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Comment from Chekroun, Yamina-Sarah

Posted by the **Animal and Plant Health Inspection Service** on Jan 26, 2026[Docket \(/docket/APHIS-2025-0704\)](/docket/APHIS-2025-0704) / [Document \(APHIS-2025-0704-0001\) \(/document/APHIS-2025-0704-0001\)](/document/APHIS-2025-0704-0001)
/ [Comment](#)

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I am submitting this comment as a licensed attorney admitted to practice and in good standing in the state of New York to address the information collection associated with specimen submission for livestock disease surveillance. While accurate diagnostic testing is a prerequisite for national biosecurity, I urge the Agency to ensure that these collection protocols are utilized as a safeguard against the unnecessary destruction of non-infected animals.

From an administrative law and animal welfare perspective, I advocate for the following:

Mandatory Diagnostic Precedent: APHIS should prioritize the completion and verification of specimens (via VS Form 10-4) prior to issuing depopulation orders. The "preemptive culling" of animals before lab results are finalized is an extreme measure that should be restricted to cases of immediate and proven catastrophic risk. The current information collection should be used to track and minimize the lag time between sampling and results to spare healthy animals from unnecessary slaughter.

Chain of Custody for Sanctuary Off-Ramps: For animals intended for transfer to 501(c)(3) sanctuaries, the specimen submission process should include a "priority track." Ensuring that these animals can be quickly cleared of disease via rigorous testing allows the Agency to fulfill its health mandate while facilitating humane rehoming instead of destruction.

Humane Sampling Requirements: The instructions for specimen collection should explicitly mandate the use of the least invasive methods possible. Any professional nominated to collect specimens under this program must be certified in humane handling to ensure that the process of "surveillance" does not itself result in undue physiological stress or injury to the animal.

Verification of "Negative" Results: To ensure transparency, APHIS should include in this data collection a requirement to report the number of animals that were culled before a negative test result was returned. This data is essential for the public to evaluate whether the Agency's "take" of animal life is truly

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proportionate to the biological threat.

Accurate data is the only legitimate basis for government-sanctioned loss of animal life. This information collection must be a tool for precision, not a justification for broad-scale culling.

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