



A GREENER WORLD

Our Food. Our Farms. Our Future. Let's Choose!

April 18, 2024

Food Safety and Inspection Service

U.S. Department of Agriculture

Email: FSISPetitions@usda.gov

Re: Petition 23-03

To Whom it May Concern,

Please accept the following comments in response to the petition submitted by **Perdue Farms, LLC (Petition 23-03)**, which requests that the Food Safety and Inspection Service (FSIS) conduct rulemaking to define separate “free range” and “pasture-raised” claims for meat and poultry products, and that FSIS update its guidance on claims related to living/raising conditions to ensure the claims align with consumer expectations.

With respect to this petition, A Greener World requests FSIS to respond by issuing an Advanced Notice of Proposed Rulemaking (ANPR), enabling input from the broad set of stakeholders potentially impacted by changes to these claims.

A Greener World (AGW) promotes practical, sustainable solutions in agriculture by supporting farmers and educating consumers. We believe the way we farm, the nutritional quality of the meat, milk and eggs produced—and the impact of farming systems on wildlife, the environment and wider society—are all connected. AGW's growing family of trusted certifications validated by on-farm, third-party audits includes [Certified Animal Welfare Approved by AGW](#), [Certified Grassfed by AGW](#), [Certified Regenerative by AGW](#) and [Certified Non-GMO by AGW](#).

As labeling regulations currently stand, “free range” claims may be used in reference to meat and poultry products from enclosed confinement systems devoid of any meaningful pasture access. Similarly, the “pasture-raised” claim lacks any legal definition, leading to its frequent misuse—and subsequent confusion among consumers. While “pasture-raised” implies that animals were raised outdoors on pasture, there is presently **no** guarantee of this whatsoever without an accompanying third-party certification that physically verifies pasture-based management, such as the Certified Animal Welfare Approved by AGW program.

When purchasing meat and poultry products, it is essential that consumers are clearly informed about the production system, including any outdoor access provided to animals, the size of the outdoor area, and the duration of time animals spend outdoors. Without a clear definition, the term “pasture-raised” also provides no assurance of high-welfare or environmentally sustainable practices. While raising animals on pasture can provide the conditions for improved animal welfare, access to pasture alone



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does not guarantee positive outcomes in a farming system. This is why AGW's Animal Welfare Approved standards and certification procedures address pasture-based management holistically through a comprehensive assessment of management practices, including feed and water quality, physical alterations, breed suitability to pasture-based management, handling, socialization, and responsible use of medical treatments.

We contend that any "pasture-raised" claims about meat and poultry products should be clearly defined and verified by third-party audit and certification to ensure transparency and consistency. In any case, as globally recognized certifications that require pasture-based management, Certified Animal Welfare Approved by AGW, Certified Grassfed by AGW, Certified Regenerative by AGW, and Certified Non-GMO by AGW should all serve as valid documentation for a "pasture-raised" claim.

It is widely acknowledged that "free range" is **not** synonymous with—and cannot be considered equal to—"pasture-raised." As such, further clarity is urgently required for both claims. We therefore support efforts by the USDA to pursue that clarity in a way that meets consumer expectation and upholds transparency and high animal welfare, conducted in an open and deliberate process with robust public engagement and stakeholder consultation. In the context of increasing public concern about the impact of their food choices on the environment and animal welfare, concerted efforts to ensure meaningful definitions for valuable label claims will not only prevent consumer confusion from misleading claims but will also protect farmers by having a common and transparent meaning.

On behalf of the thousands of exceptional farmers and conscientious consumers with whom we work, we urge the USDA to take definitive action on this matter to ensure the integrity of food labeling and to promote greater transparency within the agricultural industry.

Thank you for your consideration and please be in touch if we can offer any further assistance.

Sincerely,



Emily Moose
Executive Director

[A Greener World](https://www.agreenerworld.org)

Empowering Sustainable Solutions in Agriculture

