Recently, the Cornucopia Institute released a study (<a href="http://www.cornucopia.org/2014/12/investigation-factory-farms-producing-massive-quantities-organic-milk-eggs/">http://www.cornucopia.org/2014/12/investigation-factory-farms-producing-massive-quantities-organic-milk-eggs/</a>) alleging that one of our poultry suppliers – Smart Chicken – was not following regulations set by the National Organic Standards Board in regards to the housing of its chickens. Because we have been carrying Smart Chicken for quite a while and have even sent our Meat Manager to their facilities to inspect their operations, we were surprised to read the allegations and decided to contact Humane Farm Animal Care - one of the organizations that certifies the practices at Smart Chicken - to get their perspective. Their reply which follows contradicts what Cornucopia has alleged and affirms that Smart Chicken's operation is well within the required standards.

At Humane Farm Animal care we have the toughest chicken standards out there and they include slaughter and traceability. Smart Chicken is an outstanding company that works hard to meet our standards and exceed them. They were visited by Jamie Oliver's assistant, Daniel Nowland who is now on our board of directors and he was impressed with all the farms of theirs that we visited. Jamie Oliver recommends the Certified Humane® program for their consumers in the US.

The letter from Cornucopia makes the following statements on the space of the birds:

"The photographs were taken on June 12, 2014 at 12:55 PM. State regulatory documents indicate this facility is managing 540,000 birds — none were visible outdoors, as federal law requires. However, marketing information available on the web states that they have approximately 25,000 birds per house. If that's correct, there are 1 million birds at this facility (we don't know if that means they are in violation of their permit in Nebraska). Based on the published reports of the size of their houses (510'  $\times$  43') that would only provide birds with .88 ft.² each. The USDA should determine if, when the birds are fully grown, this dubious amount of space meets the published standards for organic livestock management."

The statement above is based on conjecture. We have actual inspectors that go to these houses and measure, actually measure with expensive laser measuring devices and they meet our space requirements which are:

## E 20: Stocking density

- a. The maximum stocking density must be calculated on the weight of birds per available floor space.
- b. This density allowance must not exceed 6 lbs. /ft2 (30 kg/m2).

Cornucopia also states "Furthermore, there appear to be no windows in the buildings. In addition to being deprived access to the outdoors these birds apparently are also deprived of "year-round access to direct sunshine" that federal organic regulations also require"

Please note that it is very cold in Nebraska much of the year. When you have barns and those birds are in there from hatch to about 7 or 8 weeks, they need warmth. If there are windows, they leak air. What they do have is light and a lot of light and the amount of light that we require in our standards, the equivalent of day light.

The organic standards require outdoor access and obviously they meet that requirement. However, if you read their letter carefully it says:

"We believe that meaningful outdoor access — at a bare minimum an area large enough for every bird to be outside at the same time, and covered with either vegetation and/or dirt — is necessary to accommodate the health and natural behavior of laying hens, as the rule states — and there must be meaningful egress so that the birds can access the outdoors."

Again, please note the words "WE BELIEVE..." That is not what the organic standard actually says, that is what Cornucopia institute believes.

Chickens do not like to go out in direct sunlight. Was the helicopter over the houses at noontime? Chickens do not like wind or rain. And in fact, chickens can't go outdoors until they are at least 4 weeks of age because they must become fully feathered. So for all the overhead helicopter visit, Cornucopia had no idea as to the age of the chickens, the time of day or anything else.

If you purchase Smart Chicken, I suggest you continue to do so. I purchase Smart Chicken for my family and will continue to do so.

Adele Douglass

Executive Director

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