



October 4, 2023

Food Safety & Inspection Service (FSIS)
U.S. Department of Agriculture
Email: FSISPetitions@usda.gov

Re: Petitions Regarding FSIS's "Pasture Raised" claims

The Cornucopia Institute (Cornucopia) uncovers the truth behind organic food and advocates for an organic label you can trust. Through research and investigations into agriculture and food issues, we provide needed information to family farmers, consumers, and other stakeholders in the organic agriculture community.

Cornucopia's primary audience is the consumer, but we regularly receive information and collaborate with retailers, farmers, and other stakeholders. Labeling claims are confusing and misleading to consumers, especially when the same terms are being used for a wide range of practices. Third-party labels deepen this confusion, but the foundation is a lack of clarity in federal labeling regulations.

Despite the confusion, consumers, retailers, and farmers understand that "free range" and "pasture raised" refer to different production practices. Unfortunately, federal labeling policy does not mesh with the common understanding of these terms at all.

In Cornucopia's experience of stakeholder feedback, consumers believe that "pasture raised" production chickens spend the majority of their lives with outdoor access that includes quality vegetation. Consumers expect this outdoor access to be meaningful in terms of giving the birds opportunities to forage, rather than just having access to the outdoors.

Cornucopia supports the Perdue Petition regarding "Petition Regarding FSIS's "Pasture Raised" claims". Cornucopia concurs that FSIS should amend its interpretation of "free range" raised chicken as defined in its current guideline document to remove "pasture-raised" from the list of claims that are synonymous with "free range". Cornucopia also agrees that "pasture raised" should be separately and specifically defined and supports Perdue's suggested definition as it meshes with consumer and retailer understandings of the term.

Respectfully,

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