



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

Re: Support for FSIS petition 14-01

To Whom It May Concern:

I write on behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA) and our over two million supporters in the United States to share our concern with the lack of substantiation required for animal welfare-related claims commonly found on meat, egg, and dairy products. We urge you to grant rulemaking petition number 14-01, submitted by the Animal Welfare Institute, to ensure that the label approval process signifies meaningfully humane production.

The United States Department of Agriculture (USDA)'s current process for approving animal welfare label claims on products fails to adequately protect consumers and farmers choosing higher-welfare production by allowing inaccurate and misleading claims. The Food Safety Inspection service (FSIS) currently approves label claims such as "humanely raised" for foods produced under widely varying welfare conditions, including for those products only meeting minimum industry standards. FSIS also approves label claims based on affidavits of a sentence or two professing that the animals are raised humanely. This is not enough to establish the accuracy of a labeling claim.

This gap in oversight disadvantages producers raising animals under better standards and perpetuates consumer confusion. Consumers who wish to support or purchase higher welfare items cannot make informed decisions about the products they purchase. Nor can they effectively support farmers utilizing more humane practices who have earned the right to use such claims. Farmers raising animals with higher welfare, such as those who provide access to pasture, face a price disadvantage that consumers may not fully appreciate. Transparent labeling and marketing is essential to address the confusion and level the playing field.

In order to do this, USDA should require third party certification that animals were raised according to standards that measurably surpass industry norms in order for a product to carry a claim like "humanely raised." USDA should also require all third party certifiers used to publish

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their standards. **In our assessment, Certified Humane, Animal Welfare Approved, and Global Animal Partnership at Steps 3 and above have animal welfare requirements that are measurably above industry standards. .**

We urge you to grant AWI's petition to protect animals, consumers, and higher-welfare farmers by requiring the use of the certifications we have suggested in order to verify all "humanely raised" claims.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne R. McMillan".

Suzanne McMillan
Senior Director
Farm Animal Welfare Campaign
ASPCA