

Organic Poultry Scorecard Scoring Criteria

Ownership Structure

Cornucopia considered each poultry brand’s ownership structure. We collected this information because ownership structure relates to the control and verification of marketing claims. In practical effect, a farmer who lives and works on their farmstead is going to have more control over their supply than a corporate officer coordinating purchasing from dozens or hundreds of individual farms. This is also true of brands that blindly accept the claims of their suppliers of poultry, or finished products as with private-label brands from other organizations.

Ownership structure	
100	Farmstead (owned and operated by farm family)
80-90	Farmer-owned cooperative (or similar) — close ties/partnership with farmers and closely involved in management decisions
80-90	Family-owned business or closely held business — close ties/partnership with farmers and closely involved in management decisions
70	Corporate/investor owned and/or independent subsidiaries — deep roots/ties with farmers but limited contact with suppliers
60	Investor-owned corporations and similar with no contact or relation with suppliers
25-50	Investor-owned corporations with questionable track record
0-25	Any ownership structure with history as “bad actor”
0	No response on survey and/or no reliable information found with background investigations

Dedication to Organic Production

Brands that focus exclusively on organic production are generally more dedicated to organic integrity. They truly have “skin in the game.” If the organic label is untrustworthy in the eyes of the consumer, these dedicated brands could lose big. Cornucopia asks for this information to determine a brand’s “commitment to organics.”

“Split” operations often have to juggle keeping organic and conventional products separate. The practice of organic and conventional production taking place on the same farm is not forbidden under the organic standards. This is a weakness in the USDA standards.

Organic production	
100	100% organic production (brand does not market conventional)
60-80	Brand markets both organic and conventional poultry products (score depends on level of segregation)
60	Company markets only organic, even though the supplier farms may have both organic and non-organic birds

40	Markets both conventional and organic with good segregation at processing level but unknown segregation at farm-level
20	Split operations with organic and conventional poultry on same property
0	No response on survey and/or no reliable information found with background investigations

Transparency and Disclosure

Most producers who voluntarily participated in this study received a high score for disclosure (transparency). Some points were deducted for the number of questions left blank, for not providing other information used for compliance purposes, or for preventing an on-farm site visit. Brands that do not participate in our survey can receive some points in this section if they are fully transparent with a trusted third-party reviewer.

Transparency	
100	Full and open disclosure
20-80	Depending on the percentage of questions answered fully, participation in other background investigation
20-50	Some information confirmed via trusted outside sources
0	No response on survey and/or no reliable information found with background investigations

Organic Certifier

Cornucopia takes into account a brand's certifier because some have a better track record than others. Certifier scores reflect their treatment of operations that are skirting the law. Certifier policies are also taken into account. In general, Cornucopia gives certifiers the benefit of the doubt until the certifier is caught in some wrongdoing (for example: certifying operations that have been found to be operating illegally).

Organic Certifier	<i>Certifier</i>
100	Baystate Organic Certifiers
100	Organic Alliance International
100	MOFGA
100	Maryland Dept. of Agriculture
100	Midwest Organic Services Association (MOSA)
100	Montana Dept. of Agriculture
100	Nature's International Certification Services (NICS)
100	New Jersey Department of Agriculture
100	Northeast Organic Farming Association (NOFA)
100	Northeast Organic Farming Association of New York (NOFA-NY)
100	Ohio Ecological Food and Farming Association

100	Oklahoma Agriculture Department
100	Organic Crop Improvement Association
100	Stellar Certification Services
100	Utah Dept. of Agriculture
100	Vermont Organic Farmers (VOF)
100	Washington Dept. of Agriculture
100	Marin Organic Certified Agriculture (MOCA)
100	Organic Certifiers
100	International Certification Services (ICS)
100	EcoCert ICO
100	A Bee Organic Certified
100	Global Culture
100	Organic Certifiers
100	New Mexico Dept. of Agriculture
100	OneCert
85	Pennsylvania Certified Organic (PCO)
85	New Hampshire Dept. of Agriculture
85	Natural Food Certifiers
85	Quality Certification Services (QCS)
85	Iowa Department of Agriculture
75	Colorado Department of Agriculture
75	Texas Department of Agriculture
75	California Certified Organic Farmers (CCOF)
75	Quality Assurance International (QAI)
75	Global Organic Alliance
75	Oregon Tilth Certified Organic (OTCO)
0	No Answer

Flock sizes

Flocks are denoted by how many birds are kept together in one area or even in one “batch.”. For example, the number of birds contained in one mobile hoop house can constitute a “flock.” Meat birds are often raised in batches since their lifespans are relatively short in comparison to other types of poultry. This means that a brand may raise several flocks per year.

In general, large flock sizes go hand-in-hand with static housing and a fewer opportunities for legitimate outdoor access.

Flock Sizes	
100	500 birds or fewer in a flock for chickens (200 for turkeys) coupled with stocking densities that indicate high welfare (no overcrowding)

100	Provides at least 3sqft per turkey in mobile housing rotated at least every other day.
80	2,000 birds or fewer per flock for chickens with stocking density allowing for high welfare for each individual bird.
50	4,000 birds or fewer
40	Over 4000 birds per flock with good dedication to maintaining high-welfare stocking density indoors
30	Brand uses supplier farms and does not set limits on flock sizes
0	4,001 or more birds per flock without legitimate outdoor access, or did not answer/did not know

Stocking Density (Indoors and Outdoors) and Space Allotted

Total square footage provided over a bird’s lifespan (on average) is considered. In general, birds with a brand new 1.5 square feet provided per day is better than the same 4 square feet provided throughout their lifespan (despite the daily stocking density being more “crowded”). This is especially true when flock sizes are kept to a reasonable amount of birds.

In general, brands with the highest ratings in stocking density provide at enough space to accommodate no more than 1.5 lbs per square foot. Brands that exceed 3.5lbs per square foot indicate the birds are more crowded. With some strains (such as the Cornish cross or other fast-growing hybrids) they perform better in close quarters because they are less active and more interested in feeding at static feeders rather than foraging. You may see these kinds of conditions in a mid-range producer using static housing.

However, the highest welfare birds may be “free ranging” or in intensively managed mobile housing.

Due to the variables in this scoring mechanism, more details about the individual brand’s practices can be found in the explanation bar.

Stocking Density and Space Allotted	
100	Stocking densities are such that chickens and turkeys are not overcrowded, meaning flock stress is low and every bird has ample opportunity to forage outdoors without social stress. Daily square footage provided per bird as well as life time square footage is ample. Usually this is indicated by no more than 1.5 lbs of live bird per square foot
40-90	Good stocking densities providing for high welfare, generally allowing no more than 3.5lbs per square foot. (Variation in score depends on precise stocking density.)
30	Moderate stocking densities, generally no more than 5lbs per square foot
0	Indications the birds are overcrowded, including exceeding

	6lbs per square foot
0	No response on survey and/or no reliable information found with background investigations

Housing Style

Cornucopia stands by the principle that larger farms can provide outdoor access of the same quality to their birds as small farmsteads, However, in practical terms this takes particular dedication and hard work.

Housing Style	
100	Mobile housing (chicken/turkey tractors, moveable fencing, or something similar) moved frequently without fixed housing
60	Fixed housing with clear dedication to providing the best outdoor access possible given housing constraints, including rotated pasture/silviopasture, or pasture with over 50% vegetation
30	Fixed housing without any legitimate outdoor access, but still some enrichments that promote bird welfare.
0	No answer or fixed housing without <i>any</i> legitimate outdoor access for any of the birds

Strain and/or Breed and Slaughter Age

Taken into account with this scoring is the breed(s) and/or strain(s) utilized by the farm or brand and the time and availability of foraging outdoors is given to those birds (including the birds' age at slaughter). In general

Strain and/or Breed	
100	Raises heritage varieties or "slow growing" with excellent commitment to encouraging use of outdoor spaces, slaughtering over 13 weeks of age for chickens
90	Brand raises Freedom Ranger, Red Ranger, or similar and slaughters between 9-13 weeks for chickens
70	Brand uses Cornish Cross or similar with excellent commitment to encouraging use of outdoor spaces, slaughtering between 6-8 weeks for chickens
50	Brand uses Cornish Cross or similar with some commitment to utilizing outdoor spaces, slaughtering at 4-5 weeks
0	Brand uses Cornish Cross or similar with poor or no commitment to true outdoor access
0	No response on survey and/or no reliable information found with background investigations

Timing for Outdoor Access

Organic broilers and turkeys have short life spans and therefore the time they spend outdoors can be limited by many factors. The organic standards allow producers to keep their birds indoors due to their “stage of life”, meaning many birds do not receive outdoor access until they are feathered.

Timing of Outdoor Access	
100	Birds spend 3/4ths or more of their lives outdoors with superb outdoor access
90	Birds spend 2/3rds or more of their lives with superb outdoor access
80	Birds spend at least ½ of their lives with superb outdoor access
50	Birds spend approximately ½ of their lives outdoors but have decent outdoor access
40	Birds spend less than ½ of their lives outdoors with poor, or inconsistent, or unconfirmed outdoor access
0	No response on survey and/or no reliable information found with background investigations

Enrichments (both outdoor and indoor)

Enrichments can include shade structures, water and food provided outside, novel feedstuff (such as greens, sprouted grains, mealworms), dust baths and other enrichments. In general, many broiler and turkey producers use “tractors” which confine the birds to a mobile structure that provides access to the ground and foraging without the birds being loose. This scoring section also includes the welfare benefits of having food and water outdoors or easily located in the mobile houses and/or the free-ranging area.

Enrichments	
100	Provides novel enrichments to the birds in conjunction with ample opportunities to forage outdoors
90	Provides legitimate time outdoors without other enrichments
50-70	Provides enrichments to their birds with some commitment to utilizing outdoor spaces
30	Brand uses supplier farms that likely use some enrichments, but the extent is unknown
0	No response on survey and/or no reliable information found with background investigations or don't know

Other Labels and Standards

The USDA organic label is the only federally backed label that verifies how a product was made. While the USDA organic label is important, some third party labels do provide reliable information about a product that the organic label may or may not cover. As already discussed in this report, some of these third-party labels can be misleading. For example, a “Non-GMO” label is redundant if alongside the organic seal, because all organic

products are required to be produced without using GMOs or ingredients that were produced with GMOs.

Our rating system is based on the third-party label standards and especially on their oversight. Consumers will find that those labels Cornucopia rates highly add something above and beyond organic certification.

Other labels and standards	
100	Animal Welfare Approved, Global Animal Partnership Step 5+, Real Organic Project, Regenerative Organic
90	Certified Naturally Grown; Biodynamic Certified (Demeter Association)
80	Salmon Safe, Wildlife Friendly, Predator Friendly
60	Food Alliance Certified Global Animal Partnership Step 4; Certified Humane (HFAC)
40	American Humane Certified (AHA), , Global Animal Partnership Step 3 (GAP Step 3)
30	Non-GMO Project verified
0	None, or no response on survey and/or no reliable information found with background investigations

Outdoor Management

Outdoor management techniques that affect the welfare and quality of a meat birds' life include whether the outdoor area is rotated to provide maximum vegetative cover (this also helps distribute manure in a more environmentally friendly manner). Generally, the best way to do this is with mobile housing of some kind and rotated outdoor space.

The *quality* of the outdoor space allotted to the birds is an important factor in their welfare. Often with high stocking densities outdoor spaces can quickly become denuded. When vegetation is sparse poultry still get some enrichment benefits (for example soil can still be used to dust bathe in) but may offer poor foraging opportunities. However, some producers run their poultry on spent vegetable or grain fields where it could be argued there is poor vegetative cover, but in fact this can be an ideal scenario for foraging poultry! Poultry are *not* grazing animals like cattle or other ruminants, though they will consume some grass. Instead, they are omnivores that thrive on an extremely varied diet.

Ultimately, the quality of the outdoor management should speak to the behavioral needs of the poultry species in question. As such, this scoring category take into account the pasture found on individual farms. For example, while a hard-packed surface with little vegetation offers almost no foraging opportunities, a spent vegetable field may have similar levels of growing vegetation but offer excellent foraging for the birds (therefore scoring higher).

Outdoor management will also vary during seasonal changes. Many organic broiler and turkey producers do not raise meat birds during the winter months due to these concerns.

Outdoor Management	
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100	Rotated pasture or outdoor space with mobile housing and/or “free ranging” access of some kind, moved frequently, and either 90-100% vegetative cover maintained at all times or other <i>high quality</i> foraging opportunities (such as foraging in spent vegetable crop fields)
80	Rotated pasture and/or silviopasture and mobile housing and/or “free ranging” access and maintained at least 50% vegetative cover at all times or other high quality foraging opportunities
50-70	Fixed housing with properly maintained outdoor area to maintain a minimum 50-75% vegetative cover
40	Confirmed that the brand meets minimum organic standards for outdoor access
30	Confirmed the brand meets the minimum organic standards for outdoor access, but not all birds actually spend time outdoors
0	No response on survey and/or no reliable information found with background investigations

Feed Sourcing

Worry of widespread fraud with grain imports has been circulating for over a decade in the organic farming community. A number of imports have been sold at low prices that domestic markets cannot compete with. In 2017, investigative reporters brought expanded exposure to the fraudulent grain imports issue.ⁱ In other words, grain is being imported under the organic label that is not actually certified organic. This has widespread effects on organic livestock operations, including all poultry.

Sourcing feed locally or growing feed on-farm supports local economies and increases the chance the feed is of high organic quality.

Feed Sourcing	
100	All feed is produced on-farm (milled on farm or locally, with traceability)
90	Feed is from confirmed local source, with some dietary needs also being met from legitimate outdoor foraging
50-85	No feed is produced on-farm but is confirmed to be domestically produced. Scoring varies depending on how much nutrition birds obtain from outdoor foraging and/or how definite the trail of feed sourcing is
40	No feed is produced on farm and birds get poor supplementation from outdoor foraging, but their feed is confirmed from domestic source; OR confirmed domestic and international sourcing with efforts to get more domestic feed.
20	Feed sourced from commercial mixes manufactured by larger companies, making sourcing difficult to track
0	No response on survey or confirmed fraudulent feed source (meaning, non-organic or suspected non-organic)

Synthetic Methionine

Methionine is an essential amino acid for poultry and is an allowed synthetic substance in organic production.¹ However, the use of synthetic methionine is very controversial in the organic marketplace.² Its continued allowance in organic poultry production has been implicated in benefitting industrialized production methods over truly outdoor-centered production methods that small and medium-sized producers favor.

Methionine is classified as an essential amino acid because it cannot be biologically produced by poultry, but is necessary to maintain their viability. Natural feed sources with high percentages of methionine include bloodmeal, fish meal, crab meal, corn gluten meal, and sunflower seed meal. In general, grains are low natural sources for methionine. It is regulated as an animal feed nutritional supplement by the Food and Drug Administration.³ Organic livestock producers had petitioned for the substance as a part of the NOSB's initial review of synthetic amino acids.

Proper foraging and diet can overcome methionine deficiency. Other management practices also decrease the need for synthetic methionine in the diet.

Synthetic methionine is only allowed for use only in organic poultry production at the following pounds of synthetic 100 percent methionine per ton of feed in the diet (maximum rates are averaged per ton of feed over the life of the flock): broiler chickens are allowed 2.5lbs and turkeys and all other poultry are allowed 3 pounds.⁴

Synthetic Methionine	
100	Does not supplement any synthetic methionine and/or methionine needs met from alternate sources (such as outdoor foraging)
80-90	Supplements synthetic methionine in some amounts less than the maximum allowed by the organic regulations
70	Supplements 2.5lbs for broiler chickens and/or 3lbs in turkeys (the maximum allowed by organic regulations)
0	Don't know or no response on survey

Cull and/or Death Rate

Meat birds are intentionally slaughtered well before their natural lifespan runs its course. However, disease that requires birds to be culled or an otherwise high death rate can be indicative of other systemic issues within a flock. Predation is also a concern if a high number of birds are lost to predation during each flock cycle.

¹ 83 §205.603(d)(1)

² Dr. Jacquie Jacob Ph.D. 2013. "Synthetic Methionine and Organic Poultry Diets." *eXtension.org*, August 27, 2013. <https://articles.extension.org/pages/69042/synthetic-methionine-and-organic-poultry-diets>

³ 21 CFR 582.5475

⁴ 7 CFR § 205.603(d)(1)

12. Cull/death rate		Rating is based on the health and survivability of a brand's flock
	100	Under 5% cull and death rate
	80	Under 10%
	60	Under 15%
	20-60	Over 15%
	0	No response on survey and/or no reliable information found with background investigations

Chick and Poultry Sourcing

The organic regulations state that “poultry intended for slaughter or egg production must be under continuous organic management beginning no later than the second day of life.”⁵ This means that the organic allows chicks to be purchased from a conventional hatchery. Their parents—breeders—live the low welfare lives of conventional chickens.

Even with this requirement, due to how chicks are hatched out, some chicks may actually be over 24 hours old when they are shipped. Chicks are often “batch hatched” in groups. In practice, not every bird will hatch out at the same time, meaning some chicks in a batch will be slightly older. Often these chicks are deprived of food and water until their entire “batch” has hatched.

Methods of managing chicks or poults (the term for a baby turkey) that allow them to be organic since (or before) hatching are preferred.

14. Chick and poul		
	100	Chicks and/or poults are certified organic since hatching and/or hatched out on-farm
	80-100	Chicks and/or poults are certified organic since hatching and/or from organic breeders
	70	Purchase chicks/poults from conventional hatcheries (allowed practice in organic production)
	0	No response on survey and/or no reliable information found with background investigations

Physical Alterations

Physical Alterations		
	100	Brand performs no physical alterations
	80	Individual chicks and/or poults are beak tipped if they display behavioral issues.
	70	Some birds are beak tipped when only a few days old by chick/poult supplier
	20	Brand regularly performs or allows the performance of beak tipping or other alterations

⁵ §205.236

0	No response on survey and/or no reliable information found with background investigations
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Farm Support

The rating for “farm support” has everything to do with oversight. In the words of one farmstead producer, when asked for how often their farms are visited by company representatives: “We live here.” Characteristically, farmstead producers are with their birds every day and personally supervise the production. Some organizations have a dedicated field staff, or the owner visits with the organic farmers regularly. Others might visit annually or exclusively depend on certification and inspectors (which do not typically verify proprietary standards over and above what the USDA mandates).

Farm support	
100	Farmstead (owner and/or management works on-site and sees birds daily)
70-90	Cooperative/corporation that sets standards and has a staff that visits farms regularly (or similar situation)
60	Visits a minimum of once a year
50	Depends on trusted third-party for supervision
5	No direct supervision/no personal relationship with farm
0	No response on survey and/or no reliable information found with background investigations

Slaughter and Stunning Methods

There is much debate in the industry as to what methods of slaughter and stunning are the most humane.

This category is non-scoring at this time.

Slaughter and Stunning	This category is provided for information only.
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Soy-Free

Because soy is a common allergen, many consumers are interested in products that are soy-free. This information is provided for consumer benefit without any associated rating. Many poultry farms feed soy as a protein source.

This category is non-scoring at this time.

Soy-free Ration	Added for additional information to consumers.
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Extra Credit

Extra credit opportunities emphasized brand transparency and willingness to open their inner-workings to investigators. Transparency is avoided by factory-organic brands and so can be one distinguishing factor between ethical and factory-organic brands.

Extra credit included producers sharing their organic systems plan (OSP). The OSP is a detailed description of the practices and procedures used by an organic operation to produce whatever organic goods they have. Operations must update their OSP annually or as changes occur (this document is supplied to the inspectors on an annual basis)

18. Extra credit		Several questions were asked in addition to the original survey questions that would ultimately give producers “extra credit” points.
	50	Provide full organic systems plan (OSP).
	75	Provide the contact information and details about <i>every farm</i> supplier instead of just the five largest (if a brand with more than five supplier farms).
	10-100	This brand uses some novel practice in the industry that sets them apart (see description line for more information)

ⁱ Peter Whoriskey. 2017. “The labels said ‘organic.’ But these massive imports of corn and soybeans weren’t.” *The Washington Post*, May 17. https://www.washingtonpost.com/business/economy/the-labels-said-organic-but-these-massive-imports-of-corn-and-soybeans-werent/2017/05/12/6d165984-2b76-11e7-a616-d7c8a68c1a66_story.html?utm_term=.fd27d25aa53e