



THE HUMANE SOCIETY
OF THE UNITED STATES

July 13, 2016

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Director, Standards Division
USDA-AMS-NOP, Room 2646, Ag Stop 0268
1400 Independence Ave., SW
Washington, DC 20250

Re: Biosecurity and Proposed Rule RIN 0581-08023

Dear Dr. Lewis,

I write on behalf of The Humane Society of the United States (HSUS), the nation's largest animal protection organization, regarding biosecurity and animal health as addressed in the USDA Agricultural Marketing Service's proposed rule on Organic Livestock and Poultry Practices.

The HSUS shares concerns about animal health, as well as poultry diseases like avian influenza, and food safety threats like *Salmonella*. These are threats to both public health and animal welfare, and must be taken seriously.

The proposed rule requires that birds be given access to the outdoors and direct sunlight, and also suggests multiple methods of disease prevention. The organic regulations allow for the use of vaccines and physical barriers, including netting, fences, and other management practices to prevent contact between domestic and wild birds and animals.

While these methods do not fully prevent contact between domestic and wild birds, importantly, fully confining birds indoors has not prevented exposure to the avian influenza virus or *Salmonella*. As noted by AMS regarding the 2014-2015 avian influenza outbreak, the disease "was detected in 211 commercial flocks, which are primarily exclusively indoor operations," and in only "21 backyard flocks which generally provide ample outdoor access."

We urge the use of common sense practices to fight the spread of disease, including good management practices, physical barriers between domestic and wild birds, footbaths outside of poultry houses to prevent spread of disease between flocks, and temporary confinement of birds when necessary for reasons of inclement weather and conditions that jeopardize health, safety, or well-being of the animals, as provided for in the proposed rule. The rule also clarifies that birds may be confined during periods of wild bird migration, further improving organic producers' ability to mitigate risks.



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The proposed rule's requirement that organically raised birds have access to the outdoors codifies common organic practices. According to the Organic Trade Association, approximately 76% of organic poultry producers are already in compliance with the proposed requirements that organic flocks have outdoor access. Additionally, studies have shown that exposure to direct sunlight can actually have a protective effect, completely inactivating the avian influenza virus in chicken feces,¹ and the Food and Agriculture Organization of the United Nations has found that UV rays of the sun may "destroy any residual virus."² Strong biosecurity practices and flexibility to temporarily confine birds when needed are already embedded in the proposed rule to ensure that organic producers can continue to protect the health of their flocks.

The HSUS strongly supports finalization of this important proposed rule.

Sincerely,

Michael J. Blackwell, DVM, MPH
Chief Veterinary Officer
The Humane Society of the United States

¹ Songserm, T., Jam-On, R., Sae-Heng, N., and Meemak, N. 2006. Survival and stability of HPAI H5N1 in different environments and susceptibility to disinfectants. In Proceedings of the OIE/FAO International Scientific Conference on Avian Influenza, eds. Schudel, A. and Lombard, M., Vol. 124, 254. Karger, Switzerland: International Association for Biologicals.

² Food and Agriculture Organization of the United Nations. 2004. FAO recommendations on the prevention, control and eradication of highly pathogenic avian influenza (HPAI) in Asia.
<ftp://ftp.fao.org/docrep/fao/012/ak714e/ak714e00.pdf>.