



May 26, 2026

Submitted via www.regulations.gov

Dr. Justin Ransom
Administrator
Food Safety & Inspection Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250-3700

RE: Request To Renew an Approved Information Collection: New Poultry Inspection System (Docket No. FSIS-2026-0067)

Dear Administrator Ransom:

Legal Impact for Chickens (LIC)¹ submits this comment in response to the U.S. Department of Agriculture (USDA) Food Safety & Inspection Service's (FSIS) request to renew the approved information collection regarding poultry slaughter inspection. LIC urges FSIS to collect cause-specific condemnation information from New Poultry Inspection System (NPIS) establishments. Changes in cause-specific condemnation reporting under the NPIS limit FSIS's ability to detect and respond to emerging disease risks and ensure that poultry products are safe, wholesome (not adulterated), and properly labeled. As discussed below, the utility of cause-specific information extends beyond statistical comparisons and can significantly aid FSIS in the detection and reporting of disease conditions to protect the public health. Collecting cause-specific information would also enhance the quality and clarity of the other information collected by closing a critical information gap.

¹ LIC is a 501(c)(3) nonprofit organization and California society for the prevention of cruelty to animals. LIC works to protect farmed animals by enforcing the law.

Since 2020, the USDA’s National Agricultural Statistics Service (NASS) has published reports showing a steep decline in condemnation categories such as “cadavers,” alongside a large increase in condemnations classified as “unknown.”² This is apparently the result of the NPIS, where establishment employees rather than federal inspectors perform much of the initial sorting, and specific causes of condemnation are often not recorded. Accordingly, the decline in cadavers is seemingly attributable to establishment employees failing to assign specific causes of condemnation to birds pulled from the line. As a result, birds who were previously categorized as “cadavers” are now being absorbed into the “unknown” category. The observed decline in cadavers is therefore likely attributable to a change in data collection and classification rather than any reduction in pre-slaughter mortality.

When cause-specific information is missing, early signs of disease—such as small increases in mortality or changes in bird condition—may go unnoticed or be buried within the “unknown” category. By failing to collect cause-specific information, FSIS cannot readily distinguish routine mortality from mortality that may be linked to disease or abnormal conditions. This further limits FSIS’s ability to identify trends and concerns that warrant closer scrutiny and weakens early detection, reducing the chance for timely intervention.

Unlike USDA’s inspection of non-poultry livestock, which includes explicit regulatory triggers for the identification and reporting of serious animal diseases,³ the poultry inspection system relies heavily on general antemortem observation and inspector judgment, supplemented by agency directives rather than codified requirements.⁴ In this context, any reduction in inspection visibility has heightened implications for the detection and reporting of disease conditions. And these signals are especially important for diseases of public health concern, including avian influenza and other respiratory or systemic infections. Even when imperfect, cause-specific information would allow FSIS and researchers to detect unusual patterns, compare outcomes across facilities, and determine when further investigation may be needed.

² See generally *Poultry Slaughter Annual Summary*, USDA, <https://esmis.nal.usda.gov/publication/poultry-slaughter-annual-summary> (last visited May 13, 2026) (providing public access to annual reports dating back to 2018).

³ See 9 C.F.R. § 309.15.

⁴ See FSIS Directive 6000.1 (addressing reportable and foreign animal diseases, applying to both poultry and other types of livestock, and requiring notification to the USDA’s Animal & Plant Health Inspection Service and coordination for outbreak response).



In sum, cause-specific condemnation information provides useful signals that can indicate underlying problems such as infectious diseases. As more condemnations are classified as “unknown,” the information becomes less useful, increases the likelihood that early signs of disease will go unnoticed, and reduces the opportunity for timely intervention. The present information gap of cause-specific condemnation impairs FSIS’s functions and abilities to protect public health and ensure that poultry products are safe, wholesome (not adulterated), and properly labeled. Because of the reasons stated herein, LIC urges FSIS to collect cause-specific information from NPIS establishments.

Sincerely,

A handwritten signature in black ink, reading "Ashely Monti". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Ashely Monti
Staff Attorney
Legal Impact for Chickens