



Animal Welfare Institute

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April 14, 2021

CARE Auditing Program
Where Food Comes From
202 6th Street, Suite 400
Castle Rock, CO 80104

Via electronic mail to: publiccomment@wherefoodcomesfrom.com

RE: Draft BeefCare Standard

To Whom It May Concern:

We write to submit comments on the draft BeefCare standards on behalf of the staff and membership of the Animal Welfare Institute (AWI). AWI appreciates the opportunity to comment and commends Where Food Comes From (WFCF) for transparency in its standards-setting process and for soliciting feedback from interested stakeholders such as AWI.

About the Animal Welfare Institute

Since its founding in 1951, AWI 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. We promote pasture-based farming systems that allow animals to express natural behaviors as an alternative to intensive production.

In 1988, with assistance from farmers, veterinarians and ethologists who specialize in the natural behavior of farmed animals, AWI developed its first set of farm animal husbandry standards. In 1989, AWI obtained the first USDA-approved label for pork from pigs who were raised on family farms, able to roam free on pastures or in bedded pens, and lived without the routine use of antibiotics to promote growth and prevent diseases associated with factory farming. AWI called this program Pastureland Farms.

Nearly 10 years later, in 1997, AWI began approving additional pig farms under its husbandry standards and made plans to expand the program to cover additional animal species. By 2006, when AWI formally launched the Animal Welfare Approved label, about 500 farmers were participating in the program. The program's standards were predicated on the principle of fitting the farming system to the animals, rather than the animal to the system. The Animal Welfare Approved program is now administered by A Greener World under an agreement with AWI.

Although AWI no longer operates a food certification program, we remain committed to promoting higher-welfare, sustainable farming systems. We do this by educating consumers about farm animal

husbandry, evaluating relevant auditing and marketing programs, and filing legal challenges against misleading animal-raising claims. We also routinely commission and analyze national public opinion surveys to measure consumer expectations for farm animal welfare.

Review of the BeefCare Standards

AWI commends Where Food Comes From for your expressed goal of ensuring cattle raised for beef “are free from hunger and thirst, discomfort, pain, injury, disease, fear and distress, and that facilities that house cattle allow them to express natural behaviors.” To help ensure that your BeefCare standards effectively promote this goal, are based on sound science, and maintain standards similar to those of other third-party animal-welfare certification programs, AWI would like to recommend the following modifications to some of your standards. (You might also consider adopting beef cattle care standards of one of the established animal welfare certification programs, such as American Humane Certified, Certified Humane, Certified Animal Welfare Approved, or Global Animal Partnership.)

Section AC2. Biosecurity & Emergency Preparedness

Recommended standard AC2a: “The operation has an emergency action plan to include: contacts/associated phone numbers, farm/ranch map, and *contingency plans to safeguard the welfare of cattle during natural disasters, disease outbreaks, and other emergencies. The emergency action plan should cover procedures to be followed by those discovering an emergency, logistics of evacuating animals and/or providing emergency shelter or housing, mechanisms to ensure animals will have access to feed and water during and after extreme weather events, and options for providing veterinary care to animals in need. All personnel should receive regular training on how to execute the emergency action plan and their responsibilities during an emergency scenario.*”

Rationale for recommended standard: In the United States, extreme weather events result in the deaths of thousands of cattle each year. The Beef Quality Assurance program, as well as other third-party certification programs, require or recommend emergency planning. Having an emergency response plan in place can minimize animal suffering as well as economic losses by the producer, but it must be detailed and comprehensive to be useful.

Section AC4. Herd Health

Recommended standard AC4c: “Stockpersons follow BQA best practices for all animal health products, including recommended injection sites. *Castration is performed at the earliest age possible; if performed after 2 months of age, only surgical castration by a veterinarian is permitted. Disbudding is selected over dehorning whenever possible, and should be performed at less than one month of age, ideally within the first week of life. Pain relief is required for all methods of castration, dehorning, and disbudding.*” (Note – also relevant to Standard AC6e)

Rationale for recommended standard: Extensive research confirms that dehorning and castration are painful procedures, and that pain, stress, and decreased weight gain are more severe in older animals. Delaying castration does not convey any benefit in terms of carcass weight or taste of beef, and may

increase risk of bovine respiratory disease.¹ The amended standard would be consistent with the American Veterinary Medical Association policy statement on dehorning and castration.² Pain management is necessary for these procedures and is covered in more detail in standard AC6e below.

Recommended standard AC4d: *“Orphaned calves are provided a minimum of 3 quarts of high-quality colostrum within 6 hours of birth (the sooner the better).”*

Rationale for recommended standard: Provision of adequate colostrum is one of the most important factors in determining calf health and survival. As soon as calves are born, the cells lining their digestive tract are able to absorb colostrum proteins, which provide nutrition as well as being necessary for a functional immune system, intestinal maturation, and post-natal growth and organ development. As soon as the digestive tract is stimulated by ingestion of any material, it begins to change to no longer permit absorption. By six hours after birth, only approximately 50% of the absorptive capacity remains and by 24 hours no absorptive capacity remains.^{3, 4}

Recommended standard AC4e: *“Weaning practices are implemented to reduce stress for cow and calf. Calves must not be weaned from their mothers prior to 6 months of age, unless exceptions are warranted due to environmental or medical conditions. Stress should be reduced by evidence-based methods, such as weaning calves into a familiar environment, using the fenceline weaning method, changing diet gradually, etc. Orphan calves must not be weaned (ceasing to feed milk or milk replacer) before 5 weeks of age, unless directed by a veterinarian. Calves must be weaned no sooner than 30-45 days prior to being transported.”*

Rationale for recommended standard: Natural weaning occurs gradually in domestic cattle typically between 7 and 14 months of age. The stress of abrupt, early weaning has implications for both the physical and psychological well-being of cattle. Conventionally on beef operations, separation of the cow and calf occurs simultaneously with other stressors, including change in diet, cessation of nursing, change in physical environment, and social group disruption.⁵ Behavioral and physiologic responses to abrupt weaning indicate detrimental effects to animal welfare. Enforced mother-calf separation is often associated with coccidiosis, viral diarrhea, respiratory disease and death, constituting a significant economic loss.⁶ Fenceline weaning is a management system in which the calves are removed from their

¹ American Veterinary Medical Association (2014) Literature Review on the Welfare Implications of Castration of Cattle. Available at: <https://www.avma.org/resources-tools/literature-reviews/welfare-implications-castration-cattle>.

² American Veterinary Medical Association. Policy: Castration and dehorning of cattle. Available at: <https://www.avma.org/resources-tools/avma-policies/castration-and-dehorning-cattle>.

³ Godden SM, Lombard JE, Woolums AR. Colostrum Management for Dairy Calves. *Vet Clin North Am Food Anim Pract.* 2019 Nov;35(3):535-556. doi: 10.1016/j.cvfa.2019.07.005.

⁴ Hammon HM, Liermann W, Frieten D, Koch C. Review: Importance of colostrum supply and milk feeding intensity on gastrointestinal and systemic development in calves. *Animal.* 2020 Mar;14(S1):s133-s143. doi: 10.1017/S1751731119003148.

⁵ Enríquez D, Hötzel MJ, Ungerfeld R. Minimising the stress of weaning of beef calves: a review. *Acta Vet Scand.* 2011 May 13;53(1):28. doi: 10.1186/1751-0147-53-28.

⁶ Reinhardt, V. Artificial Weaning of Calves: Benefits and Costs. *Journal of Applied Animal Welfare Science* 5(3), 247-251, 2002. Available at: <https://awionline.org/content/artificial-weaning-calves-benefits-and-costs>.

dams but are allowed to see, hear, smell, and – in some cases – touch their dams. It has been shown to reduce stress and improve daily weight gain compared to abrupt weaning.⁷

Section AC6. Cattle Handling

Recommended standard AC6d: “The operation uses only approved handling aids to drive or process cattle. *Examples of approved driving aids include paddles, sorting sticks, flags, etc. Cattle are not yelled or screamed at, tails are not twisted aggressively, and sticks are not used for hitting, beating, or poking the cattle. Electric prods are used only as a means of last resort, when human or animal safety is in jeopardy.*”

Rationale for recommended standard: Tolerating use of electric prods in up to 10% of cattle, as described in the draft standard, would undermine your stated commitment in Standard AC6b to low-stress handling techniques. Use of electric prods and other aversive techniques is a poor substitute for understanding cattle behavior and perceptual abilities, on which low-stress cattle handling is based. Research shows that cows are at greater risk of balking, vocalizing, stumbling, and falling when touched with an electric prod.⁸ Dr. Temple Grandin recommends that a reasonable attainable goal for electric prod use is 1-5% of the cattle at a squeeze chute entrance and 0% when groups are moved.⁹ Currently, other third-party animal welfare certification programs prohibit non-emergency use of electric prods.

Recommended standard AC6e: “*When physical alterations, such as castration or dehorning/disbudding, or other surgeries are performed, the operation utilizes comprehensive pain management (e.g., local anesthetic combined with systemic analgesics, such as nonsteroidal anti-inflammatories), as per FDA label guidelines or as prescribed by the veterinarian of record following AMDUCA regulations.*”

Rationale for recommended standard: Given WFCF’s laudable goal of ensuring cattle are free from discomfort and pain, it is important to note that all methods of castration and dehorning/disbudding cause pain in cattle of all ages, and the pain response is additive when both castration and dehorning are performed at the same time.¹⁰ The age of the animal and the methods used affect the severity and duration of pain. Proper pain management involves preventing pain, for example, through local anesthetics or presurgical analgesics, as well as treating it throughout its duration.

AWI is cognizant of the complications resulting from the current lack of approved drugs for treating pain caused by physical alterations of farm animals in the United States, and the necessity of relying on

⁷ Taylor JD, Gilliam JN, Mourer G, Stansberry C. Comparison of effects of four weaning methods on health and performance of beef calves. *Animal*. 2020 Jan;14(1):161-170. doi: 10.1017/S1751731119001228.

⁸ Simon GE, Hoar BR, Tucker CB. (2016) Assessing cow-calf welfare. Part 2: Risk factors for beef cow health and behavior and stockperson handling. *J Anim Sci*.;94(8):3488-3500. doi: 10.2527/jas.2016-0309.

⁹ Grandin, T. (2018) Using Prods and Persuaders Properly to Handle Cattle, Pigs, and Sheep. Available at: <https://www.grandin.com/behaviour/principles/prods.html>

¹⁰ American Veterinary Medical Association (2014) Literature Review on the Welfare Implications of Castration of Cattle. Available at: <https://www.avma.org/resources-tools/literature-reviews/welfare-implications-castration-cattle>

“extra label” use of pain medications. Fortunately, a veterinarian-client-patient relationship, as required in BeefCare Standard AC8b, will enable producers to legally access necessary pain medications.

Recommended standard AC6h: *“Hot-iron branding and face (cheek) branding are not allowed unless required by law. The least invasive method of identification is used. Freeze branding is avoided where alternative identification methods (e.g., electronic identification or ear tags) exist.”*

Rationale for recommended standard: Research has demonstrated that hot-iron branding causes significant pain and distress to cattle, while freeze-branding causes similar, though potentially less severe, effects.¹¹ Hot-iron branding is banned in many countries. The American Veterinary Medical Association recently recommended to the USDA that it place a high priority on the development of alternatives to hot-iron branding.¹² Branding of any kind is prohibited in numerous third-party animal welfare certification programs. Given that radiofrequency identification (RFID) is becoming the preferred identification method for the purposes of animal disease traceability, and that BeefCare embraces RFID in Standard AC7e, it makes sense for BeefCare Standards to prohibit branding when it is not required by law.

Section AC7. Animal Observations/ Outcome Measurements

Recommended standard AC7b: *“The operation assesses cattle lameness and hoof health routinely. At least weekly, a designated, adequately trained individual identifies any lame cattle. Once an animal has been identified as lame, a proper treatment protocol should be initiated within 24 hours. When observed, 97% of the cattle have no indication of lameness or a treatment program that addresses environmental, nutritional, and/or husbandry deficits is implemented.”*

Rationale for recommended standard: Lameness negatively affects each of the five freedoms to which WFCF is committed. Strengthening this guideline to improve lameness surveillance and accountability will help ensure a positive outcome for both the animal and the operation. According to the most recent BQA survey, 96.8% of cattle at slaughter had a mobility score of 1, indicating no apparent lameness.¹³ This suggests that using a 95% cut-off in the standard is too low. The amended standard is consistent with the American Association of Bovine Practitioners’ guidelines on creating an effective lameness program.¹⁴

¹¹ American Veterinary Medical Association. Literature Review: Welfare Implications of Hot-Iron Branding and Its Alternatives. Available at: <https://www.avma.org/resources-tools/literature-reviews/welfare-implications-hot-iron-branding-and-its-alternatives>.

¹² American Veterinary Medical Association. Policy: Livestock identification and animal traceability. Available at: <https://www.avma.org/resources-tools/avma-policies/livestock-identification-and-animal-traceability>; also AVMA, Comment on Docket No. APHIS-2016-0050, Branding Requirements for Bovines Imported into the United States from Mexico, May 23, 2018. [Letter on file with author and available on Regulations.gov website.]

¹³ Beef Quality Assurance (2016) National Beef Quality Audit: Navigating Pathways to Success at 11. Available at: https://www.bqa.org/Media/BQA/Docs/2016nbqa_es.pdf.

¹⁴ American Association of Bovine Practitioners (2014) Lameness in Dairy and Beef Herds. Available at: http://www.aabp.org/resources/aabp_guidelines/lamenessguidelines-03-11-2014.pdf.

Section AC8. Responsible Antibiotic Use

Recommended standard AC8c: *“The operation promotes judicious use of antibiotics by ensuring that antibiotics are only used therapeutically, as directed by a veterinarian, ideally based on culture and susceptibility testing. Antibiotics, including coccidiostats such as ionophores, are not used for growth promotion, to improve feed efficiency, or to prevent disease that has not yet been diagnosed.”*

Rationale for recommended standard: Strengthening this standard aligns with all three of BeefCare’s commitments – to Animal Care, Environmental Stewardship and People & Community. Inappropriate use of antimicrobials in cattle can lead to selection for, and dissemination of, antimicrobial resistant bacteria in the animals themselves, their wastes, and their surrounding environment, which ultimately causes human deaths due to antibiotic-resistant bacterial infections.

In 2017, the World Health Organization (WHO) recommended that medically important antimicrobials not be used in food-producing animals for growth promotion or prevention of infectious diseases that have not yet been clinically diagnosed.¹⁵ From an animal care perspective, using vaccines and sanitation to prevent disease, as recommended by the WHO, is preferred. While regulatory agencies do not consider ionophores to be medically important antibiotics for humans, they must also be used only judiciously, as farm animals have begun to develop ionophore-resistant infections and there is evidence that ionophore resistance can result in cross-resistance to medically important antibiotics.^{16, 17}

Strengthening this standard as recommended would not prevent veterinarians from prescribing appropriate antibiotics for diagnosed medical conditions, which AWI supports.

Section AC10. On-Farm Euthanasia

Recommended standard AC10a: *“Non-ambulatory cattle unable to eat or drink, or not showing improvement within 24 to 36 hours of managed care are humanely euthanized. If the farm veterinarian determines that an animal cannot be successfully treated, it must be euthanized humanely and immediately.”*

Rationale for recommended standard: Large body size predisposes non-ambulatory cattle to secondary nerve and muscle damage, with prognosis worsening significantly after 6 hours. Due to the potential for pain and distress, and the poor prognosis for non-ambulatory cattle not responding to treatment within 24 hours, timely euthanasia is essential to avoid unnecessary suffering.

¹⁵ World Health Organization (2017) WHO guidelines on use of medically important antimicrobials in food-producing animals. Geneva: World Health Organization. Available at: <https://apps.who.int/iris/bitstream/handle/10665/258970/9789241550130-eng.pdf;jsessionid=EF104A10A338906C394B1FF143EF5FE0?sequence=1>.

¹⁶ Federation of Veterinarians of Europe (2016) FVE position paper on coccidiostats or anticoccidials. Available at: <https://www.fve.org/cms/wp-content/uploads/FVE-position-paper-on-coccidiostats-or-anticoccidials.pdf>.

¹⁷ Wong A. 2019. Unknown risk on the farm: does agricultural use of ionophores contribute to the burden of antimicrobial resistance? *mSphere* 4:e00433-19. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6763768/pdf/mSphere.00433-19.pdf>.

Section AC11. Facilities

Recommended standard AC11e: “For operations utilizing barns to house cattle, *stocking density, bedding, and air quality promote cattle comfort, and lighting levels are sufficient to assess cattle. Cattle must have access to a well-drained lying area of sufficient size to accommodate all cattle lying down together in normal resting posture, and should be provided with dry bedding. Hard-surfaced floors should prevent slippage and be impervious to water and urine, but not be abrasive to cattle’s feet. Cattle comfort, including freedom to groom themselves and stretch their limbs, is observed during the audit to assess housing conditions.*”

Rationale for recommended standard: Making the current standard more specific will help ensure meaningful assessment. The inclusion of objectively assessable values (e.g., parts per million for ammonia, minimum sq. ft. per animal) would provide clear guidance to both assessors and operations.

Recommended standard AC11h: “The operation addresses extreme weather conditions to ensure cattle comfort *and ability to thermoregulate. Natural or manmade structures must be available to provide shade and protect against extreme heat, cold, precipitation, and wind.*”

Rationale for recommended standard: For cattle grazing in the open, lack of shelter from the elements can cause discomfort, injury, and even death. For example, winter storms resulted in the deaths of more than 37,000 beef cattle in Montana during the winter of 2018. According to data reviewed by the Humane Farming Association, during a recent 5-year period, the US Department of Agriculture’s (USDA) Livestock Indemnity Program compensated producers for nearly 300,000 livestock deaths (not including poultry). Though some deaths from adverse weather are unavoidable, every precaution possible should be taken to ensure that cattle are safe from extreme weather events.

Section AC12. Transportation

Recommended standard AC12b: “All cattle loaded at the operation are considered fit for transport, able to handle the rigors of transportation and are not severely injured or ill. *Non-ambulatory cattle are only transported for veterinary care.*”

Rationale for recommended standard: This standard should be strengthened by stipulating requirements related to non-ambulatory cattle.

Recommended standard AC12d: “Maximum transport time shall be no longer *than 8 hours. Whenever possible, the animal should be slaughtered as close to where it was raised as possible.*”

Rationale for recommended standard: The current standard uses the maximum legally allowable transport time, as established by the 28-Hour Law, as its criterion, meaning it does not surpass industry standards. Third-party animal welfare certification programs typically require significantly shorter transport times for cattle, such as Certified Humane’s 8-hour limit. Given the significant discomfort that cattle frequently experience during transport, such as food and water deprivation, lack of bedding, uncomfortable temperatures, and overcrowded conditions, the draft version of this standard is inconsistent with to your stated goals of ensuring cattle are free from discomfort and distress.

Decreasing the maximum allowable transport time is unlikely to be a major obstacle to producers, as the most recent BQA survey found the average transport time for steers and heifers is 2.7 hours.¹⁸

***Note:** We have observed that the posted draft BeefCare standards only cover cow-calf and stocker (“backgrounder”) operations, and that the feedlot (“finishing”) phase of beef production is not addressed. If feedlots are not to be allowed under the BeefCare program, we believe it is important that this be clearly stated in the standards. On the other hand, if feedlot finishing is allowed, this aspect of husbandry must be addressed. Not covering up to 50% of an animal’s life is not acceptable for a program that certifies animal husbandry and sustainability aspects of production.

CARE Certified as a Misleading Marketing Claim

AWI believes that the WFCF’s CARE Certified program, as currently designed, is misleading to consumers. A CARE Certified logo implies that the animals raised under the program are subject to animal care that is higher than the industry standard. Consumers have expressed a similar view of the claim “humanely raised,”¹⁹ and the now-defunct United Egg Producer’s “Animal Care Certified” logo, which was found to be misleading by both the National Advertising Division (NAD) of BBB National Programs, Inc., and the U.S. Federal Trade Commission (FTC).

In 2002, producer members of the industry group United Egg Producers (UEP) began marketing their egg products with an “Animal Care Certified” logo. The “certification” represented compliance with minimum industry animal care standards. Recognizing that this logo was likely to mislead consumers, Compassion Over Killing (COK) (now known as “Animal Outlook”) filed legal petitions with the NAD, the FTC, the U.S. Department of Agriculture, and the U.S. Food and Drug Administration about the claim. The NAD agreed with COK, stating that consumers could reasonably interpret the claim to mean that the hens who laid the eggs marketed under that claim are afforded a more humane level of care than what is allowed by those guidelines. In essence, because the claim was based upon compliance with industry standards, it was likely to mislead consumers. The NAD recommended the claim be discontinued.

When UEP producers continued to market products using the “Animal Care Certified” logo, COK asked the NAD to refer the case to the FTC for enforcement. After investigating, the FTC agreed with the NAD, and came to an agreement with the UEP that the logo would be discontinued permanently. These products are now marketed with a “United Egg Producers Certified” logo which the FTC stated “directly address[es] the deception identified in the [NAD] decision.”

The CARE Certified logo is likely to mislead consumers in a similar way. The program name and the factual basis that led the NAD and FTC to finding the “Animal Care Certified” logo misleading are nearly identical. Just like the UEP’s “Animal Care Certified” program, CARE Certified is based upon compliance

¹⁸ National Beef Quality Audit, *supra* note 13 at 8.

¹⁹ For example, AWI has surveyed four times on the claim “humanely raised” and found that consumers believe that producers should not be allowed to use the claim unless they exceed minimum industry animal care standards. *E.g. Survey of Consumer Attitudes About Animal Raising Claims on Food (Part II)*, Animal Welfare Inst. (Oct. 2018) <https://awionline.org/sites/default/files/uploads/documents/FA-AWI-survey-on-animal-raising-claims-Oct-2018.pdf>

with industry animal care standards, and creates a false impression to consumers that the animals used to create these products were treated to a higher standard of care. As written, the BeefCare standards do not substantially improve upon industry standards. As such, consumers are likely to be misled by the use of this logo on product packaging and marketing materials.

The fact that CARE Certified capitalizes upon the ethos of other, legitimate third-party animal welfare certification programs such as Certified Humane, American Humane Certified, Certified Animal Welfare Approved, and Global Animal Partnership is particularly problematic, as it is not designed as a true certification tool. No scoring criteria exist, meaning that there is no assessment of whether a facility “passes” or “fails” even if key animal welfare indicators are not met. In stark contrast to the above-listed animal welfare certification programs, it is not clear what if any consequences result from failure to meet program standards other than willful acts of abuse.

The CARE Certified program’s other attributes, such as the “environmental stewardship” and “people and community” standards, also do not provide a sufficient basis for use of the logo. According to the FTC, “[t]hird-party certification does not eliminate a marketer’s obligation to ensure that it has substantiation for *all claims reasonably communicated by the certification.*”²⁰ The CARE Certified encircled heart logo, the program’s purpose, and related marketing materials communicate a very strong animal welfare message to consumers. Even if the certification standards did substantiate the “environmental stewardship” and “people and community” attributes, marketers are responsible for “all reasonable interpretations of their claims” and must ensure that all express and implied claims are substantiated.²¹ As written, the CARE Certified standards simply *cannot* substantiate an animal welfare interpretation of the logo.

Finally, AWI finds it troubling that WFCF has already allowed products to be marketed under the CARE Certified logo despite the standards not having been finalized. The fact that retailers are selling products with the CARE Certified logo without actual substantiation is textbook consumer deception. According to the FTC, it is deceptive to “misrepresent . . . that a product . . . has been endorsed or certified by an independent third party.”²² The WFCF website states that CARE Certified products “hit shelves” in March 2021, and AWI is aware of at least one retailer that has been marketing beef, pork, and chicken products under the certification, despite the fact that *none* of these standards are complete, and to AWI’s knowledge, only the BeefCare standard is in development. WFCF has an obligation, at the very least, to ensure that its logo is not used to market products to consumers for which there is no operational certification program.

Conclusion

AWI strongly supports authentic higher-welfare, sustainability auditing and marketing programs. We view these programs as benefiting animals, workers, consumers of animal-based foods, and farmers and

²⁰ 16 C.F.R. § 260.6(c) (emphasis added).

²¹ FTC Policy Statement on Deception, 103 FTC 174 (1983); FTC Policy Statement Regarding Advertising Substantiation, 104 FTC 839 (1984).

²² 16 C.F.R. § 260.6(a).

ranchers who expend the resources required to meet consumer expectations of these products. To meet consumer expectations, these programs must be based on standards that are demonstrably higher than conventional industry guidelines. Unfortunately, the draft BeefCare animal husbandry standards do not satisfy this requirement. To prevent consumers from being confused and misled by the CARE Certified claim, we encourage WFCF to revise the BeefCare standards as described above.

We appreciate your serious consideration of AWI's concerns and suggestions. Please contact Erin Sutherland (erin@awionline.org) with any questions, or if you would like to schedule a meeting to discuss our recommendations.

Sincerely,



Erin Sutherland
Staff Attorney
Farm Animal Program



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