

# Executive Summary



## Scrambled Eggs

Separating Factory Farm Egg  
Production from Authentic  
Organic Agriculture

October 2010



**C O R N U C O P I A**  
**I N S T I T U T E**

CONSUMERS ARE INCREASINGLY INTERESTED in knowing the story behind their food—especially when food production involves animals that are often treated by “factory farms” as units of production rather than as living beings. Organic consumers are also looking for an alternative to the “factory farms”—they desire a food system that treats the environment, family farmers and animals with respect.

Ecologically minded farmers have responded to this growing demand for ethically produced food, and organic farmers are bringing laying hens back to the farm.

But while consumers expect the organic label to provide an alternative to the industrialized food system, paths are diverging in the organic-egg-producing community: One path affords more outdoor access (often on well-managed pasture), more diversity on the farm and allows the hens to ex-



2,800 organic hens share pasture with dairy cows at Alexandre Family Farms in California. Photo courtesy of Alexandre EcoDairy Farm.

hibit their natural behavior outdoors; and another path has led to large-scale industrialization motivated by profit.

All organic egg producers claim to be following the federal organic standards, but with different working definitions and viewpoints of what the standards mean. For most consumers and many producers, organic farming means respecting underlying principles of the organic farming movement,

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such as building soil fertility, maintaining ecological balance, promoting biodiversity, reducing dependence on off-farm inputs, recycling nutrients, and allowing livestock to display their natural instinctive behaviors. For others, especially industrial-scale producers, “organic” appears to be nothing more than a profitable marketing term that they apply to the agro-industrial production system—simply substituting organic feed in their production model and eliminating harmful synthetic inputs, such as pesticides and antibiotics.

Since 2002, the use of the term “organic” on food packaging

has been regulated by the United States Department of Agriculture (USDA). Federal regulations determine which farms and processors qualify as “organic,” and may use the official “USDA Organic” seal on their food packaging.

These standards include a requirement for outdoor access for livestock, including laying hens; unfortunately, our research found that most industrial-scale producers are currently confining tens of thousands of hens inside henhouses, commonly only offering tiny concrete or wooden porches as “outdoor access”—and getting away with it. In some cases they’ve used statements from veterinarians concerning hypothetical disease transmission as an excuse to offer *no outdoor access whatsoever*.

Outdoor access for laying hens is important for many reasons. When the National Organic Standards Board’s Livestock Committee first recommended meaningful outdoor access for laying hens, they specified that the intent of outdoor runs was “to satisfy [the chickens’] natural behavior patterns, provide adequate exercise area, provide preventive health care benefits and answer consumer expectations of organic livestock management.”<sup>1</sup>

This question—whether legal organic egg production requires meaningful outdoor access for hens, on vegetated outdoor runs or rotated pasture—is currently a topic of debate before the National Organic Standards Board (NOSB), the expert citizen panel that meets biannually to advise the Secretary of Agriculture on organic policy, rulemaking and enforcement.

Although the NOSB already issued a recommendation in 2002 (never adopted as regulation by the USDA), stating that organic egg producers must provide vegetated outdoor runs and that porches do not meet the intent of the organic rule, the issue resurfaced in 2009 when the NOSB’s Live-

stock Committee included similar language in a set of recommendations aimed at strengthening animal welfare in organic food production. The proposed recommendations would also require a minimum amount of square footage of indoor and outdoor space per laying hen. The exact number has yet to be decided, and is a topic of contentious debate.

In response to the proposed language that would enforce proper outdoor access for laying hens, industrial-scale producers traveled to the spring 2010 NOSB meetings, along with their trade group lobbyist from the United Egg Produc-

## **Industrial-scale producers are currently housing tens of thousands of hens inside henhouses, only offering tiny concrete or wooden porches as “outdoor access”—or no outside access whatsoever—and getting away with it.**

ers, to publicly oppose requirements for meaningful outdoor access. Bart Slaugh, director of quality assurance at Eggland’s Best, commented: “The push for continually expanding outdoor access ... needs to stop, and I believe that the proposed standards have gone too far.”<sup>ii</sup>

These industrial-scale egg producers apparently do not currently provide enough outdoor access for all their birds to enjoy vegetated outdoor space; rather, their birds are essentially confined in henhouses with as many as 85,000 hens (such as the 6 million-bird Herbruck’s Poultry Ranch in Michigan with 340,000 organic chickens). And unlike most family-scale organic egg producers (farmers), they appear completely unwilling to make any changes to their production system to accommodate stricter animal welfare standards.

A handful of industrial-scale producers argue that the organic egg industry would collapse if they were required to grant outdoor access. However, there are hundreds of family farmers producing organic eggs who do grant meaningful outdoor access to their hens. Three production models are common in the organic egg industry: pasture-based production; fixed housing affording minimal-adequate outdoor space; and the industrial model. Because of their size, industrial-scale producers are undoubtedly marketing the majority of organic eggs, but they are by no means representative of the majority of organic egg producers.

On pasture-based organic farms, flocks of laying hens are housed in either fixed houses surrounded by pasture or mobile chicken coops rotated in the pasture itself. The birds are allowed to roam freely—so the chickens are never on the same section of pasture for very long—or the outdoor space is large enough so it is not quickly reduced to dirt and mud by the chickens. Chickens can exhibit their natural behavior on pasture, such as foraging and scratching, and can exercise by running around and flapping their wings and receive some percentage of their rations from fresh grass, earthworms, seeds and insects.

Many family-scale organic egg producers do not offer managed pasture, but do offer enough outdoor space for all their hens to be outside at the same time. These outdoor runs tend to consist of dirt and mud close to the henhouse, and grasses and weeds further from the house. Henhouses in this category will generally hold between 1,000 and 20,000 birds, where hens live on the floor—no cages—with nest boxes, perches and litter. These producers generally sell their eggs through farmer-owned cooperatives or companies that market their



A double-story organic henhouse, within enclosed porches (perhaps less than 5 percent of indoor space) passing as “outdoor access” for tens of thousands of birds. Photo by The Cornucopia Institute.

eggs under national or regional brand names.

According to industrial-scale egg producers, their model of organic egg production produces 80% of the organic eggs on the market. There are, however, only a handful of companies that follow the industrial model. These producers sometimes house as many as hundreds of thousands of birds on organic “farms,” using aviary systems that are described by one organic producer as “glorified cages.” Concrete porches that are accessible to only a small percentage of the birds pass as “outdoor access,” and sometimes the certifying agent even grants a permanent exemption from going outside.

The Cornucopia Institute believes that these producers are in violation of the organic standards, and our organization has filed several formal legal complaints.

If industrial-scale producers manage to convince the NOSB to scratch strong animal welfare requirements for laying hens, it would give them the green light for construction of additional huge, double-story henhouses without outdoor access, which would economically disadvantage producers that do currently follow the spirit and letter of the organic rule. This will likely force many of the family-scale organic farmers out of business.

Meanwhile, consumers and wholesale buyers can use The Cornucopia Institute’s newly developed Organic Egg Scorecard to guide their purchasing decisions in the marketplace. The Organic Egg Scorecard rates organic egg brands based on criteria that are important to organic consumers, such as legal and legitimate outdoor access, and adherence to or-

## **Hundreds of family farmers producing organic eggs grant meaningful outdoor access to their hens—the cheaper practices of industrial-scale egg producers have already driven some family-scale producers out of business.**

**Consumers should use The Cornucopia Institute’s newly developed Organic Egg Scorecard to guide their purchasing decisions in the marketplace and support those farmers producing eggs in accordance with the letter and spirit of the organic law.**



Juxtaposition in organic egg production: Mobile chicken coop/pastured poultry, and a 34,000-bird henhouse/aviary system shipping eggs to Chino Valley.

ganic principles such as farm diversity and nutrient cycling. Consumers are encouraged to purchase ethically produced and highly rated brands in favor of those with a low rating. The Organic Egg Scorecard is available on the Cornucopia website, along with this report and other related materials ([www.cornucopia.org](http://www.cornucopia.org)).

**Endnotes**

- i Draft Recommendation, NOSB Livestock Committee, Access to the Outdoors for Poultry, December 21, 2001. Available online at [www.ams.usda.gov](http://www.ams.usda.gov).
- ii Bart Slauch, Letter to the National Organic Standards Board, October 19, 2009. Available online at [www.regulations.gov](http://www.regulations.gov).

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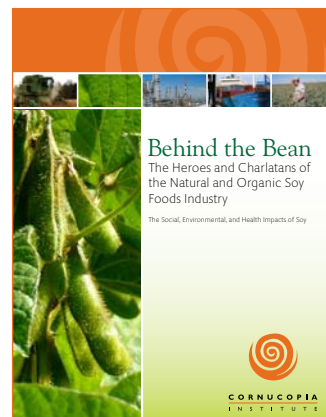
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