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Comment from Chekroun, Yamina-Sarah

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

[Docket \(/docket/APHIS-2025-0705\)](/docket/APHIS-2025-0705) / [Document \(APHIS-2025-0705-0001\) \(/document/APHIS-2025-0705-0001\)](/document/APHIS-2025-0705-0001)
/ [Comment](#)

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I am submitting this comment as a licensed attorney in admitted and in good standing in the state of New York to address the information collection associated with Animal Disease Traceability (ADT). While I support the administrative necessity of a robust traceability system, I urge the Agency to ensure that these data collection standards are leveraged specifically to minimize the lethal "depopulation" of animals during disease events.

A precise, high-resolution traceability framework should serve as a legal shield for non-infected animals. To that end, I propose the following:

Traceability as a Requirement for Non-Lethal Intervention: APHIS should formalize a "Traceability-to-Quarantine" protocol. In the event of an outbreak, the Agency should be required to use the data collected via this program to allow for the targeted quarantine and testing of individual animals rather than the immediate, broad-scale destruction of herds based on mere regional proximity.

Privacy and Sanctuary Protection: As the Agency refines its data collection on animal movements, it should include provisions to protect the status of animals moved to registered non-production sanctuaries. These animals should be exempt from "slaughter-track" traceability requirements and instead be integrated into a "lifetime-care" data category that prioritizes their continued welfare.

Accuracy Over Expediency: The "burden" of information collection is only justified if the data is used to prevent unnecessary animal loss. I advocate for the inclusion of "Disposition Data" in this collection—specifically tracking how many animals were saved or successfully rehomed due to successful trace-backs, rather than just tracking those sent to slaughter.

Accurate traceability is the only way to move our national animal health policy away from "emergency culling" and toward a scientifically sound, welfare-focused quarantine model.

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