



August 4, 2014

Docket Room Manager
USDA, FSIS
Patriots Plaza 3
1400 Independence Avenue, SW
Mailstop 3782, Room 8-163B
Washington, DC 20250-3700
Via email: fsispetitions@fsis.usda.gov

Re: Support for FSIS petition 14-01

Dear Secretary Vilsack:

I am writing to voice Friend's of the Earth's concern regarding the United States Department of Agriculture (USDA)'s current approval process for animal welfare and environmental stewardship label claims on meat and poultry products. Product labels that are accurate and properly marked are invaluable to both consumers and farmers. The USDA's current process fails to adequately protect consumers and farmers by allowing for inaccurate or misleading claims. This process confuses consumers, lacks transparency, and uses inadequate procedures to assess value-added claims.

In order to assure a reliable and accurate process for approval of these label claims, we respectfully request that FSIS grant rulemaking petition number 14-01, submitted by the Animal Welfare Institute in May 2014.

The petition requests that USDA's Food Safety and Inspection Services (FSIS) take actions to improve the label approval process for animal welfare and environmental stewardship claims by: (1) requiring companies to utilize third-party certification for humane and sustainable label claims on meat and poultry products; (2) requiring third-party certifiers to publish their standards for transparency purposes; and (3) requiring that third-party standards for animal welfare and environmental stewardship claims exceed conventional meat and poultry industry standards related to the claim.

As AWI's petition demonstrates, FSIS does not currently have the ability to determine if animal welfare and environmental stewardship claims, such as "humanely raised" and "sustainably farmed," are in fact accurate and truthful. Furthermore, consumer confusion is a common problem with use of these claims. For example, a public opinion survey commissioned by AWI found that 88 percent of frequent meat or poultry purchasers believe that producers should not be permitted to use the claim "humanely raised" on their product labels unless they exceed minimum industry animal care standards. However, FSIS is currently approving the claim "humanely raised" for products from animals raised under conditions that vary widely, and include minimum industry standards. FSIS is also approving label claims after receiving only one or two- sentence affidavits simply stating animals are raised humanely, hardly enough evidence of compliance with the label claims.

Some farmers already provide consumer assurances and meet a value-added standard, by participating in a third-party certification program such as the "USDA Certified Organic" label. However, FSIS is currently allowing producers to make claims that, to consumers, represent the equivalent message of an independent third-party certification without going through the process of certification. Producers who make animal welfare and/or environmental claims, but do not adhere to higher standards and are not independently certified, are able to avoid both the cost of certification and better production and still reap the benefits of certification by selling products at a premium price. Allowing the use of these claims without proper verification promotes unfair marketing practices, and disadvantages farmers who do adhere to higher standards and undergo independent evaluation of their product claims.

Nearly 90 percent of respondents to an AWI commissioned poll believe that claims like "humanely raised" and "sustainably farmed" should be verified by an independent third party. Third-party certification for animal welfare and environmental stewardship label claims will benefit consumers, farmers, and FSIS. Consumers will be able to determine the true meaning of these claims when they appear on meat and poultry packages, and farmers who raise animals to higher welfare and environmental standards will be able to receive just compensation for their efforts. Granting the petition will also help FSIS by ensuring labels are meaningful and have verifiable standards behind them, which in turn will allow FSIS to run a more efficient label approval process.

Sincerely,

Lisa Archer
Director Food and Technology Program