



CORNUCOPIA  
INSTITUTE

## Send Your Comments to National Organic Standards Board

**- Due April 10! -**

### **Proposed Animal Welfare Standards Would Allow Factory Farms to Produce Organic Pork**

The NOSB, which meets twice a year to advise the United States Department of Agriculture on organic policy and rulemaking, has for years been refining a proposal to strengthen animal welfare standards in organics.

Consumers expect high standards of animal welfare when they pay a price premium for organic products, and these proposed animal welfare standards are largely positive. However, the NOSB's proposed space requirements for growing pigs are so small, even standards set by **the National Pork Board—which caters to industrial hog producers—are more generous!**

The committee's proposal will be voted on at the NOSB meeting, starting April 26<sup>th</sup> in Seattle. **Please send your comments to the NOSB today** (see instructions below).

### **The NOSB Livestock Committee Proposal**

The Livestock Committee proposed the following space requirements for organic **swine**:

	Indoor bedded space (sq. ft. per animal)	Outdoor Runs and Pens (sq. ft. per animal)
Sow and piglets	48.0	40.0
Sows	30.0	30.0
Boars	64.0	85.0

The Livestock Committee proposed the following space requirements for organic **growing pigs**:

Weight (lbs)	Indoor bedded space (sq. ft. per animal)	Outdoor Runs and Pens (sq. ft. per animal)
Up to 24 lbs	1.0	0.5
24-47	2.0	1.0
47-109	3.0	1.5
109-157	4.0	2.0
157-225	5.0	2.5
225-255	6.0	3.0

The organic standards are supposed to allow animals to exhibit their natural behaviors, but these proposed space requirements would not even allow a growing pig to turn around in its bedded space!

As an example, see how different standards compare for a 105-pound growing pig. Note that the standards are listed in order, starting with the most generous space requirements to the tightest space—the National Organic Program standards would fall dead last.

**For a 105-pound growing pig:**

Program	Indoor Bedded Space per 105-pound pig (square feet per animal)
Niman Ranch (leading “natural” meat brand)	12
European Union Organic Standards	8.6
Animal Welfare Approved (Animal Welfare Institute)	8.5
National Pork Board (used by industrial-scale producers)	6.0
Certified Humane (Humane Farm Animal Care—used by industrial-scale producers)	3.3 (total space: 5.0)
National Organic Program (as proposed)	3.0

The Livestock Committee wrote, “Ultimately, [we] would like the organic seal to be the gold standard, indicating the most nutritious food produced in the safest and most humane manner.” Yet, falling behind even the National Pork Board’s recommendation, the proposed standard for organic pigs would be the *opposite* of the stated goal.

**Cornucopia’s Position:**

The organic seal should indeed be the gold standard for humane treatment of farm animals—but the proposed space requirements for growing pigs are dismally inadequate. Do we really want to allow the leading upscale brand of pork to accurately claim that they maintain higher standards for their farmers than certified organic producers?

The NOSB should consider using, at a minimum, **the European Union’s organic standards** as a guide, and require the following space requirements for growing pigs:

Weight (lbs)	Indoor Area (sq. ft./animal)	Outdoor Area (sq. ft./animal)
Up to 66	6.4	4.3
Up to 110	8.6	6.4
Up to 187	11.9	8.6
Up to 242	14.0	10.8

**We have heard diverse comments from Cornucopia farmer-members, which clearly indicate that the NOSB livestock committee's proposal is not ready for "prime time." Unless the NOSB Livestock Committee can put together a Herculean effort in Seattle, in collaboration with members of the organic community present, the NOSB will need to postpone final deliberations on their proposal until wider input can be secured from organic livestock producers.**

## **Take Action**

The National Organic Standards Board is especially interested in hearing from producers, so when submitting your comment, please **identify yourself as an organic producer.**

**To submit your comment electronically, follow these instructions:**

1. Go to [www.regulations.gov](http://www.regulations.gov)
2. Choose "Submit a Comment"
3. Type "AMS-NOP-11-0014" in the search box
4. Click on "Submit a Comment"

The direct link for submitting comments is

<http://www.regulations.gov/#!submitComment;D=AMS-NOP-11-0014-0001>

Submit your comment before the April 10 deadline.

**To submit your comment via mail (note that comments must be received – not postmarked – before April 10)**

Address your comment to:

Ms. Patricia Atkins,  
National Organic Standards Board,  
USDA-AMS-NOP  
1400 Independence Ave., SW.,  
Room 2646-So., Ag Stop 0268,  
Washington, DC 20250-0268.

Identify the following docket number on your letter: AMS-NOP-11-0014.

**Tell your family and friends to submit their comments as well!**

**To speak in person at the NOSB meeting (important if you can make it):**

In addition to sending their written comments, organic farmers and consumers living in the Seattle area, or willing to travel, are encouraged to also sign up for a five-minute speaking slot at the meeting at the end of April. Individuals can find more information about the meeting, and can pre-register for a slot by April 10, 2011, by visiting <http://www.ams.usda.gov/nosbseattleslots> or by calling (202) 720-3252.

Please email [cultivate@cornucopia.org](mailto:cultivate@cornucopia.org) or call 715-514-2627 if you are planning on attending the Seattle meeting.

The [full NOSB proposal](#) is available online, on the National Organic Program website. If you produce other species, please read the recommendation's standards for other livestock species and find additional action alerts on Cornucopia's website ([www.cornucopia.org](http://www.cornucopia.org)).

**The Cornucopia Institute is a 501(c)(3) public charity. You can financially support our work by visiting our website or by mailing a check to: P.O. Box 126, Cornucopia, Wisconsin 54827**