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Shanerika M. Flemings
Assistant Chief Counsel
Office of Advocacy
U.S. Small Business Administration
409 Third Street, SW
Washington, DC 20416

Re: National Chicken Council – USDA Regulations Impacting the U.S. Broiler Chicken Industry

Dear Ms. Flemings:

The National Chicken Council (NCC) appreciated the opportunity to participate in the U.S. Small Business Administration's (SBA) USDA Regulatory Small Business Roundtable in December 2025 and the opportunity to provide additional information regarding several USDA regulations that impact the small businesses we represent. NCC represents vertically integrated chicken companies that produce and process more than 95 percent of the chicken marketed in the United States. Our member companies encompass businesses of all sizes, and the broiler chicken industry is serviced by and supplies thousands of small businesses. The regulations that affect chicken production have substantial direct and indirect effects on small businesses across the country, and in particular on small businesses in rural areas. The small businesses associated with the broiler chicken industry provide the lifeblood of countless communities across America, and every dollar saved through reduced regulatory burdens goes directly into these communities. We appreciate your office's interest in our industry.

As the SBA identifies opportunities for regulatory reform, NCC urges your office to prioritize the rules discussed in our detailed comments below. These opportunities for regulatory reform are rooted in rules issued and pending actions by the U.S. Department of Agriculture's (USDA's) Agricultural Marketing Service (AMS), Animal and Plant Health Inspection Service (APHIS), and Food Safety and Inspection Service (FSIS). Although we support the agencies' missions to promote fair business practices, protect public and animal health, and ensure a safe food supply, each of these rules would or do impose unnecessary, costly, and unlawful regulatory burdens on industry – particularly small businesses. All these burdens would be realized without commensurate benefits to continuity of business, public and animal health, or the safety of the food supply. Further, as the Trump Administration seeks to drive down food prices for consumers, these regulations simply add cost to the small businesses that make up the industry and those that support it. These small businesses will be forced to pass on these unnecessary expenses onto consumers which will be reflected in the grocery store. Moreover, although several of these rules are not yet finalized, we believe that their substantial burdens warrant review and action. Addressing the issues described below will significantly advance President Trump's order to cut red tape, make sure agencies work within their statutory authorities, and help unleash the full potential of the U.S. chicken industry and the many small businesses that support it.

USDA-AMS: Packers and Stockyards Act (PSA) Rules

This suite of three Biden Administration rulemakings exceeds USDA's statutory authority and threatens to destroy livestock and poultry contracting practices. Two of them are particularly aimed at chicken production contracting, and they are projected to impose billions of dollars in economic harm by dismantling the highly efficient livestock and poultry production model. They are all but certain to drive food inflation. Specific deficiencies in each rule and impacts to small businesses are discussed below. More broadly, all three rules represent a gross regulatory overreach by the administrative state in clear violation of Supreme Court precedent. The rules ignore uniform precedent across all eight circuit courts of appeal to have heard the issue that there must be a showing of injury or likelihood of injury to competition to establish a violation of Section 202(a) or (b) of the PSA, and thus they exceed the authority conferred by the PSA and fail to reflect the best reading of the statute.¹ Moreover, by so fundamentally changing livestock and poultry contracting by imposing never-before-seen requirements, with costs reaching into the billions of dollars, the rules present a Major Question requiring Congressional action.² In fact, Congress has spoken against this suite of rules, and for years withheld funding to implement an earlier version of this rulemaking, which was finally repealed under the first Trump Administration. All three rules, as discussed further below, should be rescinded.

- **Name of the regulation:** Poultry Grower Payment Systems and Capital Improvement Systems³
- **What does the regulation require/restrict:** This rule, finalized in the last days of the Biden Administration and slated to go into effect on July 1, 2026, requires more onerous disclosures and forward-looking projections during the poultry contracting process. The rule creates out of thin air a tort-like obligation for integrators to follow certain steps when comparing growers, identifying and rewarding the best performers, and places a cap on the amount of bonus pay that any individual chicken grower can earn. This rule further impedes innovation and efficiency in chicken processing and, worse still, restricts the ability of high-performing farmers to reap the rewards of their labor. Finally, like the Transparency in Poultry Grower Contracting Rule, this rule would require many, if not most, chicken integrators to amend all their grower contracts prior to implementation. These mandated, serial contract amendments frustrate the principles of freedom to contract, create confusion for family farmers, and impose unnecessary, significant costs on the chicken industry. As previously stated, this rule is slated to take effect on July 1, 2026, so urgent and immediate action on this rule by USDA is needed.
- **Impact on small businesses:** This rule makes it much more difficult for high-performing family farmers to be fairly rewarded for their efforts with the outright cap on bonus payments. This makes raising chickens less appealing to the best farmers and reduces returns on the investments these farmers made on their land. Many farmers raise chickens to supplement other farming operations and reducing earnings risks destabilizing diversified farm incomes and undermining the agricultural economy in many parts of the country.
- **NCC's recommendation:** We urge the Administration to repeal this rule in its entirety. The rule will take effect on July 1, 2026, and, as such, the industry must start updating contracts soon, if they have not already begun to do so. Time for the repeal of this rule is of the essence.
- **How would this change benefit small businesses?** Repealing this rule would allow for the family farmer to be rewarded for their efforts and increase their return on investment. This will help

¹ *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024).

² *West Virginia v. EPA*, 597 U.S. 697 (2022).

³ 90 Fed. Reg. 5146 (Jan. 16, 2025).

secure the economic viability of the farmer and their families and increase the likelihood of the family farm to remain in the family to be passed down from generation to generation.

- **Are there other alternatives USDA should consider?** Even delaying the rule would cause harm by continuing the current uncertainty and forcing companies to guess whether to expend the substantial resources required to prepare for compliance.
- **Provide specific data, anecdotes, or information on compliance costs, burdens, or other impact:** This rule will require renegotiating every broiler production contract (tens of thousands of contracts), even though the industry just had to do that to comply with the Transparency in Poultry Grower Contracting and Tournaments final rule which was proposed and went into effect during the Biden Administration (discussed in greater detail below). Some companies are already incurring costs preparing for implementation, and the entire industry will soon bear considerable compliance and recordkeeping costs. Farmers will soon face regulatory caps on how large of bonuses they can earn, and top-performing farmers stand to lose out on expected earnings.

- **Name of the regulation:** Transparency in Poultry Grower Contracting and Tournaments⁴
- **What does the regulation require/restrict:** This rule, which was proposed and finalized during the Biden Administration, requires that chicken integrators provide voluminous information to farmers with each flock placement, including forward-looking financial projections, in a manner likely to obfuscate the factors that lead to a farmer's successful performance and are designed to spur litigation. It imposes substantial paperwork burdens on integrators with potentially significant consequences for even minor missteps and was implemented on a rushed timetable with minimal guidance and numerous implementation questions left unanswered. This paperwork burden is realized by farmers as well who must review and sign off on the information provided. The rule deters integrators from innovating and investing in new practices and injects substantial cost into the highly efficient chicken production process. The rule also exceeds USDA's statutory authority under the PSA beyond the ways discussed above: PSA does not require these disclosures, and in fact, the PSA has been in effect for more than one hundred years before this rule was issued, and to our knowledge no court has held that an integrator violated Section 202(a) or (b) of the PSA by failing to provide information such as this.
- **Impact on small businesses:** Each small business owner, in this case the farmer, must review and sign off on, in some cases, hundreds of pages of information which may require that they retain an attorney for assistance. Previous contracts were clear, concise, and easy to understand. However, the Transparency in Poultry Grower Contracting and Tournaments final rule requires substantial information now be given to the farmer with no realized benefit to either party.
- **NCC's recommendation:** We urge the Administration to repeal this rule in its entirety.
- **How would this change benefit small businesses?** Returning to the way previous contracts were developed and the clear information provided in these documents would allow farmers to focus on maintaining the health and welfare of their flocks. The better their flock performs, the more income they stand to make.
- **Are there other alternatives USDA should consider?** Though we urge USDA to repeal the rule in its entirety, the Agency could minimize the scope of the final rule to remove requirements including forward-looking financial projections and other onerous provisions that benefit neither party.
- **Provide specific data, anecdotes, or information on compliance costs, burdens, or other impact:** This rule required renegotiating every broiler chicken production contract (tens of thousands of

⁴ 88 Fed. Reg. 83210 (Dec. 28, 2023).

contracts) in a very short period of time. Companies must now spend significant resources on generating and maintaining required data and monitoring and auditing compliance.

- **Name of the regulation:** Inclusive Competition and Market Integrity under the Packers and Stockyards Act⁵
- **What does the regulation require/restrict:** This rule, which was proposed and finalized during the Biden Administration, in effect, creates a privileged class of growers, producers, and ranchers who, by virtue of inclusion in various self-selected identity groups, have the ability to bring lawsuits based on commercial outcomes they find disappointing. This rule injects the prospect of potentially catastrophic litigation into every single interaction in the livestock and poultry contracting process. It significantly deters innovation, value-added products, and rewarding high-performing farmers. In the preamble to the final rule, the previous Administration articulated a clear intent to ignore the long-standing judicial requirement to prove injury or likely injury to competition when establishing a violation of Section 202(a) or (b). Moreover, the rule effectively turns the PSA into a social justice law, a prospect never entertained by Congress in the law's one-hundred-plus-year history.
- **Impact on small businesses:** This rule makes it much more difficult for high-performing family farmers to be fairly rewarded for their efforts making raising chickens less appealing to the best farmers and reduces returns on the investments these farmers made on their land. Many farmers raise chickens to supplement other farming operations and reducing earnings risks destabilizing diversified farm incomes and undermining the agricultural economy in many parts of the country.
- **NCC's recommendation:** We urge the Administration to repeal this rule in its entirety.
- **How would this change benefit small businesses?** Repealing this rule would allow for the family farmer to be rewarded for their efforts and increase their return on investment. This will help secure the economic viability of the farmer and their families and increase the likelihood of the family farm to remain in the family to be passed down from generation to generation.
- **Are there other alternatives USDA should consider?** A repeal of the rule is the only option.
- **Provide specific data, anecdotes, or information on compliance costs, burdens, or other impact:** This rule injects considerable litigation risk into every business decision in meat and poultry production contracting. Broiler integrators are required to expend considerable resources to meet recordkeeping and documentation requirements to protect themselves from potential frivolous litigation, and the best-performing farmers risk losing pay or opportunities they would otherwise receive out of fear of lawsuits from others.

USDA-AMS: Organic Livestock and Poultry Standards (OLPS) Final Rule

- **Name of the regulation:** Organic Livestock and Poultry Standards (OLPS) final rule⁶
- **What does the regulation require/restrict:** This rule imposed new standards for how chickens marketed as "organic" must be raised. This rule imposed substantial restrictions on animal welfare and enrichment practices, not just the types of substances that may be administered or fed to the birds, which is typically the focus of organic regulations. This rule requires birds to have access to the outside when temperatures are as low as 32 degrees, necessitates the installation of more doors to the outside, and reduces the maximum flock density by 16%. These changes present significant animal welfare and flock health risks and impose significant costs on farmers and chicken

⁵ 89 Fed. Reg. 16092 (Mar. 6, 2024).

⁶ 88 Fed. Reg. 75394 (Nov. 2, 2023).

companies of all sizes. Chickens experience increased stress when exposed to freezing temperatures, and outdoor exposure and additional entryways increase biosecurity risks, including potential exposure to highly pathogenic avian influenza (HPAI). Further, heating a chicken house becomes even more costly when the doors of the house are required to remain open – a cost which is borne by the farmer. Moreover, flock density limits the number of chickens that can be raised in a single flock, which directly affects the earnings of a farmer with each flock and the overall production cost. The rule would force farmers to reduce their flock sizes (and incomes) or invest substantially to increase the square footage of their barns, which in turn raises both fixed and variable costs to the farmer.

- **Impact on small businesses:** This rule imposes direct costs on farmers raising organic broiler chickens by requiring them to pay for costly facility upgrades to meet the new standards, increase costs to maintain the temperature inside the barn, and indirect costs by increasing biosecurity and bird health risks. It also reduces how many chickens a farmer can raise in an existing house, which in turn directly affects the farmer's pay.
- **NCC's recommendation:** We urge USDA to rescind or amend the following regulations: 7 C.F.R. §§ 205.241(b)(4) (repeal), (b)(10) (repeal), (d)(1) (amend to replace "32 degrees F" with "40 degrees F").
- **How would this change benefit small businesses?** Rescinding or amending the regulations previously mentioned would help family farmers continue to raise organic broiler chickens in a lucrative manner. It would not require significant investment by the farmer to update facilities, decrease stocking density, and pay for the additional fuel needed to heat their barns in the winter. It would also help maintain bird health by maintaining existing biosecurity standards and minimizing disease risks.
- **Provide specific data, anecdotes, or information on compliance costs, burdens, or other impact:** This rule limits chicken farmer production efficiency, resulting in higher costs to farmers and integrators, less efficient production, and needless costs placing upward pressure on food prices.

USDA-APHIS: Payment of Indemnity and Compensation for Highly Pathogenic Avian Influenza (HPAI)

- **Name of the regulation:** Payment of Indemnity and Compensation for Highly Pathogenic Avian Influenza⁷
- **What does the regulation require/restrict:** NCC supports the Administration's strategic approach to controlling and eliminating HPAI. Strong biosecurity practices are essential for preventing the introduction of HPAI into a house, but if a flock contracts HPAI, depopulation is a critical step to prevent further spread of the disease. USDA's indemnification program has played an important role in this process by preventing catastrophic financial losses and eliminating barriers to quick action. In December 2024, APHIS issued an interim final rule (IFR) restricting future indemnification payments after an HPAI event unless the farm underwent a rigorous biosecurity audit before a new flock was placed. NCC supports strong biosecurity practices; however, the biosecurity audit is misguided and contains zero recommendations or input from the regulated industry. In fact, many of the audit parameters have nothing to do with good biosecurity or maintaining the health of a flock. In practice, there have been insufficiently trained personnel available to conduct audits, and audits are being performed to varying standards, creating significant confusion and inconsistency across the industry and unfairly penalizing farmers who face a lengthy wait for an audit.

⁷ 89 Fed. Reg. 106981 (Dec. 31, 2024).

- **Impact on small businesses:** Having access to timely indemnity payments if needed is critically important should a flock become infected with HPAI. However, this new audit requirement is an unnecessary level of regulatory oversight with little to no demonstrated impact on disease spread. Moreover, much of the required remediation is borne by family farmers themselves. Delays or inconsistency in biosecurity audits jeopardize the security of indemnification and risk leaving farmers without birds to raise for longer than is necessary.
- **NCC's recommendation:** We urge APHIS to rescind or suspend the implementation of the IFR and reissue it in its proposed form, allowing the Agency to consider comments on how to most effectively implement and audit specific biosecurity requirements.
- **How would this change benefit small businesses?** It would allow the family farmer to have certainty of indemnification payments should a flock become infected with HPAI. It would allow for the family farmer to be assured prompt restocking should their farm be in a control zone – whether their farm is directly infected by the virus or not. Rescission of the IFR would remove the onerous biosecurity audit requirements as many of the audit parameters will not minimize viral spread.
- **Are there other alternatives USDA should consider?** If rescission or suspension of the IFR is not an option, USDA could consider reopening the comment period and holding listening sessions to hear directly from industry and farmers on how the audit is (or is not) performing. Genuine consideration of input from the regulated industry would ensure the success of an audit program though, to date, input has been almost completely disregarded.
- **Provide specific data, anecdotes, or information on compliance costs, burdens, or other impact:** The requirement for the biosecurity audit delays how quickly farmers can receive a new flock, increasing out-time, and jeopardizing the farm's economic viability.

USDA-APHIS: Implementation of a Vaccine Strategy for HPAI

- **Description of the draft policy:** APHIS has developed a draft vaccination strategy for HPAI which, if implemented, threatens the economic viability and the survivability of the U.S. broiler chicken industry including the many small businesses that make up and support it.
- **What does the draft policy require/restrict:** This draft policy provides a very high-level overview of a vaccination strategy that lacks critical information on the use of the vaccine itself. Moreover, the draft policy falls woefully short in addressing all of the concerns of the entire poultry industry and fails to address some of the most critical aspects of what a vaccination strategy should look like. In short, without appropriate written assurances from our trading partners, the U.S. could lose its ability to export chicken, chicken products, and chicken genetics resulting in a direct and immediate cost of over \$5 billion. It could result in some broiler chicken companies – including small businesses – leaving the U.S. and producing chickens elsewhere. It could result in some chicken genetics companies – including small businesses – also moving out of the country.
- **Impact on small businesses:** Without appropriate assurances, the economic viability of small businesses that make up the industry and those that support it would be threatened. Some small businesses could be forced to either shut down or move their operations out of the U.S. entirely.
- **NCC's recommendation:** We urge APHIS to engage with each of our trading partners and obtain written assurances that trade will not be disrupted if the U.S. proceeds with the implementation of a HPAI vaccine strategy.
- **How would this change benefit small businesses?** If written assurances are obtained from trading partners and exports can continue, small businesses that make up the industry and those that support it can maintain business as usual.

- **Are there other alternatives USDA should consider?** USDA should consider maintaining their stamping out policy and looking for other strategies to minimize the spread of the virus. USDA should also focus their efforts on farms that have had multiple infections in the current outbreak and provide epidemiological information to industry that may also aid in minimizing the spread of the virus.
- **Provide specific data, anecdotes, or information on compliance costs, burdens, or other impact:** An inappropriate vaccination strategy would result in an abrupt drop in the global demand of U.S. chicken, as the \$5 billion chicken export market would disappear overnight. Farmers would have fewer birds to raise, resulting in a drop in farm income across the country. International competitors would quickly step into the foreign markets the U.S. broiler industry has worked hard to establish, and these international competitors could be difficult to displace even after trade restrictions were lifted.

USDA-FSIS: Maximum Line Speed Rates for Young Chicken and Turkey Establishments Operating Under the New Poultry Inspection System Proposed Rule⁸

- **Name of the proposed rule:** Maximum Line Speed Rates for Young Chicken and Turkey Establishments Operating Under the New Poultry Inspection System proposed rule⁹
- **What does the proposed require/restrict:** In 2014, FSIS created a modernized chicken slaughter inspection system intended to remove arbitrary constraints and require processing plants to take responsibility for quality control programs, freeing FSIS inspectors to focus on key food safety objectives. FSIS proposed raising the line speed limit for the evisceration line – which is a highly automated part of the chicken processing plant – from 140 birds per minute (bpm) to 175 bpm, based on the successful results from a longstanding pilot program. In the final rule, however, influenced by union pressures and unfounded worker safety concerns, FSIS under then-USDA Secretary Vilsack left the line speed increase out of the final rule. As a result, the chicken industry has been held in limbo for more than a decade with some plants operating at 175 bpm, while most of the industry remains capped at 140 bpm. This has led to an uneven regulatory playing field, unnecessarily constraining the production capacity of the U.S. chicken industry, and imposing a significant economic drag on the industry. The initial decision not to increase line speeds amounted to FSIS impermissibly considering regulatory factors outside its purview and beyond the scope of the Poultry Products Inspection Act (PPIA). More recently, a report commissioned by the Biden Administration and prepared by academics found that evisceration line speeds do not affect worker safety.¹⁰ Currently a proposed rule is at the Office of Management and Budget (OMB) for review.
- **Impact on small businesses:** Higher line speeds benefit all companies, including small businesses, with demonstrably no drawbacks. Smaller companies, especially those with only one plant, especially benefit because increased line speeds substantially increase returns on their existing fixed capital. Capitalizing on operational efficiency may also increase the need for additional farmers to raise chickens across the United States.
- **NCC's recommendation:** FSIS should amend 9 C.F.R. § 381.69(a) to replace “140” with “175” bpm to raise poultry slaughter evisceration line speeds for the entire industry regardless of size which, in turn, will provide a fair and competitive playing field across the industry. This step would have

⁸ 9 C.F.R. § 381.69(a).

⁹ [Pending EO 12866 Regulatory Review](#).

¹⁰ [Poultry Processing Line Speed Evaluation Study \(PULSE\)](#).

deregulatory effects by easing arbitrary regulatory restrictions on industry and increasing the industry's global competitiveness.

- **How would this change benefit small businesses?** Increasing the evisceration line speed to 175 bpm will benefit those small companies that do not currently operate under a waiver and are therefore limited to 140 bpm. It would allow these companies to not only be more competitive but to increase their return on investment and maximize operational efficiency. Those small businesses that do operate under a waiver do so under extreme uncertainty of losing their waiver. Codifying 175 bpm in 9 C.F.R. § 381.69(a) would eliminate the current waiver program and allow these small businesses to run up to 175 bpm without fear of losing their waiver and being forced to slow down their evisceration line thus impacting their production volume, ability to meet customer requirements, etc.
- **Are there other alternatives USDA should consider?** USDA should consider removing the line speed cap entirely. Many countries including Canada, Brazil, and some countries in the European Union operate at speeds well over 200 bpm with no impacts on food safety or worker safety. USDA should consider removing the line speed cap entirely provided establishments maintain process control and meet robust food safety requirements. This would allow the United States to compete more evenly in the global market.
- **Provide specific data, anecdotes, or information on compliance costs, burdens, or other impact:** Over the previous years, FSIS has taken waivers away from some establishments resulting in an almost immediate decrease in line speeds which equates to processing 35 less birds per minute (2,100 less birds per hour or 16,800 less birds per eight-hour shift). This has resulted in significant supply chain disruptions, financial hardship for the company, impacting their employees, and even the family farmers that grow birds. Compliance costs are significant and even more impactful to small businesses who rely heavily on their waiver to increase their competitiveness in the U.S. market.

USDA-FSIS: Guideline for Retained Water

- **Name of the guidance document:** Guideline for Retained Water¹¹
- **What does it require/restrict:** FSIS regulations require that the labels for certain raw chicken products bear a statement declaring the percentage of retained water in the product (which is water picked up during normal processing). The industry has used a straightforward approach for years to calculate this percentage. FSIS, for years, has approved plants to use this approach, and consumers are accustomed to seeing the resulting numbers on packaging. Recently, and with no clear impetus, FSIS changed its position and issued guidance calling for the use of a complicated formula that does not appear to actually reflect water retained during processing. In addition to expending considerable Agency and industry time and resources, the new formula results in declarations that, at times, differ widely from what is currently declared, despite no actual change in the product or process. This risks significant consumer confusion, undermines trust in the industry, creates an uneven playing field within the industry, and risks compromising export markets due to how some countries set retained water standards. It would also require companies to reprint all packaging for raw products with the new declarations, imposing considerable cost and waste. Although positioned as guidance, FSIS has indicated it will consider products with labels that do not follow the guidance to be misbranded, making it a de facto regulatory requirement. As such,

¹¹ Docket No. FSIS-GD-2025-0001.

changes in these requirements would require going through the rulemaking process which FSIS failed to do.

- **Impact on small businesses:** All companies, regardless of size, benefit from maintaining continuity in how retained water is declared. Moreover, small businesses are especially likely to be burdened by the costs associated with updating their retained water calculation protocols, securing regulatory approval for those protocols, paying for the necessary testing, and redesigning and obtaining new packaging, as small companies have a smaller financial footprint across which to spread these compliance costs.
- **NCC's recommendation:** We urge FSIS to withdraw this guidance and allow plants to continue using their existing approved calculation methods.
- **How would this change benefit small businesses?** Small businesses would not be forced to update their retained water calculation protocols which, in some cases, may require the hiring of a third-party expert. Small businesses would also not be required to do extensive validation and verification testing, which may require the use of an outside laboratory adding additional compliance costs when nothing in their process has changed. Overall, compliance costs for many small businesses can be extensive, and result in a significant financial burden on these small businesses – all which could be avoided if FSIS withdraws the unfounded guidance.
- **Are there other alternatives USDA should consider?** If FSIS is unwilling to withdraw the guidance, the guidance should be updated to include the previously approved mathematical formula used by industry and approved by FSIS for decades.
- **Provide specific data, anecdotes, or information on compliance costs, burdens, or other impact:** As industry attempts to update their retained water protocols, it has become evident that various methodologies have been accepted or rejected by FSIS with no clear parameters or requirements putting some establishments, regardless of size, at a competitive disadvantage. Additionally, in some cases the new retained water percentage is negative which is nearly impossible to achieve in most situations. In other cases, the new retained water percentage is magnitudes higher than the previous declaration when nothing has changed in an establishment's process or procedure.

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NCC greatly appreciates SBA's interest in identifying ways to reduce regulatory burdens for the many small businesses in and associated with the broiler chicken industry. Please do not hesitate to contact us if we can provide further information.

Respectfully submitted,



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National Chicken Council