

Primal Pastures

41519 Cherry St
Murrieta CA 92562

Reference: Petition 23-03

To whom it may concern:

Primal Pastures has over 10 years of experience raising and marketing pastured poultry to consumers nationwide.

We find the current USDA loophole that allows chickens raised primarily indoors to be marketed as “Pasture Raised” to be extremely misleading to consumers, and further, damaging to the pastured poultry industry and the greater poultry industry as a whole.

Within the current FSIS label guidance, which consider “Free Range” and “Pasture Raised” as synonymous terms, it is entirely possible, and also extremely common, for chickens to be labeled and sold as “Pasture Raised” when they have never been outside or on pasture in their entire lives.

How is a chicken that lives indoors 98% of its’ life, and never touches pasture – PASTURE RAISED??

This is intentional deception through exploitation of a well-known loophole referred to as the “Access Loophole”, and well-intentioned consumers are paying the price.

Based on current label guidance, a company can raise chickens in the system pictured below and legally label them as “Pasture Raised”. This means consumers have a high probability of paying extra for “Pasture Raised” chicken that has spent less than 3% of its life on pasture, or quite possibly never been outside at all. This system is also considered “Pasture Raised” by leading 3rd party groups.



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It is important to note that in our experience, consumers do not understand poultry flock dynamics, and “outdoor access” or “pasture access” sounds very positive, but does not mean anything with regards to pasture utilization.

Further, we submit that the term “Access” should not be anywhere in the definition of “Pasture Raised” (aka Raised on Pasture). That single word is the key to greenwashing within Pasture Raised.

We agree strongly with APPPA’s proposed definition submitted by Perdue for “Pasture Raised”, as follows:

1. The majority (51%+) of every animal’s life must be spent on pasture.
2. Pasture is defined as majority rooted vegetative cover.

This definition is broad enough to encompass many different production styles, while being specific enough to ensure consumers are no longer being deceived.



A common authentic “Pasture Raised” system – floorless mobile coops, pulled to fresh pasture often. These birds are living on pasture 24/7 after a brooding period of 2-3 weeks.

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Please note: We also strongly disagree with the notion that chicken breed has any impact on whether animals were raised on pasture or not. This would be akin to saying that only Angus cattle or Berkshire pigs can be raised on pasture. While poultry breeds warrant a worthwhile animal welfare discussion, they have zero implication on whether chickens were raised on pasture or not.

We believe that Pasture Raised is a production claim (similar to grass fed or raised in the USA), not an animal welfare claim (such as humanely raised).

In summary, we are major proponents of improvement to our food system, and production systems such as free range, outdoor access, and pasture access certainly have their merits. However, the USDA must step in and stop allowing companies to make a Pasture Raised claim unless the birds were actually raised on pasture. Access is not enough for Pasture Raised.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Rob McDaniel', with a stylized flourish at the end.

Rob McDaniel
Owner
Primal Pastures