



Not all protein is created equal!

Our chickens are Certified
Real Organic and pasture raised
in Vermont using regenerative
farming practices.

VANESSA ROSE

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Certified Organic by Vermont Organic Farmers

Hello USDA and FSIS,

My name is Vanessa Rose from Leaping Bear Farm located in Putney, VT.

The following are my (Vanessa Rose's) comments on the petition submitted by Perdue Farms, LLC (Petition 23-03) in support of APPPA's 2020 comment to the USDA (APPPA Responds to FSIS: Pasture Raised Is not Synonymous with Free Range).

Thank you for considering Perdue and APPPA's request to to address the loophole blurring the definitions of Free Range vs Pasture Raised Poultry.

There is a perception that chickens get meaningful outdoor access in the Free Range model because many people are unaware of the natural behaviors chickens are prone to exhibit. In smaller operations the birds do range outside in the morning and evening but are not naturally adventurous and will not explore very far beyond their shelters. This means their paddocks degrade into dirt runs, with any pasture access becoming obsolete. When poultry operations get to a larger scale, this issue gets even worse. They report that a growing percentage of birds typically would not leave the barn/coop at all. This does nothing for the birds health or the nutritional value of the eggs or meat they are producing, which are a vital source of protein for many Americans.

Knowing this, farms like ours all over the country are now investing in mobile infrastructure to keep poultry moving and give them access to real, fresh pasture every day. This means they are free to forage daily on bugs, worms, grass and any thing else they find in these enriched environments. In contrast to free range systems, these environments stay cleaner, and since they aren't living in their own waste the chickens are healthier. When done right, these systems create meaningful carbon sinks in our pasture lands, becoming a powerful tool in the fight against climate change. The pasture raised system positively impacts so much regarding the health and happiness of these animals, increasing the nutritional value of the eggs and meat, and improving the health of the environment. In short, the Pasture Raised model is vastly different and immensely more beneficial than the stationary systems acceptable in Free-Range systems.

Unfortunately, it's been roughly estimated that there are also 250,000+ meat birds marketed as Pasture Raised every week that come from stationary barns where birds spend minimal to no time outdoors, and likely zero time on pasture, which is a concerning number and inevitably erodes consumer trust. Producers who are not raising their chickens on pasture are currently able to use these claims and net higher profits by misleading and truly taking advantage of consumers. This is unacceptable.

Before I became a pastured poultry producer, I worked extensively as a graphic designer in consumer packaged goods within national retail spaces. There is a rule of thumb that you have just 3 short seconds to capture and communicate with shoppers in retail. That means packaging must be clear and concise but also that we must have meaningful definitions to claims that consumers can trust and understand. Without universally understood definitions that are free of loopholes, our hard work as true pasture raised poultry producers as well as the marketing messages we are trying to convey to our customers are confusing and meaningless. This issue requires action on the part of the USDA to respond in a way that clearly defines these terms.

I (Vanessa Rose) and Leaping Bear Farm support Petition 23-03 submitted by Perdue Farms, LLC, and hope that the USDA and FSIS will take this matter seriously. Many consumers are being misled into believing they are buying chicken, eggs, and other poultry products from a production model that guarantees the birds are actually on pasture. I believe we need to protect both consumers and the integrity of true pasture raised poultry by adopting APPPA's suggested definition and closing the greenwashing loophole.

Thank you for your time and consideration,
Vanessa Rose, Co-owner of Leaping Bear Farm

