





# FOOD LABELS AND ANIMAL WELFARE

Many food labels are confusing, if not downright misleading. While some food label claims have definitions controlled by the government, most do not have legal definitions. In addition, most label claims are "self-made" by the company merely for marketing purposes, and the accuracy of the claims is not verified.

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 three categories-"certified labels," "unverified claims," and "meaningless or misleading claims."

# **CERTIFIED LABELS**

These label claims are defined by a formal set of publicly available animal care standards. Compliance with the standards is verified by a third-party audit.



# AMERICAN GRASSFED CERTIFIED

(dairy, beef, lamb, goat)

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 (no feedlots). Unlike the USDA's voluntary standard for grass fed claims, confinement and the use of hormones and antibiotics is prohibited. Pain relief is not required for physical alterations like docking of tails and removal of horns. No standards exist for the treatment of breeding animals, animals during transport, or animals at slaughter.



# AMERICAN HUMANE CERTIFIED

(dairy, eggs, chicken, turkey, beef, veal, bison, lamb, goat, pork)

A third-party welfare certification program administered by the American Humane

Association. Access to the outdoors is not required for meat birds, egg-laying hens, beef cattle, and pigs. Provides the lowest space allowances of the main humane certification programs, and is the only welfare program to permit the use of cages for housing egg-laying hens. Beak trimming of poultry and tail docking of pigs without pain relief are allowed. Standards include the treatment of breeding animals, animals during transport, and animals at slaughter.



# ANIMAL WELFARE APPROVED

(dairy, eggs, chicken, goose, duck, turkey, beef, bison, lamb, goat, pork, rabbit) The only USDA-approved third-party

certification label that supports and promotes family farmers who raise their

animals with the highest welfare standards, outdoors, on pasture or range. The program, which is administered by the non-profit Animal Welfare Institute, is offered free of charge to participating farmers. Beak cutting of poultry and tail docking of pigs and cattle are prohibited, while pain relief is required for removal of horn buds of cattle. Standards include the treatment of breeding animals, animals during transport, and animals at slaughter.



# CERTIFIED HUMANE

(dairy, eggs, chicken, turkey, beef, veal, lamb, goat, pork)

A third-party welfare certification program administered by the non-profit Humane Farm Animal Care. Access to the outdoors is not required for meat birds, egglaying hens, and pigs; however, minimum space allowances and indoor environmental enrichment must be provided. Feedlots are permitted for beef cattle. 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.





# **CERTIFIED ORGANIC**

(dairy, eggs, chicken, goose, duck, turkey, beef, bison, lamb, goat, pork)

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. They do, however, 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. Physical alterations such as the removal of horns and the docking of tails are allowed, and pain relief is not required. 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 inconsistency among certifiers is a problem.



# FOOD ALLIANCE CERTIFIED

(dairy, eggs, chicken, beef, lamb, pork)

A non-profit sustainable agriculture certification program that supports "safe

and fair working conditions, humane treatment of animals, and good environmental stewardship." Standards provide for access to natural light, fresh air, and 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**

(chicken, turkey, beef, pork)

This is an animal welfare rating program as opposed to a humane certification program. Producers are certified on a six-tier scale, from Step 1 to Step 5+. Standards for Step 1 are only marginally better than those of the conventional industry; only Steps 4, 5, and 5+ require access to pasture, and feedlots are permitted for beef cattle through Step 4. Beak trimming of turkeys raised at Steps 1–3 and tail docking of individual pigs are allowed. Standards include the treatment of animals during transport, but not the treatment of breeding animals or the handling of animals at slaughter.

# **UNVERIFIED CLAIMS**

These claims have no legal definition and standards are vague and/or weak. Compliance with USDA's definition is not verified on the farm by the government or any independent third party.

# **CAGE FREE**

## (eggs)

According to 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 shed. In fact, cage free hens often have scarcely more space than caged birds, and may not be given access to sunlight and fresh air. (The term "cage free" is typically not used on eggs from hens who have access to range or pasture.) Beak cutting is permitted. The USDA Agricultural Marketing Service (AMS) verifies "cage free" claims when made by USDA-inspected egg producers. The claim is not verified when used on non-USDA inspected eggs.

# FREE RANGE/FREE ROAMING

#### (eggs)

This claim, indicating that hens were allowed access to the outdoors, may be used on eggs that are USDA Certified Organic. In this case, the claim would be verified by a USDA-accredited organic certifying agency. Non-organic free range claims on eggs are not recognized or verified by any federal entity, although state regulation of the claim is possible. For non-organic eggs, "free roaming" likely means the hens are not confined in a cage.

# FREE RANGE/FREE ROAMING

#### (all products)

No legal definition exists for these claims when used on any food products, although USDA does apply an informal guideline to applications requesting use of the claims. Moreover, USDA does not conduct on-farm inspections to verify compliance with its guideline for the claims. The guideline merely states that the animals must be given continuous, free access to the outdoors, but the number and size of exits to accommodate all animals, the size of the outdoor space, and the presence or amount of vegetation or other environmental enrichments are not specified.

#### FREE RANGE

## (chicken, turkey, goose, duck)

USDA allows the use of these claims on poultry products if the farmer submits testimonials and affidavits describing the conditions under which the birds are raised. USDA informally defines free range for poultry as having "continuous, free access to the outdoors for over 51 percent" of the birds' lives. However, because birds may be housed indoors for inclement weather and other reasons, and given that chickens raised for meat are slaughtered at just 42 days, it is possible that some free range chickens never step outside.



# FREE ROAMING

#### (beef, bison, lamb, goat, pork)

In order to receive approval from USDA to put a "free roaming" label on meat, farmers must show that the animals had "continuous, free access to the outdoors for a significant portion of their lives." According to the USDA Food Safety and Inspection Service (FSIS), which approves the claim, "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."

# **GRASS FED**

#### (dairy, beef, bison, lamb, goat)

A voluntary standard for "grass fed" has been established for producers wishing to have this claim verified by AMS. The standard requires a lifetime diet of 100 percent grass and forage, including legumes and cereal grain crops (in a pre-grain vegetative state) but excluding grains and grain byproducts. Pasture access during most of the growing season is required, but animals may be confined to feedlots and antibiotics and hormones are allowed. Producers may use the claim without AMS verification, in which case the label claim is approved by FSIS. FSIS may apply a different standard than the AMS grass fed standard.

# HUMANELY RAISED/HUMANELY HANDLED

#### (all products)

Not a USDA-approved term, meaning "humanely raised" claims should be accompanied by an explanation of what is meant. USDA has approved third-party certification programs making "humane" claims, including Animal Welfare Approved, Certified Humane, and American Humane Certified. USDA AMS has also approved "humanely raised" and "humanely handled" claims under its Process Verified Program. USDA does not have a set of independent standards for certifying products as "humanely raised," however. The agency is merely verifying that the producer has met its own standards, and as such the claim may simply represent a marketing tactic with little or no relevance to animal welfare.

## NATURALLY RAISED

# (chicken, turkey, goose, duck, beef, bison, lamb, goat, pork)

A voluntary standard has been established for producers wishing to have this claim verified by AMS. However the claim may also be used by producers not participating in an AMS verification program. The claim can be used on meat and poultry, but not on dairy and eggs, and indicates the meat came from animals who did not receive antibiotics and hormones and were fed only a vegetarian diet. The definition does not require any specific living conditions for the animals, let alone access to the outdoors or pasture.

# NO ADDED HORMONES/ NO HORMONES ADMINISTERED

#### (dairy, beef, bison, lamb)

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. USDA does not routinely test for the presence of hormones, so no verification system exists.

# NO ANTIBIOTICS ADMINISTERED/ RAISED WITHOUT ANTIBIOTICS

#### (all products)

The claim "antibiotic free" is not allowed because antibiotic-residue testing technology cannot verify that an animal has never received antibiotics. However, USDA does allow "no antibiotics administered," "no antibiotics added," 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 non-therapeutic 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.

# PASTURE RAISED/PASTURE GROWN/ MEADOW RAISED

#### (all products)

Generally, "pasture raised" is used to indicate that a dairy, egg, meat, or poultry product came from animals provided with continuous access to pasture and natural vegetation. However, no regulatory standard for the term exists, and for meat and poultry the USDA applies the same definition as it does for the "free range" claim – animals had continuous, free access to the outdoors for a significant portion of their lives. The term "significant portion of their lives" is not defined, so confinement for some period of time is not ruled out. There is no independent verification of the claim unless the farmer participates in a third-party certification program, such as Animal Welfare Approved.

# SUSTAINABLY FARMED

#### (all products)

USDA has no official definition for this claim. Evaluation of the claim is made on a case-by-case basis, dependent upon the raising protocol supplied by the producer with signed affidavits. According to USDA, the producer can further explain the claim by other claims offered on the label. In other words, as with "humanely raised," this claim can likely mean just about anything the producer wants it to mean.



# MEANINGLESS OR MISLEADING CLAIMS

The following claims are meaningless or misleading with regard to animal welfare. (They may not be meaningless or misleading in terms of other issues.)

# **CAGE FREE**

#### (chicken, turkey)

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

# HALAL

#### (chicken, turkey, goose, duck, beef, lamb, goat)

"Halal" may be used on the labels of meat and poultry products prepared according to Islamic law and under Islamic authority. The U.S. 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.

#### KOSHER

#### (chicken, turkey, goose, duck, beef, lamb, goat)

"Kosher" may be used on the labels of meat and poultry products prepared under rabbinical supervision. Kosher products are 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 U.S. Humane Methods of Slaughter Act for ritual or religious slaughter. Most animal welfare advocates consider slaughter without prior stunning to be inhumane.

# NATURAL

# (chicken, turkey, goose, duck, beef, bison, lamb, goat, pork)

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 USDA is considering establishing one.

# NO ADDED HORMONES/ NO HORMONES ADMINISTERED

#### (chicken, turkey, goose, duck, pork)

USDA prohibits the use of hormones in the production of poultry and pork, 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 pork or poultry should be considered a marketing ploy with the sole intent to mislead consumers.

# 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, and sunlight. The birds are also denied litter for dust bathing and boxes for nesting. Beak cutting without 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**

#### (all products)

USDA Agricultural Marketing Service offers this seal to producers as a marketing tool. Participating producers submit their standards for consideration, and after approval is granted, USDA conducts audits to verify that the company is following its own standards in raising animals. Hence, the meaning of a term such as "humanely raised" 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**

#### (all products)

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

