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June 10, 2016

Paul Lewis Ph.D.
Director Standards Division, National Organic Program,
USDA-AMS-NOP
Room 2646-So., Ag Stop 0268
1400 Independence Ave. SW
Washington, DC 20250-0268

RE: National Organic Program; Organic Livestock and Poultry Practices, Docket No. AMS-NOP-15-0012; NOP-15-06PR

Dear Dr. Lewis,

I am writing on behalf of Farm Sanctuary, a national nonprofit organization founded in 1986 to advocate on behalf of farm animals and to confront the harms caused by industrialized animal agriculture. We are grateful that the USDA is accepting comments on the National Organic Programs (NOP) recommendations regarding the welfare of animals raised and marketed under the organic label.

A growing number of U.S. consumers are paying attention to how their food is produced, and they are very concerned about the mistreatment of animals exploited for meat, milk and eggs. Numerous public opinion polls have shown widespread opposition to common farming practices, and every time voters have been given a chance to vote in statewide initiatives, they have voted to ban the use of restrictive confinement systems.

In response to increasing consumer awareness and misgivings about how farm animals are treated, food industry marketers have developed various programs purported to improve farm animal welfare. But these programs and their labeling claims tend to make conditions sound better than they are, and consumers are being misled.

The growth in demand for products labeled as humane, sustainable, natural, free-range, cage-free, organic, etc. illustrates that consumers oppose practices commonly used in production agriculture, and they want alternatives. Citizens rely on labeling claims to make decisions about their food purchases, and the government has a critical role to play in requiring that these labels are transparent and provide accurate information. As it stands now, labels serve primarily to market and sell products than to accurately inform consumers.

Our Mission:
To protect farm animals from cruelty, inspire change in the way society views and treats farm animals, and promote compassionate vegan living.



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Government oversight of organic and similar labeling claims is especially important because there is a commercial interest in over selling animal welfare and other virtues, and deceiving consumers. When people believe their food is produced in accordance with more ethical, sustainable, and healthful standards, they are willing to pay a significantly higher price. The risk of misleading labels is amplified because there is a strong and growing demand for foods produced according to higher standards, but the supply has not caught up. Regulatory oversight has also lagged, and it is common for retailers to charge a premium price for sub-premium products.

For years, U.S. citizens have assumed that meat, milk and eggs labeled as organic came from animals treated significantly better than animals in conventional systems, despite the lack of clear and consistent animal welfare standards in organic production. We are grateful that the USDA is attempting to remedy this problem, and to better align organic labels with consumer's expectations, but the current standard still leave a lot to be desired.

In production agriculture, including on organic farms, chickens, pigs, cows and other agricultural animals are treated primarily as economic units, not as living, feeling creatures. The proposed revisions to the organic standards include positive steps, such as a prohibition on debeaking chickens on organic farms and an attempt at providing animals with more space, enrichment, and better outdoor access, but they also, unfortunately, allow production related goals to remain paramount. These guidelines have been designed largely to accommodate the status quo.

Like all animals, farm animals deserve to be treated with respect and compassion, and their physical and emotional needs should be met. Farm animals are social creatures and their relationships with each other should be honored. Mothers should be allowed to raise their young, for example, and they should be afforded healthy physical and social environments that allow them not only to survive, but to flourish.

Our relationship with other animals is evolving, and as we learn and understand more about them, we see how similar they are to us, and we also learn more about ourselves. Kindness to animals is good for them, and it's also good for us. Mahatma Gandhi said, "You can judge the moral progress of a nation by its treatment of animals." If that is true, serious changes are called for, including on organic farms.

Thank you for your time and thoughtful consideration of this important and evolving matter.

Sincerely,
Gene Baur, President and Cofounder
Farm Sanctuary