

January 22, 2016

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

RE: Meaningful Label Claims

I am writing because consumers cannot rely on claims like "free range," "humanely raised," and "sustainably farmed" because the USDA's Food Safety and Inspection Service fails to adequately assess these claims.

Consumer protection groups have even deemed these claims worthless:

Consumer Report's "Label Report Card" assesses the free range claim as "not meaningful" because it is inconsistently applied and not verified.

BuyingPoultry.com assigns a "D" rating to the free range claim and an "F" to the humanely raised claim.

The Animal Welfare Institute (AWI) investigated the FSIS' label approval process for more than 100 approved labels containing animal welfare claims. AWI found that:

- The FSIS is approving animal production claims, such as "humanely raised," and "sustainably farmed," in the absence of any definition or production standards.
- For other claims, such as "free range" and "range grown," the FSIS is applying an overly permissive definition that is allowing consumers to be misled about the quality of the products they are purchasing.
- The FSIS is approving some label applications despite little or no evidence for the particular animal production claims.
- The FSIS is approving other label applications for animal production claims when conflicting evidence has been provided.

These findings are not only disappointing but deeply disturbing. Producers can raise animals to any standard, even woefully inadequate industry standards, and are still able to use these labels. Americans rely on the USDA to enable them to make informed decisions.

It is urgent for the USDA to strengthen its label approval process. It can do this by granting AWI's petitions to require third-party certification of animal welfare and environmental stewardship label claims (2014), redefine the free range claim, and amend the USDA's approval process (2016)

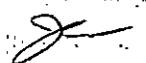
In addition, I urge you to request that the USDA Office of Inspector General audit the FSIS' approval of animal production claims.

The Department's own definitions for these terms (free range, humanely raised, sustainably farmed) are vague, ambiguous, and sometimes nonexistent. Such lack of standards and enforcement allows producers to mislead consumers and hurt farmers who do provide animals with better care. In fact, the USDA approved a majority of these claims based on bare affidavits from the producer or with no supporting evidence whatsoever.

Consumers do not know what they are getting because they rely on labels to make decisions about the products they want. Animal welfare is important to me, and, according to numerous polls, important to a majority of consumers who purchase meat and poultry products. Consumers need labels they can trust.

Thank you for your help in this urgent matter.

Yours truly,

 J. Capozzelli