

# PUBLIC SUBMISSION

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**Docket:** FSIS-2025-0247

Notice of Request to Renew an Approved Information Collection: Advanced Meat Recovery

**Comment On:** FSIS-2025-0247-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Advanced Meat Recovery

**Document:** FSIS-2025-0247-0002

Comment from SUBMITTED BY OBELISK TECH SYSTEMS INC. ON MARCH 16, 2026 FOR OMB OIRA OIG AND GAO REVIEW

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## Submitter Information

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**Organization:** SUBMITTED BY OBELISK TECH SYSTEMS INC. ON MARCH 16, 2026 FOR OMB OIRA OIG AND GAO REVIEW

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## General Comment

FSIS-2025-0247 (AMR Advanced Meat Recovery — 21,159 hrs, 47 respondents):

FSIS-2025-0247 | OMB 0583-0130 | James Hunter Poole, CEO, Obelisk Tech Systems | CAGE: 9S0L8 | HUBZone | Thomasville, Georgia. EXTRAORDINARY BURDEN: 21,159 hours across only 47 respondents = 450 hours per establishment annually — more than 11 full work weeks of compliance time per establishment. FSIS renewing this with "no changes" and no modernization evaluation is a PRA burden minimization failure. AMR establishments conduct sophisticated analytical testing (calcium, iron, spinal cord, dorsal root ganglia) using instruments that generate structured electronic LIMS data — FSIS has not evaluated LIMS API integration to replace manual documentation. With only 47 establishments, FSIS could alternatively implement enhanced inspector verification protocols at all 47 sites, eliminating the establishment recordkeeping burden entirely. Laboratory testing supply costs entirely excluded from "no cost" claim — 450 hours x \$40/hr x 47 establishments = \$846,000 annual industry compliance cost. OIRA referral requested for 450-hour-per-respondent program renewal without modernization plan. Document attached.

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## Attachments

FSIS\_0247\_AMR\_AdvancedMeatRecovery