Public Comment — FSIS-2025-0247

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Re: Advanced Meat Recovery (AMR) Systems — Renewal
Agency: Food Safety and Inspection Service, USDA
Submitted: March 16, 2026

Submitted by:
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Obelisk Tech Systems Inc. submits this comment as a HUBZone-certified small business in Thomas County, Georgia. These comments address PRA deficiencies in the AMR information collection renewal — which imposes 21,159 annual burden hours on just 47 respondents, representing an extraordinary per-respondent burden of 450 hours annually.

I. Extraordinary Per-Respondent Burden — 450 Hours Per Establishment

FSIS estimates 21,159 total annual burden hours across only 47 respondents at 900 responses per respondent annually. This produces a per-respondent annual burden of 450.2 hours — more than 11 full work weeks per establishment. FSIS has not disclosed: the breakdown between written procedure development (annual), calcium/iron/spinal cord/dorsal root ganglia testing documentation (daily or per-lot), and product disposition records (daily). A collection imposing 450 hours of annual burden per respondent requires comprehensive justification, methodology disclosure, and modernization planning that is entirely absent from this renewal notice. FSIS is simply renewing an existing 450-hour-per-establishment annual burden with "no changes" and no modernization evaluation.

- 450 hours annually per establishment = 11+ work weeks of compliance time — among the highest per-respondent burdens in USDA information collections
- "No changes" renewal of a 450-hour burden program without modernization evaluation is a PRA compliance failure
- FSIS must produce a detailed breakdown of the 900 annual responses per respondent before OMB renewal

II. Technology Failure — Laboratory Testing Documentation Automation

AMR establishments are required to conduct daily or per-lot testing for calcium, iron, spinal cord, and dorsal root ganglia and document all test results. Modern laboratory information management systems (LIMS) generate structured electronic test records as a byproduct of analytical testing — including automated result capture from analytical instruments (ICP-OES for calcium/iron, PCR/immunoassay for neural tissue). FSIS has not evaluated whether LIMS API integration with FSIS reporting systems could replace manual documentation of testing results. Given that AMR establishments are conducting sophisticated analytical testing, they almost certainly operate LIMS infrastructure — FSIS should be leveraging this existing technology rather than renewing manual documentation requirements.

- LIMS integration would reduce testing documentation burden from manual record entry to automated result capture and transmission

- FSIS must survey AMR establishments on existing LIMS capabilities before renewing manual documentation requirements

III. Practical Utility — 47 Establishments, Existing Inspection Presence

With only 47 respondents, FSIS could conduct direct relationship-based compliance monitoring for this program — verifying AMR compliance through enhanced FSIS inspector protocols at the 47 affected establishments rather than requiring 450 hours of establishment self-documentation annually. FSIS inspectors are present at official establishments. A program of direct inspector verification for a 47-establishment universe may produce equivalent or superior compliance assurance with dramatically lower establishment recordkeeping burden. FSIS has not evaluated this alternative.

IV. Small Business Impact — 47 Respondents With 450-Hour Annual Burden

Among the 47 AMR establishments, there is certainly variance in size and administrative capacity — from large commercial processors with dedicated QA laboratories and compliance departments to smaller operations managing AMR compliance with limited staff. FSIS has not produced a size-stratified burden estimate despite the PRA and RFA requirements to do so. For smaller AMR operations, 450 hours of annual compliance burden represents a disproportionate administrative tax on a specialized processing capability.

V. Cost Reality — Laboratory and QA Staff for Testing Programs

FSIS states no cost beyond respondent time. AMR establishments conducting daily calcium, iron, spinal cord, and dorsal root ganglia testing bear direct costs: laboratory reagents and consumables, instrument calibration and maintenance, laboratory technician time at $35–60/hour, QA staff time for documentation review and corrective action at $40–70/hour. At 450 burden hours x $40/hour average QA/lab technician rate x 47 establishments = $846,000 in annual industry compliance labor cost — not counting direct testing supply costs. This is entirely excluded from FSIS's "no cost" claim.

VI. Recordkeeping Modernization and OIRA Referral

The AMR collection — 21,159 hours across 47 establishments — represents one of the highest per-respondent burden programs in FSIS's PRA portfolio. FSIS renewing this collection with "no changes" without a modernization plan, LIMS integration evaluation, or alternative compliance pathway analysis represents a failure to apply the PRA's burden minimization mandate. OIRA should require FSIS to produce a modernization roadmap for the AMR testing documentation program before approving renewal. The combination of LIMS integration, inspector verification alternatives, and electronic result submission could reduce per-establishment burden from 450 hours to under 100 hours annually.

Requested: FSIS must: (1) produce detailed breakdown of 900 annual responses per respondent; (2) survey AMR establishments on LIMS capabilities; (3) evaluate inspector verification alternative for 47-establishment program; (4) produce RFA size-stratified burden analysis; (5) include realistic laboratory cost estimates; (6) produce LIMS integration modernization roadmap before OMB renewal.