Shipping and Handling of Day-Old Poultry

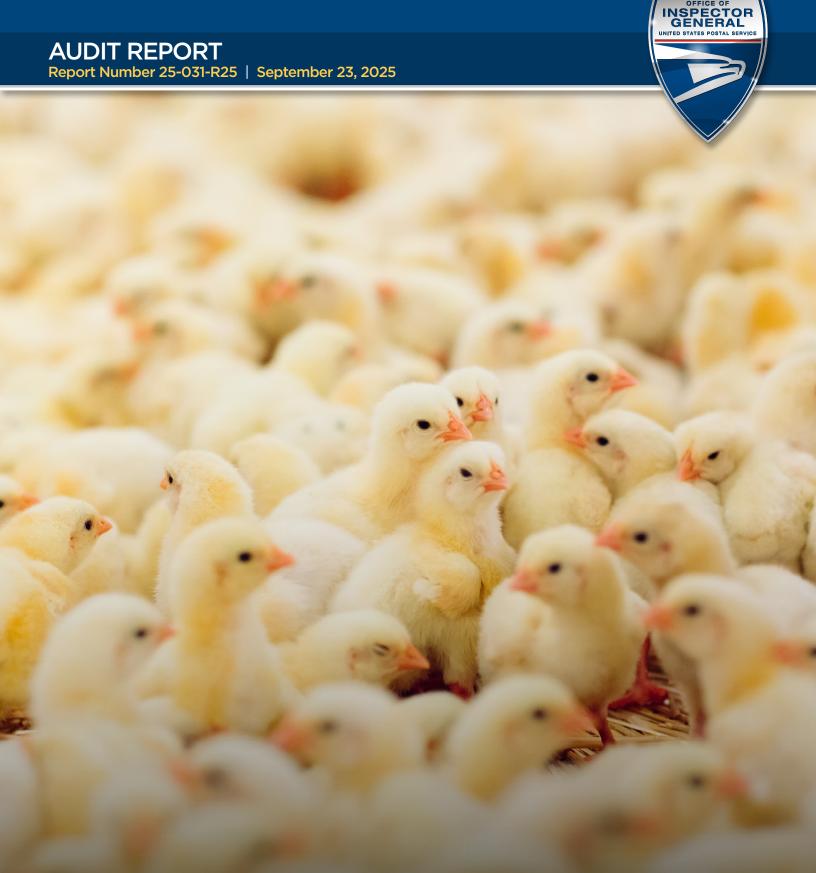


Table of Contents

Cover	
Highlights	1
Background	1
What We Did	1
What We Found	1
Recommendations and Management's Comments	1
Transmittal Letter	2
Results	3
Introduction/Objective	3
Background	3
Findings Summary	4
Finding #1: Untimely Communication of Network Changes and Ineffective Coordination Negatively Impacted	
Customers Recommendation #1	
Recommendation #2	
Postal Service Response	
OIG Evaluation	
Finding #2: Insufficient Acceptance	
Procedures Recommendation #3	
Recommendation #4	
Postal Service Response OIG Evaluation	
	9

Finding #3: Inadequate Handling	
Practices	10
Recommendation #5	12
Postal Service Response	12
OIG Evaluation	12
Finding #4: Lack of Oversight at Air Card	
Recommendation #6	14
Postal Service Response	14
OIG Evaluation	14
Finding #5: Untimely Delivery	15
Recommendation #7	17
Recommendation #8	17
Recommendation #9	17
Recommendation #10	17
Recommendation #11	17
Postal Service Response	17
OIG Evaluation	17
ppendices	19
Appendix A: Additional Information	20
Scope and Methodology	20
Prior Audit Coverage	21
Appendix B: Management's Comments.	
ontact Information	28

Highlights

Background

The U.S. Postal Service has been transporting live, day-old poultry since 1918. "Day-old poultry" is defined as day-old chickens, ducks, emus, geese, guinea birds, partridges, pheasants, quail, and turkeys. As the primary shipper for these time-sensitive shipments, or "lives," the Postal Service provides an essential service for hatcheries, farmers, feed stores, and backyard hobbyists. Last year, the Postal Service handled over 41 million lives through its air network alone.

To ensure safe, effective, and efficient transportation, the Postal Service requires mailers of live animals to comply with established guidelines. In turn, the Postal Service prioritizes shipment of lives through its processing and logistic networks.

What We Did

Our objective was to assess the effectiveness of procedures for the acceptance, handling, and delivery of live, day-old poultry. For this audit, we interviewed Postal Service management and staff, three hatcheries, and a major association of bird shippers. We also judgmentally selected and conducted site visits at seven processing facilities, eight post offices, and two of the Postal Service's air carrier's facilities.

What We Found

While the Postal Service works continuously to improve practices for the well-being of lives, such as developing policy and procedures, we found opportunities exist to further protect the lives' welfare. Specifically, the Postal Service untimely communicated network changes and ineffectively coordinated on shipment issues with its customers. In addition, gaps existed in policies and procedures for the acceptance, handling, and delivery of lives. Further, the Postal Service did not provide adequate oversight of its contracted air carrier operations. Failed shipments, for any reason, can result in the death of lives, which hurts the Postal Service brand and damages its relationship with bird shippers, customers, and animal welfare advocates alike.

Recommendations and Management's Comments

We made 11 recommendations to address the issues identified in the report. Postal Service management agreed with eight recommendations and disagreed with three. Management's comments and our evaluation are at the end of each finding and recommendation. The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to recommendations 1, 2, 3, 4, 5, 6, 9, and 10 as corrective actions should resolve the issues identified in the report. We will work with management on recommendations 7, 8, and 11 through the audit resolution process. See Appendix B for management's comments in their entirety.

Transmittal Letter



September 23, 2025

MEMORANDUM FOR: MARC MCCRERY

VICE PRESIDENT, CUSTOMER EXPERIENCE

JENNIFER VO

VICE PRESIDENT, RETAIL AND POST OFFICE OPERATIONS

DANE COLEMAN

VICE PRESIDENT, PROCESSING OPERATIONS

ROBERT CINTRON

VICE PRESIDENT, LOGISTICS

MARGARET PEPE

EXECUTIVE DIRECTOR, PRODUCT SOLUTIONS

JOHN MORGAN

VICE PRESIDENT, DELIVERY OPERATIONS

LINDA MALONE

VICE PRESIDENT, APPLIED ENGINEERING

FROM: Mary K. Lloyd

Deputy Assistant Inspector General

Mary K. Sloyd

for Operations, Performance, and Services

SUBJECT: Audit Report – Shipping and Handling of Day-Old Poultry

(Report Number 25-031-R25)

This report presents the results of our audit of Shipping and Handling of Day-Old Poultry.

All recommendations require U.S. Postal Service Office of Inspector General (OIG) concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations 1, 2, 3, 4, 5, 7, 8, 9, 10, and 11 should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed. We consider recommendation 6 closed with issuance of this report.

We appreciate the cooperation and courtesy provided by your staff. If you have any questions or need additional information, please contact Brandi Adder, Director, Strategic Initiatives and Performance, or me at 703-248-2100.

Attachment

cc: Postmaster General

Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the shipping and handling of day-old poultry (Project Number 25-031). Our objective was to assess the effectiveness of procedures for the acceptance, handling, and delivery of live day-old poultry. See Appendix A for additional information about this audit.

Background

The Postal Service began shipping live, day-old poultry (hereafter "lives"¹) in 1918 for customers such as hatcheries, feed-stores, farmers, and backyard hobbyists. Being the primary shipper for these timesensitive packages, the Postal Service takes this legacy operation seriously, with a goal to ensure each shipment safely reaches its destination. The proper handling and timely delivery of lives is vital

to the Postal Service's customer satisfaction and brand image.

From January 1 through December 31, 2024, the Postal Service handled about 3.4 million pounds,² or over 41 million lives through its air network.3 While the Postal Service accepts shipment of lives year-round, peak shipping of lives runs from February through May, and it requires the full cooperation of the mailer to safely and effectively transport animals through the mail. Shipments of all mailable live animals⁴ are subject to the requirements in USPS Publication 52, Hazardous, Restricted, and Perishable Mail – and the mail and its environment are to be protected from damage, obnoxious odors, or noise. However, dayold poultry shipments are also subject to specific conditions to ensure their safety and security,5 warranting additional attention and oversight, as shown in Figure 1.

Figure 1. Requirements for Day-Old Poultry Shipments



Day-old poultry that is presented for delivery, after first being shipped by a third-party air service, must be in good condition and properly packaged.



Boxes of day-old poultry about identical size, securely fastened together to prevent separation, may be accepted for mailing as a single parcel, provided the length and girth does not exceed Postal Service limits.



Packed in a box that is properly ventilated, of proper construction and strength to bear safe transport in the mail, and is not stacked more than 10 units high.



Must meet all provisions of the airlines, if air transportation is required.



Mailed early enough in the week to avoid receipt at the office of address on a Sunday, a national holiday, or the afternoon before a Sunday or national holiday.



The date and hour of hatching is noted on the box.



Deliverable to the addressee within 72 hours of the time of hatching.

Source: OIG analysis of Publication 52, *Hazardous, Restricted, and Perishable Mail,* Section 521, General Requirements, and Section 526.32, Mailability Requirements, issued September 2023.

¹ The term "lives" is used interchangeably with the Postal Service's definition for live, day-old poultry described in Publication 52, Section 526.31. The following live, day-old poultry are acceptable for mailing when properly packaged: chickens, ducks, emus, geese, guinea birds, partridges, pheasants (only during April through August), quail, and turkeys.

² A day-old chicken weighs about 38 grams. There are 453.592 grams in a pound.

Enterprise Data Warehouse report, pulled on July 22, 2025. This figure does not include shipment of lives that moved through surface transportation.

⁴ In addition to live, day-old poultry, the Postal Service accepts shipments of live honeybees, adult birds, live scorpions under certain circumstances, and other small, harmless cold-blooded animals.

⁵ Publication 52, Hazardous, Restricted, and Perishable Mail, Section 526.32, Mailability Requirements, issued September 2023

The biggest risk to the well-being of lives occurs when they are being transported or left in confined spaces — as such, the Postal Service has provided instructions to personnel to take specific precautions. For example, shipments must be maintained in an upright position with at least four inches of air space around the perimeter. They should not be left in direct sunlight or drafty areas, exposed to exhaust fumes, placed near dry ice shipments, or moved in a regular, closed Postal Service vehicle for more than four hours. Further, when shipments of lives arrive at the post office for delivery, the customer is called to come pick up the package. If the package is not picked up, delivery is attempted by a mail carrier.

"The biggest risk to the wellbeing of lives occurs when they are being transported or left in confined spaces as such, the Postal Service has provided instructions to personnel to take specific precautions."

Death of any live animal due to mishandling or delays is not only problematic from an animal welfare perspective but also takes a financial toll on mailers. In recent years, shippers have reported spending millions of dollars to refund or replace orders of lives for their customers. In addition, these losses take an emotional toll on the recipients who may be families building a backyard flock, farmers, or community agricultural programs.

Recently, the Postal Service made changes to its transportation network that are relevant to transportation of lives. To align with its Delivering for America plan, the Postal Service entered into a new air carrier delivery contract on September 30, 2024, that significantly changed how its network operates. Previously, multiple flights per day were available

to transport lives, and the Postal Service chose to primarily use daytime flights. Its night-time flights were used to transport any overflow volume of lives. However, under the current air contract, lives are almost entirely flown during the nighttime, with limited or no daytime flights available. As a result, if lives cannot make the nighttime flight, the shipments will be returned to the Postal Service by the air carrier rather than being sent on the next flight.

In addition to the contract change, in November 2024,⁶ the Postal Service proposed a flat Live Animal and Perishable Handling Fee to cover additional costs associated with the handling and transportation of live animals. The fee, which went into effect in January 2025, is \$15 for Priority Mail and \$7.50 for Ground Advantage and Priority Mail Express, per package.

To assess the effectiveness of procedures for the acceptance, handling, and delivery of lives, we judgmentally selected seven mail processing facilities and eight post offices to conduct observations and interview local Postal Service staff. We also conducted interviews with headquarters personnel, three hatcheries, and a major association of bird shippers; observed operations at two hatcheries; and observed operations at two air carrier's facilities. See Appendix A for additional information.

Findings Summary

The Postal Service continues to refine its practices to address issues with the shipping and handling of lives and works with external stakeholders to protect the welfare of lives as they move through the mail. However, opportunities exist to further improve these practices and coordination efforts. Specifically, the Postal Service can develop better communication paths with internal and external stakeholders, implement acceptance procedures at mail processing facilities, update and communicate handling procedures, provide oversight of its air carrier, and issue clearer guidance on delayed, missent, or perished shipments.

⁶ USPS Notice of Changes in Rates and Classifications of General Applicability for Competitive Products, Filing #132819, on November 15, 2024

Finding #1: Untimely Communication of Network Changes and Ineffective Coordination Negatively Impacted Customers

The Postal Service was untimely in its communication and ineffective in coordination with its customers, including bird shippers, leading into the 2025 peak shipping season for lives.

Untimely Communication

The Postal Service did not timely communicate ongoing changes to postage and operations, which significantly impacted the mailers of lives. Specifically, the Postal Service instituted a new fee on January 19, 2025¹⁰ – two months after its initial proposal to do so. Because of the short notice, shippers had to revise previously established shipping prices to incorporate the new fee. Additionally, the Postal Service entered into a new air carrier contract on September 30, 2024, that reduced the availability of air transportation and changed when lives were flown. Because the impacts of air transportation were not timely communicated, the shipper's operations were impacted. For example, shippers had to:

- Adjust their hatching schedules, which were planned up to months in advance.
- Start packing operations five-to-eight hours earlier to meet the new timeframes.

Ineffective Coordination

The Postal Service did not effectively coordinate with shippers to identify why delays occurred and what the shippers could do to mitigate future delays. For example, one hatchery had its shipment refused by the air carrier, returned to the mail processing facility, and held until the next flight the following evening. The shipper asked the Postal Service why its shipment was delayed but did not get a clear answer, and it was not instructed on what it could do to avoid future delays.

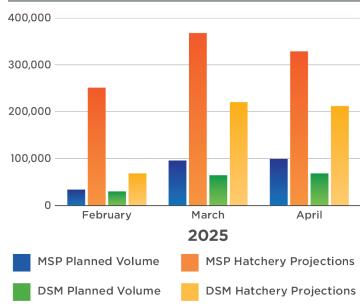
In a separate example, a shipper experienced delays sending lives out of its local mail processing facility. The shipper took action to mitigate Postal Service delays by transporting shipments of lives to an out-of-state mail processing facility. The shipper

stated if it had been made aware of these delays, it would have implemented this action earlier to ensure successful delivery.

Based on our analysis, these delays were the result of a shortfall in planned air capacity "The Postal Service did not timely communicate ongoing changes to postage and operations, which significantly impacted the mailers of lives."

out of Minneapolis/St. Paul International (MSP) and Des Moines International (DSM) airports. The Postal Service should have been aware of air capacity constraints based on the projected volume provided by the shippers in comparison to the capacity agreed to be provided by the air carrier. See Figure 2 for a summary of the shortfalls in planned air capacity.

Figure 2. Projected vs. Planned Lives Shipments



Source: OIG analysis of planned volume and hatchery forecasts provided by the Postal Service.

¹⁰ Live Animal and Perishable Handling Fee, effective with January 19, 2025, pricing change.

"The untimely communication and ineffective coordination from the Postal Service with bird shippers limits its ability to work collaboratively to preemptively identify potential issues, react to unexpected issues, and implement corrective actions."

These issues occurred because of ineffective management of processes to safely transport lives, to include communicating externally the necessary quality information to achieve the entity's objectives.11 Specifically, at a national level, the Postal Service is relying on one primary Postal Service point of contact for mailers of lives. While the employee serves as the primary point of contact, that is not their primary responsibility. Shippers expressed having a positive working relationship with the employee, but also expressed concerns about the employee's ability to implement change, and that the role required the attention of more than one person. At a local level, hatcheries expressed, and we identified, inconsistencies in communication from and with the Postal Service. While each of the three hatcheries had a local point of contact, the relationships varied greatly. One felt it had a great working relationship with its local contact, one stated it could never reach its local contact, and another stated it did not have a local contact. Because of the inconsistencies, the hatcheries primarily relied on the national point of contact to answer questions or address issues. In late June, headquarters management confirmed that consideration was being given to hire additional staff to serve as an area point of contact with the hatcheries.

The untimely communication and ineffective coordination from the Postal Service with bird shippers limits its ability to work collaboratively to preemptively identify potential issues, react to unexpected issues, and implement corrective actions. These hatcheries rely on the Postal Service as their primary shipping partner and consider it a lifeline to their business model. Due to the delicate nature of lives and the tight delivery requirements, Postal Service management must communicate relevant information to external stakeholders so both parties can work together to ensure the safety and well-being of the animals.

Recommendation #1

We recommend **Vice President, Customer Experience,** create job positions where the primary responsibility is to oversee regional coordination of the shipping and handling of day-old poultry between internal and external stakeholders.

Recommendation #2

We recommend **Vice President, Customer Experience,** establish recurring meetings throughout peak shipping season of dayold poultry with the applicable internal and external stakeholders to discuss issues and implement immediate corrective action.

Postal Service Response

Management agreed with the finding and recommendations 1 and 2.

Regarding recommendation 1, management stated that it will identify, train, and align subject matter experts within its existing complement to support each region/area. The target implementation date is January 31, 2026.

Regarding recommendation 2, management stated that it will leverage semi-weekly collaboration meetings through peak season, and will meet quarterly (at a minimum) to

¹¹ Government Accountability Office, GAO-25-107721, Standards for Internal Control in the Federal Government, Principle 15, Communicate Externally, published May 2025.

discuss issues and provide resolutions leading into and through peak season. The target implementation date is March 31, 2026.

OIG Evaluation

The OIG considers management's comments responsive to recommendations 1 and 2, as the corrective actions should resolve the issue identified in the report.

Finding #2: Insufficient Acceptance Procedures

The Postal Service did not always accept lives shipments in accordance with policy. At the Des Moines, Memphis, and St. Paul Processing & Distribution Centers (P&DCs), we observed Postal Service personnel accept lives shipments and move them into processing without first ensuring the shipments met acceptance standards. Specifically, the shipment boxes were not:

- Labeled with the hatching time and date. If a label was included, staff did not review whether the hatch date was within 24 hours or determine if the package was deliverable within 72 hours.
- Properly ventilated.
- Properly secured shut, allowing lives to escape (see Figure 3).
- Free of food. Food contained in the boxes can deteriorate the integrity of the box and/or other packages during transit.

"At the Des Moines, Memphis, and St. Paul P&DCs, we observed Postal Service personnel accept lives shipments and move them into processing without first ensuring the shipments met acceptance standards."

As these shipments arrived in an unacceptable state, Postal Service staff should have immediately addressed these deficiencies with the customer or refused acceptance.

Figure 3. Day-Old Poultry Found Outside Improperly Secured Box



Source: OIG photo taken at the St. Paul P&DC April 21, 2025.

Lives are primarily accepted at processing facilities but can also be accepted at post office retail counters. However, in general, the retail staff at the post offices we visited were unaware of the acceptance requirements. While they stated that they would rely on information within the retail system to ensure proper acceptance of lives, they were not always able to locate the requirements within the system.

On May 21, 2025, the Postal Service took corrective action and issued a workbook to processing staff on the handling of lives.¹³ This guidance requires processing staff to assess packaging to ensure animals cannot escape and will not deteriorate during transportation, but does not instruct processing staff to review the packages for all acceptance requirements. Additionally, on June 3, 2025, the Postal Service issued a memorandum to retail and delivery staff on the proper handling and processing of live animals that includes procedures for retail acceptance.14 We believe the procedures in the retail and delivery memorandum are sufficient to address the issues identified. However, the Lives Workbook for processing staff needs to be updated to include procedures for

¹² Publication 52, Hazardous, Restricted, and Perishable Mail, Section 526.32, Mailability Requirements, issued September 2023.

¹³ Machine Workbook-Operations: Handling Lives, dated May 21, 2025. We will use the term "Lives Workbook" to refer to this document.

¹⁴ Memorandum to District Manager, Mangers Post Office Operations, and Postmasters: *Proper Handling and Processing of Mailable Live Animal Mailings*, dated June 3, 2025. We will use the term "Retail and Delivery Memorandum" to refer to this document.

"Proper acceptance of packages containing lives is critical to ensuring they survive and arrive in a timely manner."

reviewing acceptance requirements. Further, a best business practice would be to communicate guidance on the shipment of lives prior to the start of peak shipping season.

Proper acceptance of packages containing lives is critical to ensuring they survive and arrive in a timely manner. If boxes are accepted without verification of mailing

requirements, the danger of the lives' well-being increases, and the chance they arrive on time decreases. Lastly, failed shipments could result in the death of lives, which hurts the Postal Service brand and damages its relationship with bird shippers, customers, and animal welfare advocates.

Recommendation #3

We recommend **Vice President, Processing Operations,** in coordination with **Vice President, Applied Engineering,** revise the Handling Lives
Workbook to include procedures for accepting
day-old poultry, including visual aids in accordance
with mailing requirements in Publication 52.

Recommendation #4

We recommend **Vice President, Retail and Post Office Operations,** and **Vice President, Processing Operations,** communicate to staff each year the acceptance procedures for day-old poultry prior to the start of peak shipment season.

Postal Service Response

Management disagreed with the finding but agreed with recommendations 3 and 4.

Regarding the finding, management stated that OIG's comments are anecdotal. It stated employees are required to use the Retail System Software for acceptance requirements for day-old poultry, and can also access Publication 52 through it as well, if additional information is needed.

Regarding recommendation 3, management stated that it updated the Handling Lives Workbook to further clarify procedures for accepting day-old poultry, and requested closure upon final report issuance. Management also provided a target implementation date of November 30, 2025.

Regarding recommendation 4, management stated acceptance procedures will be communicated on an annual basis and, as needed, when concerns arise. The target implementation date is April 30, 2026.

OIG Evaluation

Regarding the finding, the OIG acknowledges that the retail system includes the requirements for the proper acceptance of lives. However, the information in the retail system is limited by the user's ability and we found that retail staff could not always locate this information.

The OIG considers management's comments responsive to recommendations 3 and 4, as the corrective actions should resolve the issue identified in the report.

Regarding recommendation 3, while management stated it updated the Handling Lives Workbook, the updates did not include procedures for accepting day-old poultry, including visual aids, in accordance with mailing requirements in Publication 52. Therefore, this recommendation will remain open until OIG can verify that relevant changes were included in the workbook.

Regarding recommendation 4, while the corrective action should resolve the issue identified in the report, because the target implementation date is after the start of next year's peak shipping season for lives, the effectiveness of the corrective action will be limited.

Finding #3: Inadequate Handling Practices

The Postal Service did not always adequately handle lives packages to ensure their safe, efficient, and effective processing and shipment. We observed various lives handling operations at seven mail processing facilities and found that the Postal Service improperly tagged shipments of lives, applied incorrect handling codes, staged lives in unacceptable conditions, and loaded lives onto trucks for transportation that put their well-being at risk.

Improper Tagging

At the Des Moines, Memphis, and St. Paul P&DCs, the Postal Service applied air transportation tags to all shipments of lives regardless of the correct mode of transportation. This resulted in shipments that should have been trucked being transported by air, and led to processing delays, which increased the risk that the lives would not be delivered timely.

Postal Service instruction for handling lives does not include a requirement to sort the packages by transportation mode before applying tags. When packages of lives are processed without performing a primary sort, it increases the risk that packages will be sent via an incorrect mode of transportation.

Incorrect Handling Codes

At the Memphis P&DC, we observed staff not applying the correct handling codes on air tags. The correct handling code for day-old poultry is "L" (Lives). Adult birds receive an "A" (Adult Bird), and all other live animals should receive a "G" (Perishable) handling code. Throughout our observations, we found packages of lives incorrectly labeled (see Figure 4) and conversely, we found packages with the "L" handling code that were not day-old poultry. The proper handling code ensures the lives are transported expeditiously and not sitting unnecessarily. Further, proper coding is needed to accurately forecast volumes by type.

Figure 4. Example of Day-Old Poultry Incorrectly Labeled as Perishable ("G")



Source: OIG photo taken at the Memphis P&DC April 29, 2025.

Memphis P&DC plant management did not identify and address the issue. Additionally, at the time of our observations, the Postal Service instruction for assigning handling codes did not clearly define what was considered day-old poultry, which is the only type of package that would receive the "L" or "Lives" code. By mislabeling lives, staff may fail to treat these

packages as a time-sensitive mailpiece. This also limits the Postal Service's ability to accurately track the volume of lives requiring air transportation.

"By mislabeling lives, staff may fail to treat these packages as a time-sensitive mailpiece."

Unacceptable Staging Conditions

At five processing facilities,¹⁵ we observed staff staging lives in conditions not in accordance with Postal Service instruction.¹⁶ At four of these facilities, staff used enclosed containers with limited airflow for staging and transporting (see Figure 5). Additionally,

¹⁵ Des Moines, Memphis, St. Louis, and St. Paul P&DCs, and St. Louis Network Distribution Center (NDC).

¹⁶ Work Instruction: Handling Live Animal Shipment, dated March 20, 2024

at the St. Louis and Memphis P&DCs, we observed lives staged in areas of the facility that were not climate-controlled, exposing them to excessive temperatures.

Figure 5. Examples of Unsuitable Mail Containers





Source: OIG photos taken at the St. Paul P&DC April 22 and 23, 2025.

During our discussions with staff, most were unaware of the Postal Service instruction, and even after being made aware, failed to take action to remediate these conditions. Placing lives in enclosed containers can increase the risk of suffocation due to limited airflow. Staging lives in areas that are not climate-controlled can increase the risk they perish due to overheating.

Poor Loading and Dispatch Practices

At the same five processing facilities, we also observed staff loading and dispatching packages onto trucks for transportation that put the well-being of the lives at risk. Personnel did not adhere to the policy when preparing live shipments for surface transportation. Specifically, personnel:

- Failed to secure lives packages to the truck.
- Stacked packages more than 10 high.

- Loaded packages into the front of the trailer, furthest from the trailer door.
- Dispatched packages on ground transportation routes longer than four hours.
- Dispatched packages after the cutoff time.
- Loaded lives onto a trailer and closed the door more than 30 minutes before departure.

Additionally, we observed practices that are not currently in policy, but could affect the well-being of lives. Specifically, personnel:

- Took about an hour to bed load¹⁷ lives, increasing the total time spent in a trailer.
- Did not dispatch lives to the air carrier following first in, first out (FIFO) methods.

During our discussions with staff and management, most were unaware of the Postal Service policy for loading and dispatching lives. When proper loading and dispatch practices are not followed, the danger of lives' wellbeing increases and their survival during shipment decreases.

As previously noted, the Postal Service issued a Lives "During our discussions with staff and management, most were unaware of the Postal Service policy for loading and dispatching lives."

Workbook with updated guidance for processing staff after we completed our observations. The workbook included a visual guide to assist employees in determining the correct handling code; explained when to load lives onto a trailer; and stated the need to stage lives in a climate-controlled area (see Figure 6).

¹⁷ Bed load refers to how mail is loaded onto a truck; specifically, when the mail is not in containers, but stacked directly on the floor.

Figure 6. Visual Aid for Transporting Lives

Source: USPS Machine Workbook—Operations: *Handling Lives*, dated May 22, 2025.

Transporting Li	ive Aniı	mals in the USPS Network			
Live Animals	D&R Tag Assignment	IMPORTANT			
USPS is required to deliver day-old poultry Day-Old Poultry USPS is required to deliver day-old poultry within 48 hours	L	CET Critical Entry Time Shipment that arrives after this CET will not be dispatched out until the next night Shipment that arrives			
Adult Birds	Α	DOV Dispatch of Value Trip Number Dock Door			
Perishables (other live animals)	G	Never load the truck with live animals more than 30 minutes before truck departure time Always load live animals last Live animals require air flow around them. Do NOT			
Bee Hives	Surface Transportation ONLY	 block ventilation holes Do NOT use a container that blocks ventilation and prevents air flow (e.g., gaylord, plastic postcon, ERMC) Always stage lives animal containers in temperature-controlled areas only 			

While this guidance addressed several of the issues we identified, it does not address the need to perform a primary sort by transportation mode, proper bed loading, FIFO methods, or a maximum limit for stacking boxes. It also includes specific instructions that lives be loaded no earlier than 30 minutes before departure, but it did not require immediate unloading of lives from trailers upon arrival at their destination.

Recommendation #5

We recommend Vice President, Logistics; Vice President, Processing Operations; and Vice President, Applied Engineering, revise the Handling Lives Workbook and reissue annually, before each peak shipping. At a minimum, revisions to the workbook should include: performing a primary sort by transportation mode; proper bed loading; a limit for stacking packages; following first in, first out methods; and unloading day-old poultry timely from trailers.

Postal Service Response

Management agreed with the finding and recommendation 5.

Regarding recommendation 5, management stated the Handling Lives Workbook was updated May 29, 2025, and it will reissue the guidance before peak shipping season. The target implementation date is April 30, 2026.

OIG Evaluation

The OIG considers management's comments responsive to recommendation 5, as the corrective action should resolve the issue identified in the report. However, if the Postal Service does not act until the stated target implementation date — which is after the start of next year's peak shipping season for lives — the effectiveness of the corrective action will be limited.

Finding #4: Lack of Oversight at Air Carrier Operations

The Postal Service relies on a contractor to fly lives from the location where they were mailed to the location where they will be delivered. However, during observations at the air carrier's hub in Memphis, TN, we noted multiple examples of noncompliance with contract requirements and practices that could affect the well-being of lives. During one night of observations, we found that 50 percent of the lives being unloaded from a Postal Service trailer had perished. These packages could have been intercepted and properly disposed of to prevent injury to employees, damage to equipment, or attraction of other pests¹⁸ if proper oversight was being performed. Other specific issues included:

- Lives arriving from the local processing facility were not unloaded in a timely manner. Specifically, the lives arrived at the carrier's hub around 8 p.m., but unloading was not completed until 10:45 p.m. Postal Service trucks have limited ventilation; therefore, leaving lives on them for extended periods of time increases temperatures and carbon dioxide levels. According to tracking data provided by a hatchery:
 - Temperatures on the truck rose to a high of 113 degrees. Temperatures over 100 degrees can cause the lives to perish.
 - Carbon dioxide rose to a level 74 times higher than in earth's atmosphere.
- Lives were not palletized in accordance with work instructions. For example:
 - Boxes were stacked up to 12 high when the maximum height is supposed to be nine (see Figure 7);
 - Pallets were stacked on top of lives boxes (see Figure 8);
 - Insufficient spacing between lives boxes limited airflow; and

- Lives shipments were not stacked so that they always remained level.
- "During one night of observations, we found that 50 percent of the lives being unloaded from a Postal Service trailer had perished."
- Lives in baggage carts, used to transport them from the airplane to the sorting area, sat for extended periods of time with the curtains closed, restricting air flow.
- Boxes of lives were poorly loaded into plane compartments, allowing the boxes to shift during transportation.

Figure 7. Box Crushed Due to Over-Stacking



Source: OIG photo taken in Memphis, TN, April 29, 2025.

¹⁸ Postal Operations Manual, Issue 9, Section 691.521, dated July 2002 and updated online through May 31, 2024.

Figure 8. Pallets Stacked on Top of Day-Old Poultry Packages





Source: OIG photos taken in Memphis, TN, April 29, 2025.

These conditions were present, in part, because there was limited to no Postal Service personnel on-site at the hub since the air carrier contract changed. Headquarters management confirmed that it relies on the contractor to self-report issues and take corrective action to address deficiencies. Additionally, it stated there is not enough work at the air carrier's hub to justify an on-site position. Without having a Postal Service representative on-site at the air carrier's hub, the Postal Service misses an opportunity to oversee nationwide operations for mailing lives and intercepting any shipments of perished lives.

Not effectively overseeing the contractor's performance has led to lives being subjected to prolonged exposure to heat, increased levels of carbon dioxide, and poor handling — all of which are detrimental to the health of the animals and decreases the likelihood they will survive transportation.

"Not effectively overseeing the contractor's performance has led to lives being subjected to prolonged exposure to heat, increased levels of carbon dioxide, and poor handling."

Recommendation #6

We recommend **Vice President, Logistics,** establish processes and procedures for periodic on-site review of its air carrier operations to ensure proper loading and securing of day-old poultry shipments.

Postal Service Response

Management agreed with the finding and recommendation 6.

Regarding recommendation 6, management provided a standard operating procedure that requires the Headquarters Air Logistics team to conduct quarterly audits of the air carrier lives operations, effective October 1, 2025.

Management also requested closure of this recommendation upon final report issuance.

OIG Evaluation

The OIG considers management's comments responsive to recommendation 6, as the corrective action should resolve the issue identified in the report. Based on our review of the standard operating procedure requiring quarterly audits at its air carrier operations, we consider recommendation 6 closed with the issuance of this report.

Finding #5: Untimely Delivery

The Postal Service did not always deliver lives within 72 hours of hatching or follow policy for late deliveries, and did not have a policy for missent lives. ¹⁹ As a result, we observed delayed, missent, and perished shipments of lives that continued to move through the mailstream.

Delayed Day-Old Poultry

At the St. Louis and Minneapolis P&DCs, we found delayed packages of lives that were not processed in time to make scheduled transportation to the post offices for delivery. These packages were held at the processing facility until transportation became available later in the day. For example, at the St. Louis P&DC, we found about 90 delayed packages of lives around 11 a.m., which required delivery to the customer in less than 21 hours. St. Louis P&DC staff confirmed that the lives would not be dispatched until later that evening, at the earliest, delaying delivery until the following morning and likely exceeding the 72-hour requirement. St. Louis P&DC management was unaware of the issue or the possible actions to take to expedite delivery, including:

- Using express clerks to deliver the lives;
- Requesting an extra transportation trip to take the lives to the proper post office for delivery;
- Calling the customer and requesting they pick up the lives at the P&DC; or
- Disposing of the day-old poultry in accordance with Postal Service policy.²⁰ This would include selling, donating to a charitable organization, or delivering the lives to a local humane society or animal shelter after determination is made that the delivery requirement cannot be met.²¹

Delayed packages of lives occurred because staff were unaware of the delivery requirement, did not check the hatch date on each package, or failed to determine the required delivery date and time. Currently, Postal Service policy requires only that the hatch date and time be included on all packages;

however, requiring a highly visible "deliver by" date would be more consistent with other Postal Service products, like Priority Mail Express. This requirement would place less reliance on the staff's familiarity with the policy or need to determine the "deliver by" date.

If Postal Service staff does not check or cannot locate the hatching date, then it is impossible to ensure the lives will be delivered within 72 hours of hatching, ultimately putting their health and well-being at risk.

Further, the
Postal Service
does not uniquely
track shipments of
lives as they move
through the mail;
rather it tracks
them using the
same procedures
as all packages. If

"Delayed packages of lives occurred because staff were unaware of the delivery requirement, did not check the hatch date on each package, or failed to determine the required delivery date and time."

the Postal Service does not track these shipments, it cannot take additional action when potential delays are identified. Recently, thousands of lives were found left on a Postal Service truck for three days.²² Having the capability to uniquely track shipment of lives may have been useful in preventing this process breakdown.

Missent Day-Old Poultry

The Postal Service does not have a policy for how shipment of lives should be handled when sent to the wrong facility. We found packages of lives that had been missent to the St. Louis NDC and the Des Moines P&DC. Staff treated these packages like any other piece of missent mail and routed them to the correct facility. However, one of these packages failed to

¹⁹ Publication 52, Hazardous, Restricted, and Perishable Mail, Section 526.32, Mailability Requirements, issued September 2023.

²⁰ Publication 52, Hazardous, Restricted, and Perishable Mail, Section 524, Disposal, issued September 2023

²¹ Postal Operations Manual, Issue 9, Section 691.522, dated July 2002 and updated online through May 31, 2024.

²² Shipment of thousands of chicks left in USPS truck. Overwhelmed shelter needs help adopting them, News Release, dated May 19, 2025.

meet the 72-hour delivery requirement, which should have been considered before redirecting. Similarly, retail and delivery staff stated they would send any missent package of lives back to the processing facility to be redirected to the correct delivery unit regardless of the 72-hour delivery requirement.

Without clear guidance on how to handle these situations, the Postal Service put the health and well-being of missent lives at risk. Additionally, shippers are financially impacted, as they are left to replace the customer's order at additional cost.

Failing to immediately dispose of dead animals puts both the Postal Service staff's health at risk, as well as the customers, and could potentially damage Postal Service property.

Perished Day-Old Poultry

Retail, delivery, and processing staff were unsure of the process for handling packages of perished lives. Additionally, the Postal Service is not tracking when lives perish in its network. During site observations at the St. Louis and Des Moines P&DCs, we found packages of perished lives creating a foul odor. These packages were still being handled, instead of being disposed of because Postal Service policy does not give clear guidance.23 Processing staff stated they regularly continue to move packages of perished lives to the next processing facility or dispatch them for delivery (see Figure 9). Similarly, retail and delivery staff stated that they would either deliver the package or call the customer asking them how to proceed. These procedures aligned with the shippers' displeasure that the Postal Service delivered packages of perished lives to their facilities and to their customers.

Figure 9. Package of Perished Day-Old Poultry That Was Returned to Sender





Source: OIG photos taken at the St. Louis P&DC March 18, 2025.

Failing to immediately dispose of dead animals puts both the Postal Service staff's health at risk, as well as the customers, and could potentially damage Postal Service property. Also, instances of dead animals arriving at their destination can generate negative publicity and spark calls for improved practices and better animal welfare standards within the Postal Service. Headquarters management confirmed that they do not track shipments of lives that perish in their custody. Failing to track these shipments limits their ability to identify root causes and take corrective action to mitigate recurring issues.

²³ Postal Operations Manual, Issue 9, Section 691.521, dated July 2002 and updated online through May 31, 2024, requires the destruction of packages that are considered injurious, which we would consider inclusive of perished shipments of day-old poultry, but this is not explicitly stated.

The Lives Workbook issued to processing staff reiterated the requirement to deliver lives within 72 hours of hatching but did not define the procedures to follow for the handling of missent lives, or the disposal of lives (e.g., selling, donating to a charitable organization, or delivering the lives to a local humane society or animal shelter). Additionally, the Lives Workbook and Retail and Delivery Memorandum did not include sufficient guidance on the disposal of perished poultry.

Recommendation #7

We recommend **Executive Director, Product Solutions,** revise Publication 52 to require the mailer to include a "deliver by" date, which is 72-hours after hatching, on all packages of day-old poultry.

Recommendation #8

We recommend **Vice President, Applied Engineering,** develop electronic methods to uniquely track shipments of day-old poultry, including shipments that have perished.

Recommendation #9

We recommend **Vice President, Processing Operations,** develop a process specifically for the processing and handling of missent shipments of day-old poultry.

Recommendation #10

We recommend **Executive Director, Product Solutions,** revise Publication 52 to define when day-old poultry should be disposed of as an injurious item.

Recommendation #11

We recommend Vice President, Retail and Post Office Operations; Vice President, Delivery Operations; Vice President, Processing Operations; and Vice President, Logistics, develop and provide training to staff on the correct processes for the disposal of day-old poultry.

Postal Service Response

Management agreed with the finding and recommendations 9 and 10, but disagreed with recommendations 7, 8, and 11.

Regarding recommendation 7, management stated that the hatch date is already on the package, and it is known that delivery is expected within 72-hours of that date.

Regarding recommendation 8, management stated that it only adds to a process when the stakeholders (such as customers and product and process owners) ask for a technology solution. Management added that the product and process owners do not want this added as the product is barcoded and scanned like other barcoded packages.

Regarding recommendation 9, management stated it will clarify the process for missent shipments of day-old poultry, and will distribute. The target implementation date is April 30, 2026.

Regarding recommendation 10, management stated it will establish a policy on the disposal of perished day-old poultry. The target implementation date is January 31, 2026.

Regarding recommendation 11, management stated it will continue to follow established processes for the disposal of day-old poultry and if guidelines are updated in the future, instructions will be issued.

OIG Evaluation

The OIG considers management's comments responsive to recommendations 9 and 10, as the corrective action should resolve the issue identified in the report.

Regarding recommendation 7, the OIG found delayed shipments of day-old poultry because staff were unaware of or failed to properly determine the 72-hour delivery requirement using the hatch date on the package. This makes the hatch date ineffective at ensuring timely delivery

and protecting the well-being of the day-old poultry. The OIG considers management's disagreement with recommendation 7 as unresolved and will pursue it through the audit resolution process.

Regarding recommendation 8, although management stated that product and process owners do not want unique tracking for shipments of day-old poultry, it did not take customers into consideration. We found that hatcheries are looking for additional information, and use their own tracking mechanisms within packages. The OIG considers management's disagreement with recommendation 8 as unresolved and will pursue it through the audit resolution process.

Regarding recommendation 11, although management stated it would provide future instruction if guidelines for the disposal of day-old poultry are updated, the lack of clarity regarding current policy for the disposal of day-old poultry resulted in perished shipments continuing to move through the mail. The OIG considers management's disagreement with recommendation 11 as unresolved and will pursue it through the audit resolution process.

Appendices

Appendix A: Additional Information	20
Scope and Methodology	20
Prior Audit Coverage	21
Appendix B: Management's Comments	22

Appendix A: Additional Information

Scope and Methodology

Our objective was to assess the effectiveness of procedures for the acceptance, handling, and delivery of live, day-old poultry. To accomplish our objective, we:

- Interviewed Postal Service Headquarters management to gain an understanding of the nationwide process, challenges, and responsibilities for the acceptance, shipping, handling, and delivery of lives.
- Gained an understanding of internal controls around the shipping and handling of lives to help structure the nature, timing, and extent of audit procedures.
- Reviewed applicable laws and regulations and Postal Service policies and procedures.
- Reviewed contractual requirements between the Postal Service and its air carrier provider regarding lives.
- Interviewed three hatcheries and a major association of bird shippers to identify challenges and document experiences with the Postal Service's shipping and handling of lives.
- Obtained and analyzed lives volume data for January through May of 2024 and 2025.
- Reviewed lives insurance claims for Quarters 1-3, 2025, and air capacity data for February to April 2025.
- Judgmentally selected seven processing facilities, eight delivery units, and the two air carrier provider facilities (see Table 1) and conducted site visits in March and April 2025. During site visits we:
 - Conducted observations and interviews with Postal Service employees to gain an understanding of the process, challenges, training documents, and responsibilities for the acceptance, shipping, handling and delivery of lives.

- Conducted observations at two hatcheries to gain an understanding of their operations.
- Observed the intake, processing, staging, and loading to planes of lives at the air carrier provider facility.

Table 1. Judgmentally Selected Site Visit Locations

State	Facility	Date of Site Visit
IA	Des Moines Processing and Distribution Center (P&DC)	April 21-22, 2025
IA	Pella Post Office (PO)	April 22, 2025
	Ames PO	April 22, 2025
	Minneapolis Air Mail Center/Twin Cities Airport Mail Facility	April 21-24, 2025
MN	St. Paul P&DC	April 21-23, 2025
" "	Minneapolis P&DC	April 22, 2025
	Prior Lake PO	April 22, 2025
	Twin Cities PO	April 24, 2025
	St. Louis P&DC	March 19-20, 2025
МО	St. Louis Network Distribution Center	March 18-20, 2025
	Sparta PO	March 19, 2025
	Greenville PO	March 20, 2025
"	Troy PO	March 20, 2025
	Alton PO	March 18, 2025
TN	Memphis P&DC	April 29, 2025
IIN	Air Carrier Provider Facility	April 28-29, 2025

Source: OIG site visits.

We conducted this performance audit from
November 2024 through July 2025 in accordance with
generally accepted government auditing standards
and included such tests of internal controls as we
considered necessary under the circumstances.
Those standards require that we plan and perform
the audit to obtain sufficient, appropriate evidence
to provide a reasonable basis for our findings and
conclusions based on our audit objective. We believe
that the evidence obtained provides a reasonable

basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on August 21, 2025, and included its comments where appropriate.

In planning and conducting the audit, we obtained an understanding of acceptance, shipping, handling, and delivery of live, day-old poultry internal control structure to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the program and mitigating associated risks. Additionally, we assessed the internal control components and underlying principles, and we determined that the following five components were significant to our audit objective:

- Control environment
- Risk assessment
- Control activities
- Information and communication
- Monitoring

We developed audit work to ensure that we assessed these controls. Based on the work performed, we identified deficiencies related to the control environment, risk assessment, control activities, information and communication, and monitoring that were significant within the context of our objectives. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of Customer 360, Product Tracking and Reporting, Surface Visibility, and Enterprise Data Warehouse data by performing testing for data completeness, reasonableness, accuracy and validity. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
Efficiency of Surface Transfer Centers in the Southern Region	To evaluate the efficiency and effectiveness of the Southern Region's Surface Transfer Centers (STCs).	21-212-R22	03/16/22	\$ O
Assessment of Changes to Air Transportation Contracts	To evaluate the U.S. Postal Service's air transportation network changes under its new air agreement.	25-022-R25	06/23/25	\$0

Appendix B: Management's Comments



September 11, 2025

LAURA LOZON DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Shipping and Handling of Day-Old Poultry (25-031-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft audit report, Shipping and Handling of Day-Old Poultry (25-031-DRAFT)

Finding #1: Untimely Communication of Network Changes and Ineffective Coordination Negatively Impacted Customers

Management agrees we could enhance our line of communication to be more robust in certain instances.

Finding #2: Insufficient Acceptance Procedures

Management disagrees. Management believes OIG's comments are anecdotal when referring to the retail acceptance process. Employees are required to follow the established workflows as detailed in the Retail System Software (RSS) – including the acceptance requirements for day-old poultry. Employees that need additional information can easily access Publication 52 via the same RSS technology. Management will continue to supplement the employee knowledge base by periodically distributing supportive resources as needed.

Finding #3: Inadequate Handling Practices

Management agrees there were isolated incidents where we did not always handle lives packages in the optimal manner. We were in the process of addressing inadequacies and making improvements to the process simultaneously as the audit was being performed.

Finding #4: Lack of Oversight at Air Carrier Operations

Management agrees with this finding.

Finding #5: Untimely Delivery

Management partly agrees with this finding.

The following are Management's comments on each of the eleven recommendations.

<u>Recommendation 1:</u> We recommend **Vice President, Customer Experience,** create job positions where the primary responsibility is to oversee regional coordination of the shipping and handling of day-old poultry between internal and external stakeholders.

Management Response/Action Plan:

Management agrees with this recommendation, although we do not feel that the primary responsibilities warrant additional full-time positions in CX. Our Area Business Service Network (BSN) Specialists and Representatives currently assist with poultry and lives issues. We will identify, train and align subject matter experts within our existing BSN complement to support each Region/Area. We are in the process of conducting subject matter expert (SME) training, to be completed prior to the end of FY25 and ensure compliance as we move into FY26.

Target Implementation Date: 1/31/2026

Responsible Official:

Sr. Director Customer Relations

<u>Recommendation 2:</u> We recommend **Vice President, Customer Experience**, establish recurring meetings throughout peak shipping season of day-old poultry with the applicable internal and external stakeholders to discuss issues and implement immediate corrective action.

Management Response/Action Plan:

Management agrees with this recommendation.

CX is currently a stakeholder in semi-weekly Internal Lives collaboration meetings through Peak shipping season. We will partner with Product Classification, who has an existing cadence with external Industry members from Bird Shippers of America. Jointly, we will meet quarterly, or more frequently as required, to discuss issues and provide resolutions leading into and through Peak shipping season.

Target Implementation Date: 3/31/2026

Responsible Official:

Sr. Director Customer Relations

<u>Recommendation 3:</u> We recommend **Vice President, Processing Operations,** in coordination **with Vice President, Applied Engineering**, revise the Handling Lives Workbook to include procedures for accepting day-old poultry, including visual aids in accordance with mailing requirements in Publication 52.

Management Response/Action Plan:

Management **agrees** with this recommendation. The Workbook has been updated to further clarify procedures. USPS requests closure at issuance of the final report.

Target Implementation Date: 11/30/2025

Responsible Official:

Sr Director Strategic Planning & Implementation

<u>Recommendation 4:</u> We recommend Vice President, Retail and Post Office Operations, and Vice President, Processing Operations, communicate to staff each year the acceptance procedures for day-old poultry prior to the start of peak shipment season.

Management Response/Action Plan:

Management **agrees** with this recommendation. Acceptance procedures for day-old poultry will continue to be communicated on an annual basis – and as needed when concerns arise.

Target Implementation Date: 04/30/2026

Responsible Official:

Sr Director Strategic Planning & Implementation, Director, Retail Operations

Recommendation 5: We recommend Vice President, Logistics; Vice President, Processing Operations; and Vice President, Applied Engineering, revise the "Handling Lives" Workbook and reissue annually, before each peak shipping. At a minimum, revisions to the workbook should include: performing a primary sort by transportation mode; proper bed loading; a limit for stacking packages; following first in, first out methods; and unloading day-old poultry timely from trailers.

Management Response/Action Plan:

Management agrees with this recommendation. The Workbook was updated 5/29/25 and will be reissued before peak shipping time.

Target Implementation Date: 4/30/2026

Responsible Official:

Sr Director Strategic Planning & Implementation

<u>Recommendation 6:</u> We recommend **Vice President, Logistics**, establish processes and procedures for periodic on-site review of its air carrier operations to ensure proper loading and securing of day-old poultry shipments.

Management Response/Action Plan:

Management **agrees** with this recommendation. The Headquarters Air Logistics team will establish and conduct quarterly audits of the air carrier Lives operations to ensure the air carrier is adhering to the proper loading and securing of day-old poultry shipments as they transit through the air carriers' network. Management requests to close with issuance of the final report.

Target Implementation Date: 10/31/2025

Responsible Official: Dir Air Cargo Operations

<u>Recommendation 7:</u> We recommend <u>Executive Director</u>, <u>Product Solutions</u>, revise Publication 52 to require the mailer to include a "deliver by" date, which is 72-hours after hatching, on all packages of day-old poultry.

Management Response/Action Plan:

Management disagrees with this recommendation.

The hatch date is already on package. It is known that delivery is expected 72 hours from hatch date.

Target Implementation Date: N/A

Responsible Official: N/A

<u>Recommendation 8:</u> We recommend **Vice President, Applied Engineering,** develop electronic methods to uniquely track shipments of day-old poultry, including shipments that have perished.

Management Response/Action Plan:

Management **disagrees** with this recommendation. As a support organization, Applied Engineering only adds to a process when the stakeholders (customers, product and process owners) ask for a technology solution. The product owners and the process owners do not want this added as the product is barcoded and scanned like other barcoded packages.

Target Implementation Date: N/A

Responsible Official: N/A

<u>Recommendation 9:</u> We recommend Vice President, Processing Operations, develop a process specifically for the processing and handling of missent shipments of day-old poultry.

Management Response/Action Plan:

Management agrees with this recommendation. The process will be clarified and distributed.

Target Implementation Date: 04/30/2026

Responsible Official:

Sr Director Strategic Planning & Implementation

<u>Recommendation 10:</u> We recommend <u>Executive Director</u>, <u>Product Solutions</u>, revise Publication 52 to define when day-old poultry should be disposed of as an injurious item.

Management Response/Action Plan:

Management agrees with this recommendation. Management will establish a policy on the disposal of day-old poultry that have perished.

Target Implementation Date: 01/31/2026

Responsible Official:

Executive Director, Product Solutions

<u>Recommendation 11:</u> We recommend Vice President, Retail and Post Office Operations; Vice President, Delivery Operations; Vice President, Processing Operations; and Vice President, Logistics, develop and provide training to staff on the correct processes for the disposal of day-old poultry.

Management Response/Action Plan:

Management disagrees with this recommendation. Management will continue to follow established processes for the disposal of day-old poultry. If guidelines are updated in the future, communication and necessary instructions will be issued.

Target Implementation Date: N/A

Responsible Official: N/A

E-SIGNED by MARC.D MCCRERY on 2025-09-11 17:25:14 EDT

Marc McCrery

Vice President, Customer Experience

E-SIGNED by Jennifer.T Vo on 2025-09-11 16:27:04 EDT

Jennifer Vo

Vice President, Retail and Post Office Operations

E-SIGNED by DANE.A COLEMAN on 2025-09-12 10:10:36 EDT

Dane Coleman

Vice President, Processing Operations

E-SIGNED by ROBERT CINTRON on 2025-09-12 05:54:07 EDT

Robert Cintron

Vice President, Logistics

E-SIGNED by MARGARET.M PEPE on 2025-09-11 17:45:24 EDT

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Linda Malone

Vice President, Applied Engineering

cc. Corno	rate Audit & Res	snonse Manag	ement		
cc. Corpo	rate Audit & Res	sporise Mariag	GIIIGIIL		





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