabell, Irena Hwang, and Mollie Simon, "America's Food Safety System Failed to Stop a *Salmonella* Epidemic. It's Still Making People Sick," *ProPublica,* October 29, 2021.

18 CDC, "2018 *Salmonella* Infections Linked to Raw Chicken Products," February 21, 2025.

19 Yeung et al., "America's Food Safety System Failed."

20 For more detail on requirements based on establishment size and product volume, see: 9 CFR 381.65"§ 381.65, "Operations and Procedures, Generally."

Test results are posted monthly on the USDA website, going back to October 2015 for aggregate testing data and October 2017 for individual establishment data. Although these results are publicly available, the data on the site is obscure. In light of the difficulty of accessing and making sense of FSIS testing data, Farm Forward reviewed and analyzed the FSIS salmonella verification testing program to determine how poultry establishments are rated for salmonella contamination and which poultry brands most consistently failed to meet FSIS salmonella performance standards. FSIS evaluates salmonella contamination levels against its performance standards in each poultry product type over a 52-week testing window, using a three-category rating system:[21]

- **Category 1,** the best rating, means that an establishment has been at or below half the allowed contamination level of the mandated standard.
- **Category 2** means that establishments have met the standard.
- **Category 3** is reserved for establishments that exceed the maximum allowable percentage and, thus, fail the standard.

Importantly, these performance standards do not track a product's bacterial load; the tests measure *presence* or *absence* of salmonella, meaning that a product with a high cultural density of salmonella organisms is not differentiated from a lower (but still positive) test. Further, FSIS does not test for the serotype (strain) of *Salmonella*; some serotypes are more virulent than others and cause more serious illnesses, and some have developed multidrug antibiotic resistance, which adds another significant layer of public health risk. In short, the current salmonella testing framework does not tell us what we need to know about actual risks to public health.

The agency assesses salmonella contamination by taking a very small sample of a plant's total output. It assigns its category ratings based on maximum allowable percentages of contaminated products, specific to different types of poultry products at each plant: they are highest in comminuted (finely minced or ground) chicken products (25% of samples are allowed to be contaminated by salmonella), comminuted turkey products (13.5%), and chicken parts (15.4%), while chicken carcasses allow for 9.8% and turkey carcasses for 7.1% (see **Figure 1**).

21 USDA-FSIS, "*Salmonella* Verification Testing Program Monthly Posting." Note: FSIS bases salmonella performance standard category determinations on the availability of a minimum number of salmonella sample results from a 52-week moving window.

Figure 1: Salmonella Poultry Performance Standard[22]

Product	Performance Standard*	Maximum Allowable % Positive	Minimum # of Samples to Assess Process Control**
Comminuted Chicken	13 of 52 samples	25.0%	10
Chicken Parts	8 of 52 samples	15.4%	10
Comminuted Turkey	7 of 52 samples	13.5%	10
Broiler Carcasses	5 of 51 samples	9.8%	11
Turkey Carcasses	4 of 56 samples	7.1%	14

* The performance standard is represented as a fraction of maximum allowable positives over the target number of samples collected and analyzed in a 52-week window.

** FSIS must analyze at least this number of samples in a single 52-week window in order to categorize an establishment for the standard listed.

Source: USDA-FSIS, "Performance Standards: *Salmonella* Verification Program for Raw Poultry Products," Directive 10250.2, March 2, 2021.

These maximum allowable percentages highlight how FSIS routinely permit high rates of salmonella contamination in poultry products; for instance, it is acceptable for up to one quarter of samples of comminuted chicken at any given plant to be contaminated. Even the best category rating allows for a significant percentage of contaminated meat to enter the food supply. A highest-tier Category 1 chicken plant, for example, can have 12% (more than 1 in 10) of comminuted meat samples test positive for salmonella. While some types of poultry products are higher risk than others, consumers are potentially put at risk with every type of raw chicken and turkey product, even those that receive the government's best rating.

Many establishments produce multiple types of products and, therefore, receive more than one salmonella rating. Looking at ratings for all poultry product types combined at each establishment, we found that for the period from January 28, 2024 to January 25, 2025, 13.1% received a Category 3 rating and 20.6% were assigned to Category 2.[23] Since a "passing" Category 2 rating still allows anywhere from 7.1% to 25% of those products to be found contaminated with salmonella, a total of 33.7% (just over one-third) of poultry products classified as Category 2 or 3 is a substantial figure.

It seems sensible that, when a plant fails the performance standard and receives a Category 3 rating, FSIS would take corrective or enforcement action to ensure that salmonella contamination would be eliminated or, at least, reduced. However, this is not the case.

USDA has the authority to issue category-specific reports on testing, **but it does not have the authority to enforce the standards it sets.**

22 Interpretation of **Figure 1**, which was created by USDA-FSIS, may not be intuitive. The most salient column is the third, "Maximum Allowable % Positive." For any given product type, this shows the highest percentage of salmonella-contaminated samples that will not cause the plant to fail the FSIS salmonella performance standards. The second column, "Performance Standard," refers only to plants so large that FSIS tests them for salmonella (approximately) every week of the year; a large plant with 13 of 52 samples of comminuted chicken testing positive for salmonella would receive a passing Category 2 rating. Small plants are tested far less frequently; Column 4 refers to the minimum number of tests FSIS requires over the course of a year for the smallest plants. A small plant with 2 of 10 samples of comminuted chicken testing positive for salmonella over the course of a year would receive a passing Category 2 rating.

23 USDA-FSIS, "*Salmonella* Verification Testing Program Monthly Posting."

The agency cannot issue penalties for consistently high salmonella contamination levels, let alone suspend a plant or shut it down; they can only ask companies to voluntarily pull products from the shelves when there is an outbreak.[24]

The question of USDA's authority to regulate salmonella goes back decades. In 2001, salmonella regulation "was dealt a serious blow to food safety reforms" when USDA lost in a court case against Supreme Beef over the regulation of salmonella in the meat industry.[25] This decision would have empowered USDA to shut down plants that exceed standards for salmonella contamination. Supreme Beef's win cemented the meat industry's allowance of high levels of contamination in its plants and laid the groundwork for policy reforms to face significant hurdles into the future. As a result, the industry operates with little regulation, allowing for the potential for salmonella to travel unchecked through the food supply.

To investigate in the current regulatory landscape whether FSIS takes any enforcement action against plants exceeding allowable salmonella levels, Farm Forward submitted a query to "askFSIS," a USDA service that answers questions from the public about meat, poultry, and egg product inspections. **In its response to Farm Forward, FSIS confirmed that it does not issue any administrative actions or withhold products from commerce based on a plant's violation of** salmonella **standards.** It added: "Failure to meet the salmonella performance standards triggers additional inspection follow up, both in sampling and in food safety program review, which may identify non-compliances or enforcement issues."[26] In other words, exceeding salmonella performance standards results in additional monitoring that may identify other, more enforceable violations, but there are no consequences for repeatedly exceeding sampling standards. The high percentage of establishments in Category 2 and Category 3 reflects systematic failures in the poultry industry to reduce or control salmonella contamination.

The framework proposed by USDA in August 2024 to categorize salmonella at certain levels as an adulterant would have changed this, giving FSIS the authority to stop the sale of contaminated poultry and better safeguard public health. Specifically, it would have developed *enforceable final product standards* (where the actual risk posed to consumers would be evaluated, and contamination levels enforced, by testing the poultry products to be sold to consumers) rather than its current *performance standards* (which simply evaluate the production process and categorize establishments based on sampling at slaughter and processing plants). The May 2025 withdrawal of the proposed rule means that FSIS will not be granted the authority to enforce any limits on contamination, all but ensuring that high levels of salmonella will continue to enter the consumer market and pose an ongoing risk to public health. In this void of government enforcement of salmonella standards, and to empower consumers to make their own judgments about consuming contaminated products, Farm Forward identified the companies with the worst salmonella ratings.

24 Michael Grabell, "USDA Plans Major Reforms to Curb *Salmonella* in Poultry," ProPublica, October 14, 2022.
25 PBS, "Supreme Beef v. USDA."
26 USDA-FSIS, askFSIS Case Number 01854945, July 8, 2025.

MAJOR POULTRY BRANDS SELL PRODUCTS *WITH HIGH LEVELS OF SALMONELLA CONTAMINATION*

Some of the most well-known poultry brand names have received Category 3 ratings, meaning that consumers who regularly purchase meat from grocery stores are at high risk of unknowingly purchasing salmonella-contaminated meat.

Farm Forward wanted to understand the full scope of potential contamination originating from top poultry companies. Through our analysis of data from the FSIS salmonella testing program, we discovered that many major poultry brands consistently failed to meet the agency's performance standards and had one or more plants (including both slaughtering/processing and processing-only plants) receive Category 3 ratings, exceeding the salmonella limits for both 2023 and 2024. These companies included household brands like Butterball, Perdue, Foster Farms, Cargill, and Lincoln Premium Poultry, Costco's supplier. **The companies with the worst records had 100% of their plants rated as Category 3 for both 2023 and 2024, including:**

- **Perdue** turkey products (sells under the **Perdue** and **Harvestland** brands)
- **Pitman Farms** chicken products (sells under the **Mary's, Fulton Valley, Sweetwater Creek,** and **Shelton's** brands)
- Foster Poultry Farms turkey products
- **Lincoln Premium Poultry** chicken products (supplier of chicken to **Costco**)
- Grimaud Farms chicken products
- **Michigan Turkey Products** (sells under the **Great Lakes** and **Michigan Turkey** brands)

Additionally, **Butterball** (selling turkey under **Butterball, Carolina Turkey, Just Perfect,** and **Farm to Family** brands), **Cargill** (selling turkey under **Honeysuckle White Turkey** and **Shady Brook Farms** brands), and **Foster Farms** chicken had **at least half of their plants rated Category 3** (see **Figure 2**).

Figure 2: Retail Poultry Companies with Category 3 Plants for 2023 & 2024*

Company Name	Type of Product	Retail Brands**	Plants in Category 3	% of Plants in Category 3
Foster Poultry Farms	Turkey	Foster Farms	1	100%
Grimaud Farms	Chicken	Grimaud Farms	1	100%
Lincoln Premium Poultry	Chicken	Costco	1	100%
Perdue Foods	Turkey	Perdue Harvestland	1	100%
Pitman Farms	Chicken	Mary's Fulton Valley Sweetwater Creek Shelton's	1	100%
Michigan Turkey Prod.	Turkey	Great Lakes Michigan Turkey	1	100%
Cargill Meat Solutions	Turkey	Honeysuckle White Turkey Shady Brook Farms	2	67%
Butterball LLC	Turkey	Butterball Carolina Turkey Just Perfect Farm to Family	3	60%
Foster Poultry Farms	Chicken	Foster Farms	3	50%
Mar-Jac Poultry	Chicken	Mar-Jac	1	33%
Perdue Foods	Chicken	Perdue Petaluma Poultry PastureBird Draper Valley	3	23%
Bachoco O.K. Foods	Chicken	TenderBird Top Chick	1	20%
George's Chicken	Chicken	George's George's Farmers Market Ozark Mountain Poultry	1	20%
Koch Foods	Chicken	Koch Foods Antioch Farms Preferred Foods Rogers Royal	1	10%
Tyson Foods	Chicken	Tyson Jimmy Dean	2 (2023), 1 (2024)	6% (2023), 3% (2024)

* According to FSIS "*Salmonella* Verification Testing Program Monthly Posting" in January of each year.

** These names represent major company brands but not necessarily the specific brands produced at the company's Category 3 plant(s) (unless all company plants are rated Category 3).

Source: USDA-FSIS, "***Salmonella* Verification Testing Program Monthly Posting.**" Sample collection periods: Jan 29, 2023 through Jan 27, 2024; Jan 28, 2024 through Jan 25, 2025.

These ratings are not a matter of a company just having a "bad year" for salmonella; these companies had violations across multiple years, reflecting an ongoing failure to address persistent contamination problems. Looking back at the data for the past five years (2020-2024), we found that 18 plants were rated as Category 3 in all five years, 33 plants were rated Category 3 in at least four of the five years, and 50 plants were rated Category 3 in three of the five years (see **Figure 3**).[27]

Figure 3: Poultry Plants Rated as Category 3 in Multiple Years (2020-2024)* (summary)**

Rated Category 3 in at Least 3 of 5 Years	Rated Category 3 in at Least 4 of 5 Years	Rated Category 3 in all 5 Years
50 plants	33 plants	18 plants

*For one or more types of poultry products. According to FSIS "*Salmonella* Verification Testing Program Monthly Posting" in January of each year.

** For individual plant salmonella ratings by year, see the full list in **Appendix B**.

Source: USDA-FSIS, "*Salmonella* Verification Testing Program Monthly Posting." Sample collection periods: Dec 29, 2019 through Dec 26, 2020; Jan 31, 2021 through Jan 29, 2022; Jan 30, 2022 through Jan 28, 2023; Jan 29, 2023 through Jan 27, 2024; Jan 28, 2024 through Jan 25, 2025.

We then further scrutinized the 18 plants that had been rated as Category 3 for at least one type of product for each of the past five years. Since the FSIS monthly postings represent a "rolling" or "moving" rating, we reviewed all 60 individual monthly reports to determine how long each establishment spent in Category 3 during the past five years. As shown in **Figure 4**, all 18 plants were rated Category 3 in at least 77% of the monthly reports. In addition, five of the plants (including those owned and operated by Butterball, Cargill, and Koch) were rated Category 3 in all 60 reports, meaning that there was not a single month for at least five years that these plants did not have contamination levels that exceeded the maximum allowable percentage of salmonella (see **Figure 4**).[28]

27 USDA-FSIS, "*Salmonella* Verification Testing Program Monthly Posting." Sample collection periods: Dec 29, 2019 through Dec 26, 2020; Jan 31, 2021 through Jan 29, 2022; Jan 30, 2022 through Jan 28, 2023; Jan 29, 2023 through Jan 27, 2024; Jan 28, 2024 through Jan 25, 2025.

28 For the complete list of companies with at least one plant with a Category 3 rating across multiple years, see **Appendix B**.

Figure 4: Individual Poultry Plants with the Worst Salmonella Records (2020-2024)*

Company Name	Category 3 Plant Number	Location of Category 3 Plant	# of Monthly Reports in Category 3	% of Monthly Reports in Category 3
Butterball LLC	P8727	Carthage, MO	60 of 60 reports	100%
Cargill Meat Solutions	P18	Dayton, VA	60 of 60 reports	100%
Ihsan Farms LLC	P46897	Princess Anne, MD	60 of 60 reports	100%
James River Corr Ctr	P31843	State Farm, VA	60 of 60 reports	100%
Koch Foods	P19378	Cumming, GA	60 of 60 reports	100%
Perdue Foods	P2178	Georgetown, DE	57 of 60 reports	95%
Wabash Poultry Proc	P46248A	Forrest, IL	50 of 60 reports	94%
David Elliot Poultry Farm	P134	Scranton, PA	55 of 60 reports	92%
Lincoln Premium Poultry	P48304	Fremont, NE	54 of 59** reports	92%
Pelleh Poultry Corp	P44121	Swan Lake, NY	55 of 60 reports	92%
Perdue Foods	P286	Washington, IN	55 of 60 reports	92%
Butterball LLC	P7345	Mount Olive, NC	54 of 60 reports	90%
Windy Meadows Farm	P44992	Campbell, TX	54 of 60 reports	90%
Perdue Foods	P1243	Rockingham, NC	53 of 60 reports	88%
Cargill Meat Solutions	P963	Springdale, AR	52 of 60 reports	87%
Baffoni's Poultry Farm	P9378	Johnston, RI	51 of 60 reports	85%
O.K. Foods	P165M	Muldrow, OK	48 of 60 reports	80%
Pitman Farms	P27389	Sanger, CA	46 of 60 reports	77%

* For one or more types of poultry in FSIS "*Salmonella* Verification Testing Program Monthly Posting."

** Test data for this plant were not available in all monthly reports.

Source: USDA-FSIS, "***Salmonella* Verification Testing Program Monthly Posting**."

The fact that five establishments were rated Category 3 for 60 consecutive monthly reports demonstrates that the standards are not enforceable and highlights the urgent need for regulatory reform. As evidence of this, when we reviewed all FSIS quarterly enforcement reports for 2020-2024, we found that an administrative enforcement action was issued for only 2 of the 18 plants that were in Category 3 for most of the past five years. One Butterball plant (P8727) was issued a Notice of Intended Enforcement on March 13, 2020, and a Notice of Suspension on February 10, 2020. Pelleh Poultry (P44121) was issued a Notice of Intended Enforcement on December 1, 2020.

In each case, the basis of the enforcement action was identified as violations of "Sanitation Standard Operating Procedures," "Hazard Analysis & Critical Control Point," and "Sanitation Performance Standards" but FSIS guidelines state that NOEs and NOIEs cannot be issued 'based solely on the fact that an establishment exceeded a performance standard.'[29]

29 USDA-FSIS, "Quarterly Enforcement Reports."

Instead, FSIS leaves it up to the poultry industry to voluntarily comply with its standards based on each company's level of concern about contamination and the public posting of its test results. While it's possible that this approach may have been effective for some companies, a significant number consistently fail the performance standards (see Figures **3** & **4**). The poultry industry's decades-long poor track record with salmonella contamination demonstrates that the poultry industry cannot be trusted to control or reduce contamination at plants. And because USDA does not have the authority to meaningfully regulate salmonella, the poultry industry has essentially been deputized by the federal government to regulate itself. Establishments can repeatedly fail to meet FSIS performance standards—and this information is posted publicly—but these institutions are not penalized for jeopardizing public health.

USDA PURCHASES MEAT FROM COMPANIES WITH SALMONELLA-CONTAMINATED PLANTS *FOR FEDERAL NUTRITION ASSISTANCE PROGRAMS*

It is not just retail products sold at grocery stores that can be contaminated with salmonella. The USDA Agriculture Marketing Service (AMS) Commodity Procurement Program purchases a variety of meat products for its federal nutrition assistance programs, such as the National School Lunch Program (public schools source 40% of all their poultry products from USDA's AMS)[30] and the Emergency Food Assistance Program (which includes food assistance to food banks and individual households). Although AMS has a zero-tolerance policy for salmonella for some of the meats it purchases,[31] AMS purchases raw poultry products for federal nutrition assistance programs from companies with Category 3 ratings, putting children and people with low food security at risk.

These programs are supplied with food through the AMS's Commodity Procurement Program is designed to create marketing opportunities for US food producers.[32] Purchases are made through a competitive bidding process. AMS maintains a list of approved suppliers who are invited to submit bids for AMS contracts.[33] In 2024, a total of 26 companies supplied poultry products to AMS for use in federal nutrition assistance programs.[34] These companies included producers, processors, manufacturers, distributors, and wholesalers of poultry products. AMS paid a total of more than $686 million for more than 403 million pounds of poultry products from these suppliers in 2024.[35]

More than half of these purchases in 2024 were from 10 producers; in addition to their income from sales to the consumer market, these top 10 companies were paid more than $460 million for more than 270 million pounds of poultry in 2024 by AMS (see **Figure 5**).

30 Michael Ollinger, John Bovay, Casiano Benicio, and Joanne Guthrie, "Economic Incentives to Supply Safe Chicken to the National School Lunch Program," USDA Economic Research Service, November 2015.
31 USDA-AMS, "Microbiological Testing of AMS Purchased Meat, Poultry and Egg Commodities."
32 USDA-AMS, Commodity Procurement;" "Selling Food to USDA."
33 For details on the AMS commodity procurement process, see USDA-AMS Commodity Procurement, "How the Process Works."
34 USDA-AMS, "Fiscal Year AMS Purchases by Vendor."
35 USDA-AMS, "AMS Purchases by Commodity (FY24)."

Figure 5: Largest Retail Poultry Suppliers to Federal Food Assistance Programs (2024)

Rank	Company Name	Type of Product	Total Product Quantity	Total Product Value
1	Tyson Foods	Chicken & turkey	154,545,280 lbs.	$238,471,039
2	Jennie-O Turkey	Turkey	40,525,600 lbs.	$94,902,087
3	Pilgrim's Pride	Chicken	37,692,000 lbs.	$45,674,053
4	Cargill Meat Solutions	Turkey	8,826,000 lbs.	$25,307,450
5	George's Chicken	Chicken	10,632,400 lbs.	$20,781,147
6	Foster Farms Chicken	Chicken	12,379,600 lbs.	$17,179,570
7	Butterball LLC	Turkey	3,971,100 lbs.	$8,959,029
9	Tip Top Poultry	Chicken	2,574,000 lbs.	$6,093,906
8	Bachoco O.K. Foods	Chicken	5,054,000 lbs.	$3,625,846
10	Virginia Poultry	Turkey	880,000 lbs.	$2,501,600

Source: USDA-AMS, Food Commodity Purchasing (FY24).

As in the case of retail sales, multiple companies in this "top 10" list received Category 3 reports for salmonella contamination, failing FSIS performance standards. Farm Forward uncovered these details through tracking the sales of products from contaminated plants for the 2022-2024 period. We found examples of sales to AMS from companies with plants rated as Category 3 for salmonella during this period, including brands with the highest percentage of plants in Category 3 like Butterball, Cargill, and Foster Poultry Farms (see **Figure 6**).[36]

36 Risk varies based on type of product (minced and ground turkey from Butterball, Cargill, and Foster Poultry Farms, for instance, carries a high risk of contamination).

Figure 6: Federal Poultry Purchases from Companies with Category 3 Rating (2022-2024)*

Company Name	Year	Type of Products in Category 3	Plants in Category 3	Category 3 Plant Numbers	% of Plants in Category 3
Butterball LLC	2022	Comminuted turkey	3 of 5	P8727, P7345, P46870	60%
	2023	Comminuted turkey	3 of 5	P8727, P7345, P46870	60%
	2024	Comminuted turkey	3 of 5	P8727, P7345, P46870	60%
Cargill Meat Solutions	2022	Comminuted turkey	2 of 3	P18, P963	67%
	2023	Comminuted turkey	2 of 3	P18, P963	67%
	2024	Comminuted turkey	2 of 3	P18, P963	67%
Foster Poultry Farms	2023	Whole chicken	1 of 6	P6137A	17%
	2023	Chicken parts	2 of 6	P6137, P6164A	33%
	2023	Comminuted turkey	1 of 1	P157	100%
	2024	Whole chicken	1 of 6	P6137A	17%
	2024	Chicken parts	2 of 6	P6137, P6164A	33%
George's Chicken	2023	Chicken parts	1 of 5	P1249	20%
	2024	Chicken parts	1 of 5	P2186	20%
Bachoco O.K. Foods	2022	Chicken parts	1 of 5	P165M	20%
	2023	Chicken parts	1of 5	P165M	20%
Simmons Prepared Foods	2024	Chicken parts	1 of 5	P5837	20%
Tyson Foods	2022	Whole chicken	1 of 36	P806	3%
	2023	Whole chicken	1 of 36	P5842	3%
	2023	Chicken parts	1 of 36	P746	3%
	2024	Chicken parts	1 of 36	P27216	3%

* According to FSIS salmonella establishment categories in January of each year.

Source: USDA-FSIS, "*Salmonella* Verification Testing Program Monthly Posting." Sample collection periods: Jan 30, 2022 through Jan 28, 2023; Jan 29, 2023 through Jan 27, 2024; Jan 28, 2024 through Jan 25, 2025; USDA-AMS Commodity Purchases by Vendor, FY 2022, FY 2023, FY 2024, "Food Commodity Purchasing."

Figure 6 demonstrates that AMS may have purchased contaminated products during 2022–2024. To make this determination, Farm Forward compared AMS and FSIS records to uncover connections between the slaughtering/processing establishment, the type of product, and the time of the FSIS testing and the AMS purchase award. In doing so, we identified examples of companies selling products to AMS from a plant rated as Category 3, for the same type of product, at the approximate time of the purchase. For example, Bachoco O.K. Foods is one of the largest poultry suppliers to AMS. During the 2022-2023 period, AMS purchased more than 2.1 million pounds and 74,000 cases of chicken breasts (categorized as "chicken parts") from the Bachoco O.K. Foods plant (P165M) in Muldrow, OK, at times when the plant was rated Category 3 for chicken parts (**see Figure 7**).

Figure 7: AMS Purchases from Bachoco O.K. Foods Plant in Muldrow, OK (2022-2023)

Purchase Award Date	Purchased Product	Product Quantity*	Product Value	Plant Rated Category 3?**
02/22/2022	Chicken breasts	624,000 lbs.	$1,802,307	Yes
05/20/2022	Chicken breasts	663,000 lbs.	$2,331,147	Yes
09/02/2022	Chicken breasts	897,000 lbs.	$3,035,182	Yes
12/06/2022	Chicken breasts	20,800 cs	$2,145,923	Yes
03/07/2023	Chicken breasts	15,600 cs	$1,587,521	Yes
05/12/2023	Chicken breasts	5,200 cs	$544,934	Yes
08/24/2023	Chicken breasts	32,600 cs	$3,315,628	Yes

*Some purchase awards use "cases" (cs) as the unit, while others use "pounds" (lbs.).

**At the time of the purchase award.

Source: USDA-AMS, "Purchase Programs: Solicitations & Awards."

Our findings reveal that AMS may have enabled the delivery of raw poultry from these companies to school lunch and other food assistance programs. Given these confirmed examples of AMS's pattern of purchasing products from contaminated plants, it is possible that additional purchases were made from plants contaminated with salmonella.

Further, school districts source 60% of poultry products from wholesalers[37] and no evidence suggests that these products don't come from companies with contaminated plants. Major poultry companies with Category 3 ratings sell poultry through their K-12 foodservice programs, including Butterball,[38] Perdue,[39] Cargill,[40] Foster Farms,[41] and Tyson.[42] Given the extent of contamination in the industry and the dominance of Category 3 companies offering K-12 foodservice, fresh poultry product categories destined for school districts—both through AMS and school districts' direct contracts with suppliers—have the potential for salmonella contamination. While a significant amount of the poultry consumed in schools that participate in the National School Lunch

37 Ollinger et al., "Economic Incentives to Supply Safe Chicken to the National School Lunch Program."
38 Butterball, "K-12 Solutions."
39 Perdue, "Our Food Business."
40 Cargill, "K12 Product Portfolio."
41 Foster Farms, "Easy and Delicious for K-12."
42 Tyson, "K-12 Products."

Program are in the form of ready-to-eat products (RTE), such as nuggets and patties, which can have different standards for salmonella, school districts are purchasing and preparing more than a hundred million dollars worth of raw poultry.[43]

Food safety and inspection is a major component of USDA's work, and considerable resources are dedicated to facilitating the aims of the country's food safety laws, including the Federal Meat Inspection Act and the Poultry Products Inspection Act (PPIA). AMS's mission is to provide services to "ensure the quality and availability of wholesome food for consumers across the country and around the world."[44] The federal commodity purchase specifications for raw poultry contain one general requirement related to food safety: "Product shall be produced under FSIS pathogen reduction standards."[45] And yet, like poultry products produced for retail sales, the raw chicken and turkey products that USDA purchases for nutrition assistance programs often fail basic standards that are designed to protect the public from foodborne illnesses like salmonellosis.

Stricter AMS regulations on salmonella, however, are not unprecedented. The agency sets zero tolerance standards for salmonella in boneless beef, ground beef, diced cooked chicken, and egg products.[46] The fact that these standards are already in place for some products highlights the fact that AMS can set firm requirements for the meat it purchases but it chooses not to do so.

43 USDA, "School Food Purchase Study-III: Final Report," 2012.
44 USDA, Agricultural Marketing Service.
45 USDA-AMS, "Product Specifications & Requirements."
46 USDA-AMS, "Microbiological Testing of AMS Purchased Meat, Poultry and Egg Commodities."

INHUMANE TREATMENT OF BIRDS *FUELS HIGHER RATES OF SALMONELLA CONTAMINATION*

USDA's failures are not limited to its process of testing and reporting, or its lack of enforcement for salmonella performance standards. Compounding the problem is the treatment of live birds during the production cycle and the effect of inhumane treatment on the spread of foodborne illness.

Although it is increasingly understood that the handling of live birds affects meat quality,[47] the connection between live handling practices and the spread of foodborne pathogens is often overlooked. However, conditions in industrialized farming that compromise welfare (e.g., high-density housing, exposure to extreme temperatures, deliberate feed withdrawal, and genetic uniformity) weaken birds' immune systems and make them more susceptible to foodborne pathogens like salmonellae.[48] More specifically, studies show that live handling of poultry leading up to and during slaughter has direct implications for food safety—and for foodborne illness contamination in particular, including salmonella, e. coli, and campylobacter.[49]

Farm Forward set out to explore this connection and uncover whether companies with Category 3 salmonella ratings also had excessive humane handling violations.[50] We compared FSIS bird handling records[51] with FSIS salmonella testing records and found that multiple companies—including top companies like **Cargill, Foster Farms, Lincoln Premium Poultry (supplying Costco chicken), Perdue, and Pitman Farms, as well as some selling to AMS**—were cited for excessive inhumane handling violations while receiving Category 3 salmonella contamination ratings. Our findings validate the growing body of research that links inhumane handling to increased risk of salmonella contamination, suggesting that welfare in the live handling of birds must be addressed in order to better ensure food safety.

47 M. Debut et al., "Variation of Chicken Technological Meat Quality in Relation to Genotype and Pre-Slaughter Stress Conditions," *Poultry Science* 82, no. 12 (2003): 1829-38; G. Kannan et al., "Effects of Crating and Transport on Stress and Meat Quality Characteristics in Broilers," *Poultry Science* 76, no. 3 (1997): 523-9; Julie K. Northcutt, "Poultry Meat Quality: Factors Affecting Poultry Meat Quality," *Engormix,* 2009.

48 A.C. Gomes et al., "Overcrowding Stress Decreases Macrophage Activity and Increases *Salmonella* Enteritidis Invasion in Broiler Chickens," *Avian Pathology* 43, no. 1 (2014): 82-90; J.R. Nelson, D.R. McIntyre DR, H.O. Pavlidis, G.S. Archer, "Reducing Stress Susceptibility of Broiler Chickens by Supplementing a Yeast Fermentation Product in the Feed or Drinking Water," *Animals (Basel)* 8, no. 10 (2018): 173.

49 Luigi Iannetti et al., "Animal Welfare and Microbiological Safety of Poultry Meat: Impact of Different At-farm Animal Welfare Levels on At-slaughterhouse Campylobacter and *Salmonella* Contamination," *Food Control,* 109 (2020): 106921; L.A. Boyle and K. O'Driscoll, "Animal Welfare: An Essential Component in Food Safety and Quality." In *Food Chain Integrity : A Holistic Approach to Food Traceability, Safety, Quality and Authenticity,* Woodhead Publishing (2011): 169-184.

50 We define "excessive" as an individual plant having four or more GCP records per year.

51 USDA-FSIS, "Poultry Good Commercial Practices Inspection Task Data." See **Figure 8**: "FSIS Documentation of Poultry Inhumane Handling Incidents."

USDA Recognizes the Increased Risk of Salmonella in Inhumane Practices and Does Little to Regulate Live Bird Handling

USDA understands the connection between poor welfare in live bird handling and the risk of foodborne pathogen contamination: in 2010, USDA's Agricultural Research Service (ARS) reported that "exposure of farm animals to stressors will lead to increased levels of foodborne pathogens in the gastrointestinal tract, and increased risk of contamination of their carcasses … [thus,] stress in farm animals has a significant deleterious effect on food safety through different potential mechanisms affecting the susceptibility of farm animals to infections as well as the carriage and shedding of foodborne pathogens."[52]

Inhumane treatment of birds is a hallmark of the poultry industry at every stage of production, including breeding birds for fast growth and weight gain, housing them in high-density confinement settings, and slaughtering them in high-speed slaughter facilities.[53] Birds are routinely mistreated in part because there are no federal humane handling requirements for animals in the poultry industry—the Humane Methods of Livestock Slaughter Act sets standards for "humane slaughter," but excludes farmed birds.[54]

In September 2005, following several years of public attention to the abuse of live birds at slaughter, the USDA issued a notice reminding poultry slaughter establishments that "under the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with 'good commercial practices' (GCPs), which means they should be treated humanely."[55] The notice stated: "Although there is no specific federal humane handling and slaughter statute for poultry, under the PPIA, poultry products are more likely to be adulterated if, among other circumstances, they are produced from birds that have not been treated humanely, because such birds are more likely to be bruised or to die other than by slaughter."[56]

Following publication of the notice, FSIS in-plant inspectors began reviewing live bird handling and documenting regulatory violations of GCPs. A Noncompliance Record (NR) can be filed if the inspector observes:

- An ongoing pattern or trend of birds dying other than by slaughter (e.g., repeatedly entering the scalding tank while still breathing); AND
- An ongoing pattern or trend of birds not being appropriately bled out (e.g., as evidenced by equipment malfunction that results in increased numbers or clusters of cadavers being disposed of or condemned); OR
- An ongoing pattern or trend of birds being intentionally and repeatedly mistreated by establishment personnel.[57]

52 Marcos H. Rostagno, "Can Stress in Farm Animals Increase Food Safety Risk?" *Foodborne Pathogens and Disease* 6, no. 7 (2009): 767-76.

53 Animal Welfare Institute (AWI), "The Welfare of Birds at Slaughter in the United States: The Need For Government Regulation," November 2020; B.Y. Kwon, J. Park, D.H Kim, and K.W. Lee, "Assessment of Welfare Problems in Broilers: Focus on Musculoskeletal Problems Associated with Their Rapid Growth," *Animals (Basel)* 14, no. 7 (2024): 1116; Sara Shields and Michael Greger, "Animal Welfare and Food Safety Aspects of Confining Broiler Chickens to Cages," *Animals (Basel)* 3, no. 2 (2013): 386-400.

54 AWI, "The Welfare of Birds at Slaughter in the United States," 2020 (3rd Edition). See USDA National Agricultural Library, "Humane Methods of Livestock Slaughter Act."

55 USDA-FSIS, "Treatment of Live Poultry Before Slaughter," *Federal Register,* Vol. 70, No. 187, Sept. 28, 2005, 56624-56626.

56 USDA-FSIS, "Treatment of Live Poultry Before Slaughter."

57 USDA-FSIS, "Verification of Poultry Good Commercial Practices," July 3, 2018

When an inspector identifies one of these "ongoing patterns," they can make a determination that the plant may be "out of control," which can be grounds for an NR.[58] However, FSIS does not provide clear specifications for what constitutes a "pattern" versus an "isolated instance."

Memorandums of Interview (MOI) are issued when there is 'an isolated incident of poultry mistreatment' or "an unusually high number of injuries to the birds, e.g., broken legs or wings, but there is no evidence of intentional mistreatment."[59] The FSIS notice provides examples of what may warrant an MOI but does not rise to the level of an NR. The agency notes that the following are *not prohibited practices,* but can be cause for issuing an MOI:

- Establishment employees breaking the legs of birds to hold the birds in the shackle, squeezing them into shackles or otherwise mishandling birds while transferring them from the cages to the shackles;
- Birds frozen inside the cages or frozen to the cages themselves in cold weather; or
- Birds dying from heat exhaustion, the main observable symptom of which is heavy panting in poultry, in addition to dead or dying birds in cages.[60]

FSIS, in its "Compliance Guideline for Controlling Salmonella in Raw Poultry," discusses the importance of live bird handling in preventing contamination: "Pre-harvest interventions and practices can prevent or reduce *Salmonella* colonization of live birds, increasing the effectiveness of post-slaughter interventions and establishment controls. … Using the interventions and best practices recommended in this guideline can help to provide for animal welfare and bird health at pre-harvest, thereby reducing stress in poultry and reducing *Salmonella* in birds presented at slaughter."[61] And yet, it is clear from the GCP standards that FSIS allows for the routine suffering of birds endemic to the industry. These standards mean that the poultry industry can operate with very little oversight or accountability for the abuse of birds, which not only violates animal welfare but also cultivates the conditions for salmonella to flourish and spread.

58 USDA-FSIS, "Verification of Poultry Good Commercial Practices."
59 USDA-FSIS, "Verification of Poultry Good Commercial Practices."
60 USDA-FSIS, "Verification of Poultry Good Commercial Practices."
61 USDA-FSIS, "FSIS Guideline for Controlling Salmonella in Raw Poultry," July 2021.

Top Retail Companies and AMS Suppliers Violate Humane Handling and Salmonella Performance Standards

We compared FSIS GCP live handling records and FSIS salmonella testing records to determine the relationship between humane handling violations and salmonella contamination. Due to the very low number of GCP records (noted in **Figure 8**), we believe that inhumane incidents are likely grossly underreported by FSIS inspection personnel and, consequently, GCP records may not be a reliable measure of bird handling at federal slaughtering establishments.

Figure 8: FSIS Documentation of Poultry Inhumane Handling Incidents

Year	# of Total GCP Records*	# of Poultry Slaughter Plants	# of GCP Records Per Plant
2017	459	320	1.43
2018	509	320	1.59
2019	411	370	1.11
2020	392	370	1.06
2021	364	349	1.04
2022	231	347	0.67
2023	212	347	0.61
2024	182	361	0.50

* Good Commercial Practice (GCP) Records include Noncompliance Records (NRs) and Memorandums of Interview (MOIs).

Note: This table presents the total number of GCP records (MOIs and NRs combined) issued by FSIS from 2017 through 2024. The number of records issued per plant was calculated by dividing the total number of records by the number of federally-inspected slaughter plants. This number varied from a high of 1.59 records/plant in 2018 to a low of 0.50 records/plant in 2024.

Sources: AWI, "The Welfare of Birds at Slaughter in the United States;" AWI, "The Welfare of Birds at Slaughter in the United States," 2023 (4th Edition); USDA-FSIS, "Poultry Good Commercial Practices Inspection Task Data;" USDA-FSIS, "Frequently Requested Records Service."

In commenting on the number of GCP records per slaughter plant, the Animal Welfare Institute has noted:

> "This number is extremely low, particularly given the high volume of poultry slaughter in the United States. Consequently, AWI views GCP records as an unreliable measure of the humaneness of poultry slaughter. This position is supported by the finding that 45 percent of US poultry slaughter plants were issued no records related to the humane treatment of birds from 2020 through 2022 …, during which time some of these plants slaughtered millions of birds…. The haphazard manner in which the USDA administers GCP is not surprising, given that the standards for inspection are intended only as guidance, meaning that compliance on the part of the industry is merely voluntary."[62]

Even with such a low number of GCP records, Farm Forward was able to identify at least nine major companies selling retail poultry products had at least one plant with both Category 3 ratings and excessive humane handling violations from 2020 to 2024: **Cargill, Foster Farms, Lincoln Premium Poultry, Perdue, Pitman Farms, Case Farms, New Market Poultry, Pine Creek Processing, and Pine Manor** (see **Figure 9**).

62 AWI, "The Welfare of Birds at Slaughter in the United States," p. 7.

Figure 9: Category 3 Plants with Excessive* Inhumane Handling Incidents (2020-2024)

Company Name	Plant No.	City, State	Year	# of GCP Records
Cargill Meat Solutions	P18	Dayton, VA	2022	7
			2023	10
Case Farms	P15724	Winesburg, OH	2022	7
Foster Farms Poultry	P6137	Livingston, CA	2023	5
	P6164A	Kelso, WA	2024	4
Lincoln Prem Poultry	P48304	Fremont, NE	2020	11
New Market Poultry	P4602A	New Market, VA	2020	4
			2023	5
			2024	5
Perdue Foods	P1243	Rockingham, NC	2020	9
			2021	11
			2022	7
			2024	4
Pine Creek Processing	P45525	Ridgeland, WI	2023	5
Pine Manor	P39	Orland, CA	2020	5
Pitman Farms	P27389	Sanger, CA	2020	4

* The average number of GCP records per plant per year ranges from 0.5 to 1.6. "Excessive" is being defined as 4 or more records in one year.

Source: USDA-FSIS, "Poultry Good Commercial Practices Inspection Task Data;" USDA-FSIS, "Frequently Requested Records Service: Records Related to Good Commercial Practices."

Cargill's P18 plant in Dayton, VA—assessed as Category 3 for 60 out of 60 months—has had numerous inhumane handling incidents, such as:

> On 10/12/2023 at approximately 15:42 while performing a routine Poultry Good Commercial Practices task, I, SPHV Dr. REDACTED, observed a live turkey hen on B-line about to enter the scalder. The hen was slightly larger than the others in the lot. The hen had its head and neck turned and slightly raised, and was spontaneously blinking and rhythmically breathing. There was a shallow cut on the neck, but it was not deep enough to facilitate thorough bleeding of the carcass and death before entering the scalder.[63]

This Cargill plant supplies poultry for both retail markets and AMS purchases. Comparison of FSIS GCP bird handling records with AMS poultry purchase awards reveals multiple examples of AMS purchasing products from companies been cited by FSIS for bird handling concerns, despite AMS's product specifications related to the handling of live birds at the slaughter plant:

- "All harvesting activities shall comply with all applicable Food Safety and Inspection Service (FSIS) regulations and requirements, including 9 CFR § 381, and shall be done under FSIS inspection"; and
- "All poultry shall be humanely handled in accordance with FSIS Directive 6110.1 Verification of Poultry Good Commercial Practices."[64]

Despite these humane handling specifications, AMS has continued to purchase products from companies with documented humane handling violations.[65]

In some cases, AMS purchases originated from slaughtering establishments with a record of excessive inhumane handling incidents within 12 months of the purchase award.

Foster Farms' Livingston, CA, plant, for example—which also supplies poultry for retail markets—had at least six separate inhumane handling incidents within 12 months of the purchase date, a period when the company also received Category 3 ratings for this plant (see **Figure 10**).[66]

63 USDA-FSIS, Memorandum of Interview (MOI) issued to Cargill (P18), "Inspection Task Data," October 12, 2023.
64 USDA-AMS, "Product Specifications & Requirements." 9 CFR 381 includes a provision requiring that poultry be slaughtered in a manner that ensures breathing has stopped prior to scalding.
65 Note: A significant portion of AMS poultry purchases come from wholesalers or distributors, and the identity of the slaughtering plant was not known because that information is not provided on the purchase award. Thus, our analysis is based only on companies selling directly to AMS.
66 AMS has continuous access to the FSIS humane handling records, which are posted every quarter on the FSIS website.

Figure 10: AMS Purchases from Foster Farms Plant in Livingston, CA (P6137) (2021-2023)

Purchase Award Date	Inhumane Handling Incidents Within 12 Months of Purchase Award	Purchased Product	Product Quantity	Product Value
5/12/2023	4/4/2023, 2/28/2023, 2/26/2023, 2/2/2023, 12/14/2022, 12/6/2022, 6/10/2022	Whole chicken	279,800 cases	$671,042
12/6/2022	6/10/2022, 4/11/2022, 1/27/2022, 1/23/2022, 1/6/2022, 1/3/2022	Whole chicken	198,000 lbs.	$297,396
9/22/2022	6/10/2022, 4/11/2022, 1/27/2022, 1/23/2022, 1/6/2022, 1/3/2022, 12/30/2021, 11/26/2021	Chicken legs	1,254,000 lbs.	$913,656
5/26/2021	5/10/2021, 4/9/2021, 10/15/2020, 9/17/2020, 8/28/2020, 8/14/2020	Whole chicken	752,400 lbs.	$829,620
5/14/2021	5/10/2021, 4/9/2021, 10/15/2020, 9/17/2020, 8/28/2020, 8/14/2020	Whole chicken	79,200 lbs.	$99,792

Sources: USDA-AMS, "Purchase Programs: Solicitations & Awards | Agricultural Marketing Service;" USDA-FSIS, "Poultry Good Commercial Practices Inspection Task Data;" USDA-FSIS, "Frequently Requested Records Service."

Foster Farms' Kelso, WA plant (P6164A)—supplying both retail markets and AMS—also has been rated Category 3 multiple times and cited for excessive inhumane handling incidents, including:

> On February 29, 2024, at approximately 11:05am I, the SCSI (accompanied with a Food Inspector) observed a poultry mistreatment event not consistent with Good Commercial Practices (GCPs) at establishment #P6164A.
>
> While observing the stunned and exsanguinating carcasses entering the scalder the Food Inspector observed a bird that was still alive and conscious. The bird turned its head towards the Food Inspector as the bird entered the scalder. There was no employee stationed at that location during the time of the observation. The SCSI and The Food Inspector followed the bird through the scalder and picking machines and then removed it from the line at the Pre-Sorter location. The carcass exhibited obvious signs of being alive when it entered the scalder. The carcass was red with blood pooling in the neck and head. No cut was observed on the bird's neck. There was minor injury to the lower portion of the bird's beak/jaw, insufficient to ensure a thorough bleed out. … The Poultry Products Inspection Act (PPIA) and Title 9 Code of Federal Regulations (CFR) Part 381.65 require that live poultry must be treated in a manner consistent with Good Commercial Practices and result in thorough bleeding of the carcass and ensure breathing has stopped prior to scalding.[67]

Nearly all of GCP standards are suggestions for humane handling; they are non-regulatory, and thus, unenforceable. As such, they allow for a significant level of inhumane handling (as illustrated in guidelines for what rises to the level of an NR and MOI). Addressing salmonella requires meaningful implementation of enforceable GCP standards, including mandating strict adherence to humane handling requirements and penalties for failing these standards. The current GCP framework needs urgent policy reform to more meaningfully ensure animal welfare and food safety.

67 USDA-FSIS, Memorandum of Interview (MOI) issued to Foster Farms (P6164A), "Inspection Task Data," February 29, 2024.

CONCLUSION & RECOMMENDATIONS

In light of the persistently high rates of salmonella in both the retail market and AMS purchasing, substantial changes to USDA policy are necessary. Although USDA has maintained salmonella performance standards for poultry for 30 years, the agency has no effective enforcement mechanism. The agency requires testing and the posting of test results to encourage voluntary industry compliance with its standards, but issues no meaningful consequences for repeat offenses of excessive salmonella levels. Plants continue to operate without interruption, and contaminated products continue to be sold to consumers in retail settings and distributed to USDA federal nutrition assistance programs, like the National School Lunch Program and the Emergency Food Assistance Program. USDA has delegated responsibility for enforcing its salmonella standards to the poultry and food industries and to the American public, both of which are ill-equipped to perform the function. The industry has little incentive to control salmonella in its plants, and most consumers are not aware of the salmonella verification program and would not know how to access relevant reports to make an informed decision about what they are purchasing. Even if individuals are able to locate the posted salmonella ratings, it is difficult to understand the implications of the information and how it relates to the poultry products sold by major brands at local grocers. For salmonella performance standards to be meaningful and relevant in reducing foodborne contamination, and to protect the American public from foodborne salmonella, Farm Forward urges the federal government to take the following actions:

1. **Re-publish the August 2024 proposed Salmonella Framework for Raw Poultry and declare salmonella at certain levels to be an adulterant, in effect prohibiting poultry companies from selling salmonella-contaminated products**
2. **Enforce compliance with existing FSIS salmonella performance standards in AMS commodity procurement purchase specifications, and cease purchasing poultry from plants with excessive salmonella contamination**
3. **Expand AMS's zero tolerance standards for salmonella currently in place for boneless and ground beef, diced cooked chicken, and egg products to include raw poultry products**
4. **Investigate the extent of the association between inhumane handling at the slaughter plant and salmonella levels, adopt strong and enforceable GCP regulatory requirements for the handling of live birds, and include strict requirements for handling of live birds in any future salmonella regulation**
5. **Abide by existing humane bird handling requirements for poultry products purchased by AMS for federal nutrition assistance programs**

These recommendations are first steps to address the problem of salmonella contamination in poultry. They are *the bare minimum* requirements for protecting public health. Until these policies are implemented, salmonella will likely continue to contaminate our food supply and cause more than a million illnesses and more than 400 deaths in the United States, each year.

APPENDICES

Appendix A: Timeline of Key Policy Developments in Salmonella Regulation

July 1996 FSIS establishes a testing program for salmonella as part of the newly passed "Pathogen Reduction: Hazard Analysis and Critical Control Point Systems" (HACCP) rule. The HACCP framework requires poultry slaughter and processing plants to reduce salmonella contamination in poultry, and enables FSIS to verify whether poultry slaughter and processing plants have effective controls in place to limit the spread of the pathogen.[68]

Feb 2016 FSIS passes new salmonella "performance standards," a three-category rating system for evaluating and tracking the level of salmonella contamination in poultry plants. The agency announces that it will begin posting results of its inspections to indicate the category rating for each plant.[69]

Nov 2018 FSIS confirms its plan to post the results of its salmonella testing on its website and announces that this data will be updated monthly with the category ratings for each plant.[70]

Oct 2021 FSIS begins to gather information to inform its launch of a stronger, more comprehensive effort to reduce salmonella contaminations in poultry products.[71]

Oct 2022 FSIS releases a draft salmonella framework for raw poultry products that declares certain poultry products with unacceptable levels of salmonella as "adulterated," defined under the Poultry Products Inspection Act as being unsafe and/or produced under unsanitary conditions. Classifying salmonella as an adulterant would give FSIS the power to stop products with certain levels of contamination from entering the food supply.[72]

May 2024 FSIS follows up on its 2022 draft framework, proposing that not-ready-to-eat breaded stuffed chicken products that contain salmonella at certain levels should also be considered adulterated. FSIS sets a final determination date of May 1, 2025 for the new proposal.[73]

Aug 2024 FSIS releases a formal salmonella framework that establishes standards under which raw poultry with certain levels of salmonella can be considered adulterated.[74]

68 USDA-FSIS, "Final Rule: Pathogen Reduction: Hazard Analysis and Critical Control Point (HACCP) Systems," *Federal Register,* Vol. 61, No. 144, 38806-38989.
69 USDA-FSIS, "Notice: New Performance Standards for *Salmonella* and Campylobacter in Not-Ready-to-Eat Comminuted Chicken and Turkey Products and Raw Chicken Parts and Changes to Related Agency Verification Procedures," *Federal Register,* Vol. 81, No. 28, Feb 11, 2016, 7285-7300.
70 USDA-FSIS, "Notice: Changes to the *Salmonella* and Campylobacter Verification Testing Program: Revised Categorization and Follow-Up Sampling Procedures," *Federal Register,* Vol. 83, No. 218, Nov 9, 2018, 56046-56049.
71 USDA-FSIS, "Proposed Rule and Proposed Determination: *Salmonella* Framework for Raw Poultry Products," *Federal Register,* Vol. 89, No. 152, Aug 7, 2024, 64678-64748.
72 USDA-FSIS, "Proposed Rule and Proposed Determination: *Salmonella* Framework for Raw Poultry Products."
73 USDA-FSIS, "Final Determination: *Salmonella* Not Ready-to-Eat Breaded Stuffed Chicken Products," *Federal Register,* Vol. 89, No. 85, May 1, 2024, 35033-35053.
74 USDA-FSIS, "Proposed Rule and Proposed Determination: *Salmonella* Framework for Raw Poultry Products."

Apr 2025 FSIS announces it is delaying, until November 2025, the proposal for declaring salmonella as an adulterant in not-ready-to-eat breaded and stuffed chicken products. FSIS also announces it is withdrawing the August 2024 proposed salmonella framework.[75]

July 2025 The USDA Secretary announces she is directing FSIS "to find a more effective and achievable approach to address salmonella in poultry products" that will "prevent unnecessary regulatory overreach."[76]

75 USDA-FSIS, "Notice of Withdrawal: *Salmonella* Framework for Raw Poultry Products," *Federal Register,* Vol. 90, No. 79, Apr 25, 2025.

76 USDA, "Secretary Rollins Announces New Plan to Bolster Meat and Poultry Safety, Press Release No. 0169.25," July 15, 2025. While it is encouraging that USDA is interested in pursuing new approaches to address salmonella contamination, it is unclear what this might entail, given that FSIS has acknowledged it does not currently have authority to take any administrative actions related to salmonella contamination other than requiring additional testing.

Appendix B: Individual Poultry Plants Rated as Category 3 in Multiple Years (2020-2024)

Company Name	Plant No.	City, State	Type of Product	Years in Category 3 (2020-2024)
Adesa International LLC	P44127	Ontario, CA	Chicken parts	2022, 2023, 2024
Al-Kawthar Poultry LLC	P48466	Stevens, PA	Whole chicken	2022, 2023, 2024
Allen Harim Foods LLC	P46338	Millsboro, DE	Chicken parts	2020, 2021, 2022, 2023
B & R Meat Processing	P46910	Winslow, AR	Whole chicken, chicken parts	2021, 2022, 2023, 2024
Bachoco OK Foods	P165M	Muldrow, OK	Chicken parts	2020, 2021, 2022, 2023, 2024
Baffoni's Poultry Farm Inc	P9378	Johnston, RI	Whole chicken	2020, 2021, 2022, 2023, 2024
Butterball LLC	P8727	Carthage, MO	Turkey parts	2020, 2021, 2022, 2023, 2024
Butterball LLC	P7345	Mount Olive, NC	Turkey parts	2020, 2021, 2022, 2023, 2024
Butterball LLC	P46870	Raeford, NC	Turkey parts	2021, 2022, 2023, 2024
Campo Lindo Farms	P27297	Lathrop, MO	Whole chicken	2020, 2023, 2024
Cargill Meat Solutions	P18	Dayton, VA	Turkey parts	2020, 2021, 2022, 2023, 2024
Cargill Meat Solutions	P963	Springdale, AR	Turkey parts	2020, 2021, 2022, 2023, 2024
Common Wealth Poultry Co	P45465	Gardiner, ME	Whole chicken, chicken parts	2020, 2021, 2022, 2023
Cooks Venture Poultry Inc	P689	Jay, OK	Whole chicken, chicken parts	2020, 2021, 2022, 2023
David Elliot Poultry Farm Inc	P134	Scranton, PA	Whole chicken, chicken parts	2020, 2021, 2022, 2023, 2024
Dupont Market, dba Grimaud	P1838B	Stockton, CA	Whole chicken	2021, 2022, 2023, 2024
Foster Poultry Farms LLC	P157	Turlock, CA	Turkey parts	2022, 2023, 2024
Gold Creek Processing LLC	P44935	Gainesville, GA	Chicken parts	2020, 2021, 2022, 2023
Halpern's Steak and Seafood	P8328	Ft Lauderdale, FL	Chicken parts	2020, 2021, 2023
Heatherfield Foods Inc	P4846	Ontario, CA	Chicken parts	2020, 2021, 2024
HEB Meat Plant	P7231	San Antonio, TX	Chicken parts	2022, 2023, 2024
Holly Poultry LLC	P1305	Baltimore, MD	Chicken parts	2021, 2022, 2024
Ihsan Farms LLC	P46897	Princess Anne, MD	Whole chicken, chicken parts	2020, 2021, 2022, 2023, 2024
J & Q Food Inc	P45457	Ft Worth, TX	Chicken parts	2020, 2022, 2023, 2024
James River Correctional Ctr	P31843	State Farm, VA	Chicken parts	2020, 2021, 2022, 2023, 2024
Joyce Foods Inc	P7428	Winston Salem, NC	Chicken parts	2020, 2021, 2022, 2023

King & Sons Poultry Service Inc	P45819	Bradford, OH	Whole chicken	2021, 2022, 2023
Koch Foods of Cumming, GA	P19378	Cumming, GA	Chicken parts	2020, 2021, 2022, 2023, 2024
La Belle Farm Inc	P19150	Ferndale, NY	Whole chicken, chicken parts	2021, 2022, 2023, 2024
Lincoln Premium Poultry	P48304	Fremont, NE	Whole chicken	2020, 2021, 2022, 2023, 2024
Locust Point Farms LLC	P39915	Elkton, MD	Whole chicken, chicken parts	2022, 2023, 2024
Martin's Specialty Sausage Co	P5351	Mickleton, NJ	Chicken parts	2020, 2021, 2023, 2024
Michigan Turkey Producers Coop	P20935	Wyoming, MI	Turkey parts	2020, 2023, 2024
New Market Poultry LLC	P4602A	New Market, VA	Chicken parts	2020, 2023, 2024
Palmetto Pigeon Plant Inc	P211	Sumter, SC	Whole chicken	2020, 2022, 2023, 2024
Pelleh Poultry Corp	P44121	Swan Lake, NY	Whole chicken, chicken parts	2020, 2021, 2022, 2023, 2024
Perdue Foods LLC	P2178	Georgetown, DE	Chicken parts	2020, 2021, 2022, 2023, 2024
Perdue Foods LLC	P1243	Rockingham, NC	Chicken parts	2020, 2021, 2022, 2023, 2024
Perdue Foods LLC	P286	Washington, IN	Turkey parts	2020, 2021, 2022, 2023, 2024
Pine Creek Processing LLC	P45525	Ridgeland, WI	Whole chicken	2021, 2022, 2023, 2024
Pitman Farms	P27389	Sanger, CA	Chicken parts	2020, 2021, 2022, 2023, 2024
Pitman Farms (Moroni Turkey)	P1049	Moroni, UT	Turkey parts	2020, 2021, 2023
Plainville Brands LLC	P244	New Oxford, PA	Turkey parts	2020, 2021, 2022, 2023
Poultry Products of Manchester	P4089	Londonberry, NH	Chicken parts	2020, 2021, 2022
Roundy's Supermarkets Inc	P33997	Kenosha, WI	Chicken parts	2020, 2021, 2022
Samuel Holmes Inc	P1525	Everett, MA	Chicken parts	2021, 2022, 2023
The Best Bran	P40181	City of Industry, CA	Chicken parts	2020, 2021, 2022
Union Foods LLC	P34371	Rocky Mount, NC	Chicken parts	2020, 2022, 2023, 2024
Wabash Poultry Processing	P46248A	Forrest, IL	Whole chicken	2020, 2021, 2022, 2023, 2024
Windy Meadows Family Farm	P44992	Campbell, TX	Whole chicken, chicken parts	2020, 2021, 2022, 2023, 2024

* For one or more types of poultry products. According to FSIS "*Salmonella* Verification Testing Program Monthly Posting." in January of each year.

Source: USDA-FSIS, "*Salmonella* Verification Testing Program Monthly Posting." Sample collection periods: Dec 29, 2019 through Dec 26, 2020*; Jan 31, 2021 through Jan 29, 2022; Jan 30, 2022 through Jan 28, 2023; Jan 29, 2023 through Jan 27, 2024; Jan 28, 2024 through Jan 25, 2025.

Appendix C: Recent Examples of Inhumane Handling Incidents at Plants that Have Received Category 3 Ratings

George's Foods

"At approximately 21:05 on 4/12/2024 while performing a routine Poultry Good Commercial Practices task, I, SPHV Dr. REDACTED, observed a live hang employee forcefully throw a live chicken against the wall behind him. After being thrown against the wall, the chicken lay in sternal recumbency on the floor behind the live hang belt with a rapid respiration rate, appearing to be in respiratory distress. This is an instance of mistreatment of live poultry."

-Memorandum of Interview issued to George's Foods (P2186) on Apr. 12, 2024

"I observed the birds entering the scalder for a minute or so. I did not see any birds that were not cut, but I saw three that flapped their wings vigorously when they entered the scalder water. CSI REDACTED and I then went to the exit end of the first picking machine to observe carcasses that had exited the scalder. In a two-minute interval, I observed nine carcasses that had the bright red color on the skin of the head, neck, backside and tail that is characteristic of a cadaver carcass. I inspected the neck of each of these and found that each had been cut, but only superficially, so that they did not bleed out thoroughly. At approximately 9:21, I informed Mr. REDACTED of these findings. CSI REDACTED and I returned to the exit end of the first picking machine and resumed inspection of carcasses exiting the scalder. In a six-minute interval, I observed 13 carcasses that had been cut superficially and had not bled out thoroughly. At the end of this time (at 9:30), the last of the carcasses to be killed before lunch break exited the scalder …"

-Memorandum of Interview issued to George's Food (P2186) on Nov. 26, 2024

Cargill Meat Solutions

"I observed the following: 2nd to the bottom and 2nd stack to the last to the end of the trailer was a turkey neck and head hanging through the cage of a space of 2 inches between bars. The neck of the turkey was broken, and the turkey was dead. There were also multiple birds, no fewer than 7 that were bleeding. There was blood on the feathers of their wings close to the skin and on their feet, and on their chest and necks. … [E]ach cage along the inside tracks were sharp to the touch and too many to count sharp metal triangular spikes on the bottom of the metal track which runs along the center of all the cages I had observed. ... These sharp metal spikes are at a height where the live birds could have easily bumped into them causing them to be harmed, especially when the cages are [as] full as these were."

-Memorandum of Interview issued to Cargill Meat Solutions (P963) on Apr. 4, 2024

Foster Farms

"While observing the stunned and exsanguinating carcasses entering the scalder, the CSI observed the establishment employee stationed just prior to the scalders shut the line off and remove a live bird from the line and take it back to the live hang area. After the employee returned to their station and turned the line back on, the CSI observed a bird still alive and conscious lifting its head and turning it from side to side looking at its surroundings just before it entered the scalder. … The carcass exhibited obvious signs of being alive when it entered the scalder."

-Memorandum of Interview issued to Foster Poultry Farms (P6164A) on Mar. 21, 2024

Source: USDA-FSIS, "Poultry Good Commercial Practices Inspection Task Data."

Appendix D: Examples of Inhumane Handling Incidents at the Largest AMS Chicken Suppliers

"On Friday, October 13, 2023, at approximately 1430 hours, while performing a poultry good commercial practices task in response to a power outage, CSI REDACTED observed approximately 75 birds still submerged in the stunners among the REDACTED lines. The birds were limp and lifeless. The power went out at approximately 1315 hours and did not return until approximately 1415 hours. … Production did not resume until approximately 1435 hours. CSI REDACTED confirmed with Evisceration Supervisor REDACTED that no birds were removed from the line during this time. … So, the approximately 75 birds were left upside down in the shackles with their heads submerged under the water in the stunners for approximately 1 hour and 20 minutes. During this time, they ceased breathing and died by means other than slaughter."

-Memorandum of Interview issued to Tyson Foods (P1) on Oct. 13, 2023

"At approximately 1235 am on Friday, January 19, 2024, while performing a good commercial practice check in the live hang room I observed the following. Two employees hanging live chickens on line 1 were repeatedly using excessive force to hang the birds in the metal shackles. The employees were using a rapid downward motion slamming the bird's legs into the leg loops of the shackles. After observing this same forceful technique used on several birds, I left the live hang area in search for a supervisor."

-Memorandum of Interview issued to Foster Poultry Farms (P33900) on Jan. 18, 2024

"I observed the following: 2nd to the bottom and 2nd stack to the last to the end of the trailer was a turkey neck and head hanging through the cage of a space of 2 inches between bars. The neck of the turkey was broken, and the turkey was dead. There were also multiple birds, no fewer than 7 that were bleeding. There was blood on the feathers of their wings close to the skin and on their feet, and on their chest and necks. … [E]ach cage along the inside tracks were sharp to the touch and too many to count sharp metal triangular spikes on the bottom of the metal track which runs along the center of all the cages I had observed. ... These sharp metal spikes are at a height where the live birds could have easily bumped into them causing them to be harmed, especially when the cages are [as] full as these were."

-Memorandum of Interview issued to Cargill Meat Solutions (P963) on Apr. 4, 2024

"While performing Poultry Good Commercial Practice verification task ... I observed a large white pipe split in two allowing clear liquid running quickly like a small waterfall onto the empty cages over cage dumper 2. The liquid was flowing hard enough to splash into the full cages possibly inducing suffocation of the birds in the direct path of the liquid. I immediately took regulatory control by having the establishment to stop the cage dumper. It took 20 minutes to correct the issue."

-Memorandum of Interview issued to Pilgrim's Pride (P855) on Mar. 5, 2024

"While observing the stunned and exsanguinating carcasses entering the scalder, the CSI observed the establishment employee stationed just prior to the scalders shut the line off and remove a live bird from the line and take it back to the live hang area. After the employee returned to their station and turned the line back on, the CSI observed a bird still alive and conscious lifting its head and turning it from side to side looking at its surroundings just before it entered the scalder. … The carcass exhibited obvious signs of being alive when it entered the scalder."

-Memorandum of Interview issued to Foster Poultry Farms (P6164A) on Mar. 21, 2024

"On 8/29/24, I SCSI REDACTED while performing the Good Commercial Practices verification task at approximately 10:00 pm., observed 1 live bird in the DOA vat in the picking room area of the establishment. The live bird's head and feet were partially covered with DOAs, and it was observed gasping for air. I asked the plant attendant to remove the bird from under the DOA birds. The bird was observed to be alert with head raised and eyes blinking."

-Memorandum of Interview issued to Pilgrim's Pride (P1353) on Aug. 29, 2024

"At approximately 1735 hours on July 1, 2024, after observing the unloading of live bird cages from the trailer and the cage dumping operations, I returned back into the live bird hanging area. I observed a weak bird, that was still alive, on the DOA conveyor belt. The bird was laying on its breast with its head resting on the belt. I then observed a plant employee strike the bird on the back of the head with a metal rod that is used to assist in the retrieval of birds when they are loose on the floor. After the bird was struck, I observed that it moved its head, wings, and legs, confirming that the bird was still alive. I immediately notified Mr. REDACTED … of my observation of the mistreatment of a live bird."

-Memorandum of Interview issued to Tyson Foods (P806) on July 2, 2024

Source: USDA-FSIS, "**Poultry Good Commercial Practices Inspection Task Data**."

"A driver in shipping ran a chicken over in the open shipping area. The bird was very visible to be seen by everyone outside and was healthy and unharmed before it happened … The plant failed to maintain humane conditions. This [is] not my first time seeing deceased birds during my GCP."

-Memorandum of Interview issued to Tip Top Poultry, Inc. (P1480) on Feb. 6, 2024

"CSI REDACTED was informed [the plant was] planning on running live test birds around 1200. USDA checked on the birds at 12pm, the birds appeared to be resting in comfort, not crowded, heaters on, with 4 DOA's being observed. … At approximately 1445 I was in Mrs. REDACTED office discussing if the live birds were going to be ran on the lines. … We were all informed at that time they were not going to test-run the live birds and they would be returned to the farm in Keota. At approximately 1515 [we] were informed that the birds had been caught the previous night at approximately 2000 hours and were approaching the 18hr mark of no food or water and that due to the cold conditions, there were numerous dead-on arrivals (DOA's) on the trailer. The outside temperature stayed in the low to mid 20's throughout the day."

-Memorandum of Interview issued to Bachoco O.K. Foods (P165H) on Jan. 20, 2024

"At approximately 21:05 on 4/12/2024 while performing a routine Poultry Good Commercial Practices task, I, SPHV Dr. REDACTED, observed a live hang employee forcefully throw a live chicken against the wall behind him. After being thrown against the wall, the chicken lay in sternal recumbency on the floor behind the live hang belt with a rapid respiration rate, appearing to be in respiratory distress. This is an instance of mistreatment of live poultry."

-Memorandum of Interview issued to George's Foods (P2186) on Apr. 12, 2024

AUTHOR & ACKNOWLEDGEMENTS

Farm Forward was founded in 2007 as the nation's first nonprofit devoted exclusively to end factory farming. We are a team of strategists, campaigners, and thought leaders guiding the movement to change the way our world eats and farms. More information about Farm Forward's work and our other publications can be found at farmforward.com.

This report was written by:

Dr. Kathryn Gillespie

Farm Forward's VP of Research and Strategy, Dr. Gillespie received her PhD from the University of Washington in Human Geography and is the author of several books, including *The Cow with Ear Tag #1389*.

Dena Jones was a contributing author and researcher.

Dr. Gillespie thanks Farm Forward staff Trevor McCarty and John Millspaugh for their essential contributions to this report.