



November 4, 2023

Docket Clerk
Food Safety & Inspection Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250-3700

Submitted to FSISPetitions@usda.gov

Re: Concerns Regarding the Redefinition of "Pasture Raised" for Poultry, Petition 23-03

I am reaching out to articulate my concerns regarding Perdue Farms' recent petition to redefine the criteria for "pasture raised" poultry. As the owner of Wormuth Farm in Sussex County, NJ, I am deeply vested in the principles of pasture-raised farming and believe it is crucial to preserve the integrity of this practice.

While the objective to clearly differentiate between "free range" and "pasture raised" is commendable, the specifics of Perdue's proposal, particularly the 51% rooted-in-soil vegetative cover and allowing poultry to spend up to four weeks in a brooder, deviate significantly from the true spirit of "pasture raised".

1. Dilution of Standards - The essence of pasture-raised poultry farming is ensuring birds have meaningful access to quality pasture for the majority of their lives. A mere 51% rooted vegetative coverage and extended brooder duration undermine this foundational ethos.

2. Animal Welfare - The petition's suggested standards could have negative implications for the welfare of the birds. Poultry deserves a good, healthy life, and a reduction in pasture time could compromise this.

3. Nutritional Value - The proposed 51% vegetative cover standard could lead to lower quality and less nutritious ground for the poultry. The quality of the vegetative cover plays a significant role in the nutritional value of pasture-raised products.

4. Market Perception - Producers who genuinely prioritize pasture-raising their poultry from an early age would now share the "pasture raised" label with those adhering to the proposed lower standards. This could erode the significance of the label, potentially misleading consumers.

5. Geographic Considerations - While such practices might be suitable for regions with extreme weather conditions, it's problematic to universalize these standards. A one-size-fits-all approach,

especially one championed by a major poultry processor, may not be in the best interest of diverse farming practices across the nation.

It's evident that while Perdue's goal to clarify consumer confusion is praiseworthy, the method proposed risks compromising the core values of what "pasture-raised" represents.

I respectfully urge FSIS to carefully assess this petition, strengthen pasture raised standards, prioritize the welfare of the animals, uphold the integrity of pasture-raised farming, and ensure transparency for consumers.

Thank you for your dedicated attention to this pivotal matter.

Warm regards,

Mike Dunn

Wormuth Farm, Sussex County, NJ