



Glass Walls / We Animals



## **Are We Subsidizing the Next Pandemic?**

*How Government Payments to Big Poultry Threaten Public Health*

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## INTRODUCTION

As the highly pathogenic avian influenza (HPAI) H5N1 moves rapidly across species, the power of the industrial animal sector and the negligence of the federal government have paved the way for the next pandemic. Through industry's influence over government agencies, taxpayers are subsidizing programs that profit the industrial animal sector and increase the likelihood of a full-blown H5N1 pandemic.

An H5N1 pandemic could be catastrophic for public health. Globally, the World Health Organization reports that 48.6 percent of HPAI H5N1 cases in humans have been fatal.<sup>1</sup> In the United States, 70 human cases of the virus have been confirmed, including one fatality.<sup>2</sup> According to public health experts, however, this number could be higher, as the low rate of testing likely underestimates the extent and severity of the outbreak.<sup>3</sup> At present, human-to-human transmission of the virus has not been confirmed, but scientists have discovered that the H5N1 variant found in dairy herds requires only one mutation to cause it to pass among humans and create a potentially virulent outbreak.<sup>4</sup> Given that H5N1 mutates rapidly, like other forms of HPAI, scientists and public health officials are particularly concerned that we are just one mutation away from a potentially deadly human pandemic.

Globally, the industrial animal sector has been the cause of at least 50 percent of zoonotic diseases and is implicated in the potential for new global pandemics, according to the United Nations.<sup>5</sup> Conditions of intensive confinement, genetically homogenous livestock populations, overcrowding, poor ventilation, transport, and centralized industrial slaughter—all hallmarks of industrial meat, dairy, and egg production—have led researchers to report the impossibility of preventing these diseases under the current practices of industrial scale production.<sup>6</sup>

At the same time, the industrial animal sector has exercised its power to influence government oversight of biosecurity plans on farms, which are critical to the containment of the virus. To date, poultry producers have been granted \$1.25 billion in indemnities by USDA's Animal and Plant Health Inspection Service (APHIS)—payments that are meant to cover the costs of losses on farms when

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<sup>1</sup> Pan American Health Organization / World Health Organization, "[Epidemiological Update: Avian Influenza A\(H5N1\) in the Americas Region](#)," January 24, 2025.

<sup>2</sup> CDC, "[H5 Bird Flu: Current Situation](#)."

<sup>3</sup> Patrick Maguire, "[Dr. Leana Wen Says for Bird Flu, 'We Should Have Learned Our Lesson from COVID' in Testing](#)," CBS News, December 29, 2024.

<sup>4</sup> Ting-Hui Lin et al., "[A single mutation in bovine influenza H5N1 hemagglutinin switches specificity to human receptors](#)," *Science* 386 (2024), 1128-1134.

<sup>5</sup> United Nations, "[Environment Programme and International Livestock Research Institute. Preventing the Next Pandemic: Zoonotic Diseases and How to Break the Chain of Transmission](#)," July 6, 2020.

<sup>6</sup> Matthew Hayek, "[The Infectious Disease Trap of Animal Agriculture](#)," *Science Advances* 8, no. 44 (2022). Alyssa Marchese and Alice Hovorka, "[Zoonoses Transfer, Factory Farms and Unsustainable Human-Animal Relations](#)," *Sustainability* 14, no. 19 (2022).

birds and eggs are destroyed after infection or exposure to H5N1.<sup>7</sup> Top egg and poultry companies have received the largest bailouts while many continue to profit at the expense of taxpayers, and \$365 million has been paid to repeat recipients—producers that have had more than one outbreak at the same farm.<sup>8</sup> Following the February 2025 confirmation of the new U.S. Secretary of Agriculture, Brooke Rollins, USDA announced that it would allocate an additional \$1 billion in H5N1 response, \$900 million of which are essentially additional indemnities: \$400 million will go to the repopulation of flocks following H5N1 depopulations and \$500 million will go to addressing biosecurity concerns.<sup>9</sup> These additional funds increase taxpayer funds spent on H5N1 response to well over \$2 billion.

USDA has admitted its own failings in its indemnity program thus far, highlighting the ineffectiveness of its biosecurity audit process and how the program disincentivizes producers from making meaningful improvements to curb the spread of the disease.<sup>10</sup> Despite revisions made to USDA indemnity policies in December 2024, the audit procedures remain insufficient, and significant loopholes still exempt many farms from audits to qualify for payments. Exacerbating the problem is the Trump Administration’s communications blackout on information from the CDC and other health organizations that would alert the public to the scale of the outbreak.

### **USDA COMPENSATION PAYMENTS TO POULTRY FARMS INCREASE PANDEMIC RISK**

*(Note: The indemnity payments below are amounts that have been committed by USDA APHIS to companies but have not necessarily been paid out yet.)*

\$1.4 billion in taxpayer dollars have been spent on efforts to control the poultry outbreak between January 2022 and December 2024.<sup>11</sup> Of these funds, \$1.25 billion have been directed to indemnities paid out to more than 1,200 poultry farms infected with the virus.<sup>12</sup> Indemnity payments are federal funds generated from taxpayer dollars paid out by USDA APHIS. They offer financial compensation to farmers, ranchers, or livestock owners to cover losses or damages incurred due to specific risks, such as disease outbreaks (like HPAI H5N1), natural disasters, or government-mandated “depopulation” of animals for public health reasons.

**Some of the largest egg and poultry companies have received the highest indemnities, such as Jennie-O Turkey Store, Inc., Herbruck Poultry Ranch, Inc., Center Fresh Egg Farm, and Cal-Maine Foods (see Figure 1).**

<sup>7</sup> USDA APHIS, [Payment of Indemnity and Compensation for Highly Pathogenic Avian Influenza](#), December 31, 2024.

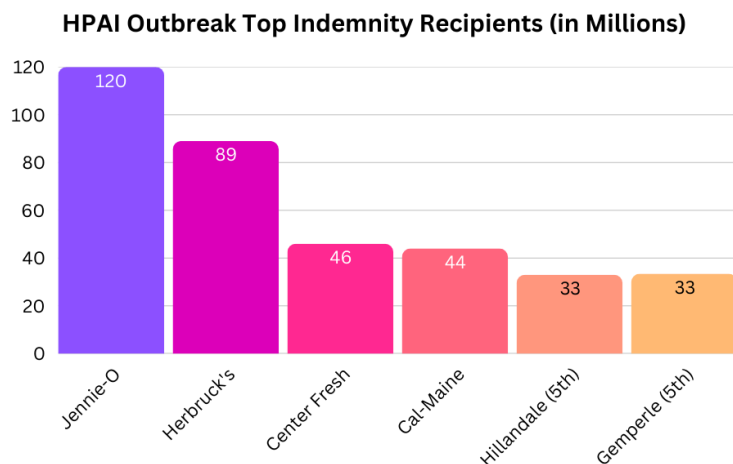
<sup>8</sup> USDA APHIS, “[APHIS Announces Updates to Indemnity Program for Highly Pathogenic Avian Influenza on Poultry Farms](#),” December 30, 2024.

<sup>9</sup> USDA, “[Press Release: USDA Invests Up To \\$1 Billion to Combat Avian Flu and Reduce Egg Prices](#),” February 26, 2025.

<sup>10</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>11</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>12</sup> USDA APHIS, [Payment of Indemnity](#).



**Figure 1. HPAI Outbreak Top Indemnity Recipients (in Millions)**

Jennie-O Turkey Store Inc., owned by Hormel, is the second largest turkey producer in the United States and supplies retail corporations like Walmart and Albertsons. Jennie-O has received the highest indemnities of any producer—roughly \$120 million since the beginning of the outbreak.<sup>13</sup>

Herbruck Poultry Ranch Inc., has been granted \$89 million.<sup>14</sup> Three of Herbruck's indemnity payments alone account for \$72 million of this amount, going to three farms that culled<sup>15</sup> **2.4 million, 2.1 million, and 1.9 million chickens**.<sup>16</sup> These are some of the highest cull numbers and corresponding indemnity payments over the course of the outbreak so far.

<sup>13</sup> USASpending.gov "[Jennie-O Turkey Store, Inc.](#)"

<sup>14</sup> USASpending.gov, "[Herbruck Turkey Ranch, Inc.](#)"

<sup>15</sup> Culling in this context refers to the mass killing of birds (e.g., chickens and turkeys) as an attempt to control the spread of bird flu in infected flocks, or at-risk flocks. It is often carried out in ways that are quite problematic for animal welfare, such as in the case of ventilation shutdown, where barns are overheated to slowly kill thousands or tens of thousands of birds at once.

<sup>16</sup> Our Honor, "[Taxpayers Have Spent More Than \\$1 billion Dollars to Support Corporate Interests During the Highly Pathogenic Avian Influenza Outbreak](#)," February 21, 2024.

Center Fresh Egg Farm has been pledged \$46 million.<sup>17</sup> The company is owned by Versova, a private holding firm that also owns other recipients of HPAI indemnities, including Trillium Farms (\$28 million in indemnities<sup>18</sup>) and Centrum Valley Farms (\$12 million in indemnities<sup>19</sup>), totaling \$86 million for Versova-held farms. The ownership of multiple producers by a holding company like Versova helps to obscure the larger-scale funds being funneled to parent companies.

Cal-Maine Foods, Inc., the largest producer and distributor of eggs in the United States, has received \$44 million.<sup>20</sup> Cal-Maine supplies eggs to retailers like Kroger, Costco, and McDonald's.<sup>21</sup> While receiving indemnities, the company has seen record growth in both sales and stock shares.<sup>22</sup> A publicly traded egg company, Cal-Maine's stocks reached an all-time high in January 2025. As the H5N1 outbreak surged, the company's market value increased 109.98 percent in 2024.<sup>23</sup> Their net sales skyrocketed from \$523.2 million in the second fiscal quarter of 2024 to \$954.7 million in the same quarter of fiscal year 2025—an 82 percent increase.<sup>24</sup>

Hillandale Farms and Gemperle Family Farms have also received high indemnities, with both companies granted \$33 million.<sup>25</sup> Hillandale, one of the largest egg producers in the country, sells its eggs at major retailers like Walmart and Sam's Club. Gemperle is a leading organic and cage-free egg producer in Northern California.

If producers can rely on indemnity payments to cover losses associated with avian flu, any incentive to implement costly changes to these high-risk farming practices is low. But it is not the poultry industry alone that threatens public health and perpetuates the spread of H5N1. **Their behavior is subsidized and incentivized by the negligence of USDA in paying out these indemnities.** USDA has not only been paying farms that have had outbreaks for the first time; a significant number of farms have received repeat indemnities for producers that do not implement effective biosecurity plans.

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<sup>17</sup> USASpending.gov, "[Center Fresh Egg Farm](#)."

<sup>18</sup> USASpending.gov, "[Trillium Farms](#)."

<sup>19</sup> USASpending.gov, "[Centrum Valley Farms](#)."

<sup>20</sup> USASpending.gov, "[Cal-Maine Foods, Inc.](#)"

<sup>21</sup> Shandra Martinez, "[Herbruck Brothers 'Serve the Bird'](#)," *Michigan Retailers Association*, March 2, 2020.

<sup>22</sup> USASpending.gov, "[Cal-Maine Foods, Inc.](#)"

<sup>23</sup> Investing.com, "[Cal-Maine Foods Stock Soars to All-Time High of \\$114.25](#)," January 17, 2025.

<sup>24</sup> Investing.com, "[Cal-Maine Foods](#)"; Cal-Maine Foods, "[Cal-Maine Foods Reports Results for Second Quarter Fiscal 2025](#)," January 7, 2025; Meredith Dawson, "[Egg demand boosts Cal-Maine net sales 82% in Q2 of 2025](#)," *WATT Poultry*, January 8, 2025.

<sup>25</sup> USDASpending.gov, "[Hillandale Farms of Ohio](#);" USDASpending.gov, "[Gemperle Family Farms](#)."

## USDA COMPENSATES REPEAT OFFENDERS

By the end of 2024, \$365 million had been paid out in indemnities to repeat recipients—farms that failed to implement measures to prevent reinfections and thus had multiple outbreaks of the virus on the same farms.<sup>26</sup> As of December 2024, USDA reported that 67 farms had H5N1 outbreaks twice or more, with 19 reporting three or more separate occurrences of reinfection.<sup>27</sup> With the option to apply multiple times for indemnities after reinfection, producers have been incentivized to continue risky behaviors that deepen the scale of the outbreak.<sup>28</sup>

According to USDA, “When producers fail to effectively implement and maintain their poultry biosecurity plan, the deficiencies can be quite pronounced and the consequences quite significant—namely that the premises gets infected with HPAI multiple times.”<sup>29</sup>

This is not only a problem of individual farms neglecting to implement appropriate biosecurity measures. USDA reports that some producers systematically refused to participate in audits and neglected to address biosecurity at multiple facilities owned by the same company.<sup>30</sup> The agency cites one example where a particular producer in the same geographic area had six different farms infected with HPAI.<sup>31</sup> Each of these facilities had “significant biosecurity lapses.”<sup>32</sup>

The lack of meaningful government oversight has allowed this dangerous trend to continue. Industry is, of course, going to take advantage of available funds and avoid bearing the costs of prevention if it is allowed to do so. Without a limit to how many times a producer can apply for indemnities for HPAI, they have been free from developing or following biosecurity plans to prevent new outbreaks, knowing that they can receive indemnity payments in the future. This behavior has been directly tied to the systematic failures by USDA to require and enforce protective measures and responsible disease management practices. USDA itself reports its failings in its regulatory oversight.

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<sup>26</sup> USDA APHIS, [“APHIS Announces Updates.”](#)

<sup>27</sup> USDA APHIS, [Payment of Indemnity.](#)

<sup>28</sup> USDA APHIS, [Payment of Indemnity.](#)

<sup>29</sup> USDA APHIS, [Payment of Indemnity.](#)

<sup>30</sup> USDA APHIS, [Payment of Indemnity.](#)

<sup>31</sup> USDA APHIS, [Payment of Indemnity.](#)

<sup>32</sup> USDA APHIS, [Payment of Indemnity.](#)

## CURRENT AUDITS FOR SAFETY MEASURES HAVE BEEN MEANINGLESS

In an interim final rule (a revision in agency policy, effective immediately) published in December 2024, USDA reviewed its practices throughout the first three years of the current H5N1 outbreak, finding significant failings in the process through which indemnities are granted. Under the current system of indemnities, the producer “becomes inclined to disregard biosecurity because they believe that APHIS will continue to cover the costs associated with damages related to an HPAI outbreak through indemnity payments regardless of their biosecurity status. The current regulations do not provide a sufficient incentive for producers ... to maintain biosecurity throughout an outbreak.”<sup>33</sup>

One of the key failings reported by the agency in its distribution of taxpayer funds has been its biosecurity auditing process. Through the end of 2024, biosecurity audits were required for poultry producers only every two years. Since the CDC has only collected data on HPAI H5N1 in poultry and other birds since early 2022,<sup>34</sup> producers could have gone through most of this current outbreak period without having their biosecurity practices inspected.<sup>35</sup> Furthermore, audits over the last three years have been *paper-based*, meaning producers have self-reported their management practices, with no verification of their reports’ accuracy or transparency. **Under the self-reporting, paper-based audit system, the number of biosecurity audit failures has been zero, despite the widespread outbreak of the virus on farms without adequate biosecurity programs to manage disease.**<sup>36</sup>

The paper-based audit process has meant that USDA has not required visual inspections to qualify for indemnities. In the absence of visual inspection of farms, USDA has been unable to ensure that producers are taking the appropriate biosecurity measures to prevent reinfection.

In an effort to address the problem of reinfections and the further spread of the disease, the new interim final rule requires audits of farms’ biosecurity measures following an outbreak before restocking the farms with new birds, and before applying for a new round of indemnity payments.<sup>37</sup> But even this revision is qualified in the document, which states that “indemnity will now be conditioned *in certain instances* on visual evaluation of biosecurity” [emphasis added].<sup>38</sup>

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<sup>33</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>34</sup> CDC, “[H5 Bird Flu: Current Situation](#).”

<sup>35</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>36</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>37</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>38</sup> USDA APHIS, [Payment of Indemnity](#).



Although the document acknowledges the ineffectiveness of this inspection process and calls for visual audits, this new system allows for inspections to be done in person or virtually.<sup>39</sup> Most of the audits, according to the agency, will be done virtually because of limited funding and the impracticality of inspectors visiting farms with understaffing (which could be exacerbated by layoffs under the Trump administration). USDA itself acknowledges that virtual audits can present incomplete views of the producer's practices since phones or other video devices limit what can be seen by auditors; for instance, the presence of rodents in feed and bedding can be overlooked if the producer does not direct the camera to evidence of their presence.<sup>40</sup> What on the surface sounds like an improvement in oversight measures actually involves only a modest change with the shift from paper-based to predominantly virtual visual inspections—one that still relies on farms representing accurately what is occurring at the facility and then proactively adopting biosecurity plans to mitigate the risk of an outbreak.

Three years into the outbreak, and \$1.25 billion in taxpayer dollars later, **USDA has done little to address the proliferation of the virus**—both in their existing oversight process and with the limitations in the new amendments proposed by the agency. In a CNN interview, director of the Center for Infectious Disease Research and Policy at the University of Minnesota Dr. Michael Osterhold said, “USDA has basically dropped the ball, big-time. I think it was out of fear to protect the industry. And they thought it was going to burn out, and it didn't.”<sup>41</sup> Whether it has been fear of the industry or more general negligence, government mishandling has led to a delayed response to the outbreak that essentially allows the industry to regulate itself. Worse, the agency has built loopholes into its new requirements, exempting many producers from biosecurity management plans altogether.

### **HUGE LOOPHOLES IN SAFETY REQUIREMENTS ALLOW MANY FARMS TO TAKE NO MEASURES AT ALL**

Industrial-scale farms that the industry deceptively classifies as “small” producers are exempt from developing or implementing a biosecurity plan to receive indemnities. They do not have to pass biosecurity audits and can continue to qualify for indemnity payments if the particular premises has fewer than a certain number of birds:

- For egg-laying facilities, fewer than 75,000 birds.
- For chicken meat production, fewer than 100,000 chickens.
- For turkey farms, fewer than 30,000 turkeys.<sup>42</sup>

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<sup>39</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>40</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>41</sup> Meg Tirrell, “[We 'Have Our Head in the Sand': Health Experts Warn US Isn't Reacting Fast Enough to Threat of Bird Flu](#),” CNN, December 27, 2024.

<sup>42</sup> USDA APHIS, [Payment of Indemnity](#).

USDA's reasoning is based on the fact that a comparatively small number of birds are being raised on farms operating at this size. The agency cites the fact that 99 percent of the total number of broiler chickens raised in the U.S., and 97 percent of turkeys, are raised on farms larger than the above-stated numbers.<sup>43</sup> For laying hens, it's 80 percent of the total number of birds who are housed on farms that exceed the threshold for producers.<sup>44</sup> In 2023, more than 9.1 billion broiler chickens, 387 million laying hens, and 218 million turkeys were raised for meat.<sup>45</sup>

But these numbers belie the reality of just how many birds are raised in these “smaller” facilities that fall below the set thresholds. The percentage of poultry raised on farms under USDA's threshold leaves 91 million broiler chickens, 77 million laying hens, and 6.5 million turkeys with no biosecurity measures required to prevent disease outbreaks or reinfection. A farm with 99,999 broiler chickens or 29,999 turkeys is not at lower risk for an outbreak than a farm with 100,001 chickens or 30,001 turkeys.

If you look at the percentage of farms with flock sizes below these thresholds, 56 percent of broiler farms, well over 99 percent of egg farms, and over 80 percent of turkey farms fall into this “smaller” size category.<sup>46</sup>

The arbitrary thresholds for exemptions benefit all of these “smaller” producers regardless of whether they are a chicken farm with 90 birds or 90,000. In fact, this rule can actually incentivize producers to keep their flocks just under these counts to pass through without oversight or the expense of developing and implementing biosecurity plans.

Furthermore, large producers can take advantage of these exemptions if the individual farms under their ownership fall under these thresholds. Using USDA data obtained through FOIA, the nonprofit Our Honor tracked the size of farms, indemnity data, and numbers of birds culled under the current H5N1 outbreak.<sup>47</sup> A deep dive into Pitman Family Farms, specifically, showed the breakdown of farm size and the associated cull numbers and indemnities.

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<sup>43</sup> USDA APHIS, [Payment of Indemnity](#).

<sup>44</sup> USDA National Agricultural Statistics Service, [“Poultry - Inventory and Number Sold: 2022 and 2017.”](#)

<sup>45</sup> USDA National Agricultural Statistics Survey, [“Chickens, Broilers - Production, Measured in Head;”](#) [“Turkeys - Production, Measured in Head,”](#) data retrieved February 13, 2025; USDA National Agricultural Statistics Service, [“Southern Region News Release Chickens and Eggs,”](#)

<sup>46</sup> USDA National Agricultural Statistics Service, [“Poultry - Inventory and Number Sold: 2022 and 2017.”](#)

<sup>47</sup> Our Honor, [“Taxpayers Have Spent More Than \\$1 billion Dollars to Support Corporate Interests During the Highly Pathogenic Avian Influenza Outbreak,”](#) February 21, 2024.

Pitman Family Farms had received obligations of more than \$27 million in indemnities by the end of 2024.<sup>48</sup> The company sells meat from poultry under several brands, including Mary’s Free Range and Organic Turkeys, available at Whole Foods. Many of their farms house fewer than 100,000 chickens and 75,000 turkeys at any given premises.<sup>49</sup> It is unclear what Pitman Family Farms’ biosecurity protocols and practices have been, but according to the USDA interim rule, farms like the ones they own with smaller numbers would be exempt from forming and executing biosecurity plans or passing biosecurity audits while still receiving large indemnity payments from the agency.

Loopholes like this one further subsidize irresponsible practices that put the public at risk and protect only industry. While the poultry industry benefits from the massive expenditure of taxpayer dollars and lax government oversight, there is another evolving level of government failure that poses a severe threat to public health—the shutdown of communications about the outbreak itself.

### **INFORMATION BLACKOUT FROM THE NEW ADMINISTRATION LEAVES PUBLIC HEALTH OFFICIALS IN THE DARK**

Upon entering office, President Trump signed a directive to freeze the release of health-related scientific results to the public. CDC was slated to release the next issue of their weekly update *Morbidity and Mortality Weekly Report*, a hallmark source of critical public health information published in various forms since the 1930s, on January 23, 2025. That report, in addition to the weekly reports following, included new data and critical information on the avian flu outbreak.<sup>50</sup> The release of these communications was halted. Meetings scheduled for outside advisory panels were canceled, NIH grant review panels and study sections were frozen, and other external communications from the CDC and FDA were paused for the foreseeable future.<sup>51</sup> These moves come at a critical time when the rapidly evolving H5N1 virus is spreading throughout the country, mutating in a range of different hosts. The scale of the virus is currently unknown to scientists and the public, and CDC data is essential for understanding its scope and severity, as well as controlling its spread.

After a two-week moratorium on the *Mortality and Morbidity Weekly Report*, the CDC released a report on February 6, 2025 that contained an update on the avian flu, specifically its confirmed transmissions between cats and humans. The information was limited to a table in the report, which was otherwise focused on the wildfires in California and emergency response. As reported by the *New*

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<sup>48</sup> USASpending.gov, “[Pitman Family Farms](#).”

<sup>49</sup> Our Honor, “[Taxpayers Have Spent More Than \\$1 billion Dollars to Support Corporate Interests During the Highly Pathogenic Avian Influenza Outbreak](#),” February 21, 2024. [See spreadsheet, “Pitman Family Farms Depopulations and Indemnity Payments.”]

<sup>50</sup> Teddy Rosenbluth, Apoorva Mandavilli, and Sheryl Gay Stolberg, “[Trump Administration Temporarily Mutes Federal Health Officials](#),” *New York Times*, January 22, 2025.

<sup>51</sup> Rosenbluth, Mandavilli, and Stolberg, “[Trump Administration Temporarily Mutes Federal Health Officials](#).”

*York Times*, shortly after posting, the information on bird flu was swiftly removed from the publication.<sup>52</sup> The confirmed human case numbers tracked by the CDC did not change immediately following this report, although since then, several new cases have been documented, bringing the total human infections to 70.<sup>53</sup>

Despite the information blackout, some startling information is starting to trickle out. As the *New York Times* reported, a new CDC study—which was supposed to be released weeks ago—revealed that three dairy veterinarians had undetected bird flu infections, including one who worked exclusively in states with no reported outbreaks.<sup>54</sup> By and large, the ongoing shutdown of communications regarding the spread of the virus continues to put the public at risk, as there is still no new comprehensive information coming out about the state of the outbreak or the risk of humans contracting the virus.

As in the COVID-19 pandemic, the slow adoption of widespread testing and research on the evolution of genetic mutations of the H5N1 virus could severely limit the government’s ability to contain the outbreak as the spread escalates and genetic mutations proliferate.<sup>55</sup> Similar to the current situation with H5N1, the Trump Administration’s response to the spread of COVID-19 in early 2020 blocked and/or delayed reports related to the virus. The Administration downplayed the danger posed to the public, and spread misinformation about not only the COVID virus itself, but also testing, vaccines, and risks to public health.<sup>56</sup>

As the H5N1 outbreak escalates, government agency silence, negligence, and its allowance of industry to self-regulate its farming practices means that the current scale and severity of the outbreak, and the level of pandemic risk, are unknown.

## **VACCINE REQUIREMENTS LAG FAR BEHIND OTHER COUNTRIES**

The U.S. government has refused to mandate the implementation of an industry vaccination program for H5N1, despite the fact that vaccination has proven to be a highly effective way to prevent the spread of the virus in many countries around the world.<sup>57</sup>

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<sup>52</sup> Apoorva Mandavilli and Emily Anthes, “[C.D.C. Posts, Then Deletes, Data on Bird Flu Spread Between Cats and People](#),” *New York Times*, February 6, 2025.

<sup>53</sup> CDC, “[H5 Bird Flu: Current Situation](#).”

<sup>54</sup> Emily Anthes, “[C.D.C. Study Finds Silent Bird Flu Infections in Dairy Veterinarians](#),” *New York Times*, February 13, 2025.

<sup>55</sup> U.S. House of Representatives Select Subcommittee on the Coronavirus Crisis, “[Select Subcommittee Releases Final Report, Culminating More Than Two Years of Investigations Related to the Nation’s Response to the Coronavirus Crisis](#),” December 9, 2022; Patrick Maguire, “[Dr. Leana Wen Says for Bird Flu, ‘We Should Have Learned Our Lesson from COVID’ in Testing](#),” CBS News, December 29, 2025.

<sup>56</sup> U.S. House, “[Select Subcommittee Releases Final Report](#).”

<sup>57</sup> Islam et al., “[The Role of Vaccination and Environmental Factors on Outbreaks of High Pathogenicity Avian Influenza H5N1 in Bangladesh](#),” *One Health* 17 (2023): 100655.



Preventive vaccination has proven far more effective than the reactive “stamp out” (mass culling) taken by the U.S., which has allowed the virus to spread unchecked.<sup>58</sup>

The federal government cites fears over losing export trade if U.S. poultry farms were to implement a widespread vaccination campaign. Some countries restrict trade due to concerns that vaccinations may mask infections in flocks, thus spreading the virus. As the outbreak escalates, spreading with increasing virulence across species, the federal government and industry are prioritizing trade and profit for the industry over public safety. Annual U.S. poultry exports account for more than \$5.5 billion.<sup>59</sup>

Despite trade concerns, France took swift and decisive action to curtail the spread of H5N1 when they launched a vaccination campaign in October 2023 and a second campaign in October 2024.<sup>60</sup> The widespread vaccination program, paired with careful surveillance strategies, has proven highly effective in preventing spread of the virus—13 farms reported an outbreak in the first year of the campaign, with only 2 outbreaks occurring on farms that had been vaccinated.<sup>61</sup>

To date, the U.S. has taken an ineffective *reactive* strategy to infections rather than a predominantly *preventive* one, culling birds who have been infected or exposed to the virus, and hoping the method will control further outbreaks. It hasn't. As the U.S. drags its feet on vaccination, the virus has continued to mutate, making the widespread adoption of vaccines a more complicated issue (new variants of the virus will mean new variations of a vaccine will be necessary to respond to the crisis). There are currently vaccines available for H5N1 that could be rolled out to farms, but they have not received authorization for deployment in the industry.<sup>62</sup>

If the U.S. does not take decisive action quickly to integrate vaccines into the current H5N1 response, managing the escalating severity of the outbreak will become even more difficult. Experiencing firsthand the losing battle of controlling the virus under the current protocols (namely, culling as a responsive strategy), some farmers have recently called for the approval of vaccination as they have been hit hard with the burdens of culling their entire flocks.<sup>63</sup> And yet, major stakeholders in the poultry industry, like the National Chicken Council, have continued to strongly oppose the vaccine, doubling down on the position that profits matter more

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<sup>58</sup> Jess Craig, “[Why Aren't We Vaccinating Birds Against Bird Flu?](#)” Vox, May 14, 2024.

<sup>59</sup> USDA Foreign Agricultural Service, “[U.S. Poultry Meat & Prods. \(excl. eggs\) Exports in 2024.](#)”

<sup>60</sup> “[France to start second bird flu vaccination campaign in October.](#)” Reuters, August 20, 2024.

<sup>61</sup> Planchand et al., “[Surveillance Strategy in Duck Flocks Vaccinated against Highly Pathogenic Avian Influenza Virus.](#)” *Emerging Infectious Disease* 31, no. 1 (2025):115-122; Sybille de La Hamaide, “[France Kicks Off Bird Flu Vaccination Despite Trade Backlash Risk.](#)” Reuters, October 2, 2023; on the effectiveness of vaccination as part of H5N1 management, see also: Islam et al., “[The Role of Vaccination and Environmental Factors on Outbreaks of High Pathogenicity Avian Influenza H5N1 in Bangladesh.](#)” *One Health* 17 (2023): 100655.

<sup>62</sup> Tom Howarth, “[Why Is the US Not Vaccinating Poultry Against Bird Flu?](#)” Newsweek, January 5, 2025.

<sup>63</sup> Leah Douglas and Tom Polansek, “[US Farmers Call for Vaccine Option to Fight Bird Flu as Wildfowl Migration Begins.](#)” Reuters, September 27, 2024.

than public health.<sup>64</sup> With the largest current H5N1 outbreak in the world and increasing numbers of documented cases in humans, federal government vaccine response is critical to avoid the next pandemic. The February USDA announcement on its H5N1 response earmarked up to \$100 million for “vaccines, therapeutics, and other innovative solutions.”<sup>65</sup> It is unclear both what the “other innovative solutions” would include and how much of this \$100 million would actually go to the development and approval of vaccines. We hope that these dedicated funds will move in the direction of making available vaccines to prevent increasing outbreaks of the virus.

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<sup>64</sup> Tom Howarth, “[Why Is the US Not Vaccinating Poultry Against Bird Flu?](#)” *Newsweek*, January 5, 2025.

<sup>65</sup> USDA, “[Press Release: USDA Invests Up To \\$1 Billion to Combat Avian Flu and Reduce Egg Prices](#),” February 26, 2025.