

Jesse LaFlamme:

My name is Jesse Laflamme and I am the owner and CEO of Pete and Gerry's Organics LLC. I would like to offer my full support for the proposed changes to organic standards for egg production. I believe that these proposed changes strengthen the organic standards, level the playing field for organic producers, and provide further trust for consumers in the USDA organic seal.

My family has been raising laying hens for almost 70 years in northern New Hampshire. In 1996, we began producing organic eggs because we were no longer able to compete against large, industrialized commodity egg producers. Since 1996, our brand (Pete and Gerry's) has grown to become the largest free range, organic egg brand in the country. We developed an innovative partnership model which allows us to work with over close to 50 organic farmers from Maine to Missouri to produce free range, organic eggs in a distributed way, providing opportunities for small family farmers to continue farming. Our farmers are definitely at a disadvantage in the marketplace if the playing field is not level with everyone adhering to meaningful outdoor access on grass.

Over the past two decades, we have spoken with tens of thousands of organic egg consumers through phone calls, social media, email, and market research. I am confident based on these conversations that the vast majority of consumers assume that the organic standard includes meaningful outdoor access for organic laying hens. So, I feel that the organic standards should be strengthened to ensure that consumers get what they believe they are paying for. If consumers learn that some organic hens do not have meaningful outdoor access on soil and vegetation, it could significantly undermine the meaning and value of the USDA organic seal.

Additionally, I believe that the proposed outdoor space allowance is the appropriate amount. We produce to at least that space allowance in order to conform with Certified Humane. The space allowance has been well researched and provides the right amount of space for hens to go outside, scratch and peck, and display other natural behaviors. I have been around hens my entire life and I am certain that they want to be outside. So, let's ensure that's exactly what happens on USDA organic egg laying farms.

Pete & Gerry's Growers (55 producers):

I wanted to write this letter in support of the National Organic Program Organic Livestock and Poultry Practices Proposed Rule that was announced on April 4, 2016 - specifically related to egg production. My family and I care deeply about the way our food is produced which is why we started in the business of producing eggs in a sustainable and humane way. We believe that this rule, while not perfect, goes a long way toward evening out the playing field for independent producers like myself, and provides consumers with additional trust in the organic label.

We believe wholeheartedly that customers should have the choice about what types of eggs they buy and the way those eggs are produced - whether caged, cage free, free range, pasture, or organic. However, we believe equally strongly that a consumer should be able to trust the labels that are on the package. It does not seem right that a consumer buys organic eggs which they believe allow significant outdoor access for the chickens, but that actually have only porches outside the chicken house. It is very difficult for my family who cares deeply about our chickens to compete with large complexes that do not allow their birds outside. I believe that the 2 square feet of outdoor access allows us to keep organic eggs affordable for consumers while also providing sufficient space for the chickens and credibility with consumers of organic products.

We are excited about the future of organic egg production, especially as this rule is implemented and we focus on providing consumers with a wholesome product that matches their expectations. I feel very blessed to be able to raise my family producing eggs. If you have any questions please do not hesitate to follow up.