

August 15th, 2023

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

RE: Aligning the “Pasture Raised” Label with Consumer Expectations

To Whom It May Concern,

We at Farm Forward appreciate the chance to provide our feedback on Petition #23-03, submitted by Perdue Farms, LLC, on March 16, 2023. Our remarks concern the Food Safety and Inspection Service’s (FSIS) approval of the use of “free range” and “pasture raised” claims on poultry products. Farm Forward has supporters nationwide who share our goal to ensure farmed animals are raised in the highest welfare conditions. In accordance with that goal, and with our supporters, we aim to push for more transparency and legitimacy with respect to the regulation of animal welfare labeling, marketing, and certifications. To that end, we support, with some important caveats and modifications, Petition #23-03, as well as the Animal Welfare Institute’s 2016 rulemaking petition (#16-01), to better define outdoor access for poultry. Importantly, Farm Forward would like to emphasize that any definition of “pasture raised” or “free range” must also require that poultry breeds or strains chosen for these systems have sufficiently healthy genetics so that they are capable of benefiting from the outdoor or pasture access. Farm Forward believes that a revised definition that requires farms to use breeds or strains of poultry with higher-welfare genetics more accurately reflects consumer expectations for the term.

To this end, the “pasture raised” claim should require both that birds be raised on pasture—defining that as vegetated land—and that birds have to be “slower growth,” meaning that they have healthy enough genetics to benefit from the outdoor environment. Specifically, the definition should require that birds have unrestricted access to pasture and enrichments outdoors that encourage them to use the outdoor space and that the pasture be vegetated with grasses, legumes, and other forages. The definition should also require that birds be of a breed or strain that is naturally suited to outdoor environments and has a maximum growth rate of 50 grams per day when evaluated when fed a two-stage, high-energy diet.

Growing Consumer Demand for More Humane Poultry

In the past decade, consumer demand for more humane treatment of farmed animals, including chickens and turkeys raised for meat, has grown dramatically. According to a 2014 national survey conducted by the American Society for the Prevention of Cruelty to Animals (ASPCA), more than 80 percent of respondents felt that it's important that the chickens they eat be humanely raised.¹ However, less than one-third of those surveyed had faith in the companies producing chicken products to—in actuality—treat their chickens humanely. A 2023 survey, also from the ASPCA, found that 79 percent of respondents were either somewhat or very concerned about the negative impacts of industrial animal agriculture on animal welfare.² Lastly, according to a 2018 YouGov survey, 63 percent of Americans indicated that if they found out a company had a bad reputation for animal welfare, it would make them less likely to buy meat produced by that company.³

Aligning “Pasture Raised” with Consumer Expectations

According to a 2023 survey that Farm Forward conducted in collaboration with the research firm Data for Progress, 64 percent of American adults believe that the term “pasture raised” indicates slower-growing chickens that are raised with unrestricted access to vegetated pasture. The same survey also found that 63 percent of Americans agree with the statement that “any label that certifies high animal welfare needs to ensure that animals are raised continuously on a pasture.”⁴

More specifically, Data for Progress’ research revealed that consumers have specific expectations when it comes to poultry that is labeled as “pasture raised.” One of these expectations is that the birds come from breeds or strains that have healthier, slower-growing genetics (i.e., birds that are not bred to maximize growth rates and feed conversion ratios). Another expectation that consumers have is that poultry labeled as “pasture raised” should have continuous access to vegetated pasture, as opposed to the status quo, where birds may be kept in enclosed houses that are periodically moved across the pasture.

Today, most poultry raised in the US, including those marketed as “free range” and “pasture raised,” are produced with the fastest growing strains. We believe that any definition of “pasture raised” that does not require breeds and strains with healthier, slower-growing genetics does not align with consumer expectations and, therefore, is misleading.

Birds Raised in “Free Range” and “Pasture Raised” Environments Must Have Healthier Genetics

¹ “Treat My Chicken Right: ASPCA Survey Shows Consumers Want More Humanely Raised Chicken, Feel it Leads to Safer Chicken Products,” ASPCA, September 2, 2014.

² “Opinion Surveys on Food & Farming,” ASPCA.

³ “Americans Care About Animal Welfare When Buying Meat,” YouGov, November 26, 2018.

⁴ Grace Adcox et al., “Holding Companies Accountable: Humanewashing, Antibiotics, and Animal Welfare,” Data for Progress, 2023 (forthcoming).

In modern poultry farming, virtually all birds have been selectively bred for fast growth, which causes a variety of health and welfare problems, often consisting of issues with leg health and musculoskeletal problems.⁵

Health issues related to the genetics of fast-growing poultry can cause pain and discomfort and greatly impede their ability to express species-specific behaviors, which include behaviors such as perching, running, and flying. As a result, even if these birds are given access to outdoor areas, whether free-range or pasture-raised, their ability to benefit from this access is greatly reduced.⁶

Birds Raised in “Pasture Raised” Environments Must Have Unrestricted Access to the Outdoors

For birds in a poultry operation to truly benefit from being raised in a “pasture raised” environment, it is essential that they have unrestricted access to the outdoors. This means that they should be able to freely move between their indoor housing and the outdoor pasture, allowing them to engage in natural behaviors and take advantage of the enrichments provided by the pasture. Today, many farmers who label their products as “pasture-raised” raise birds in housing systems that largely confine them. This practice, while commonplace, does not align with consumer expectations for what this label means. Per our survey mentioned above, consumers may expect that “pasture raised” birds have free access to outdoor areas where they can easily engage in natural behaviors.

Farm Forward’s recommendation is that the term “pasture raised” should require that birds have unrestricted access to vegetated pasture, which should provide enrichments such as perches, dust baths, and foraging opportunities that will motivate birds to use the outdoor space and engage in natural behaviors. In so doing, farmers can both improve the welfare of their flocks as well as meet consumer expectations for what it means to be “pasture raised.”

Conclusion

The FSIS is tasked with protecting “the public's health by ensuring that meat, poultry, and egg products are safe, wholesome and properly labeled.”⁷ As such, it is important that FSIS ensures that claims made on poultry products are accurate and not misleading to consumers. Currently, the term “pasture raised” has no common standard that producers have to meet to make the claim on a food label, no definition for “pasture,” and no requirement for the claim to be verified

⁵ Boyd W., “Making Meat: Science, Technology, and American Poultry Production,” *Technology and Culture* 42 (2001): 631-664.

⁶ C. Castellini, A. D. Bosco, C. Mugnai, and M. Bernardini, “Performance and behaviour of chickens with different growing rate reared according to the organic system,” *Italian Journal of Animal Science* 1 (2002): 291-300.

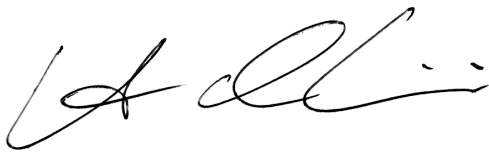
⁷ About FSIS,” *Food Safety and Inspection Service*.

through on-farm inspections. In other words, there is very little reason for consumer confidence in the meaningfulness of the label.

The USDA has already moved in a positive direction with respect to strengthening labeling practices with the recent announcement of changes to the guidelines for labeling meat products as “humanely raised,” “free range,” or “raised without antibiotics.” However, the steps outlined in the USDA’s announcement are not enough to ensure that animal-raising claims are meaningful, particularly with respect to the “pasture raised” claim.

Farm Forward thanks you for taking the time to consider our commentary on Petition #23-03. We appreciate the opportunity to share our thoughts and concerns with FSIS, and we hope that our input will help to improve the transparency and accuracy of labeling practices industry-wide.

Sincerely,



Andrew deCoriolis

Executive Director

Farm Forward