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THE HUMANE TOUCH

FARM ANIMAL WELLBEING CERTIFICATION

BY AMERICAN HUMANE ASSOCIATION

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This paper was prepared for the course Corporate Social Responsibility taught by Professor Peter Gourevitch in the winter quarter 2011 at the School of International Relations and Pacific Studies of the University of California San Diego (UCSD). The papers have not been edited after having been submitted to the course. They are posted here to provided others with information and ideas about CSR, NGO's and the private sector.

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"Personally, I would not give a fig for any man's religion whose horse, cat and dog do not feel its benefits. Life in any form is our perpetual responsibility." ~S. Parkes Cadman

I. The Humane Certified Label

What exactly stands behind a Humane Certified label? By definition food safety is a scientific discipline that encompasses handling, preparation and storage of food in ways that prevent foodborne illness. Seldom mentioned in this description, however, is the way in which animals are raised and treated, prior to joining the food chain. So, growing in importance and visibility in the arena of food safety is the humane treatment of farm animals. The whole concept is relatively new worldwide. It started in the 90s in the UK. At that time the USDA granted Texas Tech a grant to research a national animal welfare certification program. Texas Tech enlisted the American Humane Association in its efforts to study and create a certification program together. The research they completed became the basis of one of the certification methods used today in the US that stems from the 5 Freedoms – the basis for animal welfare in the UK. Founded by the United Kingdom's Royal Society for the Prevention of Cruelty to Animals (RSPCA) in 1994 the 5 Freedoms program was the first agricultural assurance scheme to set standards for animal welfare according to "science based" criteria. Since its inception, it has grown to include more than 2,000 producers and more than 40 million animals being reared under the program. The program sets specific standards for eight species of farm animals and covers welfare on the farm, in transit and at slaughter. It has served as the model for animal welfare certification programs in the U.S.

It is based on the concept, articulated by the U.K.'s Farm Animal Welfare Council, that humans have a moral obligation to afford farm animals "Five Freedoms." These freedoms imply certain

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husbandry requirements for the provision of basic farm animal welfare and are viewed as necessary to avoid welfare-related problems.

1. Freedom from hunger and thirst – by ready access to fresh water and a diet to maintain full health and vigor.

2. Freedom from discomfort – by providing an appropriate environment including shelter and a comfortable resting area.

3. Freedom from pain, injury and disease – by prevention or rapid diagnosis and treatment.

4. Freedom to express normal behavior – by providing sufficient space, proper facilities, and company of the animal's own species.

5. Freedom from fear and distress – by ensuring conditions and treatment that avoid mental suffering.

These five propositions, which provide a framework for meeting an animal's basic needs, have been incorporated into the welfare codes of AHA. The standards based on them culminate in a 200 point detailed system for evaluation reviewed and updated annually by the Scientific Advisory Committee of the American Humane Certified Program. The updates are based on the latest research, technology and practices.

II. AHA & The Humane Touch

The American Humane Association is a non-profit organization founded in 1877. Its mission is to create a more humane world without the abuse of children and animals. In this respect it has several programs under its auspices: Child Protection and Well-Being, Animal Protection and Well-Being and Human-Animal Interaction. Each of these comprises a number of projects and

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program. I focus on the Farm Animal Program\American Humane Certified or the Humane Touch – one of the nation's largest and fastest-growing humane-farming training and auditing and certification program.

The American Humane Association's Farm Animal Program, also known as the Humane Touch, is a voluntary, fee based third party certification service available to producers of animals raised for food.

Through audits conducted by an independent third party, American Humane issues certification to producers who meet their science-based standards, strictly specified and unique for each farm animal species.

III. Audit and Certification

The Audit Process

Producers interested in the certification are encouraged to review the species-specific animal welfare standards. After a certification application is received on behalf of a producer by AHA, AHA reviews it and submits a contract for a certification audit. AHA arranges for an auditor to conduct the onsite inspection. The auditor conducts over 100 observations through interviews with management and employees; observes the operation process; reviews written standard operation procedures and supporting documentation.

Standards are then scored. The producers that meet all the expected levels of compliance receive immediate certification. If any areas are found to be out of the compliance a non-compliance report is issued, signed and witnessed by the auditor and the producer at the exit interview. Within seven days of the audit, the prospective producer must send in a signed corrective action

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report showing the corrective actions have taken place. At that time, all documentation is reviewed to determine the corrective action has taken place. A new audit may be conducted and when all corrective action has taken place the producer receives the certification.

The producer who meets all the requirements as referenced in the AH certification standards is issued a "certificate of approval" valid for one year from the date of the approval letter. The approval notification includes a license agreement, which must be signed and returned to AHA before the participant can use the American Humane Certified label. The Cost of the Certification is a $1795 fee for a 10 hour audit plus a $600 administration fee. A total of $2395 per year, per farm.

Certification

The certification itself is based on a 3 tier process also known as the Humane Tracking.

Tier on, the annual independent audit, is conducted by one of the 30 auditors American Humane uses for the purpose. The auditors are ISO 9001 certified independent private companies, Validus and Facta, located in 2 different states.

Tier two is the online compliance resources. These are regular mandatory audit updates that provide monitoring throughout the year.

Tier 3 is the state-of-the art, web-based independent video monitoring that provides 24/7 real-time monitoring and instant alerts of potential problems to the producer and American Humane.

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IV. Monitoring, Transparency and Strength of AHA

For this particular program AHA does not perform the monitoring itself. It has independent auditors who go onsite and monitor the certified parties. Monitoring is conducted once a year at the field with unexpected visits and 3d party video monitoring 24/7. All the farms of a certain producer are being inspected prior to certification. Interaction with the certified producers is done through 3d party independent auditors. Permission for unexpected visits is a clause in the contract that the producers sign prior to being certified. It is a voluntary based program which is not imposed by the government. The pressure comes from the consumers. Only basic guidelines for husbandry and human treatment of animals are being provided by USDA.

The standards are set by the Scientific Committee of AHA. The monitor that is the 3d party independent auditor is separate from the standard setter. The monitors themselves are subject to the ISO 9001 standards – quality management systems as well as certification by the Professional Animal Audit and Certification Organization (PAACO).

Transparency

As far as transparency is concerned the Better Business Bureau, the private non-profit, says AHA complies with its 20 standards for charity accountability. Link to those standards is provided in References.

The main sources of revenue, according to the latest 2010 financials, are 41% from government and other grants, 22% from contributions and sponsorships, 17% from service fees and royalties, 16% investment income, 3% from training and seminars. Their main expenses are on the projects they run: animal and children welfare.

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Strength

AHA has 162 paid employees on staff. When it comes to monitoring the certification process discussed here, they have the 3d party auditors: 30 of them monitoring 1000 farms all over the US (or 50 certified producers.) The 3rd party auditors do not set the standards. Standards set by the certifier by its Scientific Committee. The 3rd party monitors are ISO 9001 certified and compliant with the set of quality management systems. They are also certified by the Professional Animal Audit and Certification Organization (PAACO).

V. Types of programs and other certifiers

Product marketing claims are often referred to as "first-party," "second-party" or "third-party." These terms can be used to refer to product standards programs as well.

First-Party Claims

These are claims made by producers without independent review or verification. First-party claims refer to producer food labeling or marketing claims such as "free range" or "no antibiotics used." A third party – the USDA – sets the standards for these claims, but compliance with the standards is not verified.

Second-Party Claims

These are claims made by industry or trade associations. The standards are developed by the industry and may be unverified, verified by the industry, or verified by an independent

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organization. For this report, second-party claims refer to animal agriculture quality assurance programs. Guidelines verified by the retail food industry, such as the Food Marketing Institute and the National Council of Chain Restaurants, are considered second-party and not third-party programs due to the business and financial connections between the animal agriculture and retail food industries.

Third-Party Claims

These are claims made by an independent third party. The certifying body, including administrators and members of the board of directors, must not have any direct financial ties to the industry. Although the purpose of third-party certification is to allow for independent, unbiased verification of claims, since producers typically pay fees to participate in third-party programs, the certifying organization still maintains a financial stake in the relationship. Third-party claims refer to those made by the USDA's "National Organic Program," the Humane Farm Animal Care's "Certified Humane" program, the American Humane Association's "Humane Certified" program, the Animal Welfare Institute's "Animal Welfare Approved" program, and the recently constitutes Global Animal Partnership Program.

As one can see Americans face a dizzying array of food labels and certifiers standing behind them. There's organic, all-natural, sustainable, cage-free, humane, whole grain, and heart-healthy, to name a few.

The question we should ask ourselves is: which of these is backed by legally enforceable guidelines? And the answer is: Only organic. Even that one has loopholes, such as the practice of giving chickens access to outdoor spaces but not requiring that the birds actually spend any time outside.

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The rest of these labels can be interpreted by food producers in many different ways. That's also true for "humane."

So, how does one avoid "humane-washing"? First, we have to remember that there are both independent and industry-produced quality assurance programs in circulation under the label of "humane." The latter were put in place with very little public input and use experts of animal production, rather than welfare, according to a report put out by Farm Sanctuary each trade organization for producers, representing different farm animals, has its own set of regulations. For example: The National Cattlemen's Beef Association (NCBA) has guidelines for the care of beef cattle that does not include any sort of audit. According to these guidelines, access to pasture is not required and castration without anesthesia is allowed, among other practices. Guidelines put out by the American Sheep Industry Association have no scoring tools for compliance or internal or external auditing. Under these guidelines, sheep farmers don't need to provide access to grazing pasture and early weaning is acceptable. The National Pork Board's Quality Assurance Plus (PQA Plus) program does not include a third-party audit. Practices allowed include confining sows to gestation crates, no access to the outdoors, and castration without anesthetics.

The closest any of the industry groups has to a third-party audit is the United Egg Producers' program UEP Certified. Following UEP Certified, audits need to be conducted on each company's facilities, but this may go down to 50 percent on subsequent audits. What's more unsettling is that even within these guidelines, practices like debeaking (in which the sharp tip of a chicken's beak is clipped by machine) and confinement in small cages is allowed.

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The various third-party auditing systems that have sprung up in recent years for farms that welcome higher standards in addition to the one I discuss in the current paper are:

Global Animal Partnership is an independent international foundation that grew out of Whole Foods' Animal Compassion Foundation. Based on a five-step rating system, the program was designed by animal welfare advocates, animal welfare scientists, and farmers. The ratings range from Step One, "no crates, no cages and no crowding" to Step Five, "animal centered -- animals spend their entire life on the same farm."

Animal Welfare Approved (AWA) is another independent label managed by the Animal Welfare Institute, and includes some of the highest standards in weaning, outdoor access, pasture, and physical alterations. What is unique about AWA is that the Institute doesn't charge producers for certification, which evens out the playing field for small family farms. Unfortunately, this program is currently overseeing less than .001 percent of all U.S. animals raised for slaughter.

Certified Humane has developed a number of standards that exceed those put out by the industry, such as banning the use of gestation crates for pregnant sows. However, the program allows feedlot confinement of beef cattle, among other practices that many would not deem humane.

VI. Conclusion

Various humane certification and labeling programs have been developed in response to growing popular concerns about the cruel treatment of farm animals, but their impact at improving animal welfare has been minimal. Food labeling and marketing claims, like “free range” and “pasture raised,” are generally subjective and not verified. Humane certification standards disallow some

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cruel practices, but significant deficiencies exist in these as well. Specialty markets, like organic and "humane" foods, may help lessen animal suffering, but they affect only a very small percent, less than 2 percent, of the billions of animals exploited for food each year in the U.S, and even animal-derived foods produced according to a "humane" program are not likely to meet consumer expectations. Based on the "humane" label certifiers I checked, I can conclude that each of them is consistent with its own standards. The standards however vary widely among all of them. This presents a significant challenge for the validity of their certification as a whole. The certifiers do not seem very good at being able to monitor their own standards since they rely on the monitors that in turn are certified as being capable of doing impartial audits by other organizations. It is a monitoring chain that does not inspire great trustworthiness. The producers certified in two of the certification programs I was able to look at more closely, i.e. The American Humane Certified and the American Wellness Approved, are small family owned farms. In the American Wellness Approved programs farmers are not required to pay fees while American Humane Association charges a nominal fee.

None of these certifiers are subject to inspections by USDA. According to the Farm Sanctuary Report USDA utilizes informal working definitions for animal care labeling claims. Some terms like "humane" and "cage free" currently have no strict regulatory definition. USDA-FSIS approves product labels like "cage free" and "grass fed" based on producer testimonials only, including a signed affidavit. The agency does not check on-farm compliance with meat and poultry claims. Thus, the third-party certification programs serve as the only verifiers.

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VII. Discussion questions

1. **What do AHA and Animal Welfare Institute do that the US Animal Welfare Act of 1966 has not addressed so far?**
2. **Of all the people surveyed 57% say that they are ready to pay from 1% to 10% more for products that are certified humane. What can be that motivates some to do so while others opt out?**
3. **How good are the various reporting structures at monitoring their own standards?**
4. **Why is it so difficult for the different certifiers to set uniform certification standards?**
5. **How big are the companies that pay for the audit? Does this affect the independent and impartial status of the certifiers?**

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VIII. References

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