

The Truth Behind the Labels: Farm Animal Welfare Standards and Labeling Practices

A Farm Sanctuary Report



farmsanctuary
rescue • education • advocacy

TABLE OF CONTENTS

1. Executive Summary	1
2. Introduction	7
3. Assessing Animal Welfare	9
4. Assessing Standards Programs	11
5. Product Labeling and Marketing Claims	13
6. Industry Quality Assurance Guidelines	21
7. Third-Party Certification Standards	36
8. Assessment of Welfare Standards Programs	44
9. Findings	50
10. Appendices	53

Published April 2009

Special thanks to Dena Jones, author of the first edition of the “Farm Animal Welfare Standards Report,” (published September 2005) for her invaluable insight and advice on the current edition.

1. EXECUTIVE SUMMARY

In recent years, citizens in the U.S. and around the world have shown increasing concern and opposition to the way farm animals are treated on industrial farms. Numerous public opinion polls have shown widespread support for enacting bans on cruel farming practices, and so far, three states have passed such laws through citizens' initiatives (Florida in 2002, Arizona in 2006, and California in 2008). Several state legislatures are also beginning to address these issues in response to popular concerns.

In the marketplace, a number of producers and retailers have sought to promote sales of meat, milk and eggs by suggesting that their animals were raised "naturally" or treated "humanely." But these claims are not adequately regulated by government agencies and they tend to sound better than they are.

In the past twelve years, more than one dozen farm animal quality assurance schemes have been developed. These include animal industry quality assurance programs, retail food animal care auditing programs, and third-party organic and humane food certification programs. In addition, government-regulated food labeling and marketing claims relevant to animal welfare continue to evolve.

Product Labeling & Marketing Claims

Food product labeling and marketing claims are governed by the U.S. Department of Agriculture (USDA) and, in some cases, the Food and Drug Administration (FDA). The USDA's Food Safety and Inspection Service (FSIS) is the federal agency responsible for ensuring truthfulness and accuracy in the labeling of meat and poultry products. The agency also regulates the labeling of pasteurized liquid eggs and cooked eggs, but not shelled raw eggs, which are regulated by the FDA and the Agricultural Marketing Service (AMS) of the USDA.

USDA utilizes informal working definitions for animal care labeling claims such as "free range" and "grass fed." These terms currently have no strict regulatory definition. USDA-FSIS approves product labels based on producer testimonials only, including a signed affidavit. The agency does not check on-farm compliance with meat and poultry claims. USDA-AMS allows producers to label eggs as "cage free," but there is no strict regulatory definition of this term. According to Roger Glasshoff, the USDA-AMS National Supervisor for Shell Eggs, verification simply consists of inspectors verifying that a facility contains no cages. The agency does not approve any other labels, including "free range," for shell eggs. Thus, with the exception of claims associated with third-party certification programs, compliance with labeling claims is barely verified, if at all. It is likely consumers grossly over-estimate the animal welfare significance of these claims.

Animal Industry Quality Assurance Programs

Quality assurance programs and guidelines to assess farm animal rearing and handling have been created by both animal agriculture producer trade associations and individual producers. These trade associations include those representing producers of dairy and beef cattle, veal calves, sheep, pigs, turkeys, meat chickens, egg laying hens, and meat packers. Of the various programs, only one – the United Egg Producer's Animal Care Certified program – currently features third-party, pass/fail audits.

The animal industry has created these quality assurance programs in response to pressure from food retailers, including grocery stores and chain restaurants, and to avoid government regulation and third-party audits. In most cases, the guidelines were developed with little or no public input, by scientists and industry officials with expertise in animal production, not animal welfare. These guidelines allow numerous inhumane practices and fail to provide animals with freedom from hunger, discomfort, pain, fear and distress and the freedom to express

normal behavior (referred to as the “Five Freedoms”). In addition, the areas of transportation, use of genetic selection, and the care of breeding animals are not sufficiently addressed. A review of animal industry guidelines for dairy cattle, pigs, meat chickens, and laying hens conducted for this report noted a total of more than 50 major violations of the Five Freedoms.

A summary of current industry quality assurance programs follows:

Beef Cattle

The National Cattlemen’s Beef Association (NCBA) has approved guidelines for the care and handling of beef cattle. No quality assurance program has been developed to implement and audit the guidelines, and the NCBA has declared publicly that it doesn’t believe auditing of animal care is necessary.

- Access to pasture not required; confinement to feedlots allowed
- Castration without anesthesia allowed
- Hot iron branding allowed
- Use of electric prods allowed

Dairy Cattle

The Milk and Dairy Beef Quality Assurance Center has operated a registration and certification process for dairies since the establishment of its original quality assurance program in 1990, but dairies are not expected to meet all of the guidelines to be certified, and no third-party auditing of the guidelines is required.

- Tail docking and dehorning allowed
- Use of growth hormones allowed
- Confinement of cows to tie-stalls and calves to crates allowed
- Minimum space allowances for calves not provided
- Calves may be removed from mothers immediately after birth

Veal Calves

The American Veal Association did not provide details regarding its Veal Quality Assurance Certification Program, despite multiple requests. However, a previous review of the program that was conducted in 2005 found that the original purpose was to reduce the incidence of chemical residues in calves. Although it is referred to as a certification program, it is voluntary and entirely self-regulated with no third-party review.

- Tethering and continuous confinement to crates allowed
- Bedding not required
- Slatted flooring allowed
- Provision of adequate dietary iron and fiber not required

Sheep

The American Sheep Industry Association has produced guidelines for the care of sheep. Overall, the guidelines are general and subjective. The Sheep Care Guide contains no forms or scoring tools for auditing compliance with the guidelines, nor does it recommend any form of internal or external auditing.

- Early weaning allowed

- Tail docking and castration allowed without anesthesia
- Access to grazing pasture not required
- Minimum space allowances not provided

Pigs

The National Pork Board's Pork Quality Assurance Plus (PQA Plus) Program consists of a manual with assessment forms. No third-party auditing is offered at present. Currently, NPB claims that more than 3,000 operations have been assessed, and that 90 percent - 95 percent of pigs slaughtered in the U.S. are raised by PQA Plus certified individuals. In addition, NPB has established the Transport Quality Assurance program to certify those involved in animal handling and transport.

- Bedding and rooting materials not required
- Tail docking, teeth clipping, ear notching, and castration without anesthetic allowed
- Confinement of sows to gestation and farrowing crates allowed
- Access to outdoors not required

Chickens

The National Chicken Council's (NCC) Animal Welfare Guidelines were developed with input from an animal welfare task force, whose members included industry representatives with backgrounds in production. Auditing is voluntary on the part of individual producers. When the retail food industry developed its animal welfare-auditing program, there were more areas of disagreement between the retail industry's recommendations and the NCC guidelines than any other animal agriculture guidelines.

- Feed/water restriction of breeding animals allowed
- Litter for dust bathing not required
- Toe clipping and comb dubbing allowed
- Access to outdoors not required

Turkeys

The National Turkey Federation (NTF) has published a set of Animal Care Best Management Practices that address hatching, breeding, growing, housing, feeding and watering, air quality, disease control, transportation, and slaughter. While there is an "audit tool" included at the end of these guidelines, no formal auditing is done by NTF or any other third-party.

- Toe clipping and snood dubbing allowed
- Feed/water restriction of breeding animals allowed
- Access to the outdoors not required

Egg Laying Hens

United Egg Producers (UEP) has developed UEP Certified, the only industry-sponsored, third-party animal care certification program. Initial audits must be conducted at each of the company's facilities, but subsequent audits may be reduced to only 50 percent of facilities. Auditors provide producers with a minimum of 48 hours notice prior to the on-site audit, and only a small percent of layer houses (chosen randomly) are inspected for compliance each year.

- Debeaking allowed
- Confinement to small cages allowed
- Access to the outdoors not required

Retail Food Auditing Programs

Animal care audit programs have been developed by both retail food trade associations and individual retailers.

FMI-NCCR

In 2001, the Food Marketing Institute (FMI) and the National Council of Chain Restaurants (NCCR), the trade associations for grocery stores and restaurants, respectively, formed an alliance to address the care of animals used for food. They created the Animal Welfare Audit Program (AWAP) to assess their suppliers' compliance with voluntary animal agriculture industry guidelines. However, despite retailer interest, lack of cooperation from producers prevented the program from gaining ground. It was eventually discontinued, and currently, while FMI and NCCR still maintain a joint animal welfare committee, they limit their activities to reviewing and endorsing guidelines issued directly by various trade groups.

Individual Retailers

Fast food giants McDonald's, Burger King and Wendy's were the first retailers to establish programs to monitor the treatment of animals by the animal agriculture industry. Their efforts in this area influenced the creation of the discontinued FMI-NCCR audit program. They continue to perform their own animal care audits. One grocery chain, Whole Foods Market, initiated a project to create animal care guidelines to cover the care of all farm animal species whose products are sold by the company. The Whole Foods Market program evolved and led to the creation of the Global Animal Partnership third-party certification program.

Third-Party Certification Programs

At present there are five independent, third-party food certification programs that include standards for the care and handling of animals. These programs are the Certified Organic, Certified Humane, American Humane Certified, Animal Welfare Approved, and Global Animal Partnership programs.

Certified Organic

The National Organic Program (NOP) was created by passage of the Organic Food Production Act of 1990. The regulations implementing the program were established as a result of one of the largest rulemaking efforts in U.S. history, in which more than 300,000 public comments were received on two proposed organic rules.

Organic producers are certified following an on-site inspection. Inspections, either announced or unannounced, are then conducted annually and as needed to verify compliance with the regulations. Less than 1 percent of farm animals are being raised under organic conditions. While still small, the organic segment of the food market has grown rapidly, and is expected to continue growing at a rate of about 18 percent per year through 2010.

NOP regulations are written to apply to all farm animal species, with very few requirements that are species-specific. The federal standards do not address handling practices such as electric prod use, management practices such as forced molting and weaning, minimum space allowances, euthanasia, or transport. They also allow physical alterations such as debeaking and tail docking.

NOP regulations require conditions that accommodate the “health and natural behavior of animals,” but these haven’t been clearly defined. Some certifying agents have permitted poultry and egg producers to keep birds confined indoors most or all of the time, sometimes in barns holding thousands of birds. Also, organic mega-dairies have been allowed to house cows without access to pasture as required by the regulations. Pasture requirements for livestock are currently under review following years of complaints about organic mega-dairies from smaller organic dairy farms.

Certified Humane

The Certified Humane program is administered by Humane Farm Animal Care and endorsed by some animal advocacy organizations. Standards have been created for beef cattle, dairy cattle, young dairy beef cattle (veal calves), pigs, sheep, goats, turkeys, broiler (meat) chickens, and egg-laying hens. The standards were developed by animal behavior scientists and veterinarians specializing in farm animal care. These advisors also recommend revisions to the standards and assist with audits.

Certified Humane standards exceed those of industry quality assurance programs in some respects. For example:

- Dairy cattle – Minimum of four hours daily outdoor exercise required
- Pigs – Confinement of pregnant sows to gestation crates is prohibited, and bedding is required
- Chickens – Litter for dust bathing is required, and slatted or wire flooring is prohibited
- Laying hens – Confinement to wire cages is prohibited, and litter for dust bathing is required

While Certified Humane standards are stronger than industry guidelines, they permit some industry practices that cause animals to suffer and prevent them from engaging in natural behavior. For example:

- There is no requirement that pigs, chickens raised for meat, or egg-laying hens be provided access to the outdoors
- Feedlot confinement of beef cattle is permitted
- Physical mutilations like debeaking hens and tail docking pigs is allowed under some circumstances

American Humane Certified

American Humane Certified (formerly Free Farmed) is administered as an in-house program of its sponsoring organization, the American Humane Association. The standards are similar to those of the Certified Humane program, although American Humane Certified also covers bison. American Humane Certified recently added video cameras at some of their production facilities to help ensure compliance.

Animal Welfare Approved

The Animal Welfare Approved program is administered by the Animal Welfare Institute (AWI). AWA has issued standards for beef cattle and calves, dairy cattle, pigs, chickens (layers and broilers), turkeys, and sheep. Standards for rabbits and ducks are being revised, and standards for bison are being drafted, along with standards for guard animals such as herding dogs. Unlike other certification programs, AWA requires that participating producers be family farms, and does not charge producers for certification. AWA husbandry criteria are superior to those listed above in the areas of physical alterations, weaning, and access to the outdoors and pasture. However, the program is significantly smaller in scale than the others. Though exact numbers are not available, an AWA representative estimated that less than 700 small farms were certified by the program. It is likely that fewer than 100,000 animals pass through the AWA system each year, which represents less than 0.001 percent of all animals slaughtered in the U.S. annually.

Global Animal Partnership 5-Step Program

Global Animal Partnership is an animal welfare auditing organization that was established in 2008 as an evolution of the Animal Compassion Foundation originally established by Whole Foods Market in 2005. Now an independent international foundation, the Global Animal Partnership is launching a pilot test of its tiered 5-Step Animal Welfare program in Whole Foods Market stores throughout 2009. Designed in collaboration with animal welfare advocates, animal welfare scientists, and farmers, the program has established specific rating criteria for beef cattle, pigs and chickens raised for meat. Criteria for other species are being developed, but in general, the five steps correspond to standards outlined below (note that each step up maintains or strengthens the standards of the previous step):

Step One: No crates, no cages and no crowding

Step Two: Indoor environments must include minimal enhancements to encourage natural behaviors

Step Three: Outdoor access required along with environmental enhancements to encourage natural behaviors

Step Four: Pasture centered – improved standards for outdoor areas

Step Five: Animal centered – all physical alterations prohibited

Step Five Plus: Animal centered – animals spend their entire life on the same farm

In addition to the progressive improvements described above, producers may also be required to meet higher standards on other parameters such as weaning periods, animal health metrics, transport times, and so on as they work to achieve a higher Step level.

Because this audit program will be applied to all animal products under its purview that are sold at Whole Foods Market, it may well end up assigning ratings to products already certified by one of the programs mentioned above. As a result, some of these programs may ultimately feel increased pressure to strengthen their own standards.

Conclusion

Various humane certification and labeling programs have been developed in response to growing popular concerns about the cruel treatment of farm animals, but their impact at improving animal welfare has been minimal. Food labeling and marketing claims, like “free range” and “pasture raised,” are generally subjective and not verified. The regulations of the National Organic Program are improving but remain too vague, non-specific as to species, and inconsistently applied. Organic egg and dairy producers have been allowed to use loopholes to deprive animals of the opportunity to graze and forage in a natural setting. Animal industry quality assurance guidelines are inadequate; they codify inhumane farming systems, fail to prevent suffering and distress, and do not allow for the expression of normal animal behavior. By comparison, humane certification standards disallow some cruel practices, but significant deficiencies exist in these as well. Specialty markets, like organic and “humane” foods, may help lessen animal suffering, but they affect only a very small percent, less than 2 percent, of the billions of animals exploited for food each year in the U.S, and even animal-derived foods produced according to a “humane” program are not likely to meet consumer expectations.

2. INTRODUCTION

In the past half century, animal agriculture in the U.S. has been taken over by corporations, turning small-scale family farms into factory farms. Industrialization has allowed agribusiness to profit by raising a large number of animals more quickly and for less money. Factory farms treat animals as production units, not as sentient beings with complex social and behavioral needs. They operate on the principle that it is more cost-effective to accept some loss in inventory (i.e., death from illness or injury) than to spend money on treating animals humanely.

Despite the often repeated claim that “animals with poor welfare don’t perform well,” the industry calculates that the improvements in performance created by enhanced welfare quickly reach a point of diminishing returns. In industrial farming systems, it is more cost-effective to produce massive quantities of animals under substandard (but inexpensive) conditions, than to raise smaller quantities of animals with higher standards. Farm animals are also genetically selected to produce large quantities of “product” – meat, milk or eggs – in shorter periods of time. Not only has this process put greater strain on the animals’ bodies, it has also allowed the industry to achieve higher production in spite of lower welfare standards. As stated by agricultural ethicist Dr. Bernard Rollin, “[I]n industrial agriculture, the link between productivity and well-being is severed. When productivity as an economic metric is applied to the whole operation, the welfare of the individual animal is ignored.”

Factory farms commonly warehouse hundreds or thousands of animals indoors, often in small pens or cages, or outdoors in barren lots. Grazing in open pasture and outdoor access is now the exception rather than the rule. Today, roughly 95 percent of egg-laying hens in the U.S. are confined for their entire lives to cages so small the birds can’t spread their wings. Two-thirds of the sows in the U.S. are confined for most of their lives to crates that prevent them from even turning around. Dairy cows may be tied indoors inside cement-floored stalls or confined outdoors to barren dirt lots with limited or no access to shade and shelter. Cattle are fattened up in feedlots, virtual cattle cities where up to 100,000 animals are crowded into pens, breathing in noxious fumes and standing or lying in waste. And slaughterhouses have cut costs by increasing production rates, killing at lightning speeds of up to 400 cows, 1,100 pigs, and 12,000 chickens every hour.

The growth of industrialized farming in the U.S. has been facilitated, in part, by the near total lack of government regulation of the care and treatment of farm animals. The only major federal laws that affect the handling of farm animals are The Humane Methods of Slaughter Act (which requires that animals be rendered insensible to pain prior to slaughter) and the 28-Hour Law (which requires that animals being transported across state lines be off-loaded and allowed access to food and water after every 28 hours of travel). The Humane Slaughter Act does not cover poultry, which comprise more than 95 percent of farm animals who are slaughtered in the U.S. In addition, animals used in food production are excluded from the federal Animal Welfare Act, while about half of the state laws prohibiting animal cruelty and neglect exempt customary farming practices. For decades, other industrialized countries have enacted laws to restrict cruel factory farming practices. And, beginning in 2002, several states in the U.S. have passed laws to outlaw certain cruel farming systems (e.g., veal crates, gestation crates and battery cages).

Not until the early 1990s did the food animal production industry attempt to set guidelines for the handling of farm animals. Temple Grandin, professor at Colorado State University, developed best management practices for the American Meat Institute (AMI), the trade association for U.S. slaughterhouses. Grandin devised audit tools that included measurable criteria, such as the percentage of animals stunned properly and the percent being moved without the use of electrical prods. In 1996, at the request of the U.S. Department of Agriculture (USDA), Grandin used her criteria to audit the handling of animals at two dozen federally inspected slaughterhouses, two-thirds of which failed the audit.

In 1999, McDonald’s Corporation, under pressure from animal advocacy groups for years, finally initiated cattle and pig slaughterhouse audits of its suppliers and eventually dropped or suspended those not able to

meet the AMI criteria. The following year, McDonald's extended its audits to poultry slaughterhouses and to chicken and egg farms. By 2001, Burger King Corporation and Wendy's International, also under pressure from animal advocacy groups, joined McDonald's in setting animal care requirements and conducting audits of their suppliers.

The United Egg Producers (UEP) became the first industry trade association to develop a voluntary certification program for farm animals. Unfortunately, the original standards set for the "Animal Care Certified" program did little to improve the welfare of chickens raised in factory farms, serving primarily as a marketing tool to promote the sale of battery-caged eggs in response to heightened consumer interest in welfare standards. In 2004, the Better Business Bureau (BBB) filed a complaint with the Federal Trade Commission (FTC) stating that the "Animal Care Certified" seal is misleading advertising, and it recommended that use of the seals be discontinued. It was only after complaints were filed with the FTC that the UEP announced they would prohibit feed withdrawal for forced molting of hens – one of the more notoriously cruel practices in poultry rearing – effective January 2006. In the wake of the FTC complaint, the UEP also announced they would stop using the "Animal Care Certified" label, in accordance with an agreement with the FTC. The "Animal Care Certified" label has now been replaced by a "UEP Certified" label.

In 2001, the Food Marketing Institute (FMI) and the National Council of Chain Restaurants (NCCR), the trade associations for grocery stores and chain restaurants, respectively, joined forces to develop a voluntary audit program that would allow its members to review the animal care practices of their suppliers. At the urging of FMI-NCCR, other animal agriculture trade associations created guidelines, or revised existing ones, that could be used in retail food industry audits. These trade associations include the National Chicken Council, the Milk and Dairy Beef Quality Assurance Center, the National Pork Board, the National Turkey Federation, and the National Cattlemen's Beef Association.

While farm animal industry guidelines and third-party certification programs may have the potential to improve the way farm animals are treated in the U.S., to date, they allow various inhumane practices and have been used largely as a way to maintain the status quo. Voluntary industry quality assurance programs are commonly cited by agribusiness during legislative deliberations as evidence that legislation to prevent cruel farming practices is unnecessary.

About the Report

Sections 3 and 4 of this report discuss criteria for assessing animal welfare and product standards programs, respectively. Current farm animal labeling claims are described in Section 5; industry quality assurance guidelines are described in Section 6; and third-party certification standards are covered in Section 7. Section 8 utilizes the criteria identified in Sections 3 and 4 to analyze the various farm animal programs. The final section of the report, Section 9, summarizes the conclusions reached in the previous sections.

Farm Sanctuary researchers obtained background information about farm animal labeling claims, industry guidelines and third-party standards from the publications and Web sites of the various sponsoring organizations and government agencies. Questions regarding the programs were submitted by mail, electronic mail and fax. In some cases interviews were conducted by telephone. Researchers attempted to verify any information received from press accounts. Contact information for the programs and organizations referenced in this report is provided in Appendix A.

For practical reasons, common industry terms such as "livestock," "poultry," and "producer," will be used. The generic term "pigs" will be used as opposed to "hogs" or "swine." "Guidelines" will be used to describe voluntary recommendations, while use of the term "standards" will be limited to the description of mandatory requirements. "Audit" refers to the process of measuring compliance with a prescribed set of criteria or standards, which are

usually pass/fail. On the other hand, “assessment” refers to a review of producer performance in meeting voluntary guidelines, and is usually a benchmarking process. The term “retail food industry” will be used to describe both grocery stores and restaurants. A list of acronyms used in the report is provided in Appendix B, and a glossary of technical terms related to animal agriculture is given in Appendix C.

3. ASSESSING ANIMAL WELFARE

Animal behavior scientist D.M. Broom defines animal welfare as the state of an individual animal in regards to her attempts to cope with the environment. Broom, who is a professor of animal welfare at the University of Cambridge and co-author with A.F. Fraser of *Farm Animal Behaviour and Welfare*, explains that this definition of welfare refers to how much an animal must do to cope with the environment, and the success of these coping attempts. Broom also notes that welfare is a characteristic of an animal, not something that is given to the individual, and varies on a continuum from very good to very poor.

Difficulty in coping, or failure to cope, with the environment may result in an animal experiencing pain or other suffering. Broom points out that suffering, which refers to the animal’s subjective feelings, is a valuable concept and the most important aspect of poor welfare, but that the two terms are not synonymous. “Suffering and poor welfare often occur together, but welfare is a somewhat wider term,” notes Broom. Welfare is associated with impacts on an animal other than suffering. Effects in addition to suffering that result from poor welfare include the following: pain, fear, lack of control due to difficulty in movement, lack of control due to frustration, lack of control due to absence of input, lack of control due to insufficient stimulation, and lack of control due to overstimulation.

The science of animal behavior (ethology) now accepts that animal welfare can be assessed in a scientific way by use of a variety of indicators. For many years, the animal agriculture industry has argued that production levels are the best indicators of welfare; high growth and reproduction rates in farm animal species like pigs are cited as verification that an animal’s welfare is good or at least adequate. But, as observed by Broom, while an inability to grow or reproduce indicates that welfare is poor, the reverse is not necessarily true, since an animal who is growing and reproducing may be able to do so only by extensive use of behavioral and physiological coping mechanisms. In fact, high production can be associated with a variety of physical problems and, as a result, may have a negative effect on duration of productive life and life expectancy. For example, this is seen in dairy cows who, because of high milk production, are susceptible to increased incidence of lameness, mastitis, damaged udder ligaments, and reproductive problems, all of which result in earlier culling. “Reduced life expectancy indicates that an animal has been stressed and that its welfare, at some time or times during its life, has been poor,” observes Broom.

Reduced welfare is indicated by a number of measures in addition to mortality and impaired growth and reproduction. These measures include body damage such as broken bones, wounds and ulcers; disease; poor functioning of the immune system; adrenal activity as reflected by abnormal levels of circulating steroids; behavior problems such as withdrawal, apathy, stereotypy and infanticide; and self narcotization, or the release of analgesic chemicals in the brain.

Multiple measures must be taken to adequately assess welfare since responses to an adverse environment differ between species, between individuals of a species, and may even change in a single individual over time. A proper assessment of welfare therefore requires the evaluation of a range of indicators, preferably repeated over an extended period of time. Abnormal findings on any one measure may indicate poor welfare, and the absence of abnormal findings does not ensure that a welfare problem doesn’t exist.

In addition to being able to recognize when an animal is able to cope with her environment by the lack of negative evidence, it is also desirable to be able to recognize good welfare by positive evidence. Techniques have been developed to assist in determining what animals like by testing the strength of their preferences. For example, pigs can be required to press a lever to modify environmental temperature or for access to earth for rooting, the number of presses indicating the value of the reward to the animal.

Understanding the behavior of farm animal species, including their preferences and both their physiological and behavioral reactions to adversity, can be used as the basis for setting standards for their care and treatment. Knowledge gained from the study of farm animal behavior may be applied to the development of housing systems, methods of handling and transportation, and procedures for slaughter. Because animals may employ such a wide range of physiological and behavioral coping mechanisms, a team of people with different expertise is usually needed to adequately evaluate the impact of a particular housing or management system.

The Freedom Food program, founded by the United Kingdom's Royal Society for the Prevention of Cruelty to Animals (RSPCA) in 1994, was the first agricultural assurance scheme to set standards for animal welfare according to "science based" criteria. Since its inception, Freedom Food has grown to include a total of more than 2,000 producers and more than 40 million animals being reared under the program. The program sets specific standards for eight species of farm animals and covers welfare on the farm, in transit and at slaughter. It has served as the model for animal welfare certification programs in the U.S.

Freedom Food is based on the concept, articulated by the U.K.'s Farm Animal Welfare Council, that humans have a moral obligation to afford farm animals "Five Freedoms." These freedoms imply certain husbandry requirements for the provision of basic farm animal welfare and are viewed as necessary to avoid welfare-related problems.

1. Freedom from hunger and thirst – by ready access to fresh water and a diet to maintain full health and vigor.
2. Freedom from discomfort – by providing an appropriate environment including shelter and a comfortable resting area.
3. Freedom from pain, injury and disease – by prevention or rapid diagnosis and treatment.
4. Freedom to express normal behavior – by providing sufficient space, proper facilities, and company of the animal's own species.
5. Freedom from fear and distress – by ensuring conditions and treatment that avoid mental suffering.

These five propositions, which provide a framework for meeting an animal's basic needs, have been incorporated into the welfare codes for various farm animal species in the U.K. and elsewhere. Explicit welfare standards, based on the Five Freedoms, have been developed to address various aspects of animal production, including: the provision of food and water; housing, bedding, and environmental enrichment; space requirements and group size; the provision of exercise, direct sunlight and fresh air; health management and elective surgeries; and handling, transport and slaughter procedures. While in some countries like the U.K. these standards may reinforce existing legal requirements, in the U.S. where farm animal treatment is largely unregulated, they take on added significance.

The development of practical and reliable measures of farm animal welfare remains a work in progress. Much still needs to be learned about how to apply scientific and empirical findings to the assessment of animal welfare on the farm, during transportation and at slaughter. The challenge is complicated by the occurrence of seemingly contradictory and confusing research data. Although those setting welfare standards may attempt to use objective, quantitative measures as much as possible, it is difficult to completely exclude the influence

of human values and perceptions about what an animal feels and wants. Consequently, honest differences of opinion may exist, even among animal protection advocates, about what standards should be set for animal care and handling. In addition, animal welfare certification programs may experience difficulty in being able to develop standards that both provide for animal well being and allow producers to remain competitive in the marketplace. In the U.S., a pervasive concern about economic profitability has interfered with efforts to produce meaningful welfare standards.

For the purpose of this report, the Five Freedoms described in this section will be used to assess the meaningfulness of various industry guidelines and third-party standards set to measure the adequacy of farm animal welfare in the U.S.

4. ASSESSING STANDARDS PROGRAMS

Types of Programs

Product marketing claims are often referred to as “first-party,” “second-party” or “third-party.” These terms can be used to refer to product standards programs as well.

First-Party Claims

These are claims made by producers without independent review or verification. For the purpose of this report, first-party claims refer to producer food labeling or marketing claims such as “free range” or “no antibiotics used.” A third party – the USDA – sets the standards for these claims, but compliance with the standards is not verified.

Second-Party Claims

These are claims made by industry or trade associations. The standards are developed by the industry and may be unverified, verified by the industry, or verified by an independent organization. For this report, second-party claims refer to animal agriculture quality assurance programs. Guidelines verified by the retail food industry, such as the Food Marketing Institute and the National Council of Chain Restaurants, are considered second-party and not third-party programs due to the business and financial connections between the animal agriculture and retail food industries.

Third-Party Claims

These are claims made by an independent third party. The certifying body, including administrators and members of the board of directors, must not have any direct financial ties to the industry. Although the purpose of third-party certification is to allow for independent, unbiased verification of claims, since producers typically pay fees to participate in third-party programs, the certifying organization still maintains a financial stake in the relationship. In this report, third-party claims refer to those made by the USDA’s “National Organic Program,” the Humane Farm Animal Care’s “Certified Humane” program, the American Humane Association’s “Humane Certified” program, the Animal Welfare Institute’s “Animal Welfare Approved” program, and the recently constituted Global Animal Partnership program.

Criteria Used to Evaluate Programs

Following is a brief description of criteria that may be used to evaluate the meaningfulness of farm animal welfare claims. The criteria apply primarily to third-party certification programs, but may be used to a more limited degree to evaluate producer product labeling claims and industry quality assurance programs.

Criteria #1: Transparent

The complete guidelines or standards, as well as information about how the standards were developed, reviewed and verified, should be available to the public, ideally free of charge. In addition, the sponsoring organization should publicly declare its intentions for product certification and readily answer questions regarding the program.

Criteria #2: Public input

Multiple stakeholders, including consumers and animal advocacy organizations, should have the opportunity to comment on the development and revision of program standards. Industry representatives may also play an advisory role as long as they have no direct financial ties to the certifying organization.

Criteria #3: Objective and measurable

Standards must be written in a form that allows for objective verification of compliance. This means that quantitative measures are used whenever possible. What constitutes compliance – also referred to as “conformance” – with a particular standard should be clearly stated for the benefit of both the producer and the auditor.

Criteria #4: Independently verified

A certifying organization and individual auditors who are financially independent of the facility being audited must perform the verification process. Ideally, the certifying organization should also have little or no personal, professional or business ties to the industry. This reduces bias and eliminates the pressure to interpret data to meet the needs of the facility or of the industry being certified. For the public to make this determination, information about the certifying organization’s structure, funding and board of directors should be available. The identity and qualification of auditors, as well as the description of the auditing process, should also be available. Regularly scheduled formal audits of all relevant systems and procedures should be supplemented by random inspections of daily activity when feasible.

Criteria #5: Reliable and consistent

Certifying organizations should implement quality control measures to ensure consistency of the auditing process. This may be accomplished by periodically shadowing the auditors, interviewing clients regarding the audit process, and tracking and comparing the performance of individual auditors. Certifying organizations should specify what actions are taken for noncompliance with standards.

Criteria #6: Relevant

Standards must be meaningful measures of the well-being of farm animals. Moreover, they should be comprehensive, covering all aspects of animal care and handling from breeding to slaughter. For the purpose of this report, the Five Freedoms, described in the previous section, will be used as a measure of relevance to farm animal welfare.

5. PRODUCT LABELING AND MARKETING CLAIMS

Labeling claims overseen by the USDA fall into two main categories: those handled by the Food Safety and Inspection Service (FSIS) and those handled by the Agricultural Marketing Service (AMS). The USDA's Food Safety and Inspection Service (FSIS) has a statutory responsibility for ensuring truthfulness and accuracy in the labeling of meat and poultry products. The agency also regulates the labeling of pasteurized liquid eggs and cooked eggs but not raw shell eggs. Labels regulated by FSIS – such as “free range,” “raised without antibiotics,” etc. – are confirmed through paper documentation only.

AMS regulates shell eggs along with the Food and Drug Administration (FDA). AMS reviews and approves all labeling for shell eggs bearing the USDA grade shield and processed in plants operating under the federal voluntary egg-grading program. In addition to overseeing the grading of eggs, AMS regulates the National Organic Program and any claims bearing the description “USDA Certified” or “USDA Process Verified.” Labels regulated by AMS must be verified by on-site inspections, in addition to paper documentation.

The Federal Trade Commission Act of 1914 prohibits deceptive or unfair marketing claims. Although manufacturers are not always required to seek verification before using a claim, the Federal Trade Commission (FTC) is obligated to investigate complaints of deceptive claims, and can take action against producers that misuse labels. The federal Food, Drug, and Cosmetic Act of 1938 regulates food products and is enforced by the USDA in regards to products made from meat animals, poultry and processed eggs. In 1992, the FTC and the Environmental Protection Agency jointly issued *Guides for the Use of Environmental Marketing Claims* (“Green Guides”), but no equivalent publication has been released to assist consumers in understanding animal welfare marketing claims.

USDA-FSIS has developed working definitions of several meat and poultry labeling terms that may be relevant to animal welfare, such as “free range” and “raised without antibiotics.” However, these definitions have not been formalized in regulation. In December 2002, AMS proposed new regulations for livestock and meat industry marketing claims “to create a common language for buyers and sellers and facilitate the nationwide marketing of livestock and meat products.” The proposal included standards for several marketing claims such as antibiotic and hormone claims; free range, free roaming and pasture raised claims; and grass fed claims. No claims related to poultry or poultry products were included. Although the claims were proposed specifically for use in the USDA Certified and USDA Process Verified programs (described below), the standards would have been used by FSIS to approve labels making these claims. Unfortunately, several of the proposed standards represented a weakening of requirements for animal handling and, as a result, a number of comments were submitted in opposition to the proposal. Ultimately, “grass fed” was the only claim that emerged from the process with attached regulations.

The FSIS and AMS divisions of USDA maintain Web sites containing information about labeling and marketing claims, and the agencies respond to questions submitted by phone, fax, conventional mail, and electronic mail.

Food labeling claims associated with animal welfare are described below.

Labeling Claim: ANTIBIOTICS (“No Antibiotics Used”)

1. *What agency regulates claim?*

USDA-FSIS

2. *How is the label claim defined?*

“No antibiotics added,” “raised without antibiotics,” and similar claims are approved for producers who

demonstrate that their animals have been raised without antibiotics.

“Antibiotic free” labeling claims are not allowed due to the fact that antibiotic-residue testing technology cannot verify that no antibiotics were ever administered. It should be noted that the FDA requires withdrawal of antibiotics from animals for a specified period prior to slaughter.

3. *How is the claim verified?*

FSIS does not test for the presence of antibiotic residue to verify labeling and other marketing claims. When antibiotic labeling claims are submitted for approval, they must be supported by food formulations, pharmaceutical invoices, or other appropriate documentation verifying that animals have not received antibiotics in feed or water, and whether they have been treated for illness. Procedures for handling sick animals must be documented.

4. *How relevant is the claim to animal welfare?*

The claim has some relevance as antibiotic use is often one indicator of intensive animal confinement. However, some third-party certification programs allow antibiotics to be administered under certain conditions to treat sick animals — as opposed to routine “sub-therapeutic” use that is designed to compensate for the compromised immune systems and elevated disease risk found in intensive systems. While animals raised within these programs may have better welfare in many cases, they would not qualify for the “no antibiotics used” label if they received antibiotics to treat ailments.

Labeling Claim: rbST FREE (“From cows not treated with rbST”)

1. *What agency regulates claim?*

FDA, some state agencies.

2. *How is the label claim defined?*

In 1994, the FDA issued the “Interim Guidance on the Voluntary Labeling of Milk and Milk Products from Cows That Have Not Been Treated with recombinant bovine somatotropin” (rbST, also referred to as recombinant bovine growth hormone or rBGH). The agency maintains that it does not have the authority to require special labeling for milk from rbST-treated cows. However, the FDA has stated that food companies that do not use milk from cows supplemented with rbST may voluntarily inform customers of this fact in their product labels, provided any statements made are truthful and not misleading. According to the FDA, because of the presence of natural bST in milk, no milk is “bST free” and, therefore, a “bST free” label would be false. Moreover, the FDA is concerned an “rbST free” label may imply a compositional difference between milk from treated and untreated cows rather than a difference in the way the milk is produced. Instead, the FDA recommends use of the phrase, “From cows not treated with rbST,” accompanied by the statement: “No significant difference has been shown between milk derived from rbST-treated and non-rbST-treated cows.”

3. *How is the claim verified?*

There is currently no practical way to differentiate analytically between naturally occurring BST and recombinant BST in milk. To ensure the validity of claims that milk comes from untreated cows, the FDA recommends that states require firms that use such claims to establish a plan and maintain records to substantiate the claims, and make those records available for inspection by state regulatory personnel. The FDA feels that in some situations (e.g., dairy cooperatives that only process milk from untreated cows), states may decide that affidavits from individual farmers and processors are adequate to document that milk or milk products received by the firm were from untreated cows. A few states have passed laws governing rbST-free labeling. For example, Minnesota requires manufacturers to keep records of how they segregate rbST-free milk from other milk. Manufacturers must also obtain affidavits from farmers certifying their cows are not treated with the hormone, and those affidavits must be kept on file and available to state inspectors. But some critics have pointed out that Minnesota state inspectors

are not actually required to review these records or affidavits.

4. *How relevant is the claim to animal welfare?*

Cows injected with rbST are made to produce greater quantities of milk than normal, which causes numerous veterinary problems. Research has demonstrated a 25 percent increase in the incidence of mastitis and as much as a 50 percent increase in lameness among cows receiving rbST. Mastitis and lameness are among the top three reasons producers give for sending cows to slaughter. Canada, Australia, New Zealand, Japan, and the European Union have all prohibited producers from using rbST, largely due to concerns over negative consequences to animal welfare.

Labeling Claim: CAGE FREE, FREE RANGE, FREE ROAMING, PASTURE RAISED (egg-laying hens)

1. *What agency regulates claim?*

Shell egg claims are handled by USDA-AMS for all eggs that are marketed with a USDA grade shield. According to Roger Glasshoff, the National Supervisor for Shell Eggs at USDA-AMS, the agency will approve the term “cage free” after visually confirming that a given facility is indeed free of cages. Also, the term “free range” may be used if the eggs are USDA Certified Organic — also under AMS regulation. For non-organic eggs, no term other than “cage free” is approved by the agency.

Producers who are not inspected by the USDA can make labeling claims such as “free range,” “free roaming,” “pasture raised,” “cage free,” and so on. Labeling claims for eggs not inspected by the USDA may fall under state regulations, which vary widely, or they may not be regulated at all.

2. *How is labeling claim defined?*

AMS defines “cage free” as confinement of laying hens in a building, room or open area with unlimited access to food and water, and with freedom to roam within these areas.

“Free range,” as it applies to eggs certified under the USDA National Organic Program, means that the hens must be allowed access to the outdoors. However, the regulations also state that producers may confine animals temporarily for a number of reasons, including “(1) Inclement weather; (2) conditions under which the health, safety or well being of the animal could be jeopardized; or (3) risk to soil or water quality.” There are also no stipulations on the number and size of exits, size of the outdoor area, flock density or size.

3. *How is claim verified?*

AMS verifies the “cage free” label by a visual inspection of the producer’s facility. If a company has both “cage free” and caged hens, AMS will also review the producer’s written protocols for identifying and segregating eggs laid by “cage free” hens from those laid by caged hens. According to Glasshoff, producer facilities are inspected at least once per year, though they may be inspected more frequently if the agency deems it necessary.

For eggs that are labeled “free range” by virtue of being certified organic, see our discussion below regarding the National Organic Program’s certification protocols.

4. *How relevant is claim to animal welfare?*

Given that approximately 95 percent of eggs in the U.S. come from hens confined to small cages, the term “cage free” has significant implications for animal welfare. While eggs labeled as “cage free” most likely come from hens not confined to a cage, the housing density may be so high that some of the problems associated with caging are experienced.

Egg producers may use the term “free roaming” in a manner similar to “cage free,” meaning that the hens are not confined to a cage and allowed to roam freely, but only within the confines of a barn. These

“free roaming” hens likely never receive the opportunity to venture outdoors.

Producers often use the term “free range” to market eggs from hens who are housed in open air barns with one or more exits to the outside that remain open for a limited period of time each day. However, these typical “free range” situations usually fail to provide an outdoor area with features attractive to hens, such as adequate space, forage and protection from predators and environmental elements. As a result, “free range” hens tend to spend most or all of their time inside where feed is easily available. All of this suggests little practical difference between the claims “cage free,” “free roaming,” and “free range.” Also, consumers should distinguish between the “cage free” and “free range” labels on eggs that are regulated by the USDA versus those that are not regulated at all.

Labeling Claim: FREE RANGE, FREE ROAMING (poultry)

1. *What agency regulates claim?*

USDA-FSIS

2. *How is labeling claim defined?*

Although there is no regulatory definition for these claims, as a matter of policy, FSIS permits the use of this claim on labels of poultry products under certain circumstances. To obtain approval for labels bearing the claim “free range” or “free roaming,” poultry producers must provide a brief description of the birds’ housing conditions when the label is submitted to the FSIS Labeling and Consumer Protection Staff for approval. The written description of the housing conditions is reviewed to ensure the birds have “continuous free access to the outdoors for a significant portion of their lives.” During the winter months in a northern climate, birds are not “free range” if they stay in coops all winter. Producer testimonials that support the use of the claim must state how the birds are raised in a northern climate in winter to conform to the meaning of “free range” during the winter months. Producers must also verify how animals are cared for during normal and inclement weather conditions, hatching or other conditions that would merit special protection.

One exception to the above is animals who are raised under the National Organic Program, which is administered by USDA-AMS and requires that animals have “access to the outdoors.” The USDA therefore considers animals raised under certified organic standards to be “free range” by default.

3. *How is claim verified?*

There is no independent verification of claims on meat and poultry labels. Approval of labeling claims is based only on a review of documents provided by the producer. Testimonials and affidavits must also be provided to officials at the federal slaughtering establishment at the time of slaughter. A carcass identification program is required at the slaughter plant to assure that only the labeling of products derived from qualified carcasses bear such claims. Label claims are approved for use at a particular slaughter establishment and producers must seek new label approvals if they switch facilities. Complaints about animal handling claims that appear on the label for a meat or poultry product may be directed to the FSIS Labeling and Consumer Protection office, unless the product is “Certified Organic,” in which case the complaint should be referred to the organic certifying agent listed on the product packaging. Producers may be penalized for making false meat and labeling claims depending on the facts of the case.

4. *How relevant is claim to animal welfare?*

Due to the fact that poultry are slaughtered at an extremely young age (meat chickens live only approximately six weeks), many birds raised during the winter months may never experience the outdoors. The number and size of exits, and the size of the outdoor area are not specified. Moreover, no limits are placed on animal density or flock size under the “free range” or “free roaming” label. Producers use a variety of concerns, such as weather and risk of disease and predation, to justify denying access

to the outdoors. Even when access is provided, conditions may be far from ideal, resulting in the birds choosing to remain indoors where feed is readily available.

Labeling Claim: FREE RANGE, FREE ROAMING, PASTURE RAISED, PASTURE GROWN (livestock)

1. *What agency regulates claim?*

USDA-FSIS.

2. *How is labeling claim defined?*

According to USDA-FSIS: “In order to obtain label approval for labels bearing the claims ‘Free Roaming,’ ‘Pasture Raised,’ ‘Pasture Grown,’ ‘Meadow Raised,’ etc., it must also be shown that the livestock from which the products are derived had continuous, free access to the out-of-doors for a significant portion of their lives. Thus, feedlot-raised livestock or any livestock that were confined and fed for any portion of their lives are not amenable to the meaning of these terms.” While the second sentence indicates that feedlots are “not amenable to the meaning of these terms,” the first sentence, which requires access to the outdoors for “a significant portion” of the animals’ lives, implies that they could be confined indoors for some of their lives. Additionally, feedlot facilities are usually outdoors, which might be used to meet the “outdoor” requirement. Producers must also verify how animals are cared for during normal and inclement weather conditions, birthing or other conditions that would merit special protection.

3. *How is claim verified?*

See notes under #3 for FREE RANGE (poultry).

4. *How relevant is claim to animal welfare?*

The term “free range” is more meaningful as applied to mammals than poultry since cattle, sheep and pigs are typically slaughtered at an older age. However, the agency’s definition is ambiguous and what is meant by such terms as “significant portion” of the animals’ lives and “outdoors” is not clear. Another concern is that the term “feedlot” is not defined. In addition, the “free range” definition does not limit animal density, which may result in animals being unable to perform normal behaviors and vegetative cover not being maintained.

Labeling Claim: GRASS FED

1. *What agency regulates claim?*

USDA-AMS, USDA-FSIS.

2. *How is labeling claim defined?*

USDA-AMS has established a standard for “grass fed” to be applied under the “Process Verified” program. Under this standard, the diet of ruminant animals must be “derived solely from forage consisting of grass (annual and perennial), forbs (e.g., legumes, Brassica), browse, or cereal grain crops in the vegetative (pre-grain) state. Animals cannot be fed grain or grain by products and must have continuous access to pasture during the growing season. Hay, haylage, baleage, silage, crop residue without grain, and other roughage sources may also be included as acceptable feed sources. Routine mineral and vitamin supplementation may also be included in the feeding regimen. If incidental supplementation occurs due to inadvertent exposure to non-forage feedstuffs or to ensure the animal’s well being at all times during adverse environmental or physical conditions, the producer must fully document (e.g., with receipts, ingredients and tear tags) the supplementation that occurs, including the amount, the frequency, and the supplements provided.”

It is important to note however that producers may use the “grass fed” label without applying for Process Verified certification. The AMS program is completely voluntary and designed primarily as a marketing tool. Those who are not in the Process Verified program must simply submit their proposed label to

USDA-FSIS for review. However, as that agency has no regulatory definition for the term “grass fed,” it is largely subjective.

3. *How is claim verified?*

As noted below, USDA-AMS Process Verified claims are verified through third-party audits. USDA-FSIS approved labels are verified solely through a review of producer testimonials and supporting documents. [See notes under #3 for FREE RANGE (poultry).]

4. *How relevant is claim to animal welfare?*

The USDA-AMS Process Verified “Grass Fed” label is relevant in that it precludes animals from being fed significant amounts of grain – which has a negative affect on the health of ruminants – and requires access to pasture for a substantial portion of their lives. However, the USDA-AMS requirements leave room for interpretation and labels that are merely approved by USDA-FSIS on the basis of producer testimonials are likely to be far less meaningful. Because such labels are subjective and not verified through any third-party audit, such claims should be regarded skeptically. It is entirely possible that – in the absence of third-party certification – meat bearing the label “grass fed” came from animals who spent a significant amount of time in confinement, including several weeks of “finishing” on a feedlot.

Labeling Claim: HORMONES (“No hormones administered”)

1. *What agency regulates claim?*

USDA-FSIS.

2. *How is labeling claim defined?*

Since all plants and animals produce hormones, a “hormone free” meat-labeling claim is not allowed. However, FSIS may approve the phrase “no hormones administered” for the labeling of beef products if sufficient documentation is provided to the agency showing no hormones have been used in raising the animals. Hormones are not allowed in raising poultry or pigs; therefore, FSIS does not allow the claims “no hormones administered” or “no hormones added” on the labels of poultry or pork products unless they are followed by a statement that says, “Federal regulations prohibit the use of hormones.”

3. *How is claim verified?*

FSIS does not test for the presence of hormones to verify labeling claims. When hormone labeling claims are submitted for approval, they must be supported by the appropriate documentation verifying that animals have not received hormones in any form. [See also notes under #3 for FREE RANGE (poultry).]

4. *How relevant is claim to animal welfare?*

The claim has some relevance, as the administration of growth stimulants has been one indicator of intensive animal confinement during the past few decades. However, it provides no assurance that animals were not raised under intensive confinement or other inhumane conditions.

Labeling Claim: HUMANELY RAISED

1. *What agency regulates claim?*

USDA-FSIS, USDA-AMS.

2. *How is labeling claim defined?*

“Humanely raised” is not a USDA-approved term. Any such claim on meat or poultry products must include an explanation of what is meant by the term. Documentation substantiating the claim must be submitted to USDA-FSIS, and in some cases to AMS (see “Process Verified” below.) USDA does accept third-party claims regarding humanely raised products after documentation about the independent certification program has been submitted and reviewed by FSIS and AMS staff. The USDA has approved

the “Certified Humane” and “American Humane Certified” third-party certification programs in this manner (see Section 7 for a discussion of these programs).

3. *How is claim verified?*

Verification is by document review only. The USDA does not independently verify on-farm compliance with “humanely raised” claims. However, third-party certification programs making humane claims must demonstrate how compliance with their standards is verified. Concerns and complaints about third-party certification programs received by the USDA are referred to the certifying organization. Any recourse taken is at the discretion of the certifier. Questions or complaints about “humanely raised” claims not associated with a third-party certification program should be referred to the FSIS Labeling and Consumer Protection Staff.

4. *How relevant is claim to animal welfare?*

The third-party certification programs endorsed by animal advocacy organizations – “Certified Humane” and “American Humane Certified” – are more meaningful to animal welfare than industry quality assurance schemes (see discussion of these programs in Section 7). Unlike other labeling claims, these programs verify compliance with certain animal care and handling practices. The possibility exists, however, that at some point in the future animal agriculture will make labeling and/or marketing use of the term “humane” while employing animal handling standards that are deemed less than acceptable by animal advocacy organizations.

Labeling Claim: NATURAL

1. *What agency regulates claim?*

USDA-FSIS.

2. *How is labeling claim defined?*

The circumstances under which the term “natural” may be used on the labeling of meat and poultry products are described in the Labeling and Additives Policy Division, Labeling Review Branch Policy Memo 055, issued in November 1982. This policy provides that the term may be applied only to products that contain no artificial ingredients, including artificial coloring ingredients or chemical preservatives, and that the product and its ingredients are not more than minimally processed. Minimally processed products that do not contain these types of ingredients, such as fresh meat and poultry, will automatically qualify for the use of the term “natural” on product labeling. Labeling claims regarding the non-use of antibiotics and hormones are handled independently of this policy (See entries for ANTIBIOTICS and HORMONES).

3. *How is claim verified?*

See notes under #3 for FREE RANGE (poultry).

4. *How relevant is claim to animal welfare?*

Use of the term “natural” as a meat and poultry-labeling claim refers to artificial ingredients added to the cut of meat, not to the manner in which the animal was raised or fed. Meat from animals fed antibiotics, hormones or animal by-products, for example, may be labeled as “natural” as long as no artificial ingredients such as coloring or preservatives were added to the meat product. Although many consumers may perceive “natural” meat and poultry as being similar to Certified Organic meat and poultry, products with this labeling claim do not need to meet requirements for organic production, including those related to animal care and handling (see discussion of the National Organic Program in Section 7). This is arguably the most misleading labeling claim, and because the “natural” market strongly competes with both organic and “humanely raised” products, this claim has the potential to exert a significant negative impact on animal welfare.

Labeling Claim: USDA PROCESS VERIFIED

1. *What agency regulates claim?*
USDA-AMS.
2. *How is labeling claim defined?*
The AMS Process Verified Program provides farmers, producers, feeders, suppliers, and processors the opportunity to assure customers that their products or services meet specific quality standards. USDA Process Verified producers are able to make marketing claims – such as breed, feeding practices or other raising and processing claims – and market themselves as “USDA Process Verified.”
3. *How is claim verified?*
This is done by having the USDA-AMS conduct third-party audits to verify production, manufacturing or service delivery processes.
4. *How relevant is claim to animal welfare?*
Relevance to animal welfare depends on the content of the producer’s program. A review of the USDA Process Verified Program participants, listed on the AMS Web site, revealed that less than a dozen companies are process verified for claims related to animal welfare. However, most of these were claims associated with industry quality assurance programs, which are voluntary and generally designed to provide minimum benchmarks only. Several companies are certified for claims such as “No added hormones” and “Raised without antibiotics,” but as discussed above, these claims have very limited relevance to animal welfare. Only two companies, Verified Beef and Instituto Nacional de Carnes, were verified for “grass fed,” which is of much greater relevance to animal welfare.

Labeling Claim: NEVER EVER 3

1. *What agency regulates claim?*
USDA-AMS.
2. *How is labeling claim defined?*
Never Ever 3 is a Process Verified Program (see entry above) that means the animal has never received any antibiotics – including both therapeutic and sub-therapeutic applications – or growth promotants (e.g., hormones), nor have they been fed any mammalian or avian animal by-products. The use of fish by-products are permissible, as is the use of milk and non-medicated milk replacer for animals prior to weaning.
3. *How is claim verified?*
See #3 under USDA Process Verified, above.
4. *How relevant is claim to animal welfare?*
As noted above under the sections discussing claims relating to hormone and antibiotic use, such prohibitions have minimal relevance to animal welfare. The use of growth promotants and sub-therapeutic antibiotics, as well as feed containing animal by-products, has been a hallmark of intensive farming practices. In some cases, hormone treatment and animal by-products in feed can be detrimental to the health of the animals receiving them. On the other hand, therapeutic antibiotic use can be an essential part of sound veterinary treatment of sick animals, and its prohibition is of questionable value to animal welfare. Regardless, Never Ever 3 provides no assurance that animals have not been subjected to the worst aspects of factory farming.

Labeling Claim: Naturally Raised

1. *What agency regulates claim?*
USDA-AMS.
2. *How is labeling claim defined?*
Naturally Raised is another Process Verified Program (see Process Verified above) that is virtually identical in character to Never Ever 3 (see previous entry). The only significant difference is that by-products of fish and other aquatic animals are not permitted.
3. *How is claim verified?*
See #3 under USDA Process Verified, above.
4. *How relevant is claim to animal welfare?*
See # 4 under the previous entry (Never Ever 3).

6. INDUSTRY QUALITY ASSURANCE GUIDELINES

Quality assurance programs to assess farm animal care and handling have been created by animal agriculture producer trade associations, individual producers, retail food industry trade associations, and individual food retailers. In addition, the Animal Agriculture Alliance, an organization representing producer trade associations, has identified Principles of Animal Care for the industry. These principles and the various producer and retail food quality assurance programs are described in this section.

Animal Agriculture Alliance Principles

The Animal Agriculture Alliance (AAA) was created in 2001 to replace the Animal Industry Foundation. Membership of the non-profit organization is comprised of individuals, companies and animal industry organizations, and its mission is to help consumers understand the role of animal agriculture “in providing a safe, abundant food supply for a hungry world.” According to the group’s Web site, “By speaking with a common voice, the Alliance will ensure consistent, accurate messages based on sound science are communicated to the general public.”

Activities of the Alliance include the following: educating consumers, teachers and the media; serving as a resource for those seeking information about animal production; monitoring emerging issues; and promoting development of animal care guidelines and third-party verification programs consistent with the Alliance Animal Care Principles. The Alliance considers its Animal Care Principles to be the foundation of professional animal care, which is supported by owners and managers of animal agriculture operations. The Alliance states that the health and well-being of farm animals may be judged by various types of science-based criteria, including behavioral, physiological, biochemical, and pathological analysis, and that a combination of these criteria provides the best assessment of animal well-being.

The Alliance Principles of Animal Care:

- **Food and Water**
Provide access to good quality water and nutritionally balanced diets as appropriate for the species.

- **Health and Veterinary Care**
Implement science-based animal health programs, including prudent product use, and provide appropriate veterinary care when required.
- **Environment**
Provide living conditions sufficient to meet the well-being needs of the animal as appropriate to each species.
- **Husbandry Practices**
Implement science-based husbandry practices appropriate to the species.
- **Handling**
Ensure proper handling practices throughout the life of the animal as appropriate to each species.
- **Transportation**
Provide transportation that avoids undue stress as appropriate to each species.

Animal Agriculture Industry Quality Assurance Programs

U.S. animal agriculture trade associations include the National Cattlemen’s Beef Association (beef cattle), the Milk and Dairy Beef Quality Assurance Center (dairy cattle), the American Veal Association (veal calves), the American Sheep Industry Association (sheep), the National Pork Board (pigs), the National Chicken Council (meat chickens), the National Turkey Federation (turkeys), the United Egg Producers (egg laying hens), and the American Meat Institute (slaughter plants for cattle, pigs, sheep, and goats). All of these organizations have developed, or are in the process of developing, quality assurance programs for assessing animal care and handling. Of the various programs, only one – the United Egg Producer’s UEP Certified – currently features third-party, pass/fail audits. UEP Certified is also currently the only trade association program that makes a label claim regarding animal care on products.

National Cattlemen’s Beef Association (Beef Cattle)

1. *Are guidelines publicly available?*

The NCBA declined to supply a copy of the guidelines, or to answer any questions regarding their development or use, for this report. In addition, the guidelines could not be found on the association’s Web site. However, the guidelines – titled “Guidelines for the Care and Handling of Beef Cattle” – were located on the Internet site of several State member organizations, including the Kansas Livestock Association. The NCBA has a shorter list of “Recommendations for the Care and Handling of Beef Cattle” on its Web site.

In 1997 the NCBA produced a set of guidelines entitled “Recommendations for the Care and Handling of Beef Cattle.” The NCBA’s Beef Quality Assurance Advisory Board and Cattle Health & Well-Being Committee adopted the guidelines. The NBCA was encouraged to revise and update those guidelines in 2001, when the Food Marketing Institute (FMI) and National Council of Chain Restaurants (NCCR) announced an effort to establish animal care guidelines for all animal agriculture systems to assist its members in evaluating animal welfare at the farm/ranch level. In 2002, the NCBA Cattle Well-Being Committee formed a Working Group to update the cattle care standards, and the Working Group’s proposed guidelines were submitted to the NCBA Board of Directors at the organization’s 2002 Conference. FMI-NCCR received the proposed guidelines in September 2002. Negotiations regarding modifications to the guidelines took place between FMI-NCCR and NCBA from that time until early 2005 when they were finalized and endorsed by both groups.

One possible explanation for the lengthy delay in completion of the guidelines is the fact that NCBA coordinates its work with thousands of individual members, State associations and industry organizations. For example, while only forty-some poultry companies account for 95 percent of the chicken flesh sold in the U.S., more than 200,000 cattle breeders, producers and feeders belong to the NCBA. Another explanation is that NCBA has been hostile to the concept of animal welfare guidelines.

2. *What animal care areas are covered by the guidelines?*

The guidelines include sections for cattle care training and education; feed and water; disease prevention practices and health care; identification; shelter and housing; cattle handling and marketing; sorting, loading and transporting; non-ambulatory (downer) cattle; euthanasia; emergency procedures; feedlot heat stress procedures; and cattle care and handling implementation and review programs.

The following NCBA Producer Code of Cattle Care lists general recommendations for care and handling of cattle:

- Provide necessary food, water and care to protect the health and well-being of animals.
- Provide disease prevention practices to protect herd health, including access to veterinary care.
- Provide facilities that allow safe, humane and efficient movement and/or restraint of cattle.
- Use approved methods to euthanize terminally sick or injured livestock and dispose of them properly.
- Provide personnel with training/experience to properly handle and care for cattle.
- Make timely observations of cattle to ensure basic needs are being met.
- Minimize stress when transporting cattle.
- Keep updated on advancements and changes in the industry to make decisions based on sound production practices and consideration to animal well-being.
- Persons who willfully mistreat animals will not be tolerated.

3. *What animal care areas are not covered by the guidelines?*

The guidelines do not include specific provisions for maximum stocking densities and feeder space allowances; indoor housing environment (lighting, ventilation, thermal regulation); or provision of outdoor windbreaks or fencing. They also fail to recommend anesthesia for routine mutilations including castration or ear notching.

4. *How were guidelines developed?*

According to information on the NCBA Web site, the guidelines were written “by producers, for producers with scientific input from veterinarian scientists, agricultural engineers and animal well-being experts.” The Cattle Care Working Group was composed of 12 producers appointed by State affiliates, two university-based veterinarians, and representatives of the Livestock Marketing Association and the Livestock Marketing Council. Bob Smith, DVM, served as chairperson, and Drs. Janice Swanson of Michigan State University, and Temple Grandin of Colorado State University, assisted the working group in an advisory role.

5. *Is compliance with guidelines assessed?*

No. NCBA emphasizes that there is no one specific set of guidelines that can be used for all cattle operations and that its guidelines are “general ‘rules of thumb.’” In March 2004, Gary Weber, executive director of regulatory affairs for NCBA, told the Des Moines Register, “We don’t think there’s any evidence that auditing is necessary.” However, the guidelines note that both self-audits and outside audits should

be periodically conducted “to ensure that animal welfare is not compromised.” A statement from NCBA in the 2002 draft guidelines suggesting that the costs of outside auditing should be borne by the packer or retailer requesting the audit, and not the producer, was deleted from the final version.

Milk and Dairy Beef Quality Assurance Center (Dairy Cattle)

1. *Are guidelines publicly available?*

Yes. The DQA FIVE-STAR Dairy Quality Assurance (DQA) Program is described in its publication, *Caring for Dairy Animals: Technical Reference Guide and On-the-Dairy Self-Evaluation Guide*. The 48-page Guide may be ordered on the Center’s Web site for a cost of \$25. It includes illustrations, a list of references and an index.

2. *What animal care areas are covered by the guidelines?*

The DQA program includes the following areas: producer and employee attitudes; evaluating animal health care; environment for dairy animals; facilities provided for animals; dairy nutritional care; evaluating milking procedures and equipment; transporting and handling animals; birth and management of calves; and sick, hospitalized, non-ambulatory, and dead animals.

3. *What animal care areas are not covered by the guidelines?*

The care of calves raised for veal is not covered.

4. *How were guidelines developed?*

The Milk and Dairy Beef Quality Assurance Program was developed in 1990; however, guidelines related to animal care were not added until 1995. Those guidelines were developed with the assistance of the DQA Animal Well-Being Standards Committee whose members include producers, private veterinarians and academics, as well as representatives of the American Veterinary Medical Association (AVMA), American Association of Bovine Practitioners, and California Department of Food & Agriculture. A list of the members is available to the public. In 2002, DQA agreed to revise its guidelines to incorporate recommendations of FMI-NCCR, which eventually endorsed the DQA guidelines (see discussion of FMI-NCCR later in this section).

5. *Is compliance with guidelines assessed?*

Yes. DQA has operated a registration and certification process for dairies since establishing its original quality assurance program in 1990.

6. *How are assessments performed?*

On-farm “walk-through” inspections are completed by a contracted auditor, often after the dairy has completed a self-audit. The inspection takes place at different locations at the dairy, and animals are observed to determine locomotion, body condition and hygiene scores. The number or percentage of animals to be assessed varies by the size of the herd – usually 5-10 percent of the animals currently milking. Following successful completion of the on-site inspection, the dairy may register for certification with the DQA Center for DQA FIVE-STAR Dairy Quality Assurance Recognition. Dairies may complete the program for one or more of the six components of the DQA program. (The six components are animal care, personnel management, environmental stewardship, milk safety and quality, pathogen management, and dairy beef.) DQA recommends that audits – both internal and external – be conducted every year.

7. *Who performs the assessments?*

The DQA Walk-Through verification is completed by a licensed veterinarian, often the herd veterinarian. Selection and training of the assessors is determined by the particular market or retailer.

8. *Is assessment pass/fail or benchmarking only?*

Benchmarking. The Caring for Dairy Animals – On-the-Dairy Self-Evaluation Guide explains that the quality control points included in the evaluation are recommendations only. In fact, it states, “The list of BMPs (Best Management Practices) does not imply you should do all of them...” Dairies receive a “5 Star” rating for an audit score of 80 percent or above, and a “4 Star” rating for a score of 70-79 percent. The producer’s marketer or retailer typically sets the standard for what is an acceptable score.

9. *How many producers are participating in the program?*

More than 9,000 dairies have been reviewed, and their data has been submitted to the DQA center for distribution to the milk or meat market requesting the information. No information is made available for individual dairies by the DQA Center to other outside parties.

American Veal Association (Veal Calves)

1. *Are guidelines publicly available?*

Unknown. The guidelines are not published on the Association’s Web site, and despite several requests, the Association never provided guidelines or any information about them. The guidelines were provided when the 2005 edition of this report was written, and the information that follows is from that report.

The Veal Quality Assurance Certification Program of the American Veal Association is a general quality assurance program, the original purpose of which was to reduce the incidence of chemical residues in calves. The primary focus of the program remains calf feeding and the administration of drugs and supplements; however, the program does include criteria specific to animal care and handling. The animal care guidelines are detailed in two publications: *A Guide for Care and Production of Veal Calves* and *Calf Care Protocol for the Dairy Producer*.

2. *What animal care areas are covered by the guidelines?*

The program includes guidelines in the following areas: buildings; ventilation, humidity and temperature; housing; feed and water; personnel; handling of the calf at the dairy farm; calf health; transportation; loading and unloading; and handling at slaughter.

3. *What animal care areas are not covered by the guidelines?*

The guidelines do not address surgical procedures, such as castration, which may be performed without painkillers.

4. *How were guidelines developed?*

The *AVA Guide for the Care and Production of Special-Fed Veal Calves* was first published in 1981. It has undergone five revisions since then, with the latest edited by Lowell Wilson, professor emeritus of the Department of Dairy and Animal Science at Pennsylvania State University. A 10-member review committee is composed of three academics associated with Penn State and several industry representatives. No animal welfare or consumer advocacy organizations are included. Carolyn Stull, PhD and Steven Berry, DVM, both of the University of California-Davis, authored the publication *Calf Care Protocol for the Dairy Producer*.

5. *Is compliance with guidelines assessed?*

No. The Veal Quality Assurance program was initiated in 1990 and revised in 1995 to include a certification option. The certification program, which is voluntary and entirely self-regulated, consists of two certification levels for producers as well as a certification process for service representatives and suppliers. Producer certification Level 1 is a temporary phase to allow the producer time to complete the requirements of Level 2. If Level 2 is not completed within six months, the producer loses certification. Level 2 consists of participation in an educational seminar, identification of a consulting veterinarian, and completion of a simple self-assessment form. Producers must be re-certified every two years.

6. *How many producers are participating in the program?*

According to Allison Wenter, director of veal quality assurance for the AVA, in 2001, 80 percent of veal producers (or approximately 800 of the 1,000 veal producers in the U.S.) had been certified. The AVA did not participate in the FMI-NCCR Animal Welfare Audit Program when it was initiated for grocery stores and chain restaurants.

As of March 2009, the AVA – along with the American Sheep Industry Association – is one of the only industry associations whose animal welfare guidelines have not been endorsed by the FMI-NCCR.

American Sheep Industry Association (Sheep)

1. *Are guidelines publicly available?*

Yes. The 16-page *Sheep Care Guide* can be located on the Web site of the American Sheep Industry Association. Scientific references and a list of individuals involved in development of the Guide are provided at the conclusion of the document.

2. *What animal care areas are covered by the guidelines?*

The *Sheep Care Guide* includes the following sections: facilities and handling, transportation, reducing depredation, nutrition, flock health program, shearing, hoof trimming, husbandry practices, enhancing reproductive efficiency and animal well-being, lambing and care of the lamb and ewe, and exhibition practices.

3. *What animal care areas are not covered by the guidelines?*

The Guide provides very little guidance on artificial shelter or indoor housing conditions (ventilation, temperature regulation), and it does not cover space allowances, fencing or slaughter practices. It does not recommend anesthesia for some routine surgical procedures such as tail docking or castration.

4. *How were guidelines developed?*

William Shulaw of Ohio State University authored the latest edition of the *Sheep Care Guide*. The document was reviewed by two dozen individuals, including representatives from academia, industry, the AVMA, and USDA-ARS. No consumer or animal protection advocates were involved in development of the guidelines.

5. *Is compliance with guidelines assessed?*

For the most part, the sheep care guidelines are general and subjective. The *Guide* itself provides no forms or scoring tools for auditing compliance with the guidelines. It is offered as “a reference for the sheep producer using a variety of management and production systems.” The *Guide* also notes that it is not intended to be an exhaustive review of all aspects of animal care. In fact, it refers readers to outside sources for more information on a variety of subjects.

Interested producers can participate in ASI’s Sheep Safety Quality Assurance (SSQA) program, which offers training in various aspects of production. Using tools provided by this program, producers can develop their own auditable systems to address animal welfare.

National Pork Board

1. *Are guidelines publicly available?*

Yes. The National Pork Board’s Pork Quality Assurance Plus (PQA Plus) program materials, including guidelines and assessment forms, are available on the organization’s Web site.

2. *What animal care areas are covered by the guidelines?*

In addition to food safety and antibiotic use, PQA Plus addresses the following: herd health, caretaker

training, facilities and emergency support, animal observation and evaluation, body condition score, body space allowance, euthanasia, handling and movement, air temperature and quality, and animal abuse. Assessment criteria are individualized for two production phases — one addressing gilts, sows, boars and neonatal pigs; and the other addressing nursery and finisher pigs.

3. *What animal care areas are not covered by the guidelines?*

Transport of animals is not addressed in the PQA Plus program; however, the NPB has developed a separate Transport Quality Assurance (TQA) program. Information regarding this program is available on the NPB Web site. There is nothing in the guidelines prohibiting the use of gestation crates or requiring that pigs be given access to the outdoors, sunlight or sufficient space to exercise and engage in natural behaviors such as rooting, foraging, nest building, etc. Bedding materials are not required, though they are presented as one possible solution to mitigating extreme low temperatures — 5 degrees Fahrenheit or lower for “finishing” or “market” pigs.

4. *How were guidelines developed?*

NPB originally developed a Swine Welfare Assurance Program (SWAP) to serve as an alternative to third-party audits, although the program is a voluntary assessment, not an audit. The pork industry initiated SWAP to provide assurances to consumers and foodservice retailers that producers are following animal welfare guidelines, and to prevent having mandatory auditing programs forced upon the industry. Work on the program began in 2000, under the auspices of the NPB Animal Welfare Committee, whose members include producers, veterinarians and animal production scientists. In November 2003, the National Pork Board adopted a resolution encouraging pig producers to participate in SWAP.

SWAP and Pork Quality Assurance food safety program were combined to create the PQA Plus program, which was formally released in June 2007 and scheduled for a three-year implementation period. In March 2008, the producer delegation adopted a resolution that encourages all pig producers to participate and complete the PQA Plus program during the next three years. According to NPB, the program was developed to be “a workable, affordable, and credible program that demonstrates pork producers’ commitment to swine welfare and to continuous improvement to all sectors of the pork chain.”

5. *Is compliance with guidelines assessed?*

Yes. NPB has developed a voluntary on-farm assessment program to assist with implementation of PQA Plus. NPB claims that a third-party verification component is being developed as part of the program as well, and will be in place for full program implementation by 2010.

6. *How are assessments performed?*

To complete a PQA Plus site assessment, producers must undertake animal care training by participating in group or one-on-one instruction with a certified PQA Plus Advisor. Following producer training, PQA Plus Advisors visit farms to evaluate animal care according to the care and well-being principles of PQA Plus. The program defines the number of individual pigs to be assessed per site based on the size of the site. To be designated as PQA Plus site, the producer must be assessed every three years by a PQA Plus Advisor.

7. *Who performs the assessments?*

Certified PQA Plus Advisors perform assessments. As of December 2008, more than 870 PQA Plus Advisors have completed training and become certified, all of whom are either university animal scientists, veterinarians or agricultural educators with a B.S. or equivalent in animal science or a related field. A database is available on the NPB Web site that is searchable by zip code for producers to locate the nearest PQA Plus Advisor. The producer may choose the advisor, who in turn determines the cost of conducting the assessment.

8. *Is assessment pass/fail or benchmarking only?*

Benchmarking. The PQA Plus assessment form includes columns for “acceptable” and “needs improvement” items; however, there is no point system for scoring a facility’s overall performance. To achieve site status, the on-farm site assessment must be completed every three years, but it is encouraged that the assessment be repeated internally every four to six months to track animal care. Consequently, a producer could “need improvement” in every area of the assessment and still be designated as a PQA Plus site.

9. *How many producers are participating in the program?*

The PQA Plus program will not be fully implemented until 2010, but more than 3,000 sites have completed a site assessment in the first 20 months of the program’s existence. The Pork Board claims that 90 percent – 95 percent of pigs slaughtered in the U.S. are raised by PQA Plus-certified individuals. In addition to PQA Plus, the National Pork Board has established the TQA program to certify those involved in swine handling and transport. As of December 2008, 352 Advisors have certified more than 13,000 drivers and producers under the program.

Since the TQA program was launched, USDA-FSIS records have shown that the number of pigs who die during transport to slaughter has declined by about 70,000. However, the Pork Board acknowledges that other factors may be at work. Still, more than 200,000 pigs arrive dead at slaughter plants each year.

National Chicken Council (Meat Chickens)

1. *Are guidelines publicly available?*

Yes. The National Chicken Council Animal Welfare Guidelines are posted on the Council’s Web site.

2. *What animal care areas are covered by the guidelines?*

The guidelines include sections for education, training and planning; hatchery operations; proper nutrition and feeding; appropriate comfort and shelter; health care; ability to display most normal behavior; on-farm best practices; catching and transportation; processing; and special considerations for breeder pullets and cockerels.

3. *What animal care areas are not covered by the guidelines?*

The guidelines do not cover ritual slaughter methods. While NCC maintains that free-range farms could easily adopt its Animal Welfare Guidelines, specific recommendations for free-range production are not addressed.

4. *How were guidelines developed?*

A NCC Animal Welfare Task Force, whose 10 members are industry representatives with backgrounds in management, live production, slaughter, health care, and nutrition, developed the guidelines. An Animal Welfare Scientific Advisory Committee then reviewed and revised the recommendations of the task force. The identity of advisory committee members is given in a 2004 article by the NCC in the *Journal of Applied Poultry Research* (Vol. 13, pp. 140-142). According to the article, input to the animal care guidelines process also came from chicken company customers, such as fast food restaurants. The guidelines were last revised in April 2005.

5. *Is compliance with guidelines assessed?*

Yes. In addition to quality assurance guidelines, NCC also developed an assessment checklist to assist companies in complying with the guidelines. Auditing is voluntary on the part of individual producers, but a request for an assessment may be made by a producer’s customer(s).

6. *How are assessments performed?*

A document titled “Guidance for Conducting Audits Under National Chicken Council Animal Welfare Guidelines” is included with the guidelines. It states that a company may choose to have all of its operations audited or only a subset, depending on the needs of its customers. If verifying compliance with an entire complex, the auditor is expected to visit a hatchery, a processing plant, and a sample of the farms associated with the plant. The auditor is also to inspect at least three “growout” houses on different farms from a list of at least 10 farms prepared by the company.

7. *Who performs assessments?*

The eight academic members of the advisory committee assist with internal and customer assessments. Customer auditing teams or consulting auditing firms may also conduct audits. One auditing company, Silliker, Inc., offers a Poultry Welfare Audit for poultry slaughter operations that it developed in conjunction with James Marion of Auburn University and the National Chicken Council. When contacted for this report, Silliker, Inc. declined to release any information about its audit program or its clients, citing a confidentiality policy.

8. *Is assessment pass/fail or benchmarking only?*

Benchmarking only. Although the assessment checklist includes a maximum score for each area and a total score for the audit as a whole, there is no indication of what constitutes an acceptable facility score.

9. *How many producers are participating in the program?*

According to an NCC spokesperson, the organization believes that the vast majority of chickens produced in the U.S. are produced according to its guidelines.

National Turkey Federation (Turkeys)

1. *Are guidelines publicly available?*

Yes. They are available online.

2. *What animal care areas are covered by the guidelines?*

The guidelines cover hatching, breeding, growing, housing, feeding and watering, air quality, disease control, transportation, and slaughter.

3. *What animal care areas are not covered by the guidelines?*

The guidelines do not provide specific recommendations for “free range” systems or ritual slaughter.

4. *How were guidelines developed?*

According to the document’s “Acknowledgements,” the guidelines “were produced under the guidance of the NTF Animal Welfare Subcommittee - Drs. Eric Gonder, David Mills, Steven Clark, Larry Pickering, James Barton, Richard Atkin, and Shannon Jennings. Members of NTF’s Live Production Committee, turkey veterinarians, and Technical and Regulatory Committee were also involved in the development, review and adoption of the Animal Care Best Management Practices Manual as well as the NTF staff and P.E. Poss, DVM.” These are primarily veterinarians and animal scientists that are either employed directly by the industry or by university agriculture departments.

5. *Is compliance with guidelines assessed?*

There is an “audit tool” included at the end of the guidelines, and producers may use this tool to assess themselves or they may hire an outside auditor to review their compliance. However, there is no auditing program overseen by the NTF.

United Egg Producers (Laying Hens)

1. *Are standards publicly available?*

Yes. The “Animal Husbandry Guidelines For U.S. Egg Laying Flocks” is available on the Web site for the UEP Certified program, operated by United Egg Producers.

2. *What animal care areas are covered by the standards?*

UEP includes sections devoted to the following: housing and space allowance (layers), beak trimming (pullets), molting (layers), and handling and transportation (pullets and layers).

4. *How were standards developed?*

UEP commissioned an independent Scientific Advisory Committee for Animal Welfare in 1999. The committee was chaired by Jeff Armstrong, dean of the College of Agriculture and Natural Resources at Michigan State University, and included two USDA-ARS representatives (Margaret Shea-Moore and Larry Stanker) and five university-based animal scientists (Joy Mench of the University of California, Patricia Hester of Purdue University, Ruth Newberry of Washington State University, Donald Bell of the University of California-Riverside, and Janice Swanson of Michigan State University). The committee also included Adele Douglass, then a representative of the American Humane Association, and Bill Chase, a private veterinarian. After reviewing the scientific literature on specific topics related to the welfare of laying hens, the committee offered its recommendations for animal care guidelines to the UEP. The program was finalized in 2002 using the name “Animal Care Certified”. In 2006, this program was renamed “UEP Certified” following a ruling by the Better Business Bureau that the “Animal Care Certified” label was misleading to consumers.

5. *Is compliance with standards audited?*

Yes. Egg companies that wish to market their eggs as UEP Certified must file monthly compliance reports and be audited by an independent auditor designated and approved by UEP. Inspection procedures, forms and a point-scoring system have been developed for use in auditing compliance.

6. *How are audits performed?*

To become UEP Certified, producers must commit to implementing the program’s standards on all of their production facilities, including all contract producers. Producers are responsible for contacting the auditing entity and making arrangement for payment. Audits are conducted on a yearly basis. Initial audits for a company must be conducted at each of the company’s facilities. However, subsequent annual audits are conducted at only 50 percent of the facilities, and at each facility, only 50 percent of layer houses are inspected. UEP believes that because the audited facilities are chosen randomly, producers will maintain compliance in all facilities to avoid the risk of losing certification. Auditors provide producers with a minimum of 48-hour notice prior to the on-site audit. The auditor randomly selects which facilities and which individual layer houses at each location are to be audited. Inside the layer house, the auditor uses a random number table to identify which cage columns are included in the audit. Auditing is limited to the housing, handling, forced molting, and transportation of layers, and the beak trimming, handling and transportation of pullets. Auditors visit pullet houses only when they are a part of the layer facility. Program compliance for pullets not housed at the facility is verified through a document review only.

7. *Who performs the audits?*

Audits are conducted by either USDA-AMS or Validus, a private auditing company. Auditors have been certified and have received training in the audit of UEP Animal Husbandry Guidelines. Both USDA and Validus auditors must receive the International Organization for Standards (ISO) 9001 Legal Auditor Training.

8. *Is audit pass/fail or benchmarking only?*

Pass/fail. Points are awarded for each of the animal husbandry categories as follows: housing and space allowance – 110 possible points; beak trimming – 30 possible points; molting – 30 possible points; and handling and transportation – 30 possible points. In 2003, producers had to receive a minimum of 140 out of 200 possible points to pass the audit; in 2004, the bar was raised to 170 points. Failure to meet the required points for the “housing and space allowance” section results in automatic failure of the audit, as does evidence of backfilling cages, co-mingling certified and non-certified eggs, and feed withdrawal molting.

Upon completion of the audit, the auditor reviews results of the audit with the producer and provides the completed audit forms to the certifying agency, which then supplies the information to UEP. Companies failing an initial audit may request at most one re-audit that must be completed within 30 days of the original audit. According to UEP, in 2003, 12 companies failed the first audit and then passed a re-audit. In 2003, UEP terminated one company for violations of the guidelines and four companies for failure to have audits conducted. UEP ignored requests to provide more recent data on the number of companies that have failed audits and/or been denied recertification.

9. *How many producers are participating in the program?*

According to the most recent USDA census data available, there are more than 4,000 farm sites that house 3,200 or more hens. These facilities hold 99 percent of U.S. egg-laying hens. In addition, approximately 94,000 farm sites house 3,200 or fewer hens. In the first year (2002) of the UEP program (then known as “Animal Care Certified”), the USDA conducted audits of 611 facilities, representing 147 egg producers, while other auditors inspected an additional 60 facilities. A UEP news release dated May 3, 2005 stated, “Ninety percent of all shell eggs sold in the U.S. are produced under these guidelines.” As of December 2008, UEP estimated that roughly 230 million hens were being kept under its guidelines. Although a large majority of the major U.S. egg producers are being audited, only a small percent of individual layer houses are inspected for compliance with the UEP guidelines. Currently only 25 percent of an egg company’s individual layer houses (chosen randomly) are visually inspected each year.

American Meat Institute (Slaughter Plants)

1. *Are guidelines publicly available?*

Yes. The AMI’s *Recommended Animal Handling Guidelines and Audit Guide* is available on its Web site. The document includes an audit guide and references.

2. *What animal care areas are covered by the guidelines?*

The *Recommended Animal Handling Guidelines* cover livestock holding facilities and trucking, as well as basic livestock handling principles. It also includes sections on electric stunning, captive bolt stunning, gas stunning, bleed rail insensibility, scoring of slipping and falling, vocalization scoring of cattle, vocalization scoring of pigs, electric prod use, handling of non-ambulatory animals, and ritual slaughter.

3. *What animal care areas are not covered by the guidelines?*

The slaughter of animals other than cattle, swine, sheep, and goats is not addressed. There are separate audit forms for cattle, swine and sheep, but there is no form for goats.

4. *How were guidelines developed?*

Temple Grandin, professor in the Department of Animal Sciences, Colorado State University, developed the AMI guidelines. Originally drafted in 1991, the guidelines were revised in 2001, 2005 and most recently in 2007. They will be updated again in 2009 and a new audit of trucks arriving at plants will be added.

5. *Is compliance with guidelines assessed?*
AMI provides audit forms but does not conduct audits or certify producers. However, Temple Grandin has established recommended scoring procedures, forms, and training manuals that may be used in internal, customer or third-party audits.
6. *How are assessments performed?*
Assessments are performed using the AMI scoring system. The guidelines recommend that slaughter plants conduct internal assessments at least once per week on varying days and at varying times of day to determine the effect of employee fatigue. The AMI guidelines specify the number of animals to be scored on the different criteria, usually a minimum of 100 animals in large plants and 50 animals in smaller plants. Scoring of very small plants is also addressed.
7. *Who performs the assessments?*
Inspections may be conducted internally by producers, by representatives of food retailers, or by a number of different third-party audit companies such as Silliker, Inc., Process Management Consulting, NSF - Cook & Thurber, and Food Safety Net Services, Ltd. The audit can be completed in eight hours and includes an assessment of facilities, animal handling and stunning.
8. *Is assessment pass/fail or benchmarking only?*
It is a pass/fail audit. Facilities must pass each criterion to pass the audit. Still, the scoring system acknowledges when plants go beyond just “acceptable” and exhibit “excellent” handling. Likewise, “not acceptable” is a failure, but the audit will note when something is a “serious problem.” Criteria include stunning efficacy, slipping and falling of animals, and animal vocalization. Some retailers and restaurants may discontinue business with suppliers who fail to meet certain levels of performance.
9. *How many slaughter operations are participating in audits/assessments?*
Because these audits may be conducted both internally and by a number of third-party auditing companies, it is difficult to say how many producers are participating, and at what level. An AMI fact sheet states that in a survey of AMI members taken in 2001, 93 percent of beef plants and 92 percent of pork plants reported conducting self-audits, but no figure was given for third-party audits. AMI members “process” 95 percent of the red meat in the U.S., according to the organization’s Web site. While many processing facilities are also slaughterhouses, processing and slaughtering occur at two different stages of production.

Retail Food Industry Auditing Programs

In Farm Sanctuary’s previous report on animal welfare standards, we included a description of the Animal Welfare Audit Program (AWAP) jointly administered by the Food Marketing Institute (FMI) and the National Council of Chain Restaurants (NCCR), the national trade associations for retail food stores and chain restaurants, respectively. While many FMI and NCCR member retailers asked their suppliers to participate in the program, suppliers often refused. For example, in November 2004, the Winn-Dixie supermarket chain sent a letter to its suppliers requesting AWAP audits in slaughter plants and on farms each year. In response, the National Pork Board (NPB) criticized AWAP and indicated it would encourage Winn-Dixie to accept NPB’s Swine Welfare Assurance Program assessments as an alternative.

Ultimately, the FMI-NCCR auditing program was discontinued. According to Jill Hollingsworth, Group Vice President of Food Safety Programs at FMI, FMI-NCCR decided that they lacked the expertise to train auditors, and would rather defer to the industry trade groups on animal welfare matters. The two organizations continue to meet with an animal welfare advisory committee that includes Adele Douglass, Humane Farm Animal Care; David Fraser, University of British Columbia; Gail Golab, AVMA; Temple Grandin, Colorado State University; Joy

Mench, University of California-Davis; Joe Regenstein, Cornell University; and Janice Swanson, Kansas State University. In consultation with these advisors, FMI and NCCR jointly endorse standards or guidelines issued by other industry trade groups. As of December 2008, they have endorsed guidelines from the American Meat Institute, United Egg Producers, Milk & Dairy Beef Quality Assurance Center; National Chicken Council, National Turkey Federation (NTF), Pork Board, and National Cattlemen's Beef Association. Regarding the NTF standards, FMI- NCCR has recommended enhancements in the areas of footpad dermatitis, lameness and gait scoring. They have also issued a policy statement encouraging The Pork Board to provide further enhancements to the housing of pregnant sows, though they do not specifically recommend phasing out gestation crates.

Individual Retailer Auditing Programs

Certain individual retailers, including restaurants and grocery stores, have developed their own animal care guidelines, along with a process for auditing their suppliers' compliance with those guidelines. One grocery chain, Whole Foods Market, initiated a project to create animal care guidelines beyond those required by the FMI-NCCR animal welfare program. In December 2003, Whole Foods Market began meeting with animal advocacy groups, producers, animal scientists, and others to create farm animal welfare standards. In 2008, the Whole Foods Market effort led to creation of the Global Animal Partnership, a third-party auditing program whose board includes representatives of Whole Foods Market and animal advocacy organizations.

Fast food restaurants (including McDonald's Corporation, Burger King Corporation, and Wendy's International) were the first retailers to establish programs to monitor the treatment of animals by the animal agriculture industry. Their efforts in this area influenced the creation of the FMI-NCCR audit program, described above. The current involvement of particular fast food restaurants in animal welfare auditing is described below.

McDonald's Corporation

1. *Are guidelines publicly available?*

Limited information regarding McDonald's animal care guidelines is available on the company's Web site. The company refused to provide any information beyond what little was publically available on its Web site for this report, claiming that the information was proprietary.

2. *What animal care areas are covered by the guidelines?*

According to the company's Web site, *McDonald's Laying Hens Guidelines* address minimum requirements for housing and feeder space per hen. McDonald's also states that it is opposed to the withdrawal of food and water to induce molting, and that it opposes "improperly controlled and/or improperly managed 'beak trimming.'" McDonald's cattle and pig slaughter plant standards are based on the guidelines developed by Temple Grandin for the American Meat Institute (see discussion of the "American Meat Institute"). The company has also developed standards for poultry slaughter.

3. *How were guidelines developed?*

In 1999, McDonald's Corporation announced that it would work with Temple Grandin to add animal handling and stunning criteria to its program of auditing supplier slaughter plants for food safety. In 2000, McDonald's extended its animal care standards to on-farm treatment of animals, and began to explore the feasibility of buying pig products from suppliers who don't use crates to house pregnant sows. And in 2001, McDonald's issued *Laying Hens Guidelines* for its egg suppliers that required 50 percent more housing space per hen than the U.S. industry average at that time. McDonald's has an animal welfare advisory committee that includes Jeff Armstrong and Janice Swanson of Michigan State University, Edmond Pajor of Purdue University, Joy Mench of the University of California, Temple Grandin of Colorado State University, and Diane Halverson, farm animal advisor to the Animal Welfare Institute.

4. *Is compliance with guidelines audited?*

In the past, McDonald's had supported the efforts of NCCR to set animal care standards, and participated in the FMI-NCCR Animal Welfare Audit Program. That program has since been discontinued (see above). McDonald's Web site states that it does conduct "onsite audits to ensure appropriate animal handling practices in [its] suppliers' slaughterhouse facilities."

McDonald's 2007 *Worldwide Corporate Responsibility Report* noted that more than 500 slaughter plant audits were conducted worldwide in 2007. These audits covered 100 percent of its beef slaughter plants, 99 percent of its pig slaughter plants, and 97 percent of its poultry slaughter plants.

Previously, company executive Bruce Feinberg stated that McDonald's works with suppliers to assist them in meeting the corporation's animal welfare standards, and has encouraged some suppliers to install monitoring equipment, such as video cameras, to address animal handling problems. McDonald's 2007 *Worldwide Corporate Responsibility Report* claims that their goal is for all their slaughter plants to pass an audit each year. It goes on to note: "Audits that did not occur in 2007 are scheduled to be completed in 2008. We are working with those four facilities that did not pass audits in 2007 to address specific problems, and they will be audited again to ensure improvements were made. If any facility fails to make necessary improvements as agreed, it is removed from our approved abattoir list."

Burger King Corporation

1. *Are guidelines publicly available?*

The information regarding Burger King's animal welfare policies is not available on its Web site. However, some information was provided upon request.

2. *What animal care areas are covered by the guidelines?*

According to information that was available on the company's Web site in 2005, it began audits of slaughter plants in 2001 and also petitioned the USDA to improve enforcement of the federal Humane Methods of Slaughter Act. In addition to requiring third-party audits of its suppliers' cattle, pig and poultry slaughter plants, Burger King had begun on-site audits of livestock production facilities.

Though no claims of this sort are currently made online, a company spokesperson stated that "BKC has adopted meaningful requirements to make certain that our vendors and suppliers treat animals properly." These requirements were not specified, except to say that producers may not use antibiotics solely for the purpose of growth promotion. The company also notes that in 2007, it purchased 5 percent of its eggs from "cage free" producers, exceeding the 2 percent goal it had previously set for itself. Similarly, it purchased 20 percent of its pork from producers who did not use gestation crates, exceeding its original goal of 10 percent.

3. *How were guidelines developed?*

BKC created an Animal Welfare Advisory Board in 1998, comprised of "renowned third-party animal science experts." According to a company spokesperson, "the board is responsible for reviewing trends in the field of animal welfare and making recommendations to BKC executives. In addition, the group reviews empirical scientific data about the living conditions for animals along BKC's supply chain, enabling us to make informed decisions about our suppliers."

Some of the animal science professionals that have advised the company in the past include Temple Grandin of Colorado State University, Janice Swanson of Michigan State University, David Fraser of University of British Columbia, and Adele Douglass of Humane Farm Animal Care.

4. *Is compliance with guidelines audited?*

No current data is available. However, Burger King did participate in the FMI-NCCR Animal Welfare

Audit Program when it was functioning in the summer of 2003. According to the company, during 2004, audits were completed with 100 percent of its suppliers in the U.S. and Canada. It reported that “a small number” of suppliers failed to meet animal care standards, and the company worked with these suppliers to assist them in their efforts to reach full compliance. At the time, all audits being conducted were announced due to biosecurity concerns.

Wendy's International, Inc.

1. *Are guidelines publicly available?*

Yes. Information regarding Wendy's animal care requirements is available on the company's Web site.

2. *What animal care areas are covered by the guidelines?*

Wendy's has adopted the animal handling guidelines of the American Meat Institute and developed very basic requirements for cattle, pig and chicken producers covering the general areas of health, housing, transport, and handling. They have also instituted buying preferences for pork producers that do not use gestation crates, and now buy at least 10 percent of their pork from such companies.

3. *How were guidelines developed?*

Wendy's has established an animal welfare council to assist in the development and review of its animal care requirements. Wendy's has also hired Temple Grandin as a consultant to evaluate the effectiveness of the company's animal care program.

4. *Is compliance with guidelines audited?*

According to Wendy's, the company has operated an objective auditing program to monitor animal handling among its suppliers since 1998. Audits of Wendy's suppliers are both announced and unannounced, and conducted a minimum of twice each year. Audits are performed by representatives of third-party auditing companies or trained Wendy's auditors. Wendy's did not participate in the FMI-NCCR Animal Welfare Audit Program. The company states that companies failing to meet their guidelines for animal care are terminated as approved suppliers.

Yum! Brands

1. *Are guidelines publicly available?*

Yum! Brands did not respond to a request for a copy of its guidelines, and did not provide answers to questions about the development of its animal care program. However, some information regarding Yum! animal care program is available on the company's Web site. (Yum! Brands is the parent company of Kentucky Fried Chicken (KFC), A&W, Long John Silver, Pizza Hut, and Taco Bell.)

2. *What animal care areas are covered by the guidelines?*

Yum! has developed animal care guidelines for its chicken suppliers. In addition, Taco Bell, Pizza Hut and A&W have adopted the slaughter guidelines of the American Meat Institute, and Yum! is developing an audit program for cattle slaughter facilities.

3. *How were guidelines developed?*

According to the Web site for KFC, the company adopted welfare performance standards for chicken slaughter establishments in 2000. To assist with the development of chicken welfare guidelines, KFC established an Animal Welfare Advisory Council comprised of Temple Grandin, Colorado State University; Ian Duncan, University of Guelph; Bruce Webster, University of Georgia; Kellye Pfalzgraf, Tyson Foods; and Bill Potter, George's Inc. In May 2003, KFC committed to adopting guidelines for the raising and handling of chickens at the farm level, and those guidelines were completed in November 2004. KFC describes its guidelines as having been developed “by leading animal welfare experts at the direction of the National Council of Chain Restaurants and the Food Marketing Institute” (see discussion of NCCR-

FMI above). In May, 2005, Temple Grandin and Ian Duncan resigned from the Animal Welfare Advisory Council over disagreements stemming from a confidentiality agreement that would have required them to refer all media inquiries to KFC's corporate headquarters.

4. *Is compliance with guidelines audited?*

The KFC Web site indicates that the company requires its suppliers to conduct self-audits of animal care guidelines. In addition, KFC conducts audits of both production and slaughter facilities, and the company says, "non-compliance could result in termination of the supplier's contract." KFC claims that a comparison of the KFC Farm Level Audit with the NCCR-FMI audit guidelines showed that KFC's farm audit was equal to or exceeded that of NCCR-FMI.

7. THIRD-PARTY CERTIFICATION STANDARDS

Currently, five independent, third-party food certification programs exist which include standards for the care and handling of animals. These programs are the National Organic Program, administered by the U.S. Department of Agriculture; the Certified Humane program, administered by Humane Farm Animal Care; the American Humane Certified program, administered by the American Humane Association; the Animal Welfare Institute's Animal Welfare Approved program; and the Global Animal Partnership Five Step program. These five programs are described briefly in this section.

National Organic Program

1. *Are standards publicly available?*

Yes. The regulations of the National Organic Program (NOP) are available on the Web site of the USDA-AMS, the government agency authorized by Congress to administer the program. The regulations can also be found in the Code of Federal Regulations (7 CFR Part 205). The AMS Web site contains extensive information regarding the NOP.

2. *What animal care areas are covered by the standards?*

The NOP regulations relevant to animal care and handling include feed, health care practices and living conditions. The regulations are general and written to apply to all livestock species.

3. *What animal care areas are not covered by the standards?*

The NOP regulations do not address animal handling practices; space allowances; environmental factors such as air quality, thermal regulation or lighting; management practices such as weaning and identification; transport; or euthanasia. Feeding regulations specify only that livestock be given organic feed that does not contain urea, manure or slaughter by-products. Although slaughter is addressed, the provisions are not specific to animal treatment. The regulations require that animals be provided access to the outdoors but do not define how many animals can be grazed per acre or the frequency or duration of outdoor access. No stocking density or maximum flock/herd size is specified for meat birds or hens kept indoors, allowing certification of operations that house thousands of birds under one roof. (By comparison, the United Kingdom's Soil Association recommends a flock size of 500 birds and will only certify farms with at most 2,000 laying birds or 1,000 meat birds.)

4. *How were standards developed?*

Congress passed the Organic Food Production Act of 1990. The law authorized the Secretary of Agriculture to appoint a 15-member National Organic Standards Board (NOSB) to advise the USDA in the development of standards for organic production and in the implementation of certain aspects of the

standards. The current NOSB is comprised of four farmers, two handlers/processors, one retailer, one scientist, three consumer advocates, three environmentalists, and one certifying agent.

The NOSB submitted recommendations to the USDA regarding standards for organic production. In December 1997 the USDA proposed its NOP regulations in the *Federal Register*, choosing to ignore many of the recommendations made by the NOSB. Public response to the proposal was so uniformly negative that the Department was forced to rewrite the regulations and resubmit the revised proposal for public comment. The second proposed rule was published in the *Federal Register* in March 2000. More than 300,000 public comments were received on the two proposed organic rules. The NOP represents one of the USDA's most complex regulatory programs and one of the largest rulemaking efforts in USDA history. The final organic rule was published on December 21, 2000, and the regulations implementing the NOP became effective October 21, 2002.

5. *How are producers certified?*

An initial on-site inspection is performed prior to certification; thereafter, inspections are conducted annually and as needed to verify compliance with the regulations. Inspections may be announced or unannounced. Organic producers must permit on-site inspection with complete access to all operations, including non-certified production areas. Organic certification remains valid until surrendered by the producer or revoked for a violation of the NOP regulations.

6. *Who performs audits for certification?*

USDA-accredited certifying agents certify organic producers. The USDA-AMS Web site contains a list of domestic and international certifying agents with their contact information. As of November 2008, the list included 55 domestic certifying agents, 50 of which were described as certifying livestock producers. State agencies represented 15 of the 55 domestic organic certifiers. The NOP regulations include provisions to avoid potential conflicts of interest for certifying agents, though ties between certifying agents and some producers they certify undoubtedly exist. NOP staff conducts on-site review audits of certifying agents, a sort of audit of the auditors.

Since initiation of the NOP, several controversies have arisen over interpretation of the program regulations and over the authority of certifying agents. Two of those controversies involve very significant provisions from an animal welfare perspective – requiring access to the outdoors for all organically-raised animals and access to pasture for organically-raised ruminants.

Access to the outdoors – The NOP regulations require that organically-raised animals be provided with “access to the outdoors, shade, shelter, exercise areas, fresh air and direct sunlight suitable to the species, its stage of production, the climate and the environment.” Immediately after the NOP regulations were finalized, poultry and egg producers complained that they should be exempted from the requirements. In May 2002 the National Organic Standards Board accepted public comment on the issue and adopted a clarification of the requirement. The clarification stated that “organic livestock facilities must give poultry the ability to choose to be in the housing or outside in the open air and direct sunlight” and, furthermore, that a producer’s organic system plan must “illustrate how the producer will maximize and encourage access to the outdoors.” However, the USDA’s official interpretation of the “access” provision, released in October 2002, simply said producers must provide livestock with an opportunity to exit any barn or other enclosure.

In the spring of 2002, a Massachusetts egg company, Country Hen, submitted an application for organic certification to Massachusetts Independent Certifiers, Inc. (MICI). The application was rejected by MICI on the grounds that Country Hen was not providing adequate access to the outdoors. The company intended to build fully enclosed balconies off the layer barns, which the hens would be allowed to use for a few hours each day during summer months only. The balconies would have been able to accommodate only a small percentage of the barns’ 6,000 hens at any one time. After Country Hen complained about

the rejection of their application, the USDA reversed MICI's decision and granted organic certification. In June 2003, MICI filed an official complaint against the USDA for granting certification without consulting the certifier. A USDA administrative judge later dismissed the appeal.

Another organic certifier – the New Hampshire Department of Agriculture – has decided that it will not require its producers to meet the standards. New Hampshire does not require that poultry have access to the outdoors in deference to Pete & Gerry's Eggs, a large egg producer that houses thousands of hens under one roof. Although the situation is arguably not compatible with the public perception of "organic" conditions, the NH Department of Agriculture claims that it is doing what is best for the birds by protecting them from severe weather, disease and predators.

Access to pasture – The NOP requirement that ruminants have access to pasture has also become controversial. Some large dairy corporations, namely Aurora and Horizon organic dairies, have regularly confined their cows to outdoor pens when they are producing milk and only allowed the animals access to pasture during the time between lactations. The confinement dairies have justified this practice based on the exception in the NOP regulations that allows temporary confinement for the "animal's stage of production." However, since approximately 85 percent of a dairy cow's productive life is spent in lactation, if lactation is interpreted as a stage of production, the pasture requirement becomes virtually meaningless for dairy cows.

For several years, the Cornucopia Institute – a farm policy think tank – as well as many others in the organic movement have pressured the USDA to tighten regulations against "organic" dairies that confine cows in factory farm environments. In October of 2008, the USDA proposed a rule stating that "lactation" does not qualify as a "stage of production" that justifies keeping cows without access to pasture. As of April 2009, the USDA has not yet issued a final ruling on this proposal.

7. *Is 100 percent compliance with standards required?*

No. Some noncompliant items are allowed. The producer must submit an updated annual organic production plan describing how such items are being corrected. Any person may file a complaint if he or she believes a violation of the NOP regulations has occurred. Complaints may be filed with the NOP, the State Organic Program (if applicable), or the certifying agent. Civil penalties up to a \$10,000 fine may be assessed to any person who knowingly sells or labels as organic a product that is not produced or handled according to the NOP regulations.

8. *How many producers are participating in program?*

In the previous edition of this report, we found that the number was more than 1,000. Unfortunately, no current data is available on the number of certified producers. However, the number of animals covered by the program has increased substantially during the past several years, and the number of producers has likely gone up as well. Organic Valley/Organic Prairie is the largest organic farmer-owned cooperative with more than 1,300 farmer members in 34 states and Canada. More than three quarters of Organic Valley members are dairy farmers.

Between 1990 and 2007, U.S. sales of organic food and beverages grew from \$1 billion to an estimated \$20 billion, according to the Organic Trade Association (OTA). Sales in 2008 were projected to hit nearly \$25 billion, a 15 percent increase over the previous year. This trend is expected to continue through at least 2010. According to the OTA's Manufacturer's Survey, dairy products are the second largest segment of the organic industry, behind fruits and vegetables.

Growth in the organic segment of animal agriculture can be illustrated by the dramatic increase in the number of animals being raised under organic systems. According to the USDA Economic Research Service, the following numbers of animals were being raised under organic systems in 2005 (the most recent year for which data are available), compared with 1997:

- 10,405,879 meat chickens, up from 38,285 in 1997
- 2,415,056 laying hens, up from 537,826 in 1997
- 144,086 turkeys, up from 750 in 1997
- 87,082 dairy cows, up from 12,897 in 1997
- 36,113 beef cattle, up from 4,429 in 1997
- 10,018 pigs, up from 482 in 1997
- 4,471 sheep and lambs, up from 705 in 1997

Although the growth in production and sales is striking, the organic segment still accounted for less than 1 percent of animals raised for meat, milk or eggs in 2005. However, if the current rate of growth continues, within the next 10 years, the National Organic Program could affect 10 percent of all farm animals in the U.S.

Certified Humane Program

1. *Are standards publicly available?*

Yes. The species-specific standards are available on the program Web site. Additional information about the program, including its policy manual, is also posted on the site.

2. *What animal care areas are covered by the standards?*

Standards are available for the following species: beef cattle, dairy cattle, young dairy beef (veal calves), pigs, sheep, goats, meat chickens, turkeys, and egg-laying hens. Animal care areas for each species include: food and water, environment, management, and health. Transportation is covered for pigs, goats, sheep, turkeys, meat chickens, and young dairy beef. Slaughter standards are provided for beef cattle, dairy cattle, young dairy beef, pigs, goats, sheep, meat chickens, and turkeys. Standards for the care of sheep were revised in 2005 to cover sheep raised for dairy.

3. *What animal care areas are not covered by the standards?*

Standards for the slaughter of egg-laying hens and for the transport of animals not addressed by the current standards – beef cattle and egg-laying hens – are being researched. The care of chickens raised as breeders is not covered. In addition, standards have not been written to cover other species such as ducks, geese, rabbits, deer, and farmed fish. It is the goal of HFAC to eventually address standards for at least some of these animals. While indoor stocking densities for birds are specified, maximum flock size is not, which allows certification of operations housing thousands of meat birds or laying hens in a single house. There is no prohibition on the use of species that have been bred for maximized production at the expense of greater welfare.

4. *How were standards developed?*

The Certified Humane standards were developed by a team of animal scientists and veterinarians with expertise in farm animal care issues. In creating the standards, the team reviewed research findings and consulted previously established standards, including those of the RSPCA. Certified Humane program standards are regularly reviewed and revised based on the results of scientific research. Recommendations for revisions are made by the scientific committee and accepted or rejected by the HFAC board of directors. The membership of the current scientific committee is posted on the program Web site and includes a number of national and international experts in farm animal welfare. Certified Humane is endorsed and funded by a consortium of individuals, foundations and animal welfare organizations, including the American Society for the Prevention of Cruelty to Animals, the Humane Society of the United States, and the Massachusetts Society for the Prevention of Cruelty to Animals.

5. *How are producers certified?*

Farm operations interested in becoming certified contact HFAC to receive an application and related materials. Following completion of the appropriate documents, HFAC reviews the application and arranges for an on-site audit of the facility. During the audit, the assessor conducts interviews with management and employees, observes animal care handling practices, and reviews written documentation regarding procedures. Applicants meeting requirements are certified for a one-year period and allowed to use the Certified Humane Raised and Handled label on its products. Specifics of the certification process are addressed in the program's policy manual.

6. *Who performs audits for certification?*

On-site inspections are conducted by members of the Certified Humane scientific committee and other individuals with training and education in animal science or veterinary medicine. Inspectors must sign a declaration of interests to ensure no financial connections between inspectors and any operation being inspected. HFAC was previously accredited by the USDA's Audit, Review and Compliance Branch to ISO/IEC Guide 65, the international standard for management of certification agencies. As part of the ISO process, Humane Farm Animal Care was audited annually by the USDA. In a phone interview, HFAC Director Adele Douglass noted that HFAC did not apply for ISO certification in 2009 due to the expense involved, but stated that the program would continue to adhere to the same standards and would bring in a third-party auditor to ensure compliance.

7. *Is 100 percent compliance with standards required?*

Yes. Certification is denied if all standards are not met. After a deficiency has been corrected, the applicant must submit to the entire certification process again. Certification may be denied for failure to provide access to facilities and records or for presentation of false information. Certification may be revoked for a variety of reasons including failure to follow policies and procedures or implementing significant changes to animal care procedures without prior approval. HFAC does not allow so-called "split" or "dual" operations where certified animals are raised in the same location as non-certified animals — though certified and non-certified farms may be owned by the same company.

8. *How many producers are participating in program?*

As of December 2008, Certified Humane reports there are 60 companies certified by the program, accounting for 22.6 million animals in 2008, a 14 percent increase over the previous year.

American Humane Certified (formerly Free Farmed)

1. *Are standards publicly available?*

Yes. The standards are currently in final annual review, and will be posted in PDF format on the American Humane Certified (AHC) program Web site by the end of March 2009. Standards for all species are available upon request from the program manager.

2. *What animal care areas are covered by the standards?*

American Humane Certified standards address the life process of beef cattle, dairy cattle, veal, bison, goats, sheep and dairy sheep, pigs, turkeys, meat chickens (broilers), and egg-laying hens. According to an American Humane spokesperson, standards for additional species are in process with scientific advisors and animal science specialists.

3. *What animal care areas are not covered by the standards?*

The care of chickens kept for breeding is not covered. There is no prohibition on the use of species that have been bred for maximized production at the expense of greater welfare. In addition, standards have not been written to cover other species such as ducks, geese, rabbits, deer, and farmed fish (See #2 above). While indoor stocking densities for birds are specified, there is no limit on the number of birds that may be housed in one building.

4. *How were standards developed?*

The AHC standards are based, in part, on farm animal welfare criteria developed by the RSPCA. Additional input came from the Scientific Advisory Committee, veterinarians and other animal science professionals convened by AHC. The membership of the current scientific committee is posted on the program Web site and includes a number of national and international experts in farm animal welfare.

Launched in September of 2000, the AHC program was the first of its kind, and it was originally administered by Adele Douglass, who later went on to create the Humane Farm Animal Care program detailed above. The current program manager is Tim Amlaw, formerly a farmer, teacher of agriculture, and owner/manager of a Denver-based beef operation.

5. *How are producers certified?*

Farm and ranch operations interested in becoming certified can review American Humane guidelines and the program description on-line and can receive copies of the AHC standards, program description, standard operating procedures, and templates to produce a farm manual and veterinary health records. Following completion of the application materials, American Humane Certified arranges for a third-party on-site audit of the operations. The auditor conducts a review of the facilities, reviews reports, conducts interviews with management and employees, and observes animal care and handling practices.

Any non-compliant items found during the audit and inspection are discussed in an exit interview with the producer who must agree to these non-conformance areas. The producer is then required to submit a corrective action report online within seven days to American Humane Certified and then a conformance report when the corrective actions are completed. Producers who meet standards and requirements are issued a “certificate of approval” valid for one year.

Beginning in 2008, AHC implemented a proprietary software program that allows for on-line monitoring of core welfare elements. Under this system, producers upload welfare observations weekly or monthly. In addition, the program now employs 24/7 video monitoring of all live handling areas for its veal producers, including transportation and slaughter. Video cameras have been installed in some poultry houses as well, and the program’s stated goal is to expand camera coverage to all producers by 2011.

6. *Who performs audits for certification?*

Validus Services and FACTA. All auditors working for American Humane are required to be ISO trained and credentialed by the Professional Animal Auditor Certification Organization (PAACO), and must have animal science education expertise and training in animal care and handling, or be a veterinarian.

7. *Is 100 percent compliance with standards required?*

There must be 100 percent compliance with core areas of animal care when the audit is performed. According to an AHC spokesperson, “core areas” would be those that are essential for the health and safety of the animals. Non-compliance in other areas must be addressed by a written plan of action within seven days of the audit and corrected within 90 days.

8. *How many producers are participating in program?*

As of February 2009, AHC reports there are 30 American Humane Certified licensed producers with about 500 farms that bring roughly 50 million animals to market each year.

Animal Welfare Approved

1. *Are standards publicly available?*

Yes. The Animal Welfare Approved (AWA) standards are posted on the program’s Web site. The Web site also offers a brief discussion of the rationale behind the criteria, which are based on the Five Freedoms (see Section 3).

2. *What animal care areas are covered by the standards?*

AWA has developed standards for beef cattle and calves, dairy cattle and calves, pigs, chickens (layers and meat birds), turkeys, sheep and dairy sheep, goats and dairy goats, and guardian dogs. They are in the process of revising their standards for ducks, geese and rabbits, and are drafting standards for bison. The following areas are covered for all species: choice of genetics, health management, herd or flock management, feeding, access to pasture or range areas, housing/shelter, space requirements, bedding, handling, transport, and slaughter.

Standards for indoor environmental conditions, such as temperature ranges and air quality measures, are somewhat subjective. For example, while other programs require that ammonia levels not exceed 25 parts per million in chicken houses, the AWA standards require that “shelters and housing must be well ventilated and allow fresh air and natural light to enter.” Thus, AWA relies on the judgment of its auditors to ensure that the air quality in a given house or barn is acceptable. AWA maintains that if the bedding in a chicken house is kept “in a dry, mold-free, friable condition” as the standards require, there should be never be a problem with air quality. The organization also asserts that its range and pasture-based model of production places AWA certified systems at a low risk for any air quality problems.

3. *What animal care areas are not covered by the standards?*

AWA requires that animals be slaughtered in AWA-approved slaughterhouses, which must meet the minimum acceptable standards according to the American Meat Institute’s “Recommended Animal Handling Guidelines,” with a further stipulation that the slaughterhouse not use electric “shock prods.” Due to a shortage of AWA-approved slaughterhouses in some areas, AWA guidelines allow some flexibility in the length of time allowed for transport, as long as other transport guidelines are met. Standards for the pre-slaughter handling and slaughter of rabbits are currently being developed.

4. *How were standards developed?*

The AWA standards are based on enhancements to the Five Freedoms articulated by Ruth Harrison and others. The program began in 1989 when the Animal Welfare Institute (AWI) developed the first USDA-approved label for pork products from farms where pigs were raised by independent family farmers on pasture or in deep-bedded pens, without the use of antibiotics or sulfa drugs. The pig standards were developed in consultation with Swedish ethologists Bo Algers, Per Jensen, and Ingvar Ekesto, and U.S. veterinarians Carlos Pijoan and Tim Blackwell (at the time, both of the University of Minnesota). AWI saw a demand for higher welfare standards for other species, and it began developing those, formally launching the Animal Welfare Approved program in 2006. A full list of AWA advisors is available on the program’s Web site.

5. *How are producers certified?*

All producers must be audited before making marketing use of the AWA name. If a producer wishes to market meat, then the slaughter plant they use must also be visited and approved prior to using the AWA logo on any products. Once the producer has passed their initial audit they sign an affidavit to show they will continue to abide by the Animal Welfare Approved criteria in exchange for the right to make marketing use of the AWA name. Audits are repeated annually.

Unique to their program, AWA requires that participating producers be family farms on which at least one individual or family member meet three criteria: 1) owns the animals, 2) depends upon the farm for their livelihood, and 3) participates in the daily physical labor necessary to managing the farm. Unlike typical certification programs, which approve products from a particular company, AWA’s approval applies to products coming from a specific farming operation. Unlike larger certifying organizations such as American Humane Association and Humane Farm Animal Care, AWA does not charge producers any fee to participate in its certification program.

6. *Who performs audits for certification?*

According to an AWA spokesperson, “auditors must meet basic minimum qualifications that demonstrate they have acquired the knowledge and skill needed for the task.” They hire auditors who have Bachelor’s degrees in a related field with two years of farm or audit experience. In exceptional cases, they may consider auditors with “at least six years on-farm experience in a high welfare system with the species being audited; and/or prior auditor training and experience in the species being audited.”

A third-party verifier also spot checks audits for consistency.

7. *Is 100 percent compliance with standards required?*

Yes. When the audit is complete, the farmer is given a summary of the areas where he or she does not meet the AWA standards. Compliance issues are divided into “non-compliances” and “critical non-compliances.” If a farmer is issued with a standard “non-compliance” – for example, a missing health plan or feed plan – they must complete a Corrective Action Plan (CAP), detailing the method of correction and the time frame for implementation. Certification would not be awarded or renewed for a farm until the noncompliance was corrected. In most cases, the CAP can be approved by mail, though auditors would again check for compliance during the next audit.

If a critical non-compliance is issued, AWA certification would not be awarded or would be terminated.

8. *How many producers are participating in program?*

In September 2008, AWA’s Administrative Manager responded to our inquiry by stating that almost 700 farms were participating in the program at that time. No estimate on the total number of animals within the program was available.

Global Animal Partnership 5-Step Animal Welfare Rating

1. *Are standards publicly available?*

Yes, once completed, the standards will be available on the Web site.

2. *What animal care areas are covered by the standards?*

Broiler chickens, pigs and beef cattle are covered under the current system. This system is unique in that it uses tiered ratings for animal welfare practices and conditions on farms using a scale from 1 through 5+. The ratings are as follows:

Step One: No crates, no cages and no crowding

Step Two: Indoor environments must include enrichments to promote natural behaviors

Step Three: Outdoor access required along with environmental enrichments to promote natural behaviors

Step Four: Pasture centered – continuous access to pasture or foraging areas

Step Five: Animal centered – all physical alterations prohibited

Step Five Plus: Animal centered – animals spend their entire life on the same farm

3. *What animal care areas are not covered by the standards?*

Ratings are still being developed for animals not currently covered, including dairy cattle, egg laying hens, sheep, and so on.

4. *How were standards developed?*

The standards were initially developed through a series of meetings comprised of animal rights and welfare advocates, farmers, animal scientists, and executives of Whole Foods Market.

5. *How are producers certified?*

Pivotal to the 5 step program is certification by Global Animal Partnership-approved, independent, third-party certifiers who verify compliance with the Global Animal Partnership 5-Step standards. These certifiers will award the Step levels based on an on-farm inspection of animal health, handling and management of the animals, feed and water availability, transportation time, and outdoor living conditions, as well as housing requirements.

6. *Who performs audits for certification?*

Audits are conducted by independent certification organizations approved by Global Animal Partnership, using inspectors experienced in auditing livestock health and management who are further trained by Global Animal Partnership to conduct on-farm animal welfare-based inspections.

7. *Is 100 percent compliance with standards required?*

To enter the program at Step 1, 100 percent compliance to benchmark animal welfare standards is required. Producers who meet all the welfare prerequisites of Step 1 may move up the steps and be recognized for meeting increasingly rigorous animal-based welfare requirements.

8. *How many producers are participating in program?*

As this program is being launched almost simultaneously with the release of this report, it is unknown at this time how many producers will be involved. However, since Whole Foods Market will ultimately require that all meat producers selling to them be rated by the Global Animal Partnership 5-Step Animal Welfare Program, other retailers may be encouraged to adopt the program, broadening its reach.

8. ASSESSMENT OF WELFARE STANDARDS PROGRAMS

Standards programs must be both meaningful and adhered to by a proportionally substantial segment of the industry to have a significant positive impact on animal welfare. Standards that are meaningful but applied to only a small number of animals, and, conversely, standards that are applied broadly but offer inadequate protection, are of limited value. Therefore, the various types of programs described in the previous sections will be analyzed below by considering both their meaningfulness and their level of adoption by the animal agriculture industry. The criteria used for assessing meaningfulness include the degree to which the standards or guidelines are 1) transparent, 2) developed with public input, 3) objective and measurable, 4) independently verified, 5) reliable and consistent, and 6) relevant to animal welfare. The level of industry adoption will be assessed by the number of producers participating in the program.

Product Labeling Claims

Criteria #1: Transparent

Animal-derived food product labeling and marketing claims are generally administered by the USDA-FSIS and USDA-AMS agencies. Definitions for livestock, poultry and egg product labeling claims are available on the USDA Web site. However, definitions for shell egg labeling claims are not posted. Individuals interested in the definition of egg labeling claims must contact the USDA directly. From a consumer perspective, current labeling claims are inadequate for making informed food choices. For example, by the label alone, shoppers are unable to discern that the terms “free range” and “cage free” may have significantly different implications for animal welfare.

Criteria #2: Public Input

The USDA-AMS has sought comment from the public in developing livestock marketing claims under its “Process Verified” and certified organic programs. Standards for claims approved by USDA-FSIS, such as “free range” and “raised without antibiotics have not been submitted for public comment, nor have standards for the “cage free” label approved by USDA-AMS.

Criteria #3: Objective and Measurable

Because so many labeling claims have no formal regulatory definition, standards are vague, and therefore difficult to measure. For example, the term “free range,” as it is applied to poultry, does not include guidance as to the frequency or duration of outdoor access, density or pasture requirements, or the percentage of a flock that must be allowed out at any given time. As a result, a significant portion – likely a majority – of poultry marketed under this claim in the U.S. are produced in a manner inconsistent with the public’s expectations.

Criteria #4: Independently Verified

Most product labeling and marketing claims are not verified through on-site inspection. Exceptions would include the label “cage-free” as it is used on USDA-AMS inspected eggs, as well as claims made by producers participating in the USDA-AMS Process Verified program and the National Organic Program. Most livestock, poultry and egg product labeling claims are approved by USDA-FSIS staff only on the basis of documentation supplied by producers.

Criteria #5: Reliable and Consistent

Since compliance with product labeling and marketing claims (except those noted in the previous section) is not audited, there is no way to assess whether the label definitions are being used in a consistent manner. In fact, it should be assumed that they are not.

Criteria #6: Relevant

With the exception of “humanely raised,” product labeling claims are specific to only one area of animal care and not designed to reflect general animal welfare. The relevance of the various commonly used labeling claims ranges from none to high. Due to inconsistency in their application, the claims “free range” and “free roaming,” particularly when used with poultry and laying hens, may be among the least relevant to animal welfare.

Criteria #7: Participation by Industry

The number of farmers utilizing animal-related food product labeling claims is not available; however, specialty products are known to be one of the fastest growing segments of the food industry. The percentage of farm animals in the U.S. currently affected by product labeling and marketing claims, other than organic, is unknown.

Animal Agriculture Industry Quality Assurance Programs

Criteria #1: Transparent

At present, industry guidelines are available to the public for the most commonly farmed species. The accessibility of the industry guidelines is probably due in large part to the influence of the discontinued FMI-NCCR Animal Welfare Audit Program (AWAP). The availability of information regarding development of the guidelines, as well as the identity of scientific advisors and auditors, varies by industry.

In its report on farm animal assurance schemes, the Farm Animal Welfare Council of the United Kingdom noted that a producer's refusal to make standards publicly available is "illogical, unacceptable and tantamount to their assuring a 'quality' that they are unwilling to openly define."

Criteria #2: Public Input

Public input has not been actively sought in the development of any industry quality assurance program.

Criteria #3: Objective and Measurable

The various industry quality assurance guidelines have been written with the goal of being objective and measurable, following the example set by the American Meat Institute guidelines for slaughter developed by Temple Grandin. The objectivity of the guidelines can also be credited to the work of FMI-NCCR's AWAP program, which was created by food retailers as a tool to audit their suppliers' compliance with quality assurance programs. Of the different industry guidelines, those of the American Sheep Industry Association and the American Veal Association are the least restrictive and the least specific; both were developed without the involvement of FMI-NCCR. Assessment of the AVA guidelines is based on a review of the guidelines as they were in 2005. The AVA did not provide any updated guidelines for this report, and none are publicly available.

Criteria #4: Independently Verified

Without verification there is no assurance of quality. Among animal agriculture trade associations, only the United Egg Producers UEP Certified program uses third-party auditors to assess compliance with its voluntary certification program. Other trade associations, such as the National Pork Board and the Milk and Dairy Beef Quality Assurance Center, offer voluntary on-farm assessments, but in many cases these inspections are conducted by individuals with personal, professional and/or financial ties to the industry, and likely in some cases to the individual facility being audited.

A new animal auditor certification group named PAACO has been formed by several professional organizations representing farm animal veterinarians and animal scientists from the Federation of Animal Science Societies, American Registry of Professional Animal Scientists, American Association of Bovine Practitioners, and American Association of Swine Veterinarians. PAACO's purpose is "to promote the humane treatment of animals through education and certification of animal auditors and to promote the profession of animal auditors." PAACO will certify farm animal welfare auditors. Members of the founding organizations will be eligible to sign-up for training and then take qualifying examinations. Individuals passing the exams may conduct welfare audits independently or for auditing firms.

Criteria #5: Reliable and Consistent

The reliability and consistency of audit results depend on a number of factors, including the qualifications and training of auditors, the number of audits performed, the existence of quality control measures, and tracking the performance of individual auditors. Some programs, such as those of the National Pork Board and the Milk and Dairy Beef Quality Assurance Center, employ the services of more than 100 auditors, each of whom only audit a few facilities each year. The use of a large number of part-time auditors is likely to reduce the consistency of the audit process. A majority of industry quality assurance programs allow producers to select their auditor, another potential source of bias and unreliable results.

Criteria #6: Relevant

Animal agriculture quality assurance guidelines have been developed not as a means of providing for animal welfare, but as a way to avoid third-party independent audits and to head-off attempts by federal and state agencies to regulate farm animal treatment and handling. To date, industry guidelines have had minimal impact

on the lives of farm animals in the U.S.; in fact, it could be argued that the guidelines have only served to sanction inhumane animal agriculture practices in this country.

It may seem surprising that guidelines developed with the input and guidance of a variety of academic professionals would so poorly reflect animal welfare. However, in many cases, the academic professionals involved in developing industry animal care guidelines have been experts in meat production science, not animal welfare science. The public is generally unaware of the role agriculture departments at state land-grant colleges and universities have played, and continue to play, in promoting industrial agribusiness. These institutions were instrumental in developing the technology and husbandry practices that have driven the consolidation of U.S. agriculture and the transition from family farm to factory farm. Scientists at these colleges routinely receive grants from corporations and the USDA for their support of agribusiness, and agriculture trade associations have used some of these scientists to lend credence to their animal care guidelines.

Use of the term “animal welfare” in conjunction with current industry guidelines is inappropriate. To date, industry guidelines have prohibited only one inhumane practice – feed withdrawal to induce molting in hens – and in many cases the guidelines fail to provide what an average American would consider humane animal care. Industry guidelines include a number of major violations of the Five Freedoms for farm animals, described in Section 3. The most significant of these violations, as related to the care of dairy cattle, pigs, chickens, and laying hens, are listed below.

1. Freedom from hunger and thirst – by ready access to fresh water and a diet to maintain full health and vigor; violations include:

Pigs

- Feed restriction of breeding sows and boars allowed without dietary supplementation
- No limit on feed withdrawal before slaughter

Meat Chickens

- Feed/water restriction of breeders allowed

Laying Hens

- Feed may be withdrawn up to 24 hours before slaughter

2. Freedom from discomfort – by providing an appropriate environment including shelter and a comfortable resting area; violations include:

Pigs

- Bedding not required
- Perforated and slatted flooring allowed

Meat Chickens

- Feces-soaked litter allowed

Laying Hens

- Wire and slatted flooring allowed

3. Freedom from pain, injury and disease – by prevention or rapid diagnosis and treatment; violations include:

Beef Cattle

- Hot iron and freeze branding allowed
- Ear notching allowed

- Anesthetic not required for castration

Dairy Cattle

- Tail docking allowed
- Dehorning/disbudding allowed
- Use of higher-yielding strains not discouraged
- Use of growth hormones allowed

Pigs

- Tail docking allowed
- Ear notching allowed
- Anesthetic not required for castration

Sheep

- Tail docking allowed
- Anesthetic not required for castration

Chickens

- Beak trimming of breeders allowed
- Toe clipping of breeding cockerels allowed
- Comb dubbing of breeding cockerels allowed
- Use of faster-growing strains not discouraged

Laying Hens

- Beak trimming allowed

4. Freedom to express normal behavior – by providing sufficient space, proper facilities and company of the animal’s own kind; violations include:

Dairy Cattle

- Confinement to tie-stalls allowed
- Immediate separation of calves from cows allowed
- Confinement of calves to crates and tethering allowed
- Minimum space allowances for calves not specified

Pigs

- Confinement of sows to gestation crates allowed
- Confinement of sows to farrowing crates allowed
- Minimum space allowances for confined sows and boars not specified
- Inadequate space allowances for growing pigs
- Access to the outdoors not required
- Rooting materials not required
- Continuous low-level lighting allowed

Meat Chickens

- Access to the outdoors not required
- Inadequate space allowance
- Near-continuous lighting allowed

Laying Hens

- Confinement to small cages allowed
- Access to the outdoors not required

- Litter, dust bathing areas and nest boxes not required
- Continuous low-level lighting allowed

5. Freedom from fear and distress – by ensuring conditions and treatment which avoid mental suffering; violations include:

Beef Cattle

- Use of electric shock prods allowed

Dairy Cattle

- Early weaning of calves allowed
- Use of electric shock prods allowed
- Slaughter without prior stunning allowed (ritual/religious slaughter)

Pigs

- Use of electric shock prods allowed
- Early weaning allowed
- Slaughter without prior stunning allowed (ritual/religious slaughter)

Meat Chickens

- Inverting and shackling for slaughter while conscious allowed

Laying Hens

- Slaughter of spent hens not addressed
- Killing of male chicks not addressed

Industry guidelines have not yet been developed for several species, including goats, geese, rabbits, bison, deer, and farmed fish. The slaughter of egg-laying hens and killing of male layer-breed chicks are also not addressed.

Criteria #7: Participation by Industry

Participation in various industry animal care quality assurance programs is difficult to assess because data is often not available to the public. When data is available, it is not comprehensive. For example, the United Egg Producers claim that more than 90 percent of the eggs sold in the U.S. are marketed under the UEP Certified label. However, because the vast majority of eggs are produced by a handful of extremely large producers, there is no way to know how many producers participate.

The American Veal Association, which did not provide information for this revised report, claimed in 2001 that 80 percent of veal producers in the U.S. participated in its program. But without knowing the percentage of veal calves accounted for by that 80 percent, it is difficult to judge the scope of that program.

The American Meat Institute reports that more than 90 percent of livestock slaughter plants conduct self-audits using its guidelines, but of course, a self-audit is of little use to outside observers.

Finally, The Pork Board's PQA Plus program admits that only about 4 percent of all U.S. hog operations have been assessed through its program. Other industry guidelines, such as those for beef cattle, turkeys, broiler chickens, and sheep are not audited at all.

9. FINDINGS

Setting standards for the care and handling of farm animals is a relatively new concept in the U.S. Logistical and economic constraints ensure that major improvements will not happen overnight. Trade associations representing animal agriculture industries have developed quality assurance guidelines for their members. Humane organizations have launched third-party certification programs based on animal welfare standards. In addition, the government is attempting to clarify some aspects of the care of animals raised under the National Organic marketing program.

Although the setting of welfare standards for farm animals is still in its infancy in the U.S., the area is evolving rapidly. For example, between July 2004 and March 2009 the following major developments occurred:

1. The National Chicken Council, the Milk and Dairy Beef Quality Assurance Center, and the American Meat Institute revised their industry guidelines for the care of chickens, the care of dairy cattle, and the handling of animals at slaughter, respectively.
2. The animal care and handling guidelines of the National Cattlemen's Beef Association were finalized and endorsed by FMI-NCCR.
3. The UEP's "Animal Care Certified" program was re-named "UEP Certified" after a complaint was filed with the FTC. UEP announced it would prohibit feed withdrawal for forced molting of hens, effective January 2006. (This is the only instance of an accepted industry practice being banned through an industry driven standards-setting process.)
4. Complaints were filed with the USDA regarding the compliance of individual dairies with the access to pasture for ruminants requirement of the National Organic Program. The National Organic Standards Board produced a draft guidance document and recommended rulemaking to clarify the pasture requirement. The USDA is preparing to issue a revised rule that could close a loophole that has allowed some producers to keep "organic" dairy cows in factory farm conditions.
5. The Certified Humane program revised its standards for sheep to include dairy animals. It also added transportation standards for pigs, goats, turkeys, and broiler chickens, as well as transportation and slaughter standards for all cattle, pigs, goats, and sheep. Since 2005, the number of companies enrolled in the program has increased from 31 to 60.
6. The American Humane Certified program developed proprietary Internet software to allow producers to upload weekly and monthly observations on core welfare elements. The program also implemented 24/7 video surveillance of all live areas for its veal producers — including transportation and processing facilities — as well as in some poultry houses.
7. The Animal Welfare Institute incorporated its previously recommended standards into a third-party audited certification program.
8. The Global Animal Partnership began developing its 5-Step Animal Welfare Rating program. It has developed standards for meat chickens, cattle and pigs, and will be addressing other species in the future. This program intends to push welfare standards higher as producers compete to earn better ratings.

Despite this activity, it is likely that only a small proportion of the billions of animals raised for food in the U.S. have been affected to a significant degree by the establishment of welfare standards. Thus far, very few (well

under 10 percent) of all U.S. farm animal production and slaughter operations have undergone any kind of outside animal care audit. The reasons for this are presented in this section.

Product Labeling Claims

Findings:

- USDA utilizes informal working definitions for animal care labeling claims such as “free range” and “grass fed.” These terms currently have no regulatory definition. Moreover, the meaning of shell-egg labeling terms is not readily available to consumers. It is likely that consumers grossly over-estimate the animal welfare significance of these claims.
- USDA does not conduct on-site audits or product testing to verify producer compliance with most animal-derived food labeling claims. USDA-FSIS approves claims used for meat and poultry products based on producer-supplied testimonials and documentation only. The agency neither approves nor verifies label claims for shell eggs. USDA-AMS verifies “cage free” and “certified organic” — which permits the use of “free range” by default. However, participation in these programs is voluntary; producers who forego USDA inspection may not have their labeling claims verified by anyone.
- Although labeling claims generally apply to only limited areas of animal care (such as housing or the administration of antibiotics and hormones), they are still relevant to the well-being of farm animals. The degree of relevance varies with the particular marketing claim.
- “Humanely raised” is not a term that originates with the USDA, which approves use of this claim when the meaning is included on the label or when the claim is backed by a third-party certification program. The terms “humane,” “animal care,” “animal welfare,” and “animal well-being” are often applied to products from animals who were treated badly.
- Product labeling claims relevant to animal welfare affect a small (less than 2 percent) but growing number of the animals raised for food in the U.S.

Animal Agriculture Quality Assurance Programs

Findings:

- Potential for bias exists in the development and implementation of animal care guidelines due to ties between advisors/auditors and the industry being assessed.
- Current industry guidelines are inadequate; they allow numerous inhumane practices and fail to provide animals with freedom from hunger, discomfort, pain, fear and distress, and do not allow the expression of normal behavior.
- A review of industry guidelines for dairy cattle, pigs, meat chickens, and laying hens found a total of more than 50 major violations of animal welfare principles. To date, only one inhumane practice has been eliminated through creation of industry guidelines (forced molting of egg laying hens).
- Industry animal care guidelines have not been developed for several farm animal species, including goats, geese, rabbits, deer, bison, and farm-raised fish.
- Individual producer guidelines are frequently not made available to the public and, as a result, must be viewed as lacking credibility.

- It seems that one of the primary purposes of industry animal care guidelines is to avoid third-party auditing and government regulation. It is unlikely that animal agriculture trade associations will strengthen their guidelines without pressure from consumers or the retail food industry.
- Because most industry group programs rely on self-assessment, the level of producer participation with quality assurance programs is difficult to determine. In some cases, the industry group that administers the program may know approximately how many producers are participating, but will not divulge that information to the public, as is the case with UEP. Even when producer involvement is high, the percentage of individual animals actually observed during audits is extremely small. Furthermore, compliance with the guidelines is often merely “assessed,” providing few consequences, if any, for non-compliance.

Retail Food Industry Auditing Programs

Findings:

- By raising awareness and demand for animal welfare guidelines among their members, FMI and NCCR influenced the development of objective and measurable animal care criteria by animal agriculture trade associations. In some cases, these two organizations succeeded in negotiating stronger guidelines than those proposed by industry. Unfortunately, the program was discontinued due to lack of cooperation from producers, and the FMI-NCCR advisory council is now limited to endorsing guidelines developed by producers, occasionally issuing recommendations for future improvements that may or may not be needed.
- Responding to pressure from consumers, some larger retailers such as McDonald’s and Burger King have forced their suppliers to implement greater animal welfare measures, such as the use of AMI auditing at slaughter plants. Unfortunately, many companies – including these two – suffer from a lack of transparency that does not allow the full scope of their impact to be examined. It is likely that the scope is limited and that supplier standards in most cases are fairly minimal.

Third-party Certification Programs – Organic

Findings:

- Organic regulations are general (not species-specific) and vague in regard to animal care and handling requirements. The regulations do not set minimum space allowances per animal, and they allow physical alterations such as debeaking of chickens and tail docking of cattle and pigs.
- Certifying agents do not enforce organic regulations consistently, and this problem has been exacerbated by loopholes that have been exploited by factory farm producers, particularly with regard to providing animals access to the outdoors or to pasture. For example, “organic” dairy cows on large farms have been denied access to pasture and kept in factory farm type conditions. As of this writing, USDA-AMS is preparing to issue a revised rule that seeks to remedy this problem, but it remains to be seen how well this revision will work.
- Some organic cooperatives and producer groups have established animal care standards that go beyond those of the NOP. Co-ops provide an alternative to corporate agriculture, potentially allowing independent farms to raise animals with a higher level of welfare.
- Organic certification, administered by the USDA, affects a small (less than 1 percent) but rapidly growing number of the animals raised for food in the U.S.

Third-party Certification Programs – Humane

Findings:

- Food certification programs sponsored by and/or involving animal advocacy organizations are more transparent, objective and reliable. These programs appear less vulnerable to the influence of bias; however, conflicts of interest remain a concern.
- Certification programs with involvement of humane groups are superior to industry quality assurance guidelines. However, many current “humane” standards are inadequate to ensure that the Five Freedoms are fully met.
- These programs affect a small percentage of farm animals today, though it seems likely that the percentage will increase as consumer support for greater welfare standards grows. Until that time comes, the success of “humane” certification programs can be measured by their ability to pressure industry to adopt stronger animal care guidelines. Thus far, agribusiness has favored promoting its own industry quality assurance programs.

10. APPENDICES

Appendix A: Contact Information

Agricultural Marketing Service (National Organic Program)

Barbara Robinson, Acting Director
Deputy Administrator
USDA-AMS-TMP
Room 4008-South Building
1400 Independence Avenue, SW
Washington, DC 20250-0020
Ph: 202-720-3252
Fax: 202-205-7808
E-mail: NOPAQSS@usda.gov
Website: www.ams.usda.gov/nop

Agricultural Marketing Service (livestock and meat marketing claims)

USDA, AMS, LSP
Livestock & Meat Standardization Branch
1400 Independence Avenue, SW, STOP 0249
Washington, DC 20250-0249
Ph: 202-720-4486
E-mail: Martin.Oconnor@usda.gov
Website: www.ams.usda.gov/lsg

Agricultural Marketing Service (poultry and egg marketing claims)

USDA, AMS, Poultry Program
Standardization Branch
1400 Independence Avenue, SW, STOP 0256
Washington, DC 20250-0256
Ph: 202-720-3506
E-mail: David.Bowden@usda.gov
Website: www.ams.usda.gov/poultry

Agricultural Marketing Service (Process Verified Program)

USDA, AMS, LSP
Audit, Review, and Compliance Branch
1400 Independence Avenue, SW, STOP 0248
Washington, DC 20250-0248
Ph: 202-720-1124
Fax: 202-690-3428
E-mail: James.Riva@usda.gov
Website: processverified.usda.gov

American Humane Certified

63 Inverness Drive East
Englewood, CO 80112-5117
Ph: 303-792-9900
E-mail: info@thehumanetouch.org
Website: www.thehumanetouch.org

American Meat Institute (AMI)

1150 Connecticut Avenue, NW 12th Floor
Washington, DC 20036
Ph: 202-587-4200
Fax: 202-587-4300
E-mail: send from Web site
Website: www.meatami.com

American Sheep Industry Association

9785 Maroon Circle, Suite 360
Centennial, CO 80112
Ph: 303-771-3500
Fax: 303-771-8200
E-mail: info@sheepusa.org
Website: www.sheepusa.org

American Veal Association (AVA)

PO Box 148
Meshoppen, PA 18630
Ph: 717-823-6995
E-mail: info@vealfarm.com
Website: www.vealfarm.com

Animal Agriculture Alliance (AAA)

PO Box 9522
Arlington, VA 22209
Ph: 703-562-5160
E-mail: info@animalalliance.org
Website: www.animalalliance.org

Animal Welfare Approved (AWA)

PO Box 3650
Washington, DC 20027
Ph: 703-836-4300
Fax: 703-836-0400
E-mail: info@animalwelfareapproved.org
Website: www.animalwelfareapproved.org

Validus Services (Animal Welfare Audits)

PO Box 14586
Des Moines, IA 50306
Ph: 515-278-8002
Fax: 515-278-8011
Website: www.validuservices.com

Farm Animal Care Training and Auditing (FACTA)

FACTA, LLC
6502-Slide Rd. Suite 200
Lubbock, TX 79424
Ph: 806-392-1891
E-mail: jmcglone@factallc.com
Website: www.factallc.com

Food Marketing Institute

2345 Crystal Drive, Ste 80
Arlington, VA 22202
Ph: 202-452-8444
Fax: 202-429-4519
E-mail: Not available. Comments and questions may be submitted through a form on the Web site.
Website: www.fmi.org

Food Safety and Inspection Service (meat, poultry and egg product labeling claims)

USDA, FSIS, OPPD
Labeling and Consumer Protection Staff
1400 Independence Avenue, SW
Room 602 – Annex Building
Washington, DC 20250-3700
Ph: 202-205-0279
Fax: 202-205-3625
E-mail: FSIS.Labeling@fsis.usda.gov
Website: www.fsis.usda.gov

Humane Farm Animal Care (Certified Humane Program)

PO Box 727
Herndon, VA 20172
Ph: 703-435-3883
Fax: 703-435-3981
E-mail: info@certifiedhumane.org
Website: www.certifiedhumane.org

Milk & Dairy Beef Quality Assurance Center (Dairy Quality Assurance Program)

801 Shakespeare Avenue
PO Box 497
Stratford, IA 50249
Ph: 800-553-2479
Fax: 515-838-2788
E-mail: info@dqacenter.org
Website: www.dqacenter.org

National Cattlemen's Beef Association (NCBA)

9110 E. Nichols Avenue
Suite 300
Centennial, CO 80112
Ph: 303-694-0305
Website: www.beef.org

National Chicken Council (NCC)

1015 15th Street, NW
Suite 930
Washington, DC 20005
Ph: 202-296-2622
Fax: 202-293-4005
E-mail: ncc@chickenusa.org
Website: www.nationalchickencouncil.com

National Council of Chain Restaurants

325 7th Street, NW
Suite 1100
Washington, DC 20004
Ph: 202-626-8183
Fax: 202-626-8185
E-mail: purviss@nrf.com
Website: www.nccr.net

National Pork Board (Swine Welfare Assurance Program)

PO Box 9114
Des Moines, IA 50306
Ph: 515-223-2600
E-mail: info@pork.org
Website: www.pork.org

National Turkey Federation (NTF)

1225 New York Avenue, NW
 Suite 400
 Washington, DC 20005
 Ph: 202-898-0100
 Fax: 202-898-0203
 E-mail: info@turkeyfed.org
 Website: www.turkeyfed.org

United Egg Producers (UEP Certified Program)

1720 Windward Concourse
 Suite 230
 Alpharetta, GA 30005
 Phone: 770-360-9220
 Fax: 770-360-7058
 E-mail: None publicly available. Public may submit comments through online form.
 Website: www.uepcertified.com

Appendix B: Acronyms

AAA	Animal Agriculture Alliance
ACC	Animal Care Certified (UEP)
AHA	American Humane Association
AHC	American Humane Certified (AHA)
AMI	American Meat Institute
AMS	Agricultural Marketing Service (USDA)
ARPAS	American Registry of Professional Animal Scientists
ARS	Agriculture Research Service (USDA)
ASIA	American Sheep Industry Association
ASPCA	American Society for the Prevention of Cruelty to Animals
AVA	American Veal Association
AVMA	American Veterinary Medical Association
AWA	Animal Welfare Approved (AWI)
AWAP	Animal Welfare Audit Program (FMI-NCCR)
AWARE	Animal Welfare Assurance Review & Evaluation Program (EMS)
AWI	Animal Welfare Institute
DQA	Milk & Dairy Beef Quality Assurance Center
EMS	Environmental Management Solutions
FACTA	Farm Animal Care Training and Auditing
FMI	Food Marketing Institute
FSIS	Food Safety and Inspection Service (USDA)
FTC	Federal Trade Commission
HFAC	Humane Farm Animal Care
HSUS	Humane Society of the United States
LCPS	Labeling and Consumer Protection Staff (USDA-AMS)
NCBA	National Cattlemen's Beef Association
NCC	National Chicken Council
NCCR	National Council of Chain Restaurants
NOP	National Organic Program (USDA-AMS)
NOSB	National Organic Standards Board
NPB	National Pork Board

PAACO	Professional Animal Auditor Certification Organization
NTF	National Turkey Federation
RSPCA	Royal Society for the Prevention of Cruelty to Animals
SWAP	Swine Welfare Assurance Program (NPB)
UEP	United Egg Producers
USDA	United States Department of Agriculture

Appendix C: Glossary of Terms

Bleed Rail Sensibility: The ability of animals to perceive pain or other sensations after having been stunned, shackled and hoisted onto the conveyor line, or “rail,” where animals are slaughtered by bleeding.

Boar: An uncastrated mature, male pig used for breeding.

Boar Bashing: Wounding the snout of boars to discourage fighting.

Bob Veal: Calves less than 3 weeks of age and 150 pounds.

Body Condition Score: One method of assessing the fitness of farm animals. On a 5-point scale, where 1 is very thin and 5 is obese, healthy animals usually receive a score of 3. On a 9-point scale, healthy animals score 4 to 6.

Bovine Somatotropin (rbST): Unless labeled otherwise, milk and dairy products produced in the U.S. may come from cows routinely injected with a genetically engineered hormone called recombinant bovine somatotropin (or rbST), also known as bovine growth hormone (BGH). rbST is a synthetic hormone, produced by gene-splicing techniques, that is injected into dairy cows to artificially manipulate lactation.

Brooding: The handling and rearing of chicks after hatching. “Brooders” are heaters for chicks that are manufactured in a variety of sizes and styles. They are available in stationary or portable styles, and may be electric, oil, hot water, or hot air heated.

Cannibalism: The propensity of intensively raised farm animals to attack, bite or otherwise injure other animals due to stress caused by crowded housing conditions and the lack of opportunity to perform normal behaviors.

Caponizing: Surgical castration of roosters.

Captive Bolt Stunning: A method of rendering animals, usually cattle and horses, insensible to pain by a concussive blow to the head. A penetrating captive bolt stunner includes a retractable bolt that enters the skull and damages the brain. The non-penetrating version of the stunner concusses the brain only, which results in potentially reversible unconsciousness.

Cardiac Arrest Stunning: A method of rendering animals, usually pigs, insensible to pain by applying an electrical current to both the brain and the heart. Since animals are killed by this method, they cannot revive during hoisting, bleeding or slaughtering procedures. (See also “Head Only Stunning.”)

Castration: Removal of the testes, accomplished by three primary methods: 1) knife; 2) the Burdizzo, or “emasculator,” which is a pincer or pliers-like device that crushes or severs the spermatic cord and blood vessels supplying the testicles; and 3) the “elastrator,” which stretches a rubber ring over the testes, shutting off blood supply and creating necrosis, which eventually results in the sloughing off of the testicles.

Cervical Dislocation: A method of killing poultry by crushing or stretching the neck. If properly performed, death results from cerebral ischemia (stretching) or asphyxia (crushing). Not the same as decapitation. Commonly referred to as “neck wringing.”

Cockerel: A young male chicken.

Colostrum: The special milk produced by cows during the first three days after calving. Contains high levels of vitamins, minerals and antibodies important to protecting calves against infection and disease.

Comb Dubbing: The removal of the comb of future male breeding chickens, performed by running a pair of scissors from the front to the back of the comb close to the head of day-old chicks. Combs function to help handle excess heat and are very vascular, making hemorrhaging a possible consequence of dubbing.

Debeaking: Removal of a portion of a bird’s beak to prevent feather picking and other forms of cannibalism among intensively-raised poultry. Usually performed by cutting off the end of a young chick’s beak with a hot blade. Also referred to as “beak trimming” or “partial beak amputation.”

Dehorning/Debudding: Generally, debudding refers to destruction of the horn bud in cattle less than three months old, while dehorning refers to amputation of the horn in older cattle. A variety of methods are used. Most often performed by applying a hot iron to burn, or cauterize, the horn bud or “button” in young calves. Calves may also have a strong chemical paste placed around the horn bud to destroy the bud. The horn is also sometimes cut out with a spoon or a scoop. Another method consists of sawing off horns of older animals.

Downer: An animal unable to walk under its own power due to disease, chronic disability or acute injury. Also referred to as a “downed animal.”

Dry Cow: Cows not being milked. Milking is usually stopped 50 to 60 days before the expected calving date to allow the mammary system to recover from the stress of lactation before starting another milking cycle.

Dust Bathing: A normal behavior performed by chickens to clean themselves, distribute oil through feathers, remove dead skin and skin irritants, and to maintain and improve feather structure. Chickens form a dust bowl, roll on their sides, and stretch out their legs and feathers. Attempted by chickens in virtually all situations, even those confined to cages with no “dust” (sand or litter).

Ear Notching: An invasive and painful means of animal identification. Other methods of identification include branding, tattooing, the use of colored and numbered ear tags and neck chains, and implanting of microchips under the skin.

Farrowing Crate: Confinement housing (also referred to as “stalls”) for lactating sows. The crates, which are similar in size to gestation crates, are designed to allow piglets to suckle while restricting movement of the sow. Sows are moved into the crates at the end of the pregnancy and are kept there for the initial two to three weeks after the piglets are born. (See also “Gestation Crate.”)

Feather Picking: A pecking disorder in which intensively-raised chickens pull the feathers of other birds. Caused by stress due to crowded housing and the inability to perform natural behaviors. (See also “Cannibalism.”)

Finisher Pig: Pigs are classified according to the purpose and age for which the animals are fed. “Finishing” refers to the process of putting weight on pigs for slaughter. Finisher pigs are sent to slaughter at 120 to 240 lbs. Also referred to as “grower-finisher pigs.”

Forage, Foraging: Normal behavior of animals when they move around in a manner that allows them to encounter and acquire food for themselves or their offspring.

Forced Molting: Artificially stimulating a new egg-laying cycle by subjecting hens to stressful conditions. These stressful conditions include withholding food and water, and limiting artificial or natural light. Conventional forced-molting protocol calls for removing food for up to 12 days and restricting water for up to three days.

Free Stall: A method of housing dairy cattle in which animals are allowed to move freely in and out of stalls and usually also out-of-doors into concrete or earth yards where they receive food and water.

Gestation Crate: A method of confining pregnant sows. The crates (stalls) are approximately two feet wide and seven feet long, and prevent the sows from turning around and moving about freely. Sows are kept in the crates while they are pregnant, which represents the vast majority of their lives. (See also “Farrowing Crate.”)

Gilt: A young female pig who has not yet been bred.

Head Only Stunning: A method of rendering animals, usually pigs, insensible to pain by applying an electrical current to the head. Head only stunning does not result in death, and animals may regain sensibility if too long an interval passes before bleeding. (See also “Cardiac Arrest Stunning.”)

Heifer: A young female cow who has not yet given birth to a calf.

Kestin Score: An objective method of assessing the walking ability of poultry. It consists of a 6-point scale where 0 = a normal gait, 1 = a slight defect in gait, 2 = a definite and identifiable defect in gait, 3 = an obvious defect affecting gait, 4 = a serious gait defect causing difficulty in walking, and 5 = a gait defect so severe that walking is not possible.

Lunge Space: The area of a stall required for a dairy cow to comfortably thrust her head forward in the process of rising from a lying position.

Mastitis: Inflammation of the udder, often caused by infection and bacteria spread through poor sanitation or injury. Causes the udder to become hot and very hard, and to produce lumpy milk sometimes streaked with blood.

Needle Teeth Clipping: Incisor (or “needle”) teeth of newborn pigs may be cut to prevent injury to sow udders and other piglets during nursing.

Neonatal Piglet: Unweaned newborn pigs, usually less than two weeks of age. Housed with their littermates and sow in individual farrowing crates. Moved at approximately two weeks to a “nursery.” (See also “Farrowing Crate” and “Nursery Piglet.”)

Nursery Piglet: Early-weaned pigs, relocated from farrowing crates to a nursery where they are kept until approximately six weeks of age. At this time the animals are moved in groups of 15 to 20 into “grower-finisher pens.” (See also “Farrowing Crate” and “Finishing Pig.”)

Parasiticide: A pharmaceutical agent used to destroy parasites in farm animals.

Pipped Egg: Egg with a shell that has been broken open by the chick in the process of hatching.

Polled Cattle: Cattle possessing a gene that causes them to not grow horns.

Poult: A young turkey.

Pullet: A young hen less than 20 weeks of age.

“Red Bird” Carcass: A chicken carcass that is bright red instead of the normal bleached skin color. Research has shown that red birds (also known as “red skins”) are the result of a physiological response to heat, and are produced when birds are placed directly in the scald tank without proper bleeding.

Ritual Slaughter: Bleeding animals, according to religious or cultural custom, without first rendering them insensible to pain by stunning.

Rumination: The act of processing food by chewing again what has been swallowed. This is characteristic of hoofed animals possessing a complex three- or four-chambered stomach.

Shackling: Fastening a metal chain, clamp or grip around one or both legs to facilitate hoisting animals upside-down for slaughter.

Sow: An adult female pig used for breeding.

Special-Fed Veal: Calves fed a milk-based liquid diet throughout their lifespan of 16 to 20 weeks (until a weight of 350 to 400 or more pounds is reached). Also referred to as “formula-fed” or “milk-fed” veal.

Stanchion: A manual or self-locking device that restrains a cow for management practices (e.g., artificial insemination, administration of drugs, or veterinary exams) or for feeding purposes.

Supernumerary Teats: Nipples seen as excessive or more numerous than required.

Switch Trimming: Trimming the tuft of long hairs at the end of a cow’s tail.

Tail Docking: Removal of the tail of pigs, sheep or cattle. Often accomplished by an “elastator,” a device that stretches a rubber ring over the tail, shutting off blood supply and creating necrosis that eventually leads to the sloughing off of the tail, or by cutting off the tail with a clipper.

Tethering: Restraining animals by tying them to a crate by a chain attached to the neck or abdomen.

Tie Stall: A method of housing dairy cattle in which the animals are tied in one place for long periods of time, unable to exercise and engage in normal behavior such as grooming.

Water Bath Stunning: A method of immobilizing poultry before slaughter by shackling and hoisting them upside down by their legs and then running their heads and upper bodies through an electrified water trough. The current in the water bath is often not sufficiently high or uniformly distributed throughout the trough to properly render the birds insensible to pain.

Appendix D: Comparison of Animal Welfare Standards by Program – BEEF CATTLE

Animal Welfare Standard	Industry Guidelines (NCBA)	National Organic Program (USDA)	Certified Humane Program (HFAC)	American Humane Certified (AHA)	Animal Welfare Approved (AWA)	Global Animal Partnership Step 5 Plus
Antibiotics	Not prohibited	Prohibited	Permitted for treatment of disease only	Permitted for treatment of disease only	Permitted for treatment of disease only	Prohibited (all steps)
Growth Hormones	Not prohibited	Prohibited	Prohibited	Prohibited	Prohibited	Prohibited (all steps)
Access to Pasture	Not required; confinement to feedlots allowed	Required; temporary confinement allowed in some situations; feedlots prohibited	Not required; cattle may be maintained in feedlots	Not required; cattle may be maintained in feedlots	Access to pasture required throughout lifetime when climate permits	Cattle must live continuously on range or pasture
Identification	Hot branding and ear notching allowed; jaw brands are not to be used	Not addressed	Hot iron branding & ear cutting prohibited; ear tagging permitted	Hot iron branding & ear cutting prohibited; ear tagging permitted	Hot iron branding & ear cutting prohibited; ear tagging permitted	Branding, wattling & ear notching are prohibited; ear tagging permitted
Castration	Recommended be done before 4 months of age; no recommendation regarding anesthesia	Physical alterations must be performed as needed to promote animal welfare & in a manner that minimizes pain & stress	Recommend be done at earliest age possible; anesthesia required for surgical removal after 2 months of age	Recommend be done at earliest age possible; anesthesia required for surgical removal after 2 months of age	Recommend be done before 2 months of age; use of anesthesia required	Prohibited
Debudding/ Dehorning	Recommended be done before 4 months of age; no recommendation regarding anesthesia	Physical alterations must be performed as needed to promote animal welfare & in a manner that minimizes pain & stress	Debudding in first 4 months using hot iron; anesthesia not required	Debudding in first 4 months using hot iron; anesthesia not required	Dehorning prohibited. Debudding only permitted on calves 2 months of age or younger	Dehorning prohibited (all steps); Debudding prohibited
Spaying of Heifers	Not prohibited	Not addressed	Prohibited	Prohibited	Prohibited	Prohibited (all steps)
Minimum Weaning Age	No limit; usually 7-8 months of age	Not addressed	Not addressed	Not addressed	6-9 months of age	Natural weaning is required
Electric Prod Use	Permitted, but voltage must be less than 50 volts	Not addressed	Permitted in emergencies only	Permitted in emergencies only	Prohibited	Permitted in emergencies only

Appendix E: Comparison of Animal Welfare Standards by Program – DAIRY CATTLE

Animal Welfare Standard	Industry Guidelines (DQA)	National Organic Program (USDA)	Certified Humane Program (HFAC)	American Humane Certified (AHA)	Animal Welfare Approved (AWA)
Antibiotics	Not prohibited	Prohibited	Permitted for treatment of disease only	Permitted for treatment of disease only	Permitted for treatment of disease only
Growth Hormones	Not prohibited	Prohibited	Prohibited	Prohibited	Prohibited
Ammonia Levels	Recommended be kept below allowable levels	Shelter designed for ventilation & air circulation	Not to exceed 25 parts per million (ppm)	Not to exceed 25 ppm	Shelters must be well ventilated
Housing	Tie-stall housing permitted but animals should be turned out daily for exercise; no minimum duration specified	Opportunity to exercise and access to outdoors must be provided; temporary confinement allowed	Confinement for more than 4 hours prohibited; animals must be turned out for 4 hours of exercise daily	Confinement for more than 4 hours prohibited; animals must be turned out for 4 hours of exercise daily	Continuous outdoor access required
Bedding	Dry, clean bedding recommended; no depth specified	Dry, clean bedding required; no depth specified	Adequate, clean bedding required 3 inches in depth	Adequate, clean bedding required 3 inches in depth	“Sufficient” quantities of clean, dry bedding required.
Calf Hutches/ Tethering	No limit on confinement of calves; tethering not prohibited	Not addressed, but exercise and freedom of movement required	Hutches permitted but calves must be able to stand, turn around, lie down, rest, and groom; tethering prohibited	Hutches permitted but calves must be able to stand, turn around, lie down, rest, and groom; tethering prohibited	Continuous outdoor access required. Isolation from other animals prohibited, except for brief periods.
Colostrum for Calves	4 quarts from 1 cow within 30-60 minutes of birth recommended	Not addressed	2-4 quarts within first 8 hours; 1.6 gallons over next 48 hours	Must receive within 6-8 hours of birth. When nursing is not possible, 2-4 quarts within first 8 hrs	Must be provided within 6 hours of birth
Min. Weaning Age	No limit	Not addressed	5 weeks	5 weeks	6 weeks
Dietary Fiber for Calves	Some dry grain before 4 weeks recommended	Not addressed	Required for calves over 30 days of age	Required for calves over 14 days of age	High quality forage required from 7 days onward
Tail Docking	Switch trimming (i.e., periodic tail hair trimming) preferred; docking allowed after pregnancy confirmed	Physical alterations must be performed as needed to ensure animal welfare	Prohibited; switch trimming permitted	Prohibited; switch trimming permitted	Prohibited
Dehorning/ Debudding	Hot iron cautery method recommended; anesthesia recommended for older calves	Physical alterations must be performed as needed to ensure animal welfare & in a manner that minimizes pain	Cautery method approved; paste & scoop methods prohibited; anesthesia required for older calves	Cautery method approved; scoop method may be used if necessary; anesthesia required for older calves	Cautery method approved for calves 2 months & younger with local anesthetic; prohibited after 2 months of age; paste approved calves younger than 7 days

Appendix F: Comparison of Animal Welfare Standards by Program – SHEEP

Animal Welfare Standard	Industry Guidelines (ASIA)	National Organic Program (USDA)	Certified Humane Program (HFAC)	American Humane Certified (AHA)	Animal Welfare Approved (AWA)
Antibiotics	Not prohibited	Prohibited	Permitted for treatment of disease only	Permitted for treatment of disease only	Permitted for treatment of disease only
Growth Hormones	Not prohibited	Prohibited	Prohibited	Not addressed	Prohibited
Access to Pasture	Not required	Required; temporary confinement allowed in some situations	Required during grass-growing season when conditions allow	Required access to “turn-out lots” for at least 4 hours of exercise per day; access to pasture suggested when climate and season permits	Continuous access required except during extreme weather or other emergency
Access to Shelter	Natural or artificial shade, shelter & windbreaks recommended	Shade and shelter required	Natural or artificial shade, shelter & windbreaks required	Natural or artificial shade, shelter & windbreaks required	Natural or artificial shade, shelter & windbreaks required
Bedding	Not required	Clean, dry bedding required	Clean, dry bedding required	Bedding required only under certain circumstances (e.g., when sheep are shorn in winter, during lambing, etc.)	Clean, dry bedding required
Perforated, Slatted Floors	Not addressed	Not addressed	Prohibited for lying areas	Allowed, though “slats must not result in injury to feet”	Prohibited
Indoor Lighting	Not addressed	Access to direct sunlight required	Artificial light at a level comparable to natural light allowed	Artificial light at a level comparable to natural light allowed	Windows or openings that allow natural daylight required
Min. Weaning Age	Early weaning allowed	Not addressed	5 weeks	5 weeks	3 months
Castration	Encouraged; local anesthetic may be needed if performed after 8 weeks of age	Physical alterations must be performed as needed to promote animal welfare	May be performed between 1 & 7 days of age using rubber ring or surgical methods, or up to 4 weeks of age by other methods if first attempt is unsuccessful; local anesthetic recommended	May be performed using rubber ring between 1 & 7 days of age, or up to 8 weeks of age by other methods if first attempt is unsuccessful; no recommendation on anesthetic	Use of rubber rings on lambs 1 week & younger acceptable only when breeding cannot be controlled by any other method
Tail Docking	Encouraged; local anesthetic may be needed if performed after 8 weeks of age	Physical alterations must be performed as needed to promote animal welfare	May be performed between 1 & 14 days using rubber ring or hot iron; anesthetic not required	May be performed between 1 & 14 days using rubber ring or hot iron; anesthetic not required	Prohibited

Appendix G: Comparison of Animal Welfare Standards by Program – PIGS

Animal Welfare Standard	Industry Guidelines (NPB)	National Organic Program (USDA)	Certified Humane Program (HFAC)	American Humane Certified (AHA)	Animal Welfare Approved (AWA)	Global Animal Partnership
Antibiotics	Not prohibited	Prohibited	Permitted for treatment of disease only	Permitted for treatment of disease only	Permitted for treatment of disease only	Prohibited (all steps)
Ammonia Levels	Should not exceed 50 ppm	Shelter designed for ventilation & air circulation	Not to exceed 25 ppm; should be less than 10 ppm	Not to exceed 25 ppm	Nothing specified; “shelters and housing must be well ventilated and allow for fresh air and natural light to enter”	No specific requirement; recommended not to exceed 10 ppm
Access to Outdoors	Not required	Required; temporary confinement allowed	Not required	Not required	Continuous access required from 10 days of age onward	Continuous access to foraging areas or pasture required
Tethers/ Gestation Crates/ Farrowing Crates	Permitted	Not specifically addressed but prohibited by the requirement for freedom of movement	Prohibited, except turn-around type farrowing pens allowed (must be at least 6x8 feet)	Prohibited, except turn-around type farrowing pens allowed (min. 5x7 feet) & gestation pens (minimum 20 square feet) during first 35 days allowed	All prohibited, including turn-around farrowing crates	Prohibited (all steps)
Min. Farrowing Space Per Sow	No limit	Not addressed	48 square feet required; 100 square feet preferred	35 square feet required	Minimum 64 square feet required bedding area, plus 32 square feet loafing area	Min 48 square feet required (all steps)
Bedding	Not required	Clean, dry bedding required	Required for housing indoors & outdoors	Required only for outdoor housing in winter	Required for housing indoors & outdoors	Required (all steps)
Slatted, Wire Floors	Permitted	Not addressed	Prohibited	Slatted floors permitted	Prohibited	Prohibited
Indoor Lighting	Subdued artificial light allowed	Access to direct sunlight required	Artificial light allowed (at level of at least 50 lux)	Artificial light allowed (at level of at least 50 lux)	Shelters and housing must have windows or openings that allow daylight; artificial light must not exceed 16 hours per day	Step 5 Plus animals live primarily outdoors with continuous access to shelter
Feed Restriction for Sows/Boars	Daily feed recommended, but controlling the amount encouraged	Not addressed; animals must be provided “a total feed ration”	Permitted, but dietary or environmental supplements must be provided	Swine must have access to food each day unless withheld on advice of a veterinarian	All pigs must have feeding plan to ensure appropriate nutrition; must have continuous access to forage to satisfy hunger between meals	Prohibited (all steps)
Min. Weaning Age	No limit	Not addressed	4 weeks	3 weeks	6 weeks	8 weeks
Tail Docking	Permitted	Permitted	Must not be done routinely; permitted only by veterinary recommendation and review by HFAC	Permitted until information on prevention of tail biting is available	Prohibited	Routine tail docking prohibited; may be done on individual animals for health or welfare reasons

Appendix H: Comparison of Animal Welfare Standards by Program – BROILER (MEAT) CHICKENS

Animal Welfare Standard	Industry Guidelines (NCC)	National Organic Program (USDA)	Certified Humane Program (HFAC)	American Humane Certified (AHA)	Animal Welfare Approved (AWA)	Global Animal Partnership
Antibiotics	Not prohibited	Prohibited	Permitted for treatment of disease only	Permitted for treatment of disease only	Permitted for treatment of disease only	Prohibited (all steps)
Ammonia Levels	Should not exceed 25 ppm; goal is 10 ppm	Shelter designed for ventilation and air circulation	Not to exceed 25 ppm; should be less than 10 ppm	Not specified	No limit specified; shelters and housing must be well ventilated and allow fresh air and natural light to enter	No specific requirement; recommended not to exceed 10 ppm
Access to Outdoors	Not required	Required; temporary confinement allowed	Not required	Not required	Required	Must have continuous access to pasture or foraging areas during daylight hours, subject to weather conditions from 4 weeks of age
Max. Stocking Density	6.5 pounds per square foot (for birds below 4.5 pounds) to 8.5 pounds per square foot (for birds more than 5.5 pounds)	Not addressed, but opportunity to exercise & freedom of movement required	6.0 pounds per square foot	56 pounds per square yard	Birds must have adequate space to perform range of natural behaviors. One bird per square foot recommended. Maximum flock size of 500 birds recommended.	Birds must have space sufficient to express natural behaviors without touching other birds; no specific square footage specified
Slatted, Wire Floor	Permitted	Not addressed	Prohibited	Not addressed	Prohibited	Slatted floor may comprise no more than 25% of area (all steps)
Litter for Dust Bath	Not required	Not addressed	Required	Required	Required	Required (all steps)
Indoor Lighting	Near-continuous lighting allowed; 4 hours of darkness per day recommended (need not be continuous)	Access to direct sunlight required	Minimum 8 hours of light (average 20 lux) & 6 continuous hours of darkness required per day	Minimum 8 hours of light (average 20 lux) & 6 continuous hours of darkness required per day	Natural lighting required; No more than 16 hours artificial lighting per day	Indoor lighting must exceed 20 lux; no more than 16 hours artificial lighting per day (all steps)

Appendix H: Comparison of Animal Welfare Standards by Program – BROILER (MEAT) CHICKENS continued

Animal Welfare Standard	Industry Guidelines (NCC)	National Organic Program (USDA)	Certified Humane Program (HFAC)	American Humane Certified (AHA)	Animal Welfare Approved (AWA)	Global Animal Partnership
Toe Clipping/ Comb Dubbing of Breeding Cockerels	Permitted	Alterations to be performed as needed to ensure welfare	Prohibited	Not addressed	Prohibited	Prohibited (all steps)
Beak Trimming	Prohibited in meat birds; permitted in breeding birds	Alterations to be performed as needed to ensure welfare	Prohibited in meat birds; not specified for breeders	Prohibited in meat birds; not specified for breeders	Prohibited for all birds	Prohibited (all steps)
Feed Withdrawal Before Slaughter	No more than 24 hours	Not addressed	No more than 12 hours	No more than 16 hours	No more than 8 hours	No more than 12 consecutive daylight hours (all steps)
Max. Transport Time	No limit	Not addressed	10 hours from start of loading to unloading at plant	12 hours from start of loading to unloading at plant	No more than 4 hours	2 hours
Slaughter Plant Holding Time	Should not exceed 6 hours	Not addressed	Not to exceed 10 hours	Not to exceed 10 hours	No more than 2 hours	Not specified
Acceptable Methods of Stunning for Slaughter	Not specified	Not addressed	Electrical stunning bath, dry stunner, hand-held stunner; gas permitted for killing only, not stunning	Electrical stunning bath, dry stunner, hand-held stunner	Gas stunning is preferred	Not specified

Appendix I: Comparison of Animal Welfare Standards by Program – EGG-LAYING HENS

Animal Welfare Standard	Industry Guidelines (UEP)	National Organic Program (USDA)	Certified Humane Program (HFAC)	American Humane Certified (AHA)	Animal Welfare Approved (AWA)
Antibiotics	Not prohibited	Prohibited	Permitted for treatment of disease only	Permitted for treatment of disease only	Permitted for disease treatment only
Ammonia Levels	Should not exceed 25 ppm; less than 10 ppm recommended	Shelter designed for ventilation & air circulation	Not to exceed 25 ppm, should be less than 10 ppm	Not to exceed 25 ppm	No limit specified; shelters and housing must be well ventilated and allow fresh air
Access to Outdoors	Not required	Required; temporary confinement allowed	Not required	Required as per National Organic Program regulations	Continuous outdoor ranging and foraging access required from age four weeks old onwards
Min. Space Per Hen	White hens: 67 square inches; Brown hens: 76 square inches	Not specifically addressed but must provide opportunity to exercise & freedom of movement	1.5 square feet; 1.0-1.2 square feet for houses with overhead perches	1.25 square feet; 1.0-1.2 square feet for houses with overhead perches	Not specified; chickens must at all times have adequate space to socialize, fly, walk, stretch, look for food and water, scratch the ground, and dust bathe
Continuous Confinement to Wire Cages	Permitted	Not addressed but prohibited due to exercise requirement	Prohibited	Prohibited	Prohibited
Litter for Dust Bath/ Nest Boxes	Not required	Not specifically addressed but clean, dry bedding required	Litter for dust bathing required; nest boxes no less than 1 per 5 hens or community nest area not less than 9 square feet per 100 birds	Litter for dust bathing required; nest boxes no less than 1 per 5 hens or community nest area with “adequate” space and dividers to ensure privacy	Litter for dust bathing required; nest boxes no less than 1 per five birds required
Indoor Lighting	Continuous subdued lighting permitted (0.5-1foot candle: approximately 5 to 10 lux)	Access to direct sunlight required	Minimum 8 hours dim light (average 10 lux), 6 hours darkness required per day	Minimum 8 hours dim light (average 10 lux), 6 hours darkness required per day	Light must average 15 lux during daylight hours, with at least 8 hours darkness
Forced Molting	Feed withdrawal prohibited; water must be provided	Not addressed but producers must provide “a total feed ration” and access to direct sunlight required	Feed withdrawal to induce molting prohibited	Feed withdrawal to induce molting prohibited	Prohibited

http://www.uepcertified.com/docs/new_advantages_of_cage_and_cage_free.pdf



farmsanctuary
rescue • education • advocacy

Farm Sanctuary is the nation's leading farm animal protection organization. Since incorporating in 1986, Farm Sanctuary has worked to expose and stop cruel practices of the "food animal" industry through research and investigations, legal and institutional reforms, public awareness projects, youth education, and direct rescue and refuge efforts. Farm Sanctuary shelters in Watkins Glen, N.Y., and Orland, Calif., provide lifelong care for hundreds of rescued animals, who have become ambassadors for farm animals everywhere by educating visitors about the realities of factory farming.

P.O. Box 150
Watkins Glen, NY 14891
607-583-2225
info@farmsanctuary.org
www.farmsanctuary.org