

ANIMAL WELFARE INSTITUTE

A CONSUMER'S GUIDE TO FOOD LABELS AND ANIMAL WELFARE






















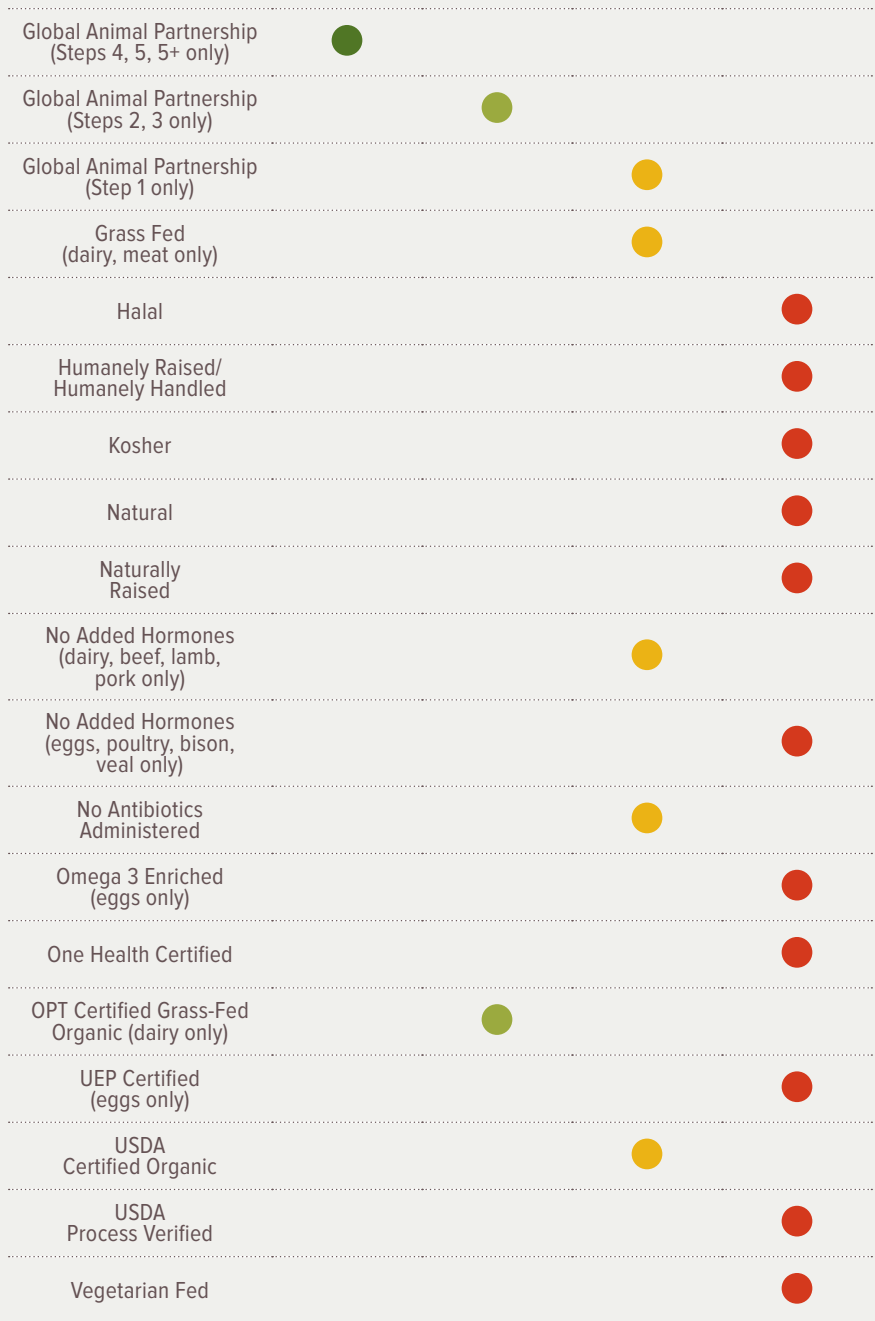
A CONSUMER'S GUIDE TO FOOD LABELS AND ANIMAL WELFARE

Many food labels that address the raising of farm animals are confusing, if not downright misleading. While some animal-raising claims have standards established by law or government policy, most are undefined. In addition, most label claims are “self made” by the company merely for marketing purposes, and in these cases, the accuracy of the claim is not verified. The exceptions are “certified” food products, where compliance with a formal set of standards has been verified by an independent third-party audit.



QUICK GUIDE TO FOOD LABELS

LABEL	BEST CHOICE	NEXT BEST CHOICE	FAIR CHOICE	BEWARE OF THIS LABEL
AGA Certified Grassfed				
American Humane Certified (pasture-raised eggs only)				
American Humane Certified (products other than pasture-raised eggs)				
Cage Free (eggs only)				
Cage Free (poultry only)				
CARE Certified				
Certified Animal Welfare Approved by AGW				
Certified Grassfed by AGW				
Certified Humane (pasture-raised eggs only)				
Certified Humane (products other than pasture-raised eggs)				
Crate Free (veal, pork only)				
Ethically/Responsibly/Thoughtfully Raised				
FACTA Animal Welfare Humane Certified				
Food Alliance Certified				
Free Range/Pasture Raised (eggs only)				
Free Range/Pasture Raised (poultry only)				
Free Range/Pasture Raised (meat only)				



Below are definitions, and the animal welfare implications, of some of the most common labels applied to dairy, egg, meat, and poultry products.

The labels are organized into four categories—“best choices,” “next best choices,” “fair choices,” and “beware of these labels.”

● BEST CHOICES

These labels feature the highest animal care standards, and compliance is verified by a third-party auditing program.



Certified Animal Welfare Approved by AGW

The only USDA-approved third-party animal welfare food certification label that supports and promotes family farmers who raise their animals with the highest welfare standards, outdoors, on pasture or range. Standards cover the treatment of breeding animals, animals during transport, and animals at slaughter. All farm locations (rather than merely a representative sample) are routinely audited and compliance with all standards is required. The program, which was created by the Animal Welfare Institute, is administered by the nonprofit A Greener World (AGW).



Certified Grassfed by AGW

An optional add-on to the Certified Animal Welfare Approved by AGW program. Requires that products come from animals fed a 100 percent grass and forage diet. Animals must be raised

outdoors on pasture or range, and they must be managed under the high animal welfare and environmental standards of the Certified Animal Welfare Approved by AGW program.



Certified Humane • Pasture-raised eggs only

A third-party animal welfare certification program administered by the nonprofit Humane Farm Animal Care. Although access to the outdoors is not required for egg-laying hens under the seal, Certified Humane offers an additional certification to designate free-range and pasture-raised hens. The “free range” designation requires daily access to an uncovered outdoor area providing a minimum of 2 square feet per bird. This does not meet AWI’s standard for free-range eggs. However, Certified Humane’s standard for “pasture raised” is 2.5 acres per 1,000 birds, which meets AWI’s standard for pasture-raised eggs. Certified Humane offers both a year-round and seasonal pasture option.



Global Animal Partnership • Steps 4, 5, 5+ only

This is a rating program, not a certification program with a single set of standards. Producers are rated on a six-tier scale, from Step 1 to Step 5+. Feedlots are prohibited and access to pasture is required for all animals at Step 4 and higher. All physical alterations are prohibited at Step 5. Standards include the treatment of animals during transport and at slaughter. All of a producer/processor’s farm locations (rather than merely a representative sample) are routinely audited and compliance with all standards is required.

● NEXT BEST CHOICES

These labels typically feature lower animal care standards, but compliance is verified by a second-party (such as a trade association) or independent third-party certification program.



AGA Certified Grassfed

A third-party certification program administered by the American Grassfed Association. The program's standards require continuous access to pasture and a diet of 100 percent forage. Confinement to feedlots and the use of hormones and antibiotics are prohibited. However, pain relief is not required for physical alterations such as the docking of tails and removal of horns. Also, no standards exist for the treatment of animals during transport or at slaughter.



American Humane Certified • *Pasture-raised eggs only*

A third-party animal welfare certification program administered by the American Humane Association. Similar to other programs, this certification is based on audited compliance with comprehensive standards. However, the animal welfare level of the standards is lower than the other programs, just slightly above conventional industry animal care standards. A notable exception is the American Humane certification of pasture-raised eggs. The space standard for the label is 2.5 acres per 1,000 birds, which meets AWI's

standard for pasture-raised eggs. Unfortunately, American Humane does not require compliance with 100 percent of its standards and only a sample of producer/processor farm locations are audited.



Certified Humane • Products other than pasture-raised eggs

A third-party animal welfare certification program administered by the nonprofit Humane Farm Animal Care. Access to the outdoors is not required for meat birds, egg-laying hens, and pigs; however minimum space allowances and environmental enrichment must be provided. Beak trimming of hens and turkeys and tail docking of pigs are allowed under certain circumstances. Standards include the treatment of breeding animals, animals during transport, and animals at slaughter. Compliance with 100% of the standards is required; however, only a representative sample of farm locations is audited.



Food Alliance Certified

A nonprofit sustainable agriculture certification program that supports “safe and fair working conditions, humane treatment of animals, and careful stewardship of ecosystems.” Standards provide for access to natural light, fresh air, and adequate space, but access to the outdoors is not required for all animals. Pain relief is not required for most physical alterations, including beak trimming and tail docking. The program’s audit criteria allow a farm to become approved based on an average score for some areas instead of requiring that every standard be met. Standards do not include the treatment of animals at slaughter.



Global Animal Partnership • Steps 2, 3 only

This is a rating program, not a certification program with a single set of standards. Producers are rated on a six-tier scale, from Step 1 to Step 5+. For poultry and pigs, continuous indoor confinement (with enrichment) is allowed at Step 2. Limited access to the outdoors and minimal vegetation is provided at Step 3. Beef cattle may be removed from pasture for feeding in a lot or yard at Step 2. Beak trimming is allowed in turkeys, but is prohibited in hens and meat chickens. Tail docking of pigs is also prohibited. Standards include the treatment of animals during transport and at slaughter. All of a producer/processor's farm locations (rather than merely a representative sample) are routinely audited for compliance with 100% of the standards.



OPT Certified Grass-Fed Organic • Dairy only

A third-party certification program administered by Organic Plus Trust, Inc. To qualify for certification, producers must meet all standards for livestock health and living conditions required under National Organic Program regulations—such as providing access to fresh air, sunlight, and exercise and not administering growth hormones—and receive USDA organic certification. Standards also require providing a longer grazing period, and a diet that consists of forage only and prohibits grains and grain-derived feeds. However, like the National Organic Program regulations, standards do not require pain relief for tail docking and horn removal, and they do not address treatment during transport or slaughter.

● FAIR CHOICES

These labels are relevant to animal welfare, but standards are weak and/or compliance is not verified on the farm by a third-party audit. In some cases, the level of animal welfare can range from very low to very high for different products with the same label.

American Humane Certified • Products other than pasture-raised eggs

A third-party animal welfare certification program administered by the American Humane Association. Similar to other programs, this certification is based on audited compliance with comprehensive standards. American Humane Certified covers the largest number of farm animals of any third-party animal welfare certification program in the United States. However, the animal welfare standards are weaker than those of other programs, just slightly above conventional industry animal care standards. Moreover, American Humane does not require compliance with 100 percent of its standards, and it only audits a sample of farm locations where animals are being raised for a particular producer or processor.

Cage Free • Eggs

According to the USDA, this claim indicates the eggs came from hens who were “never confined to a cage and have had unlimited access to food, water, and the freedom to roam,” but usually only within the confines of a barn. In fact, some cage-free hens may not have much more room than caged birds. (“Cage free” is typically not used on eggs from hens that have access to range or pasture.)

According to the Food Safety and Inspection Service (FSIS) labeling guideline—which applies to egg products but not shell eggs—animal-raising claims on a label must be accompanied by a definition. The USDA Agricultural Marketing Service (AMS) verifies “cage free” claims when made by USDA-inspected egg producers. The AMS verifies the claim with on-farm inspections conducted twice per year. The claim is not verified when used on non-USDA-graded eggs, unless the producer participates in a third-party program that certifies “cage free” claims pertaining to eggs.

Crate Free • *Pork*

The USDA does not define this claim, but requires that the definition be provided on the label, either next to the claim or connected to the claim by a symbol on the label panel where the claim is first made. Typically, the claim is used to indicate that the animal was not housed—and is not the offspring of an animal so housed—at any time in a gestation crate (used to confine sows during pregnancy) or a farrowing crate (used to confine sows from just before birth until the piglets are weaned). However, it is possible that some producers are using the claim to signify avoidance of gestation crates only, while still using farrowing crates.

Crate Free • *Veal*

The USDA does not define this claim, but requires that the definition be provided on the label, either next to the claim or connected to the claim by a symbol on the label panel where the claim is first made. Typically, the claim is used to indicate that a calf was not housed at any time in a crate, or any enclosure small enough to prevent the animal from freely turning around or lying down.

Free Range/Pasture Raised • *Eggs*

These claims, indicating that hens were allowed access to the outdoors, are verified by the AMS when made by USDA-inspected egg producers. The AMS verifies the claims with on-farm inspections conducted twice per year. The claims

are not verified when used on non-USDA-graded eggs, unless the producer participates in a third-party program that certifies “free range” or “pasture raised” claims pertaining to eggs. The FSIS allows the use of these claims on egg products if the producer submits animal care protocols and/or affidavits describing the conditions under which the birds are raised. The documentation must describe the housing conditions for the birds and demonstrate continuous, free access to the outside throughout their normal growing cycle. The FSIS does not specify what amount of space is acceptable or whether vegetation must be present for the outdoor access requirement.

**Free Range/Free Roaming/Not Confined/Pasture Raised/
Pasture Fed/Pasture Grown/Meadow Raised • *Chicken, turkey,
goose, duck***

The FSIS allows the use of these claims on poultry products if the producer submits animal care protocols and/or affidavits describing the conditions under which the birds are raised. The documentation must describe the housing conditions for the birds and demonstrate continuous, free access to the outside throughout their normal growing cycle. The FSIS does not specify what amount of space is acceptable or whether vegetation must be present for the outdoor access requirement. The 2019 FSIS labeling guideline on animal-raising claims states that, based on FSIS consultation with the AMS, these claims need not be defined on the label.

**Free Range/Free Roaming/Not Confined/Pasture Raised/
Pasture Fed/Pasture Grown/Meadow Raised • *Beef, bison, lamb,
goat, pork***

The FSIS allows the use of these claims on meat products if the producer submits animal care protocols and/or affidavits describing the conditions under which the animals are raised. The 2019 FSIS labeling guideline on animal-raising claims states that documentation must show that the animals have continuous, free access to the outdoors throughout their usual grow-out period.

For ruminants, this means the entire grazing season for the geographical area. These producers must also define the claim on the package, and include language to convey that the animals were never confined to a feedlot. The FSIS does not specify what amount of space is acceptable or whether vegetation must be present for the outdoor access requirement.

Global Animal Partnership • Step 1 only

This is a rating program, not a certification program with a single set of standards. Producers are rated on a six-tier scale, from Step 1 to Step 5+. Standards for Step 1 are only marginally better than conventional industry standards. For poultry and pigs, continuous indoor confinement is allowed. Not all GAP Animal Welfare Certified labels indicate the Step level of the product in the manner that is pictured for Steps 2-5+ above. Consequently, consumers should assume the product is rated Step 1 if a Step is not shown on the label. Environmental enrichment is required for indoor-housed birds but not pigs. Beef cattle may be removed from pasture for feeding in a lot or yard, and pain relief is not required for castration. Tail docking of pigs is prohibited. Standards include the treatment of animals during transport and at slaughter. All of a producer/processor's farm locations (rather than merely a representative sample) are routinely audited for compliance with 100% of the standards.

Grass Fed • *Dairy, beef, bison, lamb, goat*

The AMS withdrew its voluntary definition for this claim after the agency determined it did not have the authority to establish animal-raising definitions. The standard had required a lifetime diet of 100 percent grass and forage and had prohibited grains. Pasture access during most of the growing season was required, but confinement and the administration of hormones and antibiotics were not prohibited. After withdrawing the "grass fed" standard, the AMS launched a "certified grass fed" program for small producers. The program is designed for producers who, each year, market fewer than 50 cattle or market lambs produced from fewer than 100 ewes. Animals certified under

this program must be fed only grass and forage, cannot be fed grain or grain by-products, and must have continuous access to pasture during the growing season. In approving this claim, the FSIS accepts the AMS certification program, but requires that producers submit additional documentation showing that animals were fed 100 percent grass after being weaned from their mother's milk. Producers may also participate in the USDA Process Verified Program (PVP) to verify their product meets their own grass-fed standard without needing to provide the additional documentation showing that animals were fed 100 percent grass after being weaned from their mother's milk. Finally, a producer may use this claim without participating in the AMS certification program or PVP if it submits animal care protocols and/or affidavits explaining the controls for ensuring that the raising claim is valid from birth to harvest or the period of raising being referenced by the claim. The FSIS considers "grass fed" to be a diet claim, and does not require that producers address other aspects of animal raising, such as confinement or the use of antibiotics and hormones.

No Added Hormones/No Hormones Administered • *Dairy, beef, lamb, pork*

The USDA does not approve "hormone free" claims, as all animals produce hormones naturally. "No added hormones" or "no hormones administered" claims can be used if documentation is provided showing no hormones were administered during the course of the animal's lifetime. The USDA does not routinely test for the presence of hormones, so no verification system exists.

No Antibiotics Administered/Raised without Antibiotics

The claim "antibiotic free" is not allowed because antibiotic-residue testing technology cannot verify that an animal has never received antibiotics. However, the USDA does allow "no antibiotics administered" and "raised without antibiotics" claims if the producer can show documentation that the animals have not received antibiotics at any point in their lives for any purpose, including treatment of illness. Producers must also document procedures for

handling sick animals. Since nontherapeutic antibiotic use can be one indicator of intensive confinement, this claim has some relevance to animal welfare. On the negative side, however, some producers may choose to allow a sick animal to suffer instead of treating the animal, for fear of losing the opportunity to use the “raised without antibiotics” claim. In addition, recent research suggests that animals not administered antibiotics for any purpose may be more prone to develop disease conditions that cause pain and suffering. Therefore, AWI recommends against choosing products with a “no antibiotics” claim unless the product also contains a higher-welfare claim, such as “pasture raised.”

USDA Certified Organic

Standards are defined by regulations of the National Organic Program. The standards are general and apply to all animals. They don’t address many animal care issues such as weaning, physical alterations, minimum space requirements, handling, transport, or slaughter. The standards require some access to the outdoors for all animals, access to pasture for ruminants (cattle, sheep, goats), fresh air and sunlight, and freedom of movement. However, the USDA has allowed screened porches to qualify as outdoor access for birds. Physical alterations such as the removal of horns and docking of tails are allowed without pain relief. Compliance with the standards is verified by a USDA-accredited organic certifying agency, but an audit by the USDA Office of Inspector General revealed that consistency among certifiers is a problem. Consequently, the level of animal welfare varies widely among producers. The Cornucopia Institute offers scorecards that rate organic beef, dairy, egg, and poultry producers.

● BEWARE OF THESE LABELS

These labels are meaningless or misleading with regard to animal welfare. They may not be meaningless or misleading for other purposes.

Cage Free • *Chicken, turkey*

The label is meaningless when used on chicken or turkey products since, in the United States, birds raised for meat are not typically caged prior to transport to slaughter.

CARE Certified

CARE Certified is a program developed by Where Food Comes From, Inc. that focuses on three core areas: animal husbandry, environmental stewardship, and people and community. Currently, standards only exist for cattle, but some producers market their products under the certification despite the lack of developed standards. The animal husbandry standards used by CARE Certified are based upon industry guidelines and do not demonstrate a meaningful improvement in animal care. Notably, the cattle standards do not apply to feedlots, which can constitute a large percentage of the animal's life, and the standards do not prohibit painful procedures such as castration, dehorning, or disbudding.

Ethically Raised, Responsibly Raised, Thoughtfully Raised

These claims are subjective and misleading. In addition, no third-party certification programs exist for these claims. Since these claims are not defined by the USDA, the producer is required to include on the label an explanation of what is meant by the claim. These claims should be considered a marketing tactic with little or no relevance to animal welfare.

FACTA Animal Welfare Humane Certified

Farm Animal Care Training & Auditing (FACTA) is an auditing company that offers training, verification, and certification services to producers. FACTA offers two categories of audits: 1) auditing to any standard a producer wishes to comply, including industry-based guidelines, or 2) auditing to a standard developed by FACTA itself, which are also based on minimum industry animal care standards. Because both options are designed for companies that wish to follow minimum industry standards, extreme confinement and lack of outdoor access is permissible.

Halal

“Halal” may be used on the labels of meat and poultry products prepared according to Islamic law and under Islamic authority. The US Humane Methods of Slaughter Act exempts animals killed for religious purposes from the requirement that they be rendered insensible to pain (“stunned”) before shackling, hoisting, and cutting. Consequently, Halal products may come from animals who have been slaughtered without being pre-stunned. Most animal welfare advocates consider slaughter without prior stunning to be inhumane.

Humanely Raised/Humanely Handled

The federal government does not have a set of independent standards for certifying products as “humanely raised.” The department will merely verify that

the producer has met its own standards; as such, the claim may simply represent a marketing tactic with little relevance to animal welfare. Because these claims have not been defined by the USDA, they should be considered meaningless and/or misleading, unless verified by a third-party certification.

Kosher

“Kosher” may be used on the labels of meat and poultry products prepared under rabbinical supervision. Kosher products are typically produced from animals who have been killed without being rendered insensible to pain (“stunned”) before shackling, hoisting, and cutting, which is allowed under an exception to the US Humane Methods of Slaughter Act for ritual or religious slaughter. Most animal welfare advocates consider slaughter without prior stunning to be inhumane.

Natural

Although a “natural” claim may be used on eggs and dairy, the USDA definition for the term only applies to meat and poultry. According to USDA policy, “natural” can be used on a product that contains no artificial ingredients or added color and is only minimally processed. The label must explain the use of the term. Unless so noted, the term is not an indication that no hormones or antibiotics were administered. The claim has no relevance whatsoever to how the animals were raised. No regulatory definition for “natural” currently exists, but the USDA and the FDA are considering establishing one.

Naturally Raised

A voluntary standard was established for producers wishing to have this claim verified by the AMS. The claim indicated that the meat came from animals who did not receive antibiotics and hormones and were fed only a vegetarian diet.

The definition did not require the improved living conditions for animals that most consumers would expect of the claim, such as access to pasture or range. According to the USDA, it is no longer verifying this claim due to confusion with the “natural” claim, and therefore the claim should not be found on any food products from animals.

No Added Hormones/No Hormones Administered • *Eggs, chicken, turkey, goose, duck, bison, veal*

The USDA prohibits the use of hormones in the production of poultry, eggs, bison, and veal, and any “no added hormones” claims on these products must be accompanied by a statement to the effect that the administration of hormones is prohibited by federal regulation. Such a claim on poultry, eggs, bison, or veal should be considered a marketing ploy with the sole intent to mislead consumers.

Omega 3 Enriched • *Eggs*

This is a diet claim that has no relevance to animal welfare. The claim indicates that Omega-3 fatty acids were fed—in the form of flaxseed, algae, or fish oil—to the hens who produced the eggs.

One Health Certified

A Process Verified Program administered by the National Institute of Antimicrobial Resistance Research and Education (NIAMRRE) and verified by the USDA Agricultural Marketing Service (AMS). This program focuses on five core areas: disease prevention, veterinary care, responsible antibiotic use, animal welfare, and environmental impact. Currently, standards are only available for chickens and turkeys. This program has not developed its own comprehensive animal welfare standards—rather, it requires the development of an animal welfare

program that meets the criteria of other program standards, including those developed by and for the industry. Producers can become One Health Certified so long as they comply with guidelines developed by the National Chicken Council or the National Turkey Federation, which allow for extreme confinement and do not require access to the outdoors or environmental enrichments.

United Egg Producers (UEP) Certified • *Eggs*

A certification program developed by and for the egg industry. Since the standards are set by UEP itself, the certification cannot be considered independent or third party. The program's standards allow hens to be crowded into small cages for their entire lives without any access to pasture, fresh air, or sunlight. The birds are also denied litter for dust bathing and boxes for nesting. Beak cutting without any pain relief is allowed. UEP renamed the seal after federal regulators and the Better Business Bureau found the previous "Animal Care Certified" label to be misleading.

USDA Process Verified

The AMS offers the Process Verified Program (PVP) seal to producers as a marketing tool. Participating producers submit their standards for consideration. Once approval is granted, the USDA conducts audits to verify that the company is following its own standards in raising animals. Hence, the meaning of terms such as "animal care" and "humanely handled" can vary widely among producers, yet all are eligible to receive USDA Process Verified approval for the claim. In fact, products from factory-farmed animals can and do carry the PVP seal.

Vegetarian Fed

This claim, indicating the diet did not contain animal byproducts, has no relevance to the welfare conditions under which the animals were raised.





Animal Welfare Institute

ABOUT THE ANIMAL WELFARE INSTITUTE

Since its founding in 1951, the Animal Welfare Institute has been alleviating suffering inflicted on animals by people. AWI works to improve conditions for the billions of animals raised and slaughtered each year for food in the United States. Major goals of the organization include eliminating factory farms, supporting higher-welfare family farms, and achieving humane transport and slaughter conditions for all farm animals.

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