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National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave, SW  
Room 2636 – So., Mail Stop 0268  
Washington, DC 20250-0268

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Notice of Meeting of the National Organic Standards Board

I am submitting comments for your consideration on the Livestock Committee Animal Welfare, stocking rate, animal handling, transit and slaughter, animal husbandry recommendations.

We applaud the committee's efforts to add meaningful animal welfare standards to the organic rule, while having balance the competing interests of different organic producers. However, adding some space allowances, and prohibiting a few physical alterations, does not comprise a comprehensive program addressing animal welfare.

The organic movement was created to protect the environment. Animal Welfare was not a part of that movement until recently. If animal welfare is going to be part of the organic standards, then the actual needs of the animals must be considered. The proposals that I have seen are a start, but need to go much further.

Poultry (Laying Hens, broiler (meat) chickens and turkeys) all benefit from being outdoors ideally, because they are able to exhibit natural behavior such as foraging and dust-bathing, have ample space, fresh air, a healthy diet and an environment that reduces stress. However, the vast majority of poultry production, including organic poultry production is indoor systems.

Production moved indoors from outdoors for various reasons, including concerns about predators and disease, and to allow production on an intensive scale with automated feeding and watering.

How is outdoor access currently defined?

The USDA, National Organic Program defines Outdoor Access:

**Access to the outdoors simply means that a producer must provide livestock with an opportunity to exit any barn or other enclosed structure. Access to the outdoors does not require a producer to comply with a specific space or stocking rate requirement. Neither**

**does the requirement mandate that an entire herd or flock have access to the outdoors at any one time nor does the requirement supercede the producer's responsibility for providing living conditions that accommodate livestock health, safety or well-being.**

The proposal does give a space requirement for poultry outdoors. However, there are many other factors in the outdoor environment that affect poultry welfare that this proposal does not address.

These standards need to be comprehensive and must include the same requirements for indoors as well as outdoors. Birds have the same needs all year around and in any environment: to exhibit natural behavior such as foraging and dust-bathing, have ample space, fresh air, a healthy diet and an environment that reduces stress. Just like indoor birds, birds outdoors need access to feed and water so they do not have to return inside. Feeders must be protected from rain and wildlife.

Outdoor birds must have access to shade and shelter. Chickens do not like full sun, strong winds and most of all are fearful of overhead predators. Chickens may not desire to go outdoors without trees, and bushes to provide shade, roost and overhead cover. A study in the UK on broiler chickens showed that on average only 15% of the flock went outside and that number increased with the amount of tree cover on range, as well as the time of day and season of the year. More birds ventured out if there was tree cover. Chickens prefer areas with trees, they avoid bright sun and either stay close to the house or seek tree cover. On many farms, where there is a barn with an exit to go outside ("outdoor access") the chickens never venture far from the perimeter of the barn, because they have an open field. To just have an exit in a barn and say that is "outdoor access" isn't really "outdoor access" is it?

When the organic program started in the US it was to protect the environment by controlling agricultural inputs. In keeping with that and providing good animal welfare, it is imperative that the land should drain well and be covered with vegetation. There must be rotational grazing that includes pasture rotation. When pasture or field is not rotated, parasitic disease builds up and contributes to disease. With broiler chickens, pasture rotation should occur after each flock is removed and for layers, they should not be on the same pasture for the entire life of the flock. Pasture rotation should preferably be done every month, with a maximum of no more than waiting 2 – 3 months on a single pasture.

The Soil Association in the UK recommends:

Pasture for laying hens be rotated for 12 months between flocks with a requirement of at least 9 months rest.

For broiler chickens: Land used for broiler chickens must be rested for at least two months per year plus one year in every three.

The EU requirement, in order to not add excessive nitrogen to the land from animal waste, does not recommend more than 580/ broiler chickens or 230 laying hens per hectare (2.47 acres), calculated over the whole farm.

## **Dairy Cows**

Tie stalls and tethering should be prohibited. In colder portions of the US, dairy cows are confined in their tie stalls, some for 23 out of 24 hours per day. That is not acceptable. If the organic standard wants an animal welfare standard that allows animals to exhibit natural behavior, prohibiting tie stalls is the only way to assure normal postural movements and behavior in dairy cows. Walking, turning around, moving and exercise are very basic needs. No animal welfare standard allows tie stalls/stanchion barns. Prohibiting tail docking in dairy cows is also necessary. Tail docking is done on dairy herds where there is very poor management and it has been scientifically shown that there is no benefit from a food safety, or human health benefit.

## **Livestock Slaughter:**

Currently the organic standard has no handling and slaughter standards for livestock other than a listing of the chemicals that are allowed or prohibited in slaughter plants.

You can solve this problem very easily. In addition to your current chemical use standards, require all organic slaughter plants meet the AMI Guidelines, which were written by Dr. Temple Grandin. The slaughter plants already segregate organic livestock for slaughter from other livestock/ and/or are already Certified Organic. A simple additional audit would be required. Dr. Grandin has already created the audit documents, etc. This seems like a very simple thing to do and you do not have to “re-invent the wheel.” Dr. Grandin is the foremost expert on livestock slaughter so why not use her animal welfare expertise for a program that she has already designed?

## **Outcome based standards:**

The proposal is to “develop scorecards and documents designed for each species to address hygiene, locomotion, body condition, lesions and injury and anything else pertinent to a specific species” in order to “develop a system that is reasonable, accurate and enforceable.” The point of this is to “develop information on best management practices for proper animal care and provide inspectors with assessment tools and the means to consistently apply them.”

This proposal of outcome based standards is very troublesome. How is animal welfare being defined? If you are just measuring the animals’ physiological needs, e.g., locomotion, hygiene, body condition, lesions and injury, you are not getting a true measure of the animals’ welfare, since physiological needs are only one facet of an animals’ welfare. Behavioral needs are not measured or discussed in the proposal. The industry currently uses only physiological measures to evaluate animal welfare: according to industry, if the animal is healthy and reproducing, then the welfare is good. While locomotion, hygiene, body condition, lesions and injury are important, there are other indicators of animal welfare that need to be measured.

There must be measurable standards such as space. In poultry, for example, how much elevated perching is required per flock/barn? What percentage of floor space must be designated for dust bathing? Laying hens have an inherent need to perch and dust bathe. They can be healthy and reproducing without these materials, but their welfare is not being met. If only a tiny percentage of the laying hens in a flock have access to elevated perches, or dust bathing materials, that leads to frustration for the other laying hens. Therefore, these are important requirements and cannot be measured by “outcomes.”

In order to have a real outcome based measurement, you need inspectors who are knowledgeable in the behavioral as well as physiological needs of the species they are inspecting. What qualifications will be required of organic inspectors or what training will be necessary to ensure that they have the ability to determine if both behavioral and physiological needs are being met.

I would urge the committee to review this recommendation on “outcome based standards.”

Sincerely,

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