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ANIMAL WELFARE INSTITUTE

# LABEL CONFUSION 2.0

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HOW THE USDA ALLOWS PRODUCERS TO USE  
"HUMANE" AND "SUSTAINABLE" CLAIMS ON MEAT PACKAGES  
AND DECEIVE CONSUMERS



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## ABOUT THE ANIMAL WELFARE INSTITUTE

Since its founding in 1951, the Animal Welfare Institute has been alleviating suffering inflicted on animals by people. AWI works to improve conditions for the billions of animals raised and slaughtered each year for food in the United States. Major goals of the organization include eliminating factory farms, supporting higher-welfare family farms, and achieving humane transport and slaughter conditions for all farm animals.

## ABOUT THE RESEARCH

This report presents an analysis of data compiled from Freedom of Information Act requests submitted by the Animal Welfare Institute (AWI) to the United States Department of Agriculture's Food Safety and Inspection Service (FSIS) from 2014 to 2018. The requests were for the label approval files producers submit prior to using humane or sustainability claims. Some requests resulted in "no responsive records," which meant that the USDA sent no records to AWI. When AWI did receive records from the FSIS, it evaluated the records based on what was not redacted. Some relevant information may have been redacted by the USDA.

This report is an update on a 2014 report, *Label Confusion: How "Humane" and "Sustainable" Claims on Meat Packages Deceive Consumers*. The 2014 report found that the USDA was allowing producers to use animal welfare and environmental claims without supporting evidence. For 20 out of 25 claims requested by AWI, the USDA had no documentation that the producer underwent pre-market label approval for the use of these claims. In the five cases where it appeared the producer did undergo pre-market label approval, the USDA allowed producers to use claims with only minimal supporting evidence.

This report was prepared by Erin Thompson of AWI, who wishes to thank Dena Jones, AWI Farm Animal Program director, for assisting in its preparation.

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## INTRODUCTION

Food labeling claims cover a variety of topics of interest to consumers, including the manner in which animals and the environment are treated during production of a product. Many labels are confusing, however, and some are downright misleading. As a result, consumers are often thwarted in their attempts to use labels to guide their food buying decisions. Bad press regarding the reliability of food product labels has led to public skepticism about the accuracy of label claims and about the ability of the government to regulate them. In fact, consumers have good reason to be skeptical.

To evaluate the approval process for label claims related to animal welfare and environmental stewardship, the Animal Welfare Institute (AWI) obtained records via the Freedom of Information Act and conducted a review of government label approvals for 11 distinct claims (see insert at right) appearing on the packages of 19 meat and poultry products. These requests amounted to an evaluation of 23 total claims made on these 19 meat and poultry products. The review revealed that the government is regularly approving the use of animal welfare and environmental claims as long as the producer defines the claim on the package. Defining claims on the package may appear to promote transparency, but can be problematic for two reasons: Producers often define claims in a way that is not relevant to animal welfare, and the claims are approved without sufficient verification that producers actually meet these definitions.

AWI also found that the current label approval process (1) is inconsistent and lacks transparency, (2) does not meet consumer expectations, (3) leads to misleading and deceptive labeling, and (4) harms farmers who use accurate claims.

## Animal Welfare and Environmental Claims Reviewed by AWI

- + Agriculturally Sustainable and Environmentally Friendly
- + Ethically Raised
- + Free Raised
- + Humane
- + Humanely Raised
- + Humanely-raised
- + Raised Humanely
- + Socially Raised
- + Sustainable
- + Sustainably Farmed
- + Thoughtfully Raised

AWI reviewed “humane” and “sustainable” claims because of its position that these are complex, holistic claims that are often difficult to substantiate. Claims such as “grass fed,” “pasture raised,” or “cage free” were not evaluated because definitions exist or verification is possible. However, AWI also reviewed several claims it believes should not be approved by the FSIS, including claims that may have humane connotations, such as “thoughtfully raised,” “ethically raised,” and “free raised.” It is AWI’s position that these and similar claims should not be approved because they often lead to consumer deception, and measurable alternative claims exist.





## THE USDA HAS THE AUTHORITY TO REGULATE CLAIMS ON MEAT AND POULTRY

The Federal Meat Inspection Act and the Poultry Products Inspection Act give authority to the United States Department of Agriculture (USDA) to deny the use of labels believed to be false or misleading. As stated in these laws, false or misleading labeling results in “misbranded” products, and thereby jeopardizes the regulation of meat, harms public welfare, and destroys markets for products that are properly labeled. Misbranded or deceptively packaged foods can be sold at lower prices and compete unfairly with properly labeled and packaged items, to the detriment of consumers and farmers alike.

While the USDA has received authority from Congress to regulate meat and poultry labels, it does not have authority, for the most part, to regulate the manner in which animals are raised or the impacts of agricultural production on the environment. And, while the USDA approves claims related to animal welfare and environmental protection, it does not go onto farms to evaluate animal-raising or environmental practices. The USDA relies solely on information supplied by producers to determine whether claims related to humane animal treatment and sustainable agricultural practices are accurate and appropriate for use on a meat label.

According to the USDA’s 2016 *Labeling Guideline on Documentation Needed to Substantiate Animal Raising Claims for Label Submissions* (USDA Labeling Guide), a producer must provide an explanation on the package of the meaning of the claim for consumers (i.e., a producer must define its claim on the package itself). In addition, producers must provide documentation for four criteria (five if using third-party certification) to the USDA to use these claims (see below).

Unfortunately, the USDA Labeling Guide provides no specific criteria to help determine whether these different forms of supporting evidence are, in fact, adequate. AWI, thousands of members of the public, and many interest groups provided feedback during the public comment period associated with the guide; over 99 percent of comments submitted opposed finalization of the document in the form presented. Most commenters expressed concerns that the USDA Labeling Guide lacked the specificity necessary to ensure that misleading labels are not approved. The USDA has not yet responded to the comments, and the document still stands.

### Documentation Needed to Support Animal Welfare and Environmental Stewardship Claims

According to the USDA Label Guide, producers must submit the following information to support animal welfare and environmental stewardship claims.

1. A detailed written description for ensuring that the raising claim is valid from birth to harvest (i.e., an operational protocol)
2. A signed document explaining how the animals were raised to support that the specific claim made is truthful and not misleading (i.e., an affidavit)
3. A written description of the tracing and segregation mechanism from slaughter, packaging, and distribution
4. A written description of the identification, control, and segregation of nonconforming animals/product
5. A current third-party certificate for certified claims (if applicable)

## ANIMAL WELFARE AND ENVIRONMENTAL CLAIMS ARE NOT DEFINED

The use of animal welfare and sustainability claims has increased dramatically over the past decade, as consumers have become more aware of and concerned about the well-being of animals raised for food and about the negative impacts of animal agriculture on the environment. Despite their interest, consumers are typically unable to verify animal welfare and sustainability claims themselves, so they rely on potentially misleading representations made on labels. The public's interest in these claims makes them ripe for exploitation by companies attempting to lure the growing number of consumers who seek an alternative to products from factory-farming production systems.

Although the USDA regularly approves claims related to animal welfare and sustainability, no legal definitions exist for the terms “animal welfare,” “humane,” or “sustainable.” Congress has the authority to define these claims, or to require the USDA to do so, but it has not done so. Moreover, the USDA has never officially acknowledged any particular set of animal standards as acceptable supporting evidence for the use of welfare-related claims. The same is true for environmental claims—no official definition exists for “sustainable” or “environmentally friendly” and no acceptable standards have been identified.

The USDA's requirement that producers define humane and sustainable claims on packaging fails consumers for two reasons: producer-provided definitions are often too vague to substantiate claims, and claims are often approved regardless of the definition provided. AWI's review of pre-market label approval files indicates that the USDA does not assess whether the definitions provided are relevant to the overarching welfare claims made on product packages. In many cases, producers provided definitions for overarching animal-raising claims such as “humanely raised” based on isolated aspects of animal welfare—for example, defining the term to mean that the animals were not confined to crates or cages or were not fed antibiotics for growth. The welfare of animals, however, encompasses many aspects of their environment and care, including flooring and bedding, lighting, space allowance, handling methods, health care practices, and access to range and pasture or exercise areas.



AWI received no documents from the USDA relevant to the sustainability claim (“agriculturally sustainable and environmentally friendly”) made on this package. The package also contains a vague animal-raising claim (“free raised”).

Likewise, in the labels AWI reviewed, the USDA did not require definitions for “sustainable” or other environmental claims. For example, on one package, no definition at all was found for the claim “sustainably farmed,” and AWI received no label approval file from the USDA for the use of this claim (see label above). On another package, it was difficult to discern whether the barrage of text that included the terms “Agriculturally Sustainable and Environmentally Friendly” was included as part of the “free raised” definition or represented distinct claims. Regardless, no additional information is provided on the package about what the producer means by the sustainability claim. The concept of sustainability can apply to many aspects of the food chain—from farming, transportation, processing, and retailing to post-purchase actions including storage, preparation, consumption, and disposal. With so many possible interpretations and no definition provided by producers or required by the USDA, claims of sustainability lack any cognizable meaning to consumers.

## THE CURRENT PROCESS IS INCONSISTENT AND LACKS TRANSPARENCY

When consumers visit grocery stores to purchase meat and poultry products and see “humanely raised” or “sustainably farmed” labels, they cannot know the individual producer’s—or the USDA’s—interpretation of the claim. If the product being purchased is chicken, did the birds receive an average of 6.0 square feet of space, or were they restricted to only 0.6 square feet? Did they have eight hours of darkness for normal sleep every day, or was the dark period limited to 4 one-hour intervals per day? Was the indoor ammonia gas limit 10 ppm, or was it much higher? The USDA is currently approving the claim “humanely raised” for products from animals raised under conditions that vary widely. This inconsistency leads to consumer confusion and a large disparity between what consumers believe they are purchasing and the reality.

The key components of a good label are that the claims mean the same thing when used on different products, i.e., that a claim is used consistently from one product to the next, and that the definition of the claims—and the process used to approve

them—are transparent. None of these criteria are being met by the USDA’s current label-approval process for animal welfare and environmental stewardship claims.

Consistency is lacking in several respects. First, producers have different standards for defining label claims such as “humanely raised” and “sustainably farmed.” Second, the USDA’s staff members likely have different views on what practices qualify for use of these claims. Third, the USDA fails to provide producers with clear requirements to guide them in submitting an application for label approval.

Is a one-sentence statement acceptable, or is a detailed protocol required? What aspects of production must be included for an undefined animal welfare or environmental claim? Does a third-party certificate need to have the product name or company affiliation, or is a supplier certificate sufficient? The answers to these questions are not clear in the USDA Labeling Guide.

In 2014, AWI petitioned the USDA to amend its labeling regulations to require third-party certification of animal welfare and environmental stewardship claims. It is AWI’s belief that requiring third-party certification for claims like “humane” and “sustainable” reduces deception because the standards used by producers will be accessible to and consistent for consumers.

After waiting more than four years, AWI sued the USDA in 2018 for failing to respond to this petition. AWI hoped that the lawsuit would force the USDA to seriously address its insufficient label approval process and implement changes that would enhance transparency and improve the lives of millions of farm animals.

Unfortunately, in February 2019, the USDA declined the petition to engage in this rulemaking. The USDA cited the very fact that producers and individuals have different definitions for animal-raising claims as one of the reasons it could not require third-party certification. AWI finds this statement troubling, as it is the FSIS’s duty to promote consistency in the definitions of animal-raising claims, thereby ensuring misleading labels are not used on meat and poultry packages.



The USDA does not perform on-farm audits to determine if producers comply with the claims they wish to place on their labels. Moreover, most producers do not make their standards available to the public, and many even refuse to provide them when asked. This means label claims are only “transparent” to the producers themselves, who have a financial interest in promoting their products in the most marketable manner possible.

The USDA’s requirement that a producer define these claims on its packages does not remedy the problem of inconsistency or transparency. To understand whether the animal was actually raised humanely or sustainably, consumers would have to understand much more about animal production than they reasonably can. For example, if a producer defines “humanely raised” as “no antibiotics or growth hormones” for a chicken product, the burden is on the consumer to understand whether that reflects an improvement or benefit to the animal’s treatment. In this hypothetical, the definition

the producer provides is both irrelevant and does not indicate better treatment for these animals as compared to conventional chicken products. This is because antibiotic withholding has not been positively correlated with higher animal welfare, and the use of growth hormones in poultry has been banned in the United States since the 1950s. Moreover, the failure to use antibiotics to treat a sick animal could actually be less humane than treating the animal.

Food labels are theoretically used to help consumers make educated purchasing decisions. But if consumers do not know the meaning of label claims—and have no ability to access that information—an educated consumer base does not exist and companies using misleading labels receive an unfair competitive advantage.



## AWI'S REVIEW OF THE USDA'S LABEL APPROVAL FILES

AWI submitted 19 Freedom of Information Act requests to evaluate the USDA's process for approving animal welfare and environmental stewardship claims. AWI suspects that the USDA's current approval process is inadequate for other claims as well. For example, AWI's report *USDA Gives Producers Free Rein over "Free Range" Product Labels* (available at [www.awionline.org](http://www.awionline.org)), describes the USDA's failure to regulate the use of the claim "free range" on poultry product packaging. These requests covered 23 claims appearing on the labels of 19 meat and poultry products (several producers made multiple claims on their packages). The USDA responded that it was unable to locate any documents for 8 of the 19 products. This suggests the USDA or the producer did not engage in pre-market label approval for the use of the claims on these products.

Concerning the products for which AWI did receive documentation, AWI sought to answer two questions: (1) Are producers meeting the USDA's labeling guidance for animal-raising claims? (2) Are producers meeting consumer expectations? For question 1, AWI compared the information found in the label approval file with the USDA Labeling Guide for substantiating animal-raising claims. For question 2, AWI created a tool that would evaluate the evidence provided to the USDA by producers and then compare the results to AWI's understanding of consumer expectations (see Appendix II).

### Are Producers Meeting the USDA Labeling Guide?

In AWI's review of the documents it received, it was often not possible to determine whether producers were meeting the USDA Labeling Guide because of heavy redactions (i.e., information withheld under the Freedom of Information Act). This was especially true for documentation types 3 and 4, which relate to segregation of nonconforming products (see insert on page 2). This information may have been included in the producer's label approval file, but because the FSIS fully redacted some documents, it was impossible to tell which pages served what purpose. Because redactions made it difficult to fairly evaluate whether a producer was meeting the USDA's requirements, AWI chose not to present statistics on producer compliance with the guidance.



AWI received no label approval file from the USDA for the use of the term "humanely raised" on this producer's packaging. This suggests that the producer may not have undergone pre-market label approval for the use of this claim.

### Are Producers Meeting Consumer Expectations?

AWI believes that even if the requirements of the USDA Labeling Guide are met, producers are still sometimes failing to satisfy consumer expectations for substantiating animal-raising and environmental stewardship claims. Based on AWI's review (see table and scoring tool in Appendices I and II) of the label approval files, it appears that the USDA approves the use of high-value claims, such as "humanely raised," on products from animals raised under conventional industry standards. Yet, several public opinion surveys have shown that consumers view the marketing claim "humanely raised" as indicating a standard of care higher than that of the conventional animal agriculture industry.

According to AWI's review, the evidence provided by producers is usually inadequate and inconsistent with consumer perceptions of animal welfare and sustainability claims. This is not to say that all use of these claims is misleading—or that all the claims AWI reviewed were inappropriately used. Rather, it indicates that under the current approval process, there is no way for anyone—including the USDA—to know which claims are being appropriately used and which claims are not.

# CONSUMER EXPECTATIONS REGARDING GOVERNMENT OVERSIGHT OF LABEL CLAIMS

Consumer perception surveys demonstrate that the public is misled by the USDA’s label approval process for animal welfare and environmental claims. Consumers expect greater government oversight of label claims than is provided in the

USDA Labeling Guide; a large majority of those who frequently purchase meat or poultry products say the government should require producers to prove any label claims such as “humanely raised” or “sustainably farmed.”

In October 2018, AWI commissioned a national survey\* of consumer expectations regarding government regulation of label claims such as “humanely raised” and “sustainably farmed.” The survey statements and responses are as follows:

● Strongly disagree      ● Somewhat disagree      ● Somewhat agree      ● Strongly agree

a. The government should not allow the use of claims like “humanely raised” on food product labels unless the claims are verified by an independent inspection.



b. Food producers should not be allowed to use the claim “humanely raised” on their product labels unless they exceed minimum industry animal care standards.



c. The government should require more than an unverified testimonial (e.g., taking the word of a producer) to allow a food producer to use a claim like “humanely raised” on meat, poultry, egg, or dairy products.



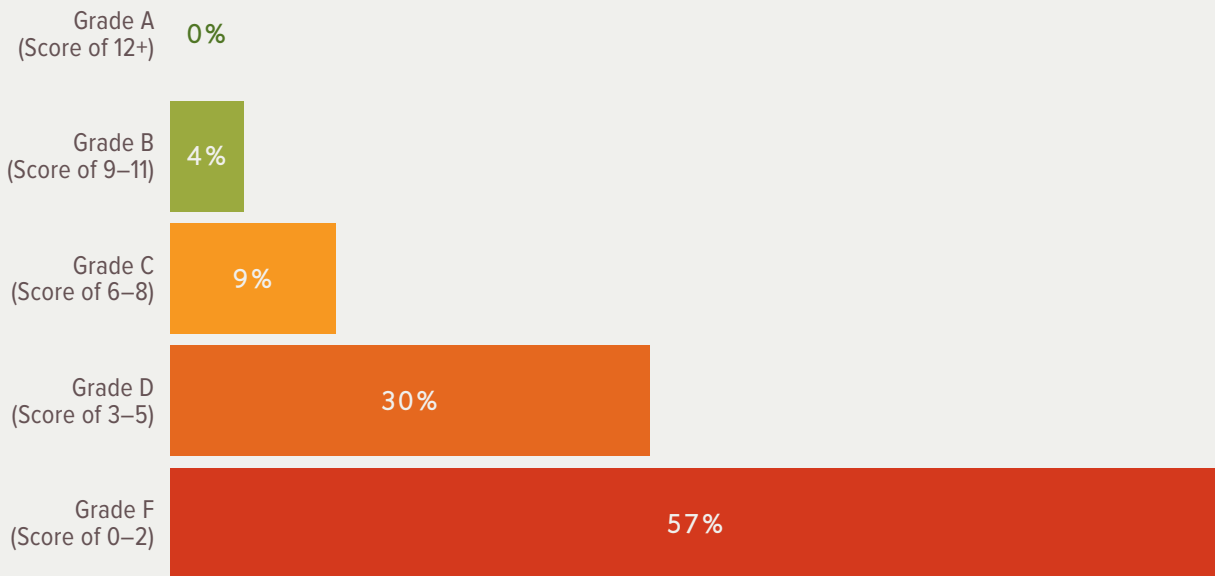
\*This survey was conducted online within the United States by The Harris Poll on behalf of the Animal Welfare Institute from October 11–15, 2018, among 2,016 US adults age 18 and older, among whom 1,990 have purchased meat, poultry, egg, or dairy products from a store or market. This online survey is not based on a probability sample and therefore no estimate of theoretical sampling error can be calculated. For complete survey methodology, including weighting variables and subgroup sample sizes, please contact Dena Jones (dena@awionline.org).

## AWI'S EVALUATION OF LABEL CLAIM APPROVAL FILES

Using AWI's scoring tool, the label approval file for each product was evaluated to determine what manner of proof a producer submitted as a basis for "humane" or "sustainability" claims made on its packaging. On a scale of 0 (grade F) to 12+ (grade

A), the vast majority of claims received a score of 5 or fewer points (grade D or F). Thirteen of the 23 claims received an F grade. No claims obtained a score of 12+ (grade A). One claim found on a package received a grade of B.

### SCORES RECEIVED\*



\*Some products made more than one claim. These products received two scores. For information on how AWI scored the evidence provided for each claim, see Appendix I: Label Claim Approval Files Reviewed by AWI and Appendix II: AWI Label Approval File Scoring Tool.

In evaluating each file, AWI noticed other relevant inadequacies, including out-of-date or expired documentation, vague affidavits or operational protocols, and certificates for third-party auditing programs with low or irrelevant standards. In some instances, AWI even noticed that while the FSIS provided documents, the documents provided had no information relevant to the claim made on the package. This type of documentation does not meet consumer expectations for the use of these high-value claims.

For the claim "humanely raised"—approved for use on one turkey producer's products—supporting documentation consisted of an affidavit containing only two sentences pertaining to the claim. A mere two sentences were sufficient for the USDA to determine that this producer deserved to use a high-value claim related to animal welfare. This was the most

common problem of the label approval files AWI reviewed: 8 out of 23 claims had a similarly vague affidavit.

Another problem observed by AWI was the USDA's approval of claims based on animal care operational protocols. Because these protocols are often fully redacted, AWI has no way of knowing whether the protocols indicate better welfare conditions for the animals raised under these suppliers' care, or just a description of standard industry practices. Additionally, it is unclear from these files whether the protocol applied to all suppliers of a product, or just one of many suppliers.

AWI ran into several issues with respect to the use of third-party certifications to bolster claims. Some certificates appeared to be expired at the time of application. In a few instances, a

producer provided third-party certificates in its documentation to the USDA, but the certifying entity did not list that producer as certified on its website. Some producers based their “humanely raised” claim on the third-party certification of a single supplier, but it was unclear whether the certified entity was the exclusive supplier to the producer making the claim. It is also AWI’s view that some of the third-party certifications submitted do not sufficiently demonstrate humane treatment of animals. For example, American Humane Certified has low standards that, for some species, are comparable to voluntary industry standards.

AWI’s review reveals that producers can easily use the government’s label approval process to their advantage. Because the process does not include verification or assessment of the provided documentation or definition, producers can submit questionable documentation in support of their claims with no fear of rejection. Then, a producer can utilize the approved yet misleading labels to deceive consumers into thinking its products are more humane or more sustainable than those of a competitor and sell products at a premium.



*This producer defined its claim “humanely raised” as “Meets Empire® Kosher’s humane policy for raising chickens on family farms in a stress-free environment.” This definition lacks the specificity necessary to ensure consumers are not misled.*

## Evidence Provided By Producers in Support of Animal Welfare and Environmental Stewardship Claims

AWI received only 9 label approval files, pertaining to 11 of the 23 claims. Although 57 percent of the producers provided definitions for the claims on the package, the documentation provided to the FSIS lacked the specificity that consumers expect and that is necessary to ensure claims are consistent and not misleading.

### CONTENTS OF LABEL APPROVAL FILES RECEIVED BY AWI\*

No responsive records received: 12 of 23 claims (52%)  
Affidavit: 8 of 23 claims (35%)  
Third-party certificate: 5 of 23 claims (22%)  
Operational protocol: 4 of 23 claims (17%)  
Internet page: 1 of 23 claims (4%)  
Photos: 1 of 23 claims (4%)

\*The results from the label approval files were mixed: In some cases, multiple forms of supporting evidence were provided to support claims. In other cases, there was documentation supporting only one or none of the claims on the packaging.



## THE CURRENT PROCESS HARMS FARMERS WHO MAKE ACCURATE CLAIMS

Lack of on-site verification of label claims is a particular problem for holistic claims such as those related to animal welfare and environmental sustainability because these claims address multiple aspects of production. Some producers seek to assure consumers that their products are properly labeled and meet a certain standard by participating in a third-party certification program. Producers who choose to use third-party certification typically incur fees associated with the certification. These producers also incur higher costs in maintaining systems that go beyond conventional production standards in terms of animal welfare and environmental stewardship.

AWI submitted a request for the label approval file for Keller Crafted Meats Uncured Smoked Maple Ham (see image at right). On its package, Keller claims its pork is “Humanely-raised on a Sustainable Family Farm.” Keller provided an array of documentation relating to one of these claims, including an affidavit about how pigs are raised, a detailed operational protocol, a Food Alliance certificate, a USDA Organic certificate, an internet page, and photos of the facilities where the animals are raised.

In stark contrast, many producers use similar claims with little to no justification provided to the USDA. For example, Strauss makes similar claims on its veal chorizo product (“free raised,” “agriculturally sustainable and environmentally friendly,” see image at right), but the label approval file that the USDA provided to AWI contained only an operational protocol. This could be harmful to producers such as Keller Crafted Meats that have substantially improved the standards under which their animals are raised.

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 the cost of both certification and better production and still reap the benefits of the claim by selling products at a premium price (or undercutting the price of products that are in fact produced to higher standards). 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.



This producer provided substantial documentation for its “humanely-raised” claim.



This producer only provided an operational protocol to the USDA as a basis for its “free raised” claim and no documentation for its “agriculturally sustainable and environmentally friendly” claim.

## IMPROVING TRANSPARENCY AND CONSISTENCY THROUGH THIRD-PARTY CERTIFICATION OF LABEL CLAIMS

The USDA must change its current label approval process to prevent misleading and deceptive labeling and promote a fairer market for farmers who are disadvantaged by producers using animal welfare and environmental label claims without verifiable substantiation. This can be accomplished by the USDA approving these claims only after certification has been obtained from an independent third party that has audited practices pertaining to the claim and has standards that exceed conventional industry standards. It is also a solution favored by the public: 86 percent of consumers responding to AWI's survey on meat and poultry labeling favored requiring verification of claims such as "humanely raised" by an independent inspection.

Third-party certifiers provide meaningful, verifiable standards. They confirm compliance with the standards—first on the farm and, if appropriate, during transport and/or at slaughter. Third-party program standards are typically available online for all interested parties to review, thus providing transparency. The

programs are independent of the companies they are certifying, and they regularly review and revise their standards.

Requiring third-party certification of label claims does not solve all problems relating to misleading labels. The USDA should also ensure that producers provide relevant documentation regarding the status of third-party certifications, including up-to-date documentation reflecting a connection between the specific product and the supplier.

Finally, it is AWI's belief that not all third-party certification programs are created equally. Some have standards that greatly exceed industry norms, while others represent only minor improvements to current practices on factory farms. AWI believes producers should participate in third-party certification programs that exceed industry practices when using humane claims. For more information on food labels, see AWI's *Food Label Guide*, available at [www.awionline.org](http://www.awionline.org).





## APPENDIX I: LABEL CLAIM APPROVAL FILES REVIEWED BY AWI

COMPANY NAME AND PRODUCT	CLAIM	SCORE	GRADE	DOCUMENTATION PROVIDED	HOW TO IMPROVE SCORE	DEFINITION ON PACKAGE?	DEFINITION APPROPRIATE?	OTHER NOTES
Diestel Turkey Ranch Organic Turkey Products	Thoughtfully Raised	4	D	USDA Organic certificate, non-detailed affidavit	higher-welfare certification, detailed operational protocol, internet page photos from farm, on-farm audit, detailed definition	None	N/A	AWI believes FSIS should not approve this claim.
Empire Kosher Chicken	Humanely Raised	3	D	non-detailed affidavit, vague definition	third-party certification, detailed affidavit, detailed operational protocol, internet page, photos of farm, on-farm audit, detailed definition	Meets Empire® Kosher's humane policy for raising chickens on family farms in a stress-free environment.	No	N/A
Empire Kosher Natural Ground White Turkey	Humanely Raised	3	D	non-detailed affidavit, vague definition	third-party certification, detailed affidavit, detailed operational protocol, internet page, photos of farm, on-farm audit, detailed definition	Meets Empire® Kosher's humane policy for raising turkeys on family farms in a stress-free environment.	No	N/A
Garrett Valley First Cut Brisket	Humanely Raised	1	F	FSIS provided no records, vague definition	ensure FSIS approval, provide documentation, detailed definition	Garrett Valley defines humanely raised as all beef is vegetarian fed, never administered animal by-products and is raised in a low-stress handling environment.	No	N/A
Garrett Valley Pork Ham Steak	Humanely Treated	1	F	FSIS provided no records, vague definition	ensure FSIS approval, provide documentation, detailed definition	Garrett Valley defines humanely raised as all pork is vegetarian fed and never administered animal by-products.	No	N/A
Garret Valley Smoked Chorizo	Humanely Raised	5	D	Humane Farm Animal Care certificate, non-detailed affidavit, irrelevant definition	ensure FSIS approval, provide documentation, higher-welfare certification, operational protocol, internet page, photos from farm, on-farm audit, detailed definition	Garrett Valley defines humanely raised as all pork is vegetarian fed and never administered animal by-products.	No	N/A
Hatfield Quality Meats Montreal Style Dry Rub Seasoned Pork Loin Filet	Ethically Raised	1	F	FSIS provided no records, vague definition	ensure FSIS approval, provide documentation, detailed definition	Ethically raised by family farmers committed to a higher standard of care governed by third party animal welfare audits.	No	AWI believes FSIS should not approve this claim.
HEB Natural Pork Chops	Socially Raised	1	F	FSIS provided no records, no definition	ensure FSIS approval, provide documentation, detailed definition	Our animals are allowed to interact and socialize in a spacious setting.	No	N/A
Keller Crafted Meats Uncured Smoked Maple Ham	Humanely-raised	9	B	Food Alliance certificate, USDA Organic certificate, non-detailed affidavit, non-detailed operational protocol, photos from farm	higher-welfare certification, internet page, on-farm audit, detailed definition	Free range, no farrowing crates or gestation pens, raised on vegetarian feed, never administered antibiotics.	No	N/A
Keller Crafted Meats Uncured Smoked Maple Ham	Sustainable	6	C	Food Alliance certificate, USDA Organic certificate, non-detailed affidavit	higher-level sustainability certification, internet page, on-farm audit, detailed definition	None	N/A	N/A
Kidfresh Chicken Nuggets	Humanely Raised	2	F	non-detailed affidavit	third-party certification, detailed affidavit, detailed operational protocol, internet page, photos of farm, detailed definition	None	N/A	N/A
Mclean Natural Meats Pepperoni Sticks	Humanely Raised	0	F	FSIS provided no records, no definition	ensure FSIS approval, provide documentation, detailed definition	None	N/A	N/A

COMPANY NAME AND PRODUCT	CLAIM	SCORE	GRADE	DOCUMENTATION PROVIDED	HOW TO IMPROVE SCORE	DEFINITION ON PACKAGE?	DEFINITION APPROPRIATE?	OTHER NOTES
Organic Prairie Ground Beef	Humanely Raised	7	C	USDA Organic certificate, detailed operational protocol, detailed definition	higher-welfare certification, operational protocol, internet page, photos from farm, on-farm audit	Organic Prairie defines humanely raised as access to fresh air, outdoors, sufficient space and shelter so our animals can express their natural behaviors.	Yes	Given space constraints, AWI believes that with proper FSIS verification this definition is appropriate.
Pederson's Natural Farms Uncured No Sugar Hickory Smoked Bacon	Raised Humanely	1	F	FSIS provided no records, vague definition	ensure FSIS approval, provide documentation	Pederson's Natural Farms defines humanely raised as no crates and room to roam.	No	N/A
Plainville Slow Cooked Uncured Ham	Humanely Raised	5	D	American Humane certificate, detailed operational protocol, vague definition	higher-welfare certification, detailed affidavit, internet page, photos from farm, on-farm audit, detailed definition	Meets Plainville Farms brand's humane policy for raising pork on family farms in a stress-free environment.	No	N/A
Simply Sausage French Country Recipe Fresh Pork Sausage	Humanely Raised	3	D	non-detailed affidavit, internet page	third-party certification, detailed affidavit, detailed operational protocol, photos of farm, on-farm audit, detailed definition	None	N/A	N/A
Strauss Ground Beef	Free Raised	2	F	FSIS provided no records, detailed definition	ensure FSIS approval, provide documentation	100% grass fed and grass finished, raised on open pastures; never raised in feedlots, never administered antibiotics or growth hormones, agriculturally sustainable and environmentally friendly, born and raised in the USA by family farmers.	Yes	AWI believes FSIS should not approve "free raised" as other claims have a more established definition.
Strauss Ground Beef	Agriculturally Sustainable and Environmentally Friendly	0	F	FSIS provided no records	ensure FSIS approval, provide documentation, detailed definition	None	N/A	N/A
Strauss Veal Chorizo	Free Raised	5	D	detailed operational protocol, detailed definition	third-party certification (welfare), detailed affidavit, internet page, photos of farm, on-farm audit	Pasture raised, never tethered, free to roam on open pastures, unlimited access to mother's milk, authentic, agriculturally sustainable and environmentally friendly.	No	AWI believes FSIS should not approve "free raised" as other claims have a more established definition.
Strauss Veal Chorizo	Agriculturally Sustainable and Environmentally Friendly	1	F	FSIS provided records (but nothing pertaining to sustainability), no definition	provide documentation relevant to claim, detailed definition	None	N/A	N/A
Thomas Farms Ground Lamb	Humanely Raised	0	F	FSIS provided no records, no definition	ensure FSIS approval, provide documentation, detailed definition	None	N/A	N/A
Thomas Farms Ground Lamb	Sustainable	0	F	FSIS provided no records, no definition	ensure FSIS approval, provide documentation, detailed definition	None	N/A	N/A
Trader Joe's Chicken	Sustainably Farmed	2	F	FSIS provided no records, organic seal on package	ensure FSIS approval, provide documentation, detailed definition	None	N/A	N/A



## APPENDIX II: AWI LABEL APPROVAL FILE SCORING TOOL

LABEL SCORING TOOL	
Company name, product, claim, and definition on package (if applicable)	
LABEL APPROVAL FILE	SCORE
<b>DID FSIS PROVIDE RECORDS?</b> Yes = 1 No = 0	
<b>CERTIFICATES</b> AWA*/GAP** step 4+/Demeter = 5 HFAC***/Food Alliance/GAP Step 2-3/USDA Organic = 2 GAP step 1/AHC**** = 1 None or expired = 0	
<b>AFFIDAVIT</b> Detailed = 2 Non-detailed = 1 None = 0	
<b>OPERATIONAL PROTOCOL</b> Detailed = 2 Non-detailed = 1 None = 0	
<b>OTHER SOURCES IN FILE PROVIDED AS BASIS</b> Internet page = 1 Photos of farm = 1 On-farm audit = 1 None = 0	
ON THE PACKAGE	SCORE
<b>DEFINITION</b> Detailed = 2 Vague/irrelevant or referral to website = 1 None = 0	
<b>CERTIFICATIONS</b> USDA Organic = 2 (only count if no certificate in file)	
<b>TOTAL SCORE/GRADE RANGE</b> A = 12+, B = 9-11, C = 6-8, D = 3-5, F = 0-2	_____ POINTS _____ GRADE

\* AWA = Animal Welfare Approved by A Greener World

\*\* GAP = Global Animal Partnership

\*\*\* HFAC = Humane Farm Animal Care, a.k.a. "Certified Humane"

\*\*\*\* AHC = American Humane Certified

PHOTO CREDITS

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