



fieldale farms corporation

April 25, 2002

VIA FACSIMILE

Ms. Katherine Benham
USDA-AMS-TMD-NOP
1400 Independence Avenue, SW, Room 4008-So., Ag Stop 0268
Washington, DC 20250-0200

Dear Ms. Benham:

We are requesting that we be included in your upcoming NOSB meeting as a presenter to discuss the current NOSB policy that requires free access to the outside. This letter is based on comments that you have previously received. We are requesting that Dr. John A. Smith, DVM, be allowed to present additional data concerning this issue at the upcoming meeting. The following comments summarize the key issues involved.

The National Organic Standards Board has proposed requirements that poultry be required to have free access to the outside. Current food safety initiatives within the USDA would be exceptionally difficult to meet should the National Organic Standards Board require access to the outside. We are requesting that the NOSB reconsider its position concerning this requirement. Quite simply, it is not in the best interest of the consuming public to require birds to be outside. The risk of disease, parasites, and predation is significantly increased if birds are required to be kept or have access to the outside. Attached you will find the three-page summary outlining conditions and additional disease organisms that birds will be exposed to if they are required to have access to the outside.

Again, we respectfully request that the NOSB carefully reconsider their position on this issue, as this position is not in the best interests of the consuming public or food safety.
Sincerely,

FIELDALE FARMS CORPORATION

Steven D. Collier
VP, Director of Operations

SDC:ms

Attach.

April 15, 2002

National Organic Standards Board
c/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001

To the National Organic Standards Board and members of the National Organic Program,

Please allow me this opportunity to comment on the Access to Outdoors for Poultry issue. It is a fundamental mandate of the OFPA and CFR 205 that livestock living conditions include access to the outdoors. To not require such practice with poultry undermines the very foundation and spirit of organic food production. Consumers expect organic poultry to be raised with access to the outdoors. There will be a credibility backlash if this dual standard is allowed. Organic poultry can and must be managed with outdoor access. Avian Influenza fears are unsubstantiated. The Organic Valley Cooperative has never experienced an AI outbreak in their ten year history.

For the sake of organic integrity and for the good of the organic industry use a strict interpretation when applying Outdoor Access to Poultry

Respectfully,

Please keep the organic industry truly organic. You can't fool the consumer.

*Respectfully,
Robert Kees
Ducan, WI.
Tel # 715-672-4197*

April 15, 2002

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c/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001

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Respectfully,

Dear Katherine,

4-22-02

99% of all the food that comes in our kitchen door comes in Certified Organic. We keep it because of what it was fed - either through the soil or through self consumption. We don't want a bunch of pecked-to-death chickens that have not been allowed to exhibit natural & normal behavior. Socially, culturally & environmentally this is required. OUTDOOR ACCESS MEANS OUTDOOR ACCESS. Consumers are smart!! Don't allow greenwashing.

*Happy Good Week!
Hard Copy to follow
by U.S. Postal Service.*

*Delia K...
216754 Simpson Lane
Durand, WI 54736*

April 15, 2002

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c/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001

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Respectfully,

Dear Katherine,

4-23-02.

All animals need Outdoor access - including chickens. As a consumer & former of I want to know the animals & essentially eat had a quality life and were not part of a confinement system

Please require All Poultry to have outdoor access. Corporate farms must meet strict guidelines if they want in on the premium prices.

Please Consider All,

Chris Ken Winkler
W 6754 Simpson Ln
Durand, WI 54734
715-672-8555

e-mail: Winkler@nelson-tel.com

April 15, 2002

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c/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001

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For the sake of organic integrity and for the good of the organic industry use a strict interpretation when applying Outdoor Access to Poultry

Respectfully, *Ed and Linda Markle and family*

We aren't into eggs but we believe that outdoor access is a very good idea. This is what the organic consumer expects. They deserve, at the price they pay, what they expect.

hard copy sent

Carolyn K. Johnson
P.O. Box 355
Williston, Ohio 43468
(419) 836-7637
email: Kris.Johnson@ecunet.org
April 25, 2002

Richard Mathews, Program Manager
USDA-AMS-TMP-NOP
Room 4008-South Building
1400 and Independence Avenue, SW
Washington, DC 20250-0020

Dear Mr Mathews,

I am writing to let you know that I believe factory-raised poultry is not acceptable as an organic product. Organic poultry must be raised in a humane, free-range environment.

Pasturing is humane and environmentally superior - Poultry's natural behavior patterns are to graze live plants and hunt for bugs. When animals are low density and on pasture, there is less soil erosion, less fossil fuel spent on manure management, and less risk to the water supply from massive manure storage spills.

Pastured poultry is a better product - The flavor of the meat from pastured animals is very different and, some argue, more delicious and nutritious. Not surprisingly, no academic studies have been done on this, as corporations now fund academic studies and it is not in their interest to prove a benefit to pastured poultry because it doesn't fit in with their industrialization of agriculture.

Pasture-ized organic poultry supports the small farmer - Most organic family farms raise poultry the old fashioned way, on pasture. This is the most environmentally friendly as the ultra low density of livestock distributes manure safely while the animal grazes and follows its natural behavior patterns of eating live greens and catching bugs. In contrast, the corporate organic meat you are probably buying at the grocery store is produced on concrete floors and high-density feedlots where chickens vainly pick at thousands of birds' manure. Industrialized factory farms, 'organic' or not, threaten small farmers and rural communities by taking away local control, creating too much manure, using unfair labor practices, diminishing the quality of life for the animals.

Factory-raised 'organic' meat will threaten the existence of small-scale organic farmers - Tyson and its brethren will stage a predatory price war and win against small producers and co-ops that market pastured organic poultry. 96% of sales occur in grocery chains and those grocery buyers only care to buy the cheapest 'organic' meat. As long as it is labeled as organic, grocery buyers don't care to know about the practices of the factories that produced the meat. This corporate commodification of organic meat will lead to organic production in developing countries, where labor can be exploited and fragile ecosystems irreparably degraded. Meanwhile, back in the USA, local and safe food systems will be systematically dismantled and family farms will go bankrupt. This move across borders and overseas will also mean bad news for consumers, who can only choose among foods that have traveled thousands of miles before reaching our dinner plates, thus greatly increasing the chance of contamination and even agro-terrorism.

I urge you to support continued strict organic standards that benefit the families of America, both urban and rural.

Yours truly,
Carolyn K. Johnson