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Mr. Paul Lewis, PhD. - Director of Standards Division
National Organic Program
USDA-AMS-NOP
Room 2646-So, Ag Stop 0268
1400 Independence Avenue SW
Washington DC 20250-0268

Docket Number: AMS-NOP-15-0012; NOP-15-06PR
Regulatory Information Number (RIN): 0581-AD44

Dear Mr. Lewis,

I am commenting today as an avian ethologist and owner of a commercial organic egg operation. Overall we are pleased with the direction the proposed rules are heading and view them as very implementable. We would offer, however, the following for consideration before the final rule is published.

1. You asked the industry what strains of egg layers are used for organic production. Our current mix is Lohman Brown: 32%, Hyline Brown: 42%, LSL White: 14%, Shaver White: 10%, Bovans White 2%. Because we believe that a variety of strains are used for organic egg production space provided for layers should be a fixed number of square feet/bird as opposed to #'s of bird per square foot. While we understand the intent of that approach we feel it still leaves a wide door open for too much interpretation by both the certifier and the producer. I.e. At what age is weight measured? Is the book standard the guide or are your producer records? Who is actually going to validate the weight of the birds? A cleaner approach is - 1.5 ft²/hen inside a building a 22 ft²/hen outside a building.
2. We believe that pullets need a variable weight approach because of rapid development of weight over 18 weeks. We support 1ft²/pullet of outside access on the soil. If concrete is allowed then it should be similar to layer approach with at least 50% on soil and 2 ft min/pullet outside.
3. Regarding outside space for layers we commend the commitment of getting layers outside but we have a concern on only 2 ft²/bird. Our experience is that if birds are truly going outside then at 2 ft²/bird soil will be overgrazed and there is an inherent conflict with our responsibility for environmental management. We strongly encourage 22 ft²/bird outside if we are truly going to provide a balance between getting birds outside and not over grazing the pasture.
4. We believe the timelines of implementation are reasonable for layers. If we look at the history of California implementing prop2 and eliminating cages there was about 18 months of distorted markets and the producer part of the market has made the necessary adjustments to meet the market demand under the new rules. We see this as very similar. However on pullets we believe a two year phase in for interior standards is more appropriate.
5. We ask for clarification of what temporary confinement for pasture restoration means. We tend to believe some in the industry will look for every opportunity to confine organic chickens so we would like clear understanding to all of the industry on allowed confinement.

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6. We would like clarification of lights coming on and dimming if this is additive to the 16 hours of artificial light or included. We recommend it is additive in addition to 16 hours artificial light.
7. The term "flat roost" was used in the proposed rule. We do not know what this means. Proper roosts are circular and 1 to 1.25 inches in diameter. Anything else limits the birds ability to engage in natural roosting behavior.
8. Outside temperature: We suggest no upper limit. Experience has shown us chickens will self regulate on warm days and will go inside the barn naturally if they are uncomfortable. We also ask for clarity on 40 degrees at the lower end. Specifically what time is it determined that it is 40 degrees? In spring and fall it is very common for the day to start out cold and warm by mid day and as fall progresses in northern climates there will arrive a point when it is 40 degrees for a very brief period of time. We are suggesting an approach that a temperature reading is taken at 9A daily. If it is 40 degrees or above then doors open. If it is below 40 degrees then producers can confine there birds that day.
9. We believe the final rule should clearly state the flock must be managed to encourage birds outside. As an example we would not expect to see training wires in front of outside access openings.
10. We dispute the fact that major economic harm will come to large aviaries. With the dramatic shift of caged production to cage free production these facilities have a real home for those producers to service their cage free business.

We applaud the effort of the NOP and the direction it is heading. As it relates to native bird behavior these proposed rules are very consistent with the animals we are managing.

Kind regards,

John Brunnquell

President

EGG INNOVATIONS LLC