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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 submitting this comment as a licensed attorney in the State of New York to express my strong support for the continued and revised information collection regarding the Control of Chronic Wasting Disease (CWD).

The robust collection of data under this program is not merely an administrative exercise; it is a critical regulatory mechanism necessary to fulfill the USDA's mandate under the Animal Health Protection Act (7 U.S.C. 8301 et seq.). CWD represents a profound threat to the welfare of both captive and wild cervid populations. Given its 100% mortality rate and the environmental persistence of infectious prions, the absence of stringent traceability and herd certification standards would lead to catastrophic and inhumane outcomes for these species.

From a legal and animal welfare perspective, I support the extension of these information collection requirements for the following reasons:

Enforcement of Welfare Standards: The record-keeping requirements for the CWD Herd Certification Program (HCP) are the only effective means of monitoring animal health across state lines. This data allows APHIS to perform targeted interventions, thereby preventing the necessity of broad, reactive depopulation efforts that cause significant animal suffering.

Mitigation of Inhumane Outcomes: CWD causes a prolonged and agonizing neurological decline. Information collection that facilitates early detection and limits interstate transmission is a direct safeguard against the widespread proliferation of this suffering.

Statutory Compliance: Under the Paperwork Reduction Act, the agency must demonstrate the utility of this data. As an advocate for animal welfare, I assert that the "burden" of this information collection is far outweighed by its necessity in preventing a national animal health crisis. Accurate data is the condition precedent for any effective disease-mitigation strategy.

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I urge the Animal and Plant Health Inspection Service to not only extend this collection but to continuously refine these data points to ensure maximum efficacy in tracking and containing CWD. A robust regulatory framework is essential to protecting the biological integrity and welfare of the nation's cervid populations.

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