



Townsend, Inc.
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Millsboro, Delaware 19966
(302) 934-9221

May 17, 2001

Dr. Eric Sideman
National Organic Program
1400 Independence Ave, SW
Washington, DC, 20090

Dear Dr. Sideman:

I am writing in regards to our efforts to produce, process and sell certified organic broiler chicken meat as defined in the USDA-NOP. We are currently working for such certification with an independent certifying agency, Quality Assurance International (QAI). Townsends, Inc. is a small commercial poultry company with corporate offices in Delaware and production facilities in North Carolina and Arkansas. While we have been researching our organic program for several years, we have just recently initiated the process for formal certification.

We plan to grow these chickens, with substantial changes in our regular production methods, on two independently owned contract broiler farms and process the chickens in our processing plant, again with significant changes in our normal process. While we are still working toward certification, there seems, in general, good understanding and agreement of the program being developed by Townsends, Inc. to produce organic chicken with the following two exceptions:

- I. By modifying our grow-out program for organic production we think we meet the definition of livestock living conditions as that which must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals including access to the outdoors as stated in 205.239 on the NOP. This section states that livestock have access to the outdoor, shade, shelter, exercise areas, fresh air and direct sunlight suitable to the species, its stage of production, the climate and the environment.
- II. Use of artificial light at certain (short daylight) times of the year and for baby chicks during the first 72 hours in the chicken house..

I should add that other points might arise as we move further in this process, but these seemed to be the most significant ones at this time.

I. Definition of Living Conditions as stated in 205.239

Access to the outside for chickens is a critical component of animal and poultry health, safety and welfare as well as that of humans. Chickens in our organic production will be raised, differently from our normal chickens, in frame houses with screening and curtains (4 foot high running the length of the house) on each side and with two 8 foot high x10 ft wide doors, with screens, at each end of every house. The curtains and doors will be opened when the age of the bird, outside temperature and weather permit. This open-air system will be supplemented by large fans, when needed, to facilitate airflow and reduce temperature.

Important points of livestock living conditions are:

A. Biosecurity and Disease Control:

Animal disease is a “hot” topic with the current epidemic of Foot and Mouth Disease in Western Europe and South America. The United States is by no means immune to these situations. Also, poultry have their own contagious infectious diseases, which include avian influenza (AI), chronic respiratory disease (CRD) as caused by **Mycoplasma gallisepticum**, Newcastle disease as caused by mesogenic and velogenic strains of that virus and cholera as caused by **Pasturella multocida**. These diseases cause extensive animal suffering, devastating emotional and financial hardships for people, and increased usage of medications. These diseases also have the potential, if unchecked, to reduce the available food supply to the American people. See attachment I FMD Tripartite Exercise 2000

AI virus is virtually endemic in the wild bird populations of the world where it causes little if any problems. However, access of these birds to chickens and turkeys results in transmission of the virus causing disease, which has proven catastrophic. In the mid 1980's, USDA spent 67 million dollars in Pennsylvania and Virginia to eliminate AI. Even with that program, the disease still shows up periodically in fowl delivered to live bird markets of several major metropolitan cities. This serves as proof that the virus is well established in the wild bird population of this country.

CRD is a disease, which the commercial industry continues to attempt to eradicate. While tremendous progress has been made in this effort over the past 40 years, outbreaks still occur. The most recent outbreak of this disease occurs yet today in the state of North Carolina, where the outbreak has involved over 100 commercial farms over an 18 month period. While the understanding of the epidemiology of this outbreak is incomplete, the role of “backyard and free flying birds and the personnel who handle them” is substantial.

Mesogenic and velogenic Newcastle disease viruses have been virtually eliminated from poultry in this country because of the severe disease they cause. The most recent outbreak in commercial poultry occurred in California in the early 1970's with devastating

suffering and losses. Periodically these viruses are found in wild and pet birds being imported into this country and in wild and pet birds brought into this country illegally. This further demonstrates that a reservoir of infection is still present in this country.

B. Health of Organically Produced Chickens:

Chickens are sensitive to temperature fluctuations. The organic meat type birds we will be raising will be processed as young healthy chickens. Chickens require a high temperature for the first three weeks of life of 90°F at placement decreasing gradually to 70°F by four weeks of age followed by a temperature of 67°F until processing at approximately 8 weeks of age. The presence of a physical opening in a chicken house from October through April in virtually all areas of this country will not allow maintenance of these temperatures. As chickens experience temperature fluctuations, their enhanced susceptibility to respiratory disease becomes a significant issue. This susceptibility results in increased suffering due to sickness and mortality, which requires medications not allowed, or wanted, in this program. Also, apparently chickens are not overly enthralled with access to outdoors as mentioned in Attachment II.

C. Vulnerability of Chickens to Other Animals:

Poultry are weak animals, which make them very sensitive to predatory animals (foxes, wild dogs and cats, rats, raccoons, snakes and others) found normally in a rural environment and to animals, which under proper circumstances are not predators, (pet dogs and cats) but often become so if allowed unrestricted access to birds. As an industry we have worked hard to rid our houses of these animals and to keep them out. When I first entered this industry in the early 1970's, chick mortality caused by rats was a frequently encountered problem, which caused suffering and hardship. While exterminators and their chemicals may take great credit for this accomplishment, restricted access to poultry houses is the most critical aspect of this successful control. I might also add that we are attempting to produce an organic chicken, not a wild bird. See attachment II.

D. Meat Quality:

Bacteriological flora of chicken, especially the meat, is under increased scrutiny in regards to both food borne disease and antibiotic susceptibility profiles. **Salmonella** and **Campylobacter** species are the subject of great interest to public health officials. I might add that at one time **Salmonella** was a big issue in poultry health, but through testing, elimination of infected flocks and more intensive biosecurity, **Salmonella** poultry pathogens are not a significant issue today.

Contamination of poultry meat with these bacteria is a big concern to the American consumer and to our industry. We are making great strides in reducing this problem through interventions in the field and processing plants. The interventions in the field

focus on reducing litter wetness, which has been shown to be a significant cause of high **Salmonella** numbers in young growing poultry. Specifically these interventions include the use of closed (nipple) water systems, precise formulation of feeds to keep dietary levels of sodium and chloride at bird requirement levels and ventilation equipment, which include fans, screens, curtains and sidewalls. Even with the changes in the ventilation system that we have made to accommodate the organic program, we can accomplish our goal of reducing the incidence of food borne bacteria. I might add that when I worked in the turkey industry in the late 1970's and early 80's, that industry was moving away from "total range" and partial confinement/range production because of problems with disease (cholera), predators and wet litter resulting from mud and water being tracked into the house by the birds.

E. Openness of our Organic Production Facilities:

These young chickens will roam freely through out the chicken house with a generous allowance of 1.5 square foot per bird, will walk, scratch and nest on wood chip litter and dirt floors, have open access to fresh air and sunshine as allowed by nature and consume only organically produced feed supplemented with fresh water for maintenance and growth. There is no opportunity for these chickens to roam and consume "unknown entities" on the outside. Chickens flourish under these conditions. They are much different than cattle, sheep and pigs ecologically, nutritionally and in their behavioral patterns. Thus we believe that our organic production program meets the definition of free access as described in NOP.

II. Use of Supplemental Light

We subscribe to the program of natural light for our organic chickens to allow for 16 hours of natural light, when available, but there are unique conditions relative to chickens and seasons of the year.

A. In starting baby chicks, it is imperative that they learn to eat and drink quickly. While these nutrients are amply available to them, light is critical for chicks to locate the feeders and drinkers. For this reason, we request that artificial light be used for the first 72 hours the chicks are in the house regardless of time of year or weather conditions. These 3 days represent a very small percentage of the approximately 55 days required for total growth of our organic chickens.

B. Our ventilation program for organic production, as described above, allows for use of natural light when it is available and when outside weather conditions permit. Rain, wind and cloudy days in the warm times of the year (>75°F) are not really an issue except with chicks younger than 3 days of age as explained above.

However, in the seasons of shorter days, the colder temperatures, rain/snow, wind and cloudy days can produce problems for all age chickens because of reduced light, which

affects bird movement. The raising of curtains on the sides of chicken houses to protect birds from the inclement weather will produce a lower level of light intensity, which will result in birds not consuming feed or water. An even worse consequence of this effect will be the greatly accelerated bird activity at the feeders and waters when birds gorge themselves as light levels increase. As in most cases of this type of activity, the bigger birds win out and the smaller ones get smaller. Also chickens will scratch themselves with their toe nails causing skin infections, which are both debilitating and systemic problems.

For these reasons we are asking, first, that for the first three days of life, supplemental light be added to raise the light level to a maximum of 3 foot candles for the first 72 hours of brooding. Second, we are requesting that light levels for birds older than 3 days of age be supplemented to a total of 16 hours of light during the shorter day light periods of the year, again at a maximum level of 3-foot candles.

In closing, I would like to say that as a company, we are very interested in organic chicken production and recognize that we are new to it. However, we are not new to raising and processing chickens, but still recognize that we don't have all the answers. We do, however, believe our current production and processing concepts to be more than appropriate for this species of animal. Thus, our comments are submitted to you as a constructive attempt to enhance the health and welfare of not just our organically produced chickens, but also those of other avian species and the people who depend on them for their livelihood and the people who need them for food. We would welcome you, and members of your board, to visit our production and processing facilities to see our level of commitment to this program.

If you have any questions please contact me. The address and telephone number above are good through May 24 at which time we are moving to a new office. That telephone number is 302-855-7108 and address is 401 South Dupont Highway, Georgetown, DE, 19947.

Sincerely,



Spangler Klopp, DVM, Dpl ACPV
Corporate Veterinarian

cc: Mr. Mark Keating/USDA
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Something to think about. Although this exercise focused on FMD, it shows the problems we could encounter if a highly contagious poultry disease were introduced.

----- Original Message -----

Subject: FMD: Tripartite Exercise 2000: Final Reports
Date: Fri, 11 May 2001 14:31:31 -0400
From: Humanitarian Resource Institute <eidnet@humanitarian.net>
To: agnet.2@smamedia.com

We apologize if you have received multiple copies of the following memorandum, we are in the process of updating our US and International communication networks.

May 11, 2001

From: Stephen M. Apatow
Humanitarian Resource Institute Emerging Infectious Disease Network
Eastern USA: (203) 668-0282 Western USA: (775) 884-4680
Internet: <http://www.humanitarian.net/eidnet> Email:
eidnet@humanitarian.net

UNITED STATES UTILIZES LESSONS FROM TRIPARTITE EXERCISE 2000 TO PROTECT AGRICULTURAL COMMUNITY FROM FOREIGN ANIMAL DISEASES IN THE CONTEXT OF EITHER AN ACCIDENTAL OR INTENTIONAL OUTBREAK FROM BIOTERRORISM

TRIPARTITE EXERCISE 2000: CANADA - MEXICO - UNITED STATES
FOREIGN ANIMAL DISEASE RESPONSE SIMULATION EXERCISE
FINAL REPORTS & SUMMARIES

Partners and participants in this exercise included:

- Animal and Plant Health Inspection Service, United States Department of Agriculture (USDA)
- Texas Animal Health Commission, Texas
- Dirección General de Salud Animal, Comisión Nacional de Sanidad Agropecuaria (SAGAR)
- Animal Products Directorate, Laboratories Directorate, Policy, Planning and Coordination Directorate,
- Centre for Policy and Epidemiology, National Centre for Foreign Animal Disease, CFIA
- CFIA Area Network Offices (Programs and Operations) in Alberta and Ontario Provincial Ministries of Agriculture
- Canadian Cattlemen's Association, Canadian Pork Council, Canadian Dairy Breeds
- Emergency Measures Ontario, Emergency Preparedness Canada

TRIPARTITE EXERCISE 2000: FINAL REPORTS

After action Report: TERT Tripartite Exercise 2000 November 1 - 9, 2000
Texas Animal Health Commission

Tripartite 2000 Exercise: Observations, Comments and Lessons Learned
CNA Corporation: Operations Evaluation Group

Texas Emergency Response Team Exercise
Special Assistant, Office of the Governor, Georgia Emergency Management Agency

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Evaluation - TERT Field Operations Site (FOS) - Tripartite 2000 Exercise
USDA APHIS VS, Oklahoma

2/26/01: Summary of Recommendations from the Planners/Coordinators based
on
Evaluators' and Observers' reports.

All reports can be accessed on the web:
<http://www.humanitarian.net/eidnet/fmd/tripartite2000.html>

Humanitarian Resource Institute has aggressively initiated educational
initiatives on Foot & Mouth disease since late February. Today, in
collaboration with international veterinary, medical and scientific
experts
we continue the development of resources to enhance academic discussion
of
emerging infectious diseases and issues associated with preparedness,
response, mitigation and policy. ProMED-mail
(<http://www.promedmail.org>),
a program of the International Society for Infectious Diseases recently
announced a new web site with references & discussion on FMD in Europe &
implications for the USA:

Humanitarian Resource Institute
Emerging Infectious Disease Network
Foot & Mouth Disease Reference Library
<http://www.humanitarian.net/eidnet/fmd>

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subject
line.

From **Natural Foods Merchandiser**
November, 1998

III
Come page

Free-Range Chicken Needs Safe Handling, Too

by **Wendy L. Bonifazi, R.N., A.P.R.**

"... in March 1998, *Consumer Reports* published the results of a 36-city test of 1,000 birds. Its report that free-range and boutique birds were more likely to harbor bacteria than big-brand chicken revived media and consumer concerns.

"Poultry farmers weren't surprised. First, outdoor access exposes chickens to contamination from bugs, birds, bats, rats and other wildlife. "I saw one of my hens swallow a field mouse whole," says Jack Avens, Ph.D., food science professor at Colorado State University (CSU). "Confinement is almost necessary."

"Second, processing constitutes a greater risk of bacterial contamination. Theoretically, there should be no difference between packaging plants owned and operated by major growers and the smaller independent processors used by small-scale farmers, says Avens, but bacteria counts tend to be lower in the big plants. "They can be equally safe depending on federal inspection, but large commercial processors tend to be safest and most sanitary, due to more experience and possibly better equipment, staff vets and microbiologists," he says. "They have more invested, and it's more competitive."

"Consumers' images of free-range birds and their cooped-up counterparts are as different as Old MacDonald and Big Brother, but neither is correct. Although meat chickens are raised indoors, most mill about large buildings, not in the cages used by mature laying hens. Free-range chickens' outdoor "exposure" may be limited to skylights. Even with access to outdoor pens, they tend to cluster inside around the food, water and flock. They're slaughtered long before reaching the pecking orders associated with sexual maturity at 21 weeks--broilers at about 7 weeks, and roasters at 12 to 15 weeks. "



Set Index vs. managed funds
City Plus • Rowe Price Blue