



Ms. Jean Richardson  
Chairperson  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, Mail Stop 0268  
Washington, DC 20250-0268

April 7, 2015

Dear Ms. Richardson:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) on behalf of our members. We are grateful for the strong animal welfare recommendations the NOSB has provided to the National Organic Program (NOP) over the years. We wish to direct your attention to a significant welfare issue that has become a major focal point for animal welfare organizations and labeling certification programs in recent years—the issue of genetic selection for rapid growth in broiler chickens and turkeys. Major animal welfare certification programs such as Animal Welfare Approved already set requirements limiting rapid growth, and others, such as the Global Animal Partnership (GAP) are currently developing them. In years past, the NOSB has acknowledged the health and welfare problems afflicting fast growing broiler strains.<sup>1</sup> We urge the NOSB to examine the issue of rapid growth in broiler and turkey strains and provide recommendations to the NOP.

“Broiler” chickens – chickens raised for meat, rather than eggs – are the most numerous of all livestock raised Certified Organic. Some 20 million were raised in 2011. Both broiler chickens and turkeys suffer from problems related to their selective breeding for certain physical traits. Modern breeds are selected for fast growth, large sizes and disproportionate bodies that emphasize the breast muscle. Birds raised organically are generally these same breeds and strains.

Troubles breathing, standing and walking are common: the birds’ skeletons and organs cannot keep up with their rapid onset of muscle weight. Painful sores on their feet, legs and breasts ensue from the inordinate weight they are forced to carry and the amount of time they spend lying down to compensate. Contributing to these birds’ rapid growth is a virtually insatiable appetite. If allowed to live beyond their few weeks of life and eat ad libitum, the birds would become obese. This means that breeding birds, who pass down their fast-growth, high-appetite genetics, but who are kept alive for much longer, must subsist on drastically fewer calories. Fed as little as every other day, and sometimes even water-restricted, they endure chronic hunger.

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<sup>1</sup> “Species-specific Guidance Recommendations,” October 14, 2011, page 18, National Organic Standards Board Livestock Committee.

Not surprisingly, these welfare problems also present human health concerns. Modern “meat” birds are so taxed that their immune systems suffer, making them susceptible to pathogens. Fast-growing birds also tend to spend more time lying in their litter, making them more likely to develop sores and to have those sores come in contact with pathogen-contaminated litter which can then serve as a conduit for infections.

Other countries encourage the use of healthier, more balanced breeds and strains in organic programs. The European Union requires chickens and turkeys to be either a “slow-growing poultry strain” or to be raised for a minimum of 81 days for chickens, 100 days for turkey hens and 140 days for turkey toms.<sup>2</sup>

An additional benefit of using slower-growing breeds and strains may be their lessened need for amino acids, including methionine.<sup>3</sup> Due to concerns about the inclusion of adequate methionine in their diets, organic birds are currently permitted synthetic methionine—a significant departure from Organic standards. Slower-growing “meat” birds could lessen this intake need. When permitted to have contact with soil and forage in an adequately vegetated environment, birds naturally acquire methionine through such sources as forage, insects and worms.

Given its requirement for “selection of species and types of livestock with regard to suitability for site-specific conditions and resistance to prevalent diseases and parasites,”<sup>4</sup> the NOP’s current livestock health care practice standard necessitates a shift to slower-growing, more balanced birds. Our organizations urge the NOSB to provide recommendations to the NOP to fulfill this mandate.

Attached please find a white paper on the problems of modern broiler chicken genetics issued by the American Society for the Prevention of Cruelty to Animals, also available here: [http://www.aspca.org/sites/default/files/chix\\_white\\_paper\\_lores.pdf](http://www.aspca.org/sites/default/files/chix_white_paper_lores.pdf).

We thank you for your work thus far and look forward to working with you to address this issue going forward.

Sincerely,



Suzanne McMillan  
Director, Farm Animal Campaign  
ASPCA



Dena Jones  
Director, Farm Animal Program  
Animal Welfare Institute



Paul Shapiro  
Vice President of Farm Animal Protection  
The Humane Society of the United States

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<sup>2</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:250:0001:0084:EN:PDF>

<sup>3</sup> [http://orgprints.org/10983/1/Final\\_Report\\_EC\\_Revision.pdf](http://orgprints.org/10983/1/Final_Report_EC_Revision.pdf)

<sup>4</sup> § 205.238(a)(1)