

[REDACTED]

May 17, 2014

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

Dear Mr. Secretary:

I am writing to urge you to improve the procedures used for approving animal welfare and sustainability label claims on meat and poultry packaging by granting a petition submitted by the Animal Welfare Institute (AWI). This petition (*To Amend Labeling Regulations under the Federal Meat Inspection Act and the Poultry Products Inspection Act to Require Third-Party Certification for the Approval of Animal Welfare and Environmental Stewardship Claims*) illustrates how requiring independent third-party certification would help prevent the use of misleading and inaccurate labels.

AWI researched USDA approval of claims like "humanely raised" and "sustainably farmed" and found that no supporting evidence whatsoever was provided for 20 of 25 claims that were approved. This lack of oversight allows for the use of intentionally deceptive labels - confusing consumers and harming high-welfare farmers who have earned the right to use these claims.

In a recent public opinion survey on meat labeling commissioned by AWI, almost 90 percent of consumers stated that producers should have to prove any claims like "humanely raised" and "sustainably farmed" on labels, and a majority of consumers believe that a brief statement from a producer does not qualify as acceptable proof. Under the current approval process, no one, including USDA, learns which claims are being appropriately used and which ones aren't.

Thank you for considering my request.

Sincerely,



Stephen W. Wonderly

Date: July 3, 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](mailto:fsispetitions@fsis.usda.gov)

Re: Support for FSIS petition 14-01

To Whom It May Concern:

I am writing to voice our concerns regarding the current approval process used for animal welfare and environmental stewardship label claims on meat and poultry products. The approval process confuses consumers, lacks transparency, and uses inadequate standards for these value-added claims. It is crucial that the United States Department of Agriculture (USDA) adhere to a process that protects consumers, and does not allow for inaccurate or misleading claims. Product labels that are accurate and properly marked are invaluable to both consumers and farmers. 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 sensible 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. These practices lead to consumer confusion and a large disparity between what consumers believe they are purchasing and the reality.

Some farmers already assure consumers that their products are properly labeled, and meet a value-added standard, by participating in a third-party certification program. 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 premise 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,

Andrew deCoriolis



Program Director  
Farm Forward



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](mailto:fsispetitions@fsis.usda.gov)

**Re: Support for FSIS petition 14-01**

July 20, 2014

To Whom It May Concern:

I am writing to you with regard to the current approval process used for animal welfare label claims on meat and poultry. As a global organization working to end factory farming, with our US office headquartered in Atlanta, Compassion in World Farming wants clear labeling that will help consumer choose higher animal welfare products. We are deeply concerned that the current system in the United States is inadequate and can result in consumers being misled, and choosing products that they did not intend to buy.

Clear labeling not only protects consumers, but it also protects the farmers working hard to create higher animal welfare choices in the market. We run a project supporting pasture raised poultry farmers and educating consumers regarding availability of higher welfare products in the market. Many of the pastured poultry farmers we work with throughout the country tell us that one of the biggest hindrances to higher welfare products being successful in the market is so called 'humane-washing' of products. This is where farmers are competing on an uneven playing field with products using terms like "humanely-raised". Consumers believe when products labeled 'humanely-raised' are similar, though substantially cheaper, than a pastured raised product, and therefore a better deal. The pastured poultry farmer is therefore at a disadvantage.

It is difficult, if not impossible, for a consumer to understand what the differences are, as the FSIS labeling process requires so little information regarding the standards of production, and makes so little of that information easily available to consumers. We are deeply concerned to learn that, in some cases, 'humanely-raised' is referring to minimum industry standards, which is a very different standard with regard to animal welfare when compared to pasture raised.

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. 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.

We also deeply concerned to learn that FSIS is approving label claims after receiving only one or two- sentence affidavits simply stating animals are raised humanely. This lack of robust approval process can lead to major gaps in what consumers believe they are buying and the reality. Labels should leave no room for interpretation by either those using them or those trying to understand them. It would appear the current system leaves ample room for both.

**It is critical that the United States Department of Agriculture (USDA) serves to protect consumers from being misled and protects farmers working hard to meet consumer demand for higher welfare products. As such, we urge you to accept the 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 sensible 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 indicates, 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.

In short, labeling should be simple and clear, and work to protect consumers and farmers choosing higher welfare production. We strongly urge you to accept grant rulemaking petition number 14-01.

Sincerely,



Leah Garces  
USA Director  
Compassion in World Farming  
One West Court, Suite 750  
Decatur, GA 30030

