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*Submitted electronically to [reorganization@usda.gov](mailto:reorganization@usda.gov)*

**Re: Secretary Memorandum: SM 1078-015, Department of Agriculture Reorganization Plan**

Dear Sir or Madam:

The National Chicken Council (NCC) appreciates the opportunity to provide comment on the United States Department of Agriculture's (USDA or the Department) "Department of Agriculture Reorganization Plan" released on July 24, 2025.<sup>1</sup> NCC represents vertically integrated companies that produce and process more than 95 percent of the chicken marketed in the United States. We support the Department's goal of optimizing the effectiveness of its functional areas, eliminating redundancy, and providing cost savings for Americans. We commend Secretary Rollins and her team for reevaluating the current Department structure to ensure efficient use of resources, preserve public safety, maintain critical oversight services provided by the Department, and minimize duplicative management layers.

NCC and our members work closely with the various branches of USDA, including the Agricultural Marketing Service (AMS), Agricultural Research Service (ARS), Animal and Plant Health Inspection Service (APHIS), Food Safety and Inspection Service (FSIS), and Foreign Agricultural Service (FAS). Together, they help ensure a safe supply of chicken and chicken products, safeguard the health of our birds, provide affordable chicken products through various feeding programs, promote exports, and support critical research needs, among many other objectives. Our members are regulated by several agencies within USDA – all of which are critically important for maintaining continuity of business. In these brief comments, we would like to highlight how collaboration, ongoing communication, and transparency between the industry and these agencies aid in ensuring the availability of safe, wholesome, and affordable chicken and chicken products, overcoming regulatory and disease challenges, and promoting the U.S. broiler chicken industry both domestically and internationally.

- **AMS:** AMS is critical to the U.S. broiler chicken industry. The agency provides regular and reliable market information that helps chicken companies and our customers make informed business decisions. AMS also provides grading services and maintains poultry standards, which help ensure the consistent and reliable supply of poultry products to the market. AMS also plays a vital role in shoring up markets and providing the needy with nutritious food through various commodity procurement programs. The team dedicated to commodity procurement is knowledgeable and responsive, and through years of collaboration, has built a strong relationship with industry participants. It is essential that this team is maintained at AMS, as they provide the unique skills necessary for procuring various agricultural products, which differ significantly from purchasing non-perishable goods. In addition, today's livestock and poultry contracting and marketing practices are regulated by AMS, which administers and enforces the

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<sup>1</sup> [Secretary's Memorandum: SM 1078-015](#).

Packers and Stockyards Act to protect farmers, ranchers, and consumers from anti-competitive practices.

- **ARS:** The dedicated researchers at ARS study a broad range of topics, including food safety, animal health and disease threats, and product quality. The research published by ARS is second to none, and the industry relies on our partnership with ARS leadership and their team to ensure that research is timely, useful, and aids in the overall success and improvement of the U.S. broiler chicken industry. Information provided by ARS helps the industry improve the food safety profile of chicken and chicken products, enhances the health of our chickens, and mitigates potential product quality issues.
- **APHIS:** NCC and our member companies work collaboratively with APHIS personnel, especially relying on the agency's leadership in animal health disease outbreaks, such as Highly Pathogenic Avian Influenza (HPAI) and Newcastle Disease in the U.S. The APHIS team is also critically important in maintaining our export markets, and their dedicated staff work tirelessly to ensure that chicken, chicken products, and breeding stock move seamlessly across our borders.
- **FSIS:** The presence of FSIS inspectors in our processing establishments is not only a statutory requirement, but it also ensures that product being produced is safe, wholesome, and properly labeled. Having routine access to Agency leadership aids in continuity of business, as some policy decisions need to be made promptly to avoid production disruptions. The team at FSIS maintains a unique skillset, and many employees have extensive institutional knowledge that is critical to the success of not only the U.S. broiler chicken industry but the Agency itself.
- **FAS:** The FAS staff work closely with our trading partners to ensure the seamless movement of agricultural products around the world. The multi-billion-dollar U.S. broiler chicken export market is a success story, and the team at FAS works not only to preserve our existing markets but also seeks to expand market access into other countries. Without the dedicated team at FAS, the movement of chicken and chicken products to international destinations would be negatively impacted.

The success of the broiler chicken industry is crucial to our nation's nutritional and economic well-being – providing a nutritious, safe, abundant, and affordable source of protein to both domestic and international consumers while supporting families, farmers, and the rural economy. USDA is uniquely positioned to aid in the overall success of American agriculture. Specifically for the U.S. broiler chicken industry, access to decision-makers within each of the aforementioned agencies is imperative for business continuity, to avoid disruptions in production, and to ensure that government policy and regulations meet their objectives without unduly burdening the industry with excessive red tape. Being able to meet face-to-face with those in key positions at USDA has proven especially important for building trust, addressing issues as they arise, and ensuring the success of the Department's critical mission areas. We urge the Department to maintain this important access. Many individuals working across the USDA possess a unique skill set that is honed specifically to address issues impacting the U.S. chicken industry, and many have decades of experience. They understand our business and our challenges, and we have appreciated the opportunity to work with these individuals over the years. We look forward to continuing these pivotal relationships.

In conclusion, NCC appreciates the opportunity to comment on the Department's reorganization plan. We hope these comments will be considered as USDA seeks opportunities to improve effectiveness, reduce regulatory burden, minimize redundancy, and make the Department more efficient overall. The USDA and the agencies housed within the department are critical to the effectiveness and efficiency of the U.S. broiler chicken industry and to maintaining business continuity. The services provided by USDA are second to none, supported by the many subject matter experts and institutional knowledge held by staff. We look forward to continuing to collaborate with the Department and its critical agencies to revitalize American agriculture and ensure chicken remains safe, affordable, and plentiful.

Please do not hesitate to contact us if we can provide additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ashley B. Peterson". The signature is fluid and cursive, with the first name "Ashley" being more prominent than the last name "Peterson".

Ashley B. Peterson, Ph.D.  
Senior Vice President, Scientific and Regulatory Affairs  
National Chicken Council