



The Global Voice for
the U.S. Pork Industry

National Pork Producers Council
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October 20, 2025

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue SW
Mailstop 3758
Washington, DC 20250-3700

RE: Docket No. FSIS-2024-0023: Proposed Rule Visual Post-Mortem Inspection in Swine Slaughter Establishments

The National Pork Producers Council (NPPC) appreciates the opportunity to comment on the proposed rule for Visual Post-Mortem Inspection in Swine Slaughter Establishments. NPPC is the global voice for the U.S. pork industry and consists of 42 affiliated state organizations, representing America's 60,000 pork producers who produce a demonstrably safe, wholesome, and nutritious product that is appreciated on American and international tables.

NPPC supports the Food Safety and Inspection Service's (FSIS) proposed actions to improve efficiency and reduce opportunities for contamination. However, NPPC has concerns about the availability of inspectors to perform critical inspection activities in swine slaughter establishments. While this proposed action will allow inspectors to perform off-line food safety duties, NPPC's members are concerned this rule will result in reduced in-plant inspection personnel in swine slaughter establishments.

NPPC supports the application of data-based findings in inspection decisions. As such, NPPC agrees with the conclusion that removing the requirement for mandibular lymph node incision and viscera palpation will not harm food safety. The conditions currently detected through lymph node incision and viscera palpation can be identified through non-intrusive visual inspection that will not pose a risk of introducing contamination.

FSIS rightly notes that several trading partners with equivalent food safety systems – France, Denmark, and the Netherlands – do not require incision of mandibular lymph nodes or viscera palpation due to contamination concerns. As FSIS notes in the preamble to the proposed rule, these countries rely on sound scientific evidence to support this choice in inspection policies. NPPC encourages FSIS to continue to maintain high standards for deeming equivalence of inspection systems to ensure that pork, whether domestic or imported, is safe and wholesome.

NPPC is concerned with FSIS's ability to adequately staff swine slaughter establishments with both on-line and off-line inspection personnel. As noted in the cost-benefit analysis, if finalized, the proposed rule's implementation would result in a reduction of one to two inspectors at both the head station and the viscera station at 14 large swine slaughter establishments operating under the traditional inspection model. NPPC is concerned that this rule will result in reduced inspector staffing at slaughter establishments operating under the traditional inspection model. Full inspection staffing is necessary for NPPC's members to efficiently operate and ensure the production of safe and wholesome pork products. NPPC encourages FSIS to reassign any inspection personnel impacted by this rulemaking to off-line food safety inspection roles.

The proposed rule must also ensure that U.S exports of pork products to foreign markets are not adversely affected by the change to visual inspection. Some trading partners may require removal of mandibular lymph nodes and changing to visual inspection may damage trade agreements and compromise U.S. swine exports.

NPPC appreciates the opportunity to comment on the proposed rule to Visual Inspection in Swine Slaughter Establishments and looks forward to continuing support of food safety and improving efficiency in swine slaughter establishments.

Sincerely,



Dr. Ashley Johnson
Director of Food Policy
National Pork Producers Council