

Some API users may have experienced issues where some field values were not populated between May 27th and May 29th. This issue was remediated the afternoon of May 29th.



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## Comment from Chekroun, Yamina-Sarah

Posted by the **Animal and Plant Health Inspection Service** on Jan 26, 2026

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I am writing as an attorney licensed in the state of New York to comment on the extension of information collection for the National Poultry Improvement Plan (NPIP) under Docket No. APHIS-2025-0703. While I recognize the necessity of disease surveillance to protect national agricultural interests, the NPIP's current administrative reliance on "depopulation" as a primary disease-control tool requires immediate evolution to meet modern animal welfare standards and constitutional principles of necessity.

Specifically, I urge APHIS to utilize this information collection period to revise NPIP Program Standards in the following ways:

**Prioritization of Non-Lethal "Off-Ramps":** The NPIP should collect data not only on destruction and indemnity but also on the viability of quarantine-and-release or sanctuary-diversion protocols. Under the current "U.S. Pullorum-Typhoid Clean" and "Avian Influenza Clean" compartments, healthy birds in proximity to an outbreak are often culled for administrative convenience. I advocate for a regulatory shift that requires an "Individualized Assessment" of flocks before lethal action is authorized.

**Legal Integration of Sanctuaries:** The NPIP should establish a formal registration category for Non-Production Animal Sanctuaries. Currently, the NPIP is designed for "breeding" or "slaughter" tracks. By creating a legal pathway for birds to be transferred to 501(c)(3) sanctuaries under strict quarantine, APHIS can fulfill its disease-control mandate without the unnecessary loss of life.

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Auditing Humane Standards: As the NPIP moves to audit biosecurity plans more strictly, these audits must also include Humane Handling and Euthanasia (HHE) protocols. The government's conditioning of indemnity on biosecurity should be matched by a requirement that any depopulation event—if absolutely unavoidable—meets the highest possible welfare standards to avoid "cruel and unusual" treatment under federal oversight.

Transparency in Mass-Culling Data: The information collection should explicitly require public reporting on the number of healthy, non-infected animals destroyed during "preemptive" culling operations. This transparency is a prerequisite for meaningful public comment and administrative accountability.

In conclusion, the NPIP must cease to be merely a mechanism for managing agricultural loss and begin to function as a framework for protecting the life and welfare of individual animals. Administrative efficiency must not supersede the ethical obligation to avoid unnecessary killing.

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