

From: [Balkcom/AGA](#)
To: [FSIS Petitions - FSIS](#)
Subject: Petition Submitted by Perdue Farms, LLC PETITION NUMBER 23-03 Monday,
Date: August 21, 2023 1:31:23 PM

Docket Clerk Food Safety and Inspection Service US Department of Agriculture 1400 Independence Avenue SW Washington, DC 20250-3700 Submitted electronically via fsispetitions@usda.gov

American Grassfed Association (AGA) appreciates the opportunity to add comments to

RE: Support for Perdue Farms LLC Petition (#23-03) To Whom It May Concern:

Thank you for the opportunity to submit comments on behalf of the American Grassfed Association, our producers and supporters nationwide on Petition #23-03 submitted on March 16, 2023 by Perdue Farms, LLC dealing with the Food Safety and Inspection Service's (FSIS) approval of the claims "free range" and "pasture raised" for use on poultry products.

Recent moves by the Secretary of the USDA shows its commitment to the Administration's call to define label claims to remove the ambiguity of labeling language. AGA appreciates the constraints FSIS faces in overseeing these claims with limited staffing and the use of affidavits to assist in verifying these claims.

AGA has developed on farm inspected standards written by and for producers of "grassfed" for ruminants and dairy as well as standards for "pastured pork." These standards align with consumer expectations. The standards written by AGA and APPPA do the same.

We have been working with APPPA (American Pastured Poultry Producers Association) for the better part of two years to create auditable credible standards that define pastured poultry that also aligns with consumer expectations of what they want when they see the "pastured raised" on the label of poultry products.

Clearly defining and having standards for the term "pasture" removes the conflation of the term of free range and pasture raised and has caused confusion in the marketplace and has led to the misleading interpretation of "pasture raised".

We are appreciative of the opportunity to add comments in support of this petition and will continue to support American Farmers in their efforts to extract the premiums these label claims bring to their products, and will remove the "posers" that use the term without doing the work that the consumer expects when they see the term "pasture raised."

Thank you,

Carrie Balkcom

Executive Director, American Grassfed Association.

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