

Comments Animal Welfare institute on Reinstatement.... ADR

FSIS requested comments on whether collection of information is necessary for proper performance

- AWI Supportive for collection of information because is important to educate public about food safety and is necessary for performance of FSIS duties
  - Promotes transparency number birds condemned for various causes
  - This information of interest to stakeholders
- Making information from establishment specific data bases (Establishment Specific Data Release Specific Plan, 80 FR 2093 (Jan 15, 2015) available to public promotes transparency and consistent with agency strategic plan to release establishment specific information
- FSIS IPP, as part of its duties monitors Good Commercial Practices (GCP). AWI has requested through FOIA the number of cadaver birds, but can't obtain the total number of birds in a lot because it is proprietary.
  - AWI suggests that obtaining information on number of "red birds" by requesting from plant to include this information on 6510-7 Poultry Lot Information – ***They are asking what is included on the form. The establishment does provide the Dead on Arrival (heads and weights) and heads and weights of antemortem condemned. It does not include the number of "red birds" (ones that do not bleed out properly—still breathing when enter scalded)***
- AWI suggests to use the number of "red birds" divided by total number head in a lot also could use to determine compliance with GCP--- *Therefore* encourages FSIS to include percentage in addition to raw numbers in its data ***FSIS does not determine compliance by a certain number or percentage of birds.***

In summary AWI supports reinstatement of approval of ADR and encourage FSIS to pursue means of enhancing quality and clarity of information collected