

ANIMAL WELFARE INSTITUTE

DECEPTIVE CONSUMER LABELS

HOW THE USDA'S FAILURE TO OVERSEE ITS
LABEL APPROVAL PROGRAM ALLOWS THE MEAT INDUSTRY
TO CO-OPT HUMANE AND SUSTAINABLE CLAIMS



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ABOUT THE ANIMAL WELFARE INSTITUTE

Since its founding in 1951, the Animal Welfare Institute (AWI) has been alleviating suffering inflicted on animals by people. Through its farm animal program, 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 farms—including through promoting fairness in labeling—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 (FOIA) requests submitted by AWI to the United States Department of Agriculture's Food Safety and Inspection Service (FSIS) from 2013 to 2021. AWI requested the label approval applications submitted by producers prior to their use of 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 label applications from the FSIS, it evaluated them based on the unredacted content. Some relevant information may have been redacted by the USDA.

This report is an update to a 2014 report, *Label Confusion: How “Humane” and “Sustainable” Claims on Meat Packages Deceive Consumers*, and a 2019 report, *Label Confusion 2.0: How the USDA Allows Producers to Use “Humane” and “Sustainable” Claims on Meat Packages and Deceive Consumers*. This report analyzes information AWI received in response to FOIA requests from 2019 through 2021, examined in conjunction with information analyzed previously in the 2014 and 2019 reports.

The report was prepared by Erin Sutherland of AWI with assistance from Dena Jones, Allie Granger and Adrienne Craig.

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SUMMARY OF KEY FINDINGS

The USDA does not, for the most part, regulate the manner in which animals are raised or the impacts of agricultural production on the environment. It is, however, supposed to deny the use of label claims deemed false or misleading, including those claiming positive animal welfare and environmental practices. To the extent the USDA evaluates label claims at all, it does so based solely on information the producer supplies in its label application.

The USDA's guidance to producers regarding substantiation of animal-raising claims is inadequate and lacks the specificity necessary to ensure these claims meet consumer expectations. The USDA asks producers to define animal-raising claims included on product labels, but it does not assess the veracity or adequacy of the definition provided. An identical claim on similar meat and poultry products, therefore, can mean different things, and consumers can still be deceived.

AWI's review revealed that the vast majority of label claims lacked adequate substantiation. AWI requested application files for 97 claims. For nearly half the claims (48), the USDA was unable to provide any application submitted by the producer. For 34 claims, an application was received with either no relevant substantiation (6) or insufficient substantiation (28). In total, 82 of the 97 claims (85%) lacked sufficient substantiation.

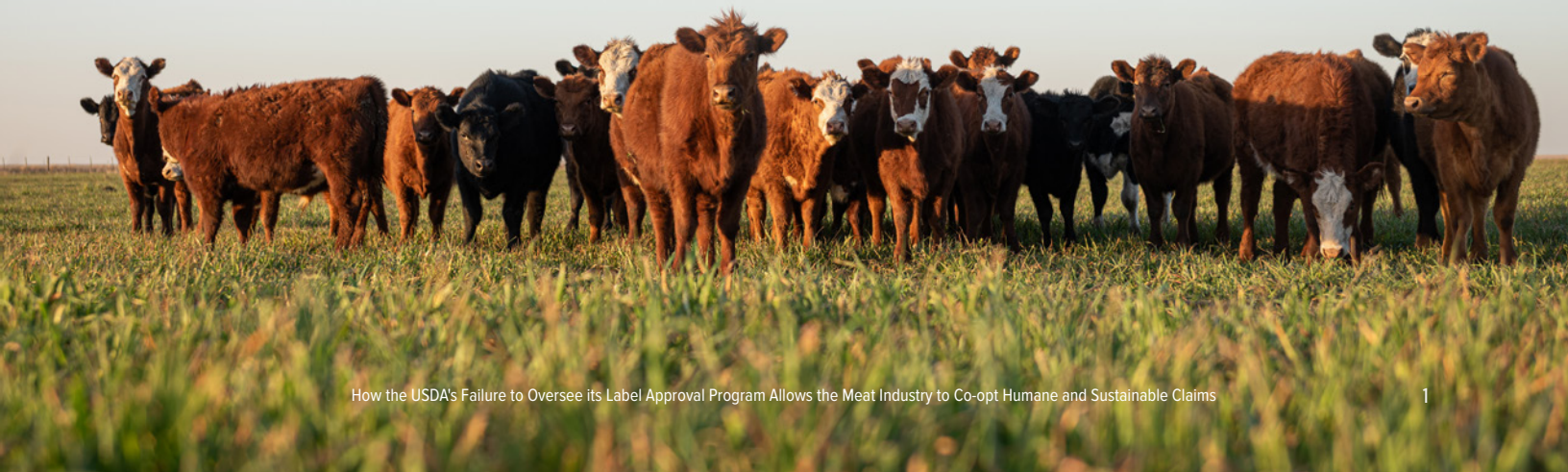
The USDA is allowing the use of high-value claims such as "humanely raised" even when the animals are raised under conventional industry conditions. Consumers overwhelmingly disagree with this practice by the USDA.

To meet consumer expectations, producers should be required to obtain third-party certification confirming that they provide a standard of care exceeding that of

Claims Reviewed by AWI

- + Agriculturally Sustainable and Environmentally Friendly
- + Animal Welfare Humane Certified
- + Ethically Raised
- + Free Raised
- + Humane
- + Humane Environment/Treatment
- + Humanely Raised/Treated/Handled/Verified
- + Prioritizes Carbon Neutrality
- + Ranchers Who Raise Animals Humanely
- + Raised Humanely/Raised the Right Way
- + Socially Raised
- + Stress-Free Environment
- + Sustainable/Sustainable Practices/Sustainably Farmed
- + Thoughtfully Raised

conventional industry production practices. Producers should be required to comply with 100 percent of the certification standards and be audited at least every 15 months to ensure that they remain in compliance with the standards.





INTRODUCTION

Label claims on food products speak to a variety of consumer interests, including the manner in which animals and the environment are treated during production. 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. Negative press regarding the reliability of food product labels has led to public skepticism about the accuracy of label claims and about government efforts 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, AWI obtained records via the Freedom of Information Act and conducted a review of government label approvals for claims appearing on the packages of 76 meat and poultry products (see box, page 1). These requests allowed for an evaluation of 97 total claims made on these 76 meat and poultry products. AWI's review did not include dairy or eggs, as these products are not subject to label pre-approval.

Legal Background

The Federal Meat Inspection Act and the Poultry Products Inspection Act give authority to the 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. Misabeled 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 is approving some label claims related to animal welfare and environmental protection, it does not go onto farms to evaluate animal-raising or environmental practices. In approving label applications, 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 or poultry label.**

PROBLEMS WITH THE USDA'S APPROACH TO REGULATING CLAIMS ON MEAT AND POULTRY

The USDA's Label Guide Is Woefully Inadequate

The USDA's *Labeling Guideline on Documentation Needed to Substantiate Animal Raising Claims for Label Submissions* is meant to provide guidance to producers in substantiating the claims relevant to this report. According to the guide, a producer must provide an explanation of the claim appearing on the package. In addition, producers must provide documentation for four criteria (five if using third-party certification) to the USDA to use these claims (see Figure 1). Yet, the guide provides no specific standards or details to help producers or the USDA determine if specified forms of supporting evidence are, in fact, adequate to justify use of the claim.

In a 2019 public comment period regarding proposed revisions to the 2016 version of the guide, AWI, public interest groups,

and thousands of members of the public provided feedback to the USDA about the document's shortcomings. Ninety-nine percent of comments opposed the FSIS label approval process for "humanely raised" claims and expressed concerns that the guide lacked the specificity necessary to ensure that misleading labels are not approved.

Recently, the USDA committed to reviewing its process for approving animal-raising claims, but AWI is concerned that any revisions made to the process may be insufficient to ensure that misleading claims are not used in the marketplace. On page 9, AWI makes several recommendations for revisions that could help.

Figure 1. Documentation Needed to Support Animal Welfare and Environmental Stewardship Claims

According to the USDA's labeling guideline, producers must submit the following information to support animal welfare and environmental stewardship claims.

1. A detailed written description explaining the controls used to ensure that the raising claim is valid from birth to harvest (i.e., an operational protocol)
2. A signed and dated 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 time of slaughter through packaging and distribution
4. A written description of the identification, control, and segregation of nonconforming animals/products
5. For certified claims, a current third-party certificate

The USDA Doesn't Define Claims—It Lets Producers Make Up Their Own Definitions

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 chosen not to. 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.

Rather than provide legal definitions for the terms used in such claims, the USDA instead asks the producer to provide its own definition of the claim on the package. While this is intended to inform consumers about what a producer means by a claim, it falls short in three ways: (1) Producer-provided definitions are often vague—providing no additional information as to the meaning of the claims, (2) claims are approved regardless of the definition provided, and (3) the burden of understanding complex, holistic claims is shifted to the consumer, who is likely to assume the claim means something more than what is indicated in the definition.

AWI's review of pre-market label approval applications 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 comprehensive 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 fed a vegetarian diet 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, social housing, handling methods, health care practices, and access to range and pasture or exercise areas. Similarly, 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 clear definition provided by producers or required by the USDA, claims of sustainability provide no useful information to consumers.

The USDA Allows Producers to Use Claims Without Approval or Adequate Substantiation

AWI requested application files for 97 claims. For nearly half of those (48 claims), the USDA was unable to provide any application submitted by the producer. For 34 claims, an application was received with either no relevant substantiation (6) or insufficient substantiation (28). In total, 82 of the 97 claims (85%) lacked sufficient substantiation.

In many of the cases where inadequate substantiation was offered, producers submitted affidavits, operational protocols, or other documentation indicating that the producer likely only complied with minimum industry animal care standards. For example, in the label approval file for Boar's Head Simplicity All Natural roasted turkey breast, the producer sought to substantiate the use of the claim “humanely raised” with an affidavit claiming its turkeys were raised antibiotic free and with



AWI found the use of “humanely raised” on Boar's Head's Simplicity All Natural turkey products so egregious, it filed a complaint with the Federal Trade Commission.



Creminelli Meats supplied a number of documents as justification for the use of “humanely raised” on its “salami minis” but it was still difficult to discern whether its use of the claim was substantiated.

documentation that the animals were raised to the industry-level standards of the National Turkey Federation. In fact, the Boar's Head “humanely raised” label claim is so misleading that AWI is challenging its use before the Federal Trade Commission. Thus far, the FTC has not responded to AWI’s complaint.

In approximately 16 percent of the files reviewed by AWI, the producer provided more substantiation for use of the claim than was seen in other files, yet the evidence offered varied significantly from one producer to the next. In many of these files, it remained unclear to AWI whether the submitted documentation was adequate to substantiate the claim. For example, in the label approval file for Creminelli Fine Meats “humanely raised” salami minis, the producer provided an affidavit, an operational protocol, and a certificate from the American Humane Association (American Humane Certified),

as well as an organic processing certificate (which is unrelated to organic animal raising). In another affidavit in the file, one of Creminelli’s suppliers claimed its pigs were raised in accordance with a different certification program (Global Animal Partnership, which evaluates standards of care using a six-step rating system), but no step level for the GAP program was indicated, and no certificate was provided. Thus, even with the documentation provided, it was impossible to determine what specific evidence Creminelli is using to support its claim and whether all meat used for the product met that level of animal care.



The USDA was unable to find any label application for the claim “Animal Welfare Humane Certified” found on Gerber’s Amish Farm chicken.

The USDA Allows Producers to Use Claims in Ways Inconsistent with Consumer Perceptions

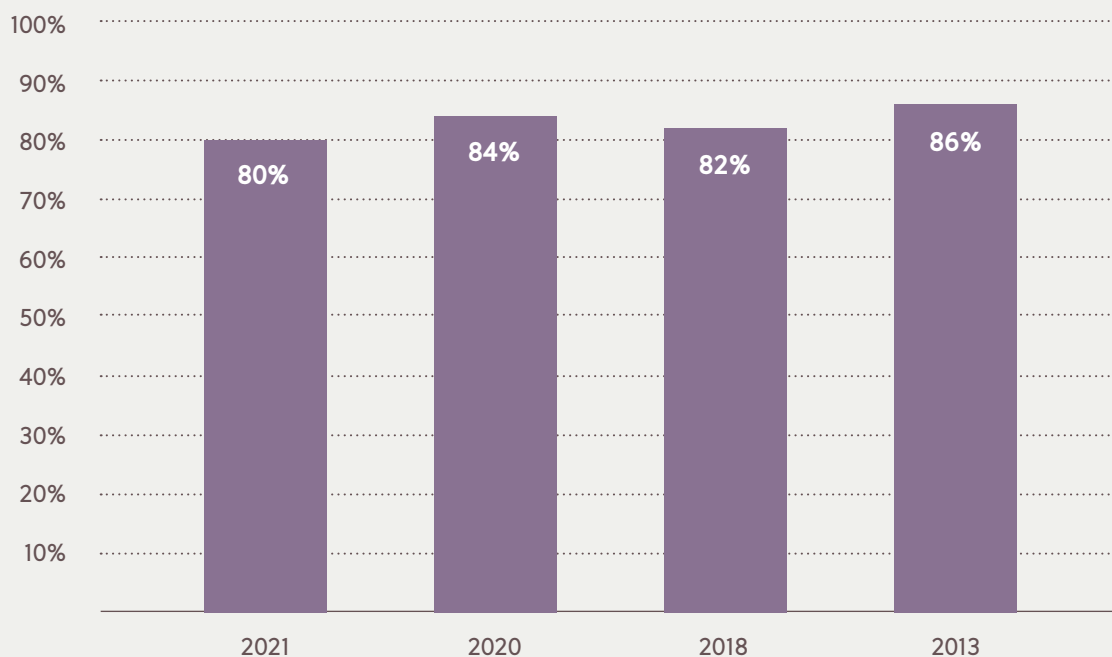
AWI believes that even if the requirements of the USDA labeling guideline are met, producers still frequently fail to satisfy consumer expectations for substantiating animal-raising and environmental stewardship claims. **Based on our review of the label approval applications (see Appendix), AWI has determined that the USDA approves the use of high-value claims, such as “humanely raised,” on products from animals raised under conventional industry standards.** This is not to say that all use of these claims is misleading or that all the claims reviewed by AWI 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 are not.

AWI regularly conducts research into consumer perceptions of label claims and the USDA’s approval of these claims. Over the

past 10 years, AWI commissioned a dozen surveys relating to consumer perceptions of high-value claims, such as humanely raised, and whether producers should or should not be allowed to use the claims. AWI has also surveyed consumers about what they perceive the government’s role in regulating these claims to be. These surveys have repeatedly shown that consumers disapprove of the USDA’s practice of allowing conventional producers to use high-value animal-raising claims such as “humanely raised” without requiring the producers to demonstrate that their standard of care exceeds that of the conventional industry. AWI’s most recent survey found that 80 percent of consumers disagree with this practice (see Figure 2).

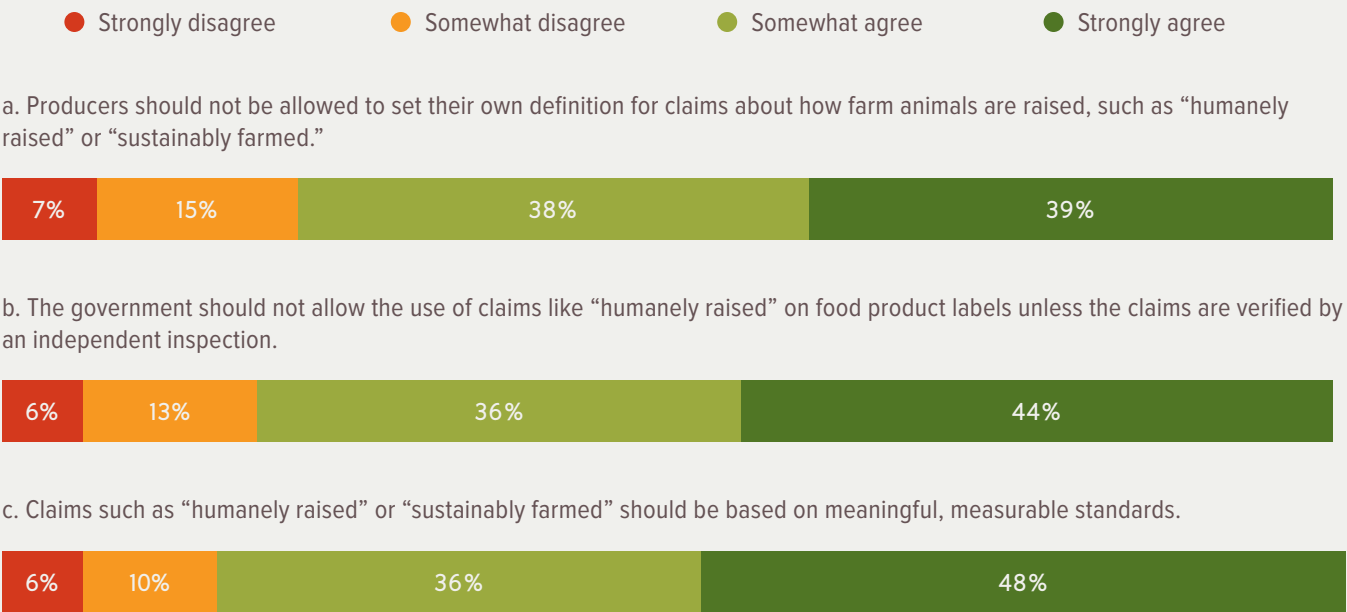
Further, consumers disagree with the USDA’s practice of allowing producers to define these claims themselves and its failure to require independent inspection. Consumers also believe claims such as “humanely raised” or “sustainably farmed” should be based on meaningful, measurable standards (see Figure 3).

FIGURE 2. Consumers overwhelmingly believe the claim “humanely raised” should not be allowed unless a producer exceeds industry standards.*



*These surveys were conducted online within the United States by The Harris Poll on behalf of the Animal Welfare Institute from October 12–14, 2021, among 2,019 US adults ages 18 and older, from October 14–16, 2020, among 1,814 US adults ages 18 and older who purchase fresh/frozen/processed chicken products at least once a month, from October 18–22, 2018, among 1,990 US adults ages 18 and older who purchase meat/poultry/egg/dairy products, and from October 10–14, 2013, among 2,027 US adults ages 18 and older. These online surveys are 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@awionline.org.

FIGURE 3. Consumer perceptions of the USDA’s practices relating to labeling.**



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AWI'S EVALUATION OF LABEL APPROVAL APPLICATIONS

Are Producers Meeting the USDA's Labeling Guideline?

In AWI's review of the applications received from the USDA, it was often not possible to determine whether producers were meeting the USDA's labeling guideline because of heavy redactions of information in documents AWI received via the Freedom of Information Act. This was especially true for documentation supporting items 3 and 4, which relate to segregation of nonconforming products (see Figure 1). This information may have been included in the producer's label approval file, but because the FSIS fully redacted some individual documents, it was impossible to tell which pages served what purpose. Because redactions make it difficult to fairly evaluate whether a producer has met the USDA's requirements, AWI chose not to present statistics on producer compliance with the guidance.

What Are Producers Submitting to Substantiate Claims?

From what AWI can determine, many producers are not submitting label approval applications to the USDA. AWI identified dozens of claims in the marketplace for which no label approval application whatsoever was provided. This would mean that either the USDA lost the file or that the producer never even submitted an application for the use of the claim.

Of the producers who did submit label approval applications to the USDA, the most common form of substantiation was an affidavit. Some parroted back the same definition found on the product package, others touted attributes not relevant to humane or sustainable production, such as supporting a "humanely raised" claim by stating that the animals were raised with vegetarian feed or without antibiotics—attributes that have limited relevance to animal welfare.

Another common substantiation type was an operational protocol, which is generally meant to describe the manner in which the animals were raised. These frequently lack detail and are far too brief to represent comprehensive animal care or environmental production practices.

Producers commonly included certificates or audits associated with certification. Some certifications were from legitimate third-party animal welfare certification programs that represent an improvement over typical industry practices, such as GAP Step 2 or higher, or Certified Humane, while others merely reflect compliance with industry standards, such as the *National Chicken Council Welfare Guidelines and Audit Checklist for Broilers*.

AWI also observed audits unrelated to farm production standards being used as a justification for on-farm treatment, such as a humane slaughter audit being used as a basis for a "humanely raised" claim. Similarly, many producers provided "organic" certificates as a basis for humane claims even though substantive standards for the welfare of animals are not included under the program.

Lastly, the integrity of the substantiation was sometimes questionable. For instance, in some cases the documentation provided showed no direct link between a producer's supplier and the brand the product was being marketed under. Third-party certificates were also sometimes expired at the time of application submittal and/or label approval.

All told, when producers do submit label approval applications to the USDA, the label approval office is not carefully reviewing these submittals to ensure that the substantiation is relevant, timely, or adequate to justify the use of these high-value claims. See Appendix for more detail.

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 use third-party certification typically incur fees associated with the certifications that meet consumer expectations. These producers also incur higher costs in

maintaining systems that go beyond conventional production standards in terms of animal welfare or environmental stewardship.

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 improved production yet 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 verification of their product claims.

IMPROVING TRANSPARENCY AND CONSISTENCY THROUGH CERTIFICATION

The USDA's failure to adequately regulate animal-raising and environmental stewardship claims has resulted in a problem that will be extremely difficult to fix. Not only have conventional producers co-opted high-value claims, they have begun to create their own third-party certification programs in response to consumer interest. Several of these industry-created third-party certification programs have standards that merely reflect compliance with baseline animal care levels used on conventional farms. AWI has identified One Health Certified, Farm Animal Care Training and Auditing (FACTA), and CARE Certified as programs that likely deceive consumers due to their reliance on baseline industry standards. Several products that AWI assessed for this report relied upon these programs as a basis for their claims. AWI expects programs like these to continue proliferating in the market and deceiving consumers if nothing is done to stop them.

Unfortunately, the industry's use of certification merely to signify adherence to conventional industry production practices adds an additional element to AWI's previous recommendation that producers be required to gain third-party certification for the use of these claims. **To meet consumer expectations,**

producers making welfare and sustainability claims should be required to gain third-party certification to a standard that exceeds conventional industry production practices.

AWI views the GAP program at Step 2 as potentially providing guidance to the USDA on what acceptable minimum animal care standards for a welfare claim might look like. For environmental stewardship claims, AWI believes USDA Organic could likely serve as a baseline. **Moreover, producers should be required to comply with 100 percent of the certification standards and be audited at least every 15 months to ensure that they remain in compliance with the standards.**

For more information on food labels, see AWI's *A Consumer's Guide to Food Labels and Animal Welfare*, available at awionline.org/foodlabelguide.



Several certifications have been developed that merely reflect compliance with baseline industry animal care standards used on conventional farms.

APPENDIX: LABEL APPROVAL APPLICATIONS REQUESTED AND REVIEWED BY AWI

- No application for the product label or for the claim in question was provided by the USDA • 48 claims (49.5%)
- Application for the product label was provided by the USDA, but it included no documentation relevant to the claim in question • 6 claims (6.2%)
- Application for the claim in question was provided by the USDA, but the substantiation offered was deemed insufficient • 28 claims (28.9%)
- Application for the claim in question was provided by the USDA, and substantiation was deemed potentially sufficient • 15 claims (15.5%)

BRAND/PRODUCT	CLAIM	YEAR	SUBSTANTIATION PROVIDED TO AWI	
4505 Meats Butcher's Snack Sausage Link	Humanely Raised	2021	●	No application received
4505 Meats Butcher's Snack Sausage Link	Sustainable (in definition for humanely raised)	2021	●	No application received
Allen Family Foods Nature's Sensation Chicken	Humanely Raised on Family Farms	2013	●	• Affidavit/testimonial • Certificate: National Chicken Council
Applegate Farms Naturals Chicken	Humanely Raised	2013	●	No application received
Applegate Farms Naturals Salami	Humanely Raised	2013	●	No application received
Applegate Farms Naturals Turkey	Humanely Raised	2013	●	No application received
Applegate Naturals Oven Roasted Turkey Breast	Humanely Raised	2019	●	• Affidavit/testimonial • Operational protocol • Certificate: GAP Step 1 • Comparison to industry standards
Applegate Naturals Uncured Genoa Salami	Humanely Raised	2019	●	• Affidavit/testimonial • Operational protocol • Certificate: GAP Step 1/Certified Humane
Applegate Oven Roasted Chicken	Humanely Raised	2019	●	• Affidavit/testimonial • Operational protocol • Certificate: GAP Step 2 • Comparison to industry standards
Boar's Head Chicken Sausage	Humanely Raised	2019	●	• FACTA audit
Boar's Head Simplicity All Natural Applewood Smoked Uncured Ham	Humanely Raised	2019	●	• Operational protocol • Certificate: American Humane Association "Free Farm Certified" (very old) • Transport and slaughter audits
Boar's Head Simplicity All Natural Roasted Turkey Breast	Humanely Raised	2019	●	• Affidavit/testimonial • National Turkey Federation audit
Boar's Head Simplicity Uncured Beef Frankfurters, Skinless	Humanely Raised	2019	●	• Affidavit/testimonial • Certificate: Certified Humane
Crème de Veau Veal	Humanely Raised	2020	●	Nothing relevant to claim in application
Crème de Veau Veal	Sustainable Family Farms	2020	●	Nothing relevant to claim in application
Creminelli Fine Meats Salami Minis	Humanely Raised	2020	●	• Affidavit/testimonial • Certificate: American Humane Certified, Organic, GAP (no step level) all for supplier • Operational protocol
Crescent Foods Young Chicken Drumsticks	Humanely Treated	2013	●	No application received
Crescent Foods Young Chicken Drumsticks	Humanely Treated	2019	●	• FACTA audit

BRAND/PRODUCT	CLAIM	YEAR	SUBSTANTIATION PROVIDED TO AWI	
Diestel Family Ranch Pastrami Seasoned Uncured Beef	Thoughtfully Raised	2021	●	No application received
Diestel Turkey Ranch Turkey	Thoughtfully Raised	2017	●	- Affidavit/testimonial - Certificate: Organic, GAP (no level)
Diestel Turkey Ranch Turkey	Humanely Raised	2013	●	Affidavit/testimonial
Diestel Turkey Ranch Turkey	Sustainable Family Farms	2013	●	Affidavit/testimonial
Diestel Turkey Ranch Turkey Burgers with Uncured Pork Bacon	Thoughtfully Raised	2021	●	- Affidavit/testimonial - Certificate: GAP (Step 3 for turkey, nothing for pigs)
Dietz & Watson Originals Pre-Sliced Angus Roast Beef	Verified Humanely Raised	2021	●	Affidavit/testimonial: Humane Slaughter
Dietz & Watson Originals Pre-Sliced Black Forest Ham	Verified Humanely Raised	2021	●	No application received
Dietz & Watson Originals Pre-Sliced Chicken Breast	Verified Humanely Raised	2021	●	No application received
Dietz & Watson Originals Pre-Sliced Herbed Turkey Breast	Verified Humanely Raised	2021	●	- Affidavit/testimonial - Certificate: Organic (handler), GAP (Step 1, image on side of processor package)
Empire Kosher Chicken	Humanely Raised	2017	●	Affidavit/testimonial
Empire Kosher Chicken	Raised on Family Farms Using Sustainable Agricultural Practices	2013	●	Affidavit/testimonial
Empire Kosher Tukey	Humanely Raised	2018	●	Affidavit/testimonial
Fircrest Farms Chicken (Foster Farms)	Sustainably Farmed	2013	●	No application received
Fork in the Road Hot Dogs	Sustainable	2013	●	No application received
FreeBird All Natural Chicken	Humanely Raised	2013	●	No application received
FreeBird Chicken Breast	Humanely Raised	2019	●	Affidavit/testimonial
Garrett Valley First Cut Brisket	Humanely Raised	2017	●	No application received
Garrett Valley Ham Steak	Humanely Raised	2017	●	No application received
Garrett Valley Smoked Chorizo Veal Sausage	Humanely Raised	2017	●	- Affidavit/testimonial - Certificate: Certified Humane
Gerber's Amish Farm Chicken	Animal Welfare Humane Certified	2021	●	No application received
Greenfield Bacon	Humanely Raised	2019	●	Affidavit/testimonial
Hatfield Quality Meats Montreal Style Dry Rub Seasoned Pork Loin Filet	Ethically Raised	2018	●	No application received
HEB Natural Pork	100% Socially Raised	2017	●	No application received
Heinen's Beef	Humanely Handled	2021	●	No application received
Heinen's Beef	Humanely Raised and Handled	2013	●	No application received
Heinen's Own Pork	Humanely Handled	2013	●	No application received

BRAND/PRODUCT	CLAIM	YEAR		SUBSTANTIATION PROVIDED TO AWI
Heinen's Own Pork	Humanely Handled	2021	●	No application received
Keller Crafted Meats Pork	Humanely-Raised	2017	●	• Affidavit/testimonial • Operational protocol • Certificate: Food Alliance, Organic • Photos
Keller Crafted Meats Pork	Sustainable	2017	●	• Affidavit/testimonial • Certificate: Food Alliance, Organic
Kettle & Fire Beef Bone Broth	Humanely Raised	2021	●	Nothing relevant to claim in application
Kettle & Fire Beef Bone Broth	Sustainable Family Farms	2021	●	• Affidavit/testimonial
Kettle & Fire Chicken Bone Broth	Humanely Raised	2021	●	No application received
Kettle & Fire Chicken Bone Broth	Sustainable Family Farms	2021	●	No application received
Kidfresh Chicken Nuggets	Humanely Raised	2018	●	• Affidavit/testimonial
Kroger Simple Truth Natural Chicken	Raised Cage Free in a Humane Environment	2013	●	No application received
Massa Natural Meats Pork	Humanely Raised	2020	●	• Affidavit/testimonial
Massa Natural Meats Pork	Regeneratively Farmed	2020	●	No application received
Maverick Ranch Bacon	Humanely Raised	2020	●	No application received
McLean Natural Meats Pepperoni Sticks	Humanely Raised	2018	●	No application received
Mid-Atlantic Country Farms Chicken (A&P store brand)	Humanely Raised	2013	●	• Operational protocol
Mid-Atlantic Country Farms Chicken (A&P store brand)	Sustainably Farmed	2013	●	No application received
Mid-Atlantic Country Farms Turkey (A&P store brand)	Humanely Raised	2013	●	No application received
Mid-Atlantic Country Farms Turkey (A&P store brand)	Free to Roam in a Stress-Free Environment	2013	●	No application received
Mishima Reserve Ground Beef	Humanely Raised	2021	●	• Affidavit/testimonial
Mishima Reserve Ground Beef	Prioritizes Carbon Neutrality	2021	●	• Brochure, scientific study
Niman Ranch Canadian Bacon	Humanely Raised	2013	●	No application received
Niman Ranch Canadian Bacon	Sustainable U.S. Family Farms	2013	●	No application received
Organic Prairie Ground Beef	Humanely Raised	2017	●	• Operational protocol • Certificate: Organic
Organic Prairie Ground Pork	Humanely Raised	2021	●	• Affidavit/testimonial • Certificate: Organic
Pederson's Natural Farms Uncured No Sugar Hickory Smoked Bacon	Raised Humanely	2018	●	No application received
Petaluma Poultry Rocky Free Range Chicken	Sustainably Farmed	2019	●	• Certificate: compliance with own standard • Sustainability audit
Petaluma Poultry Rocky Free Range Chicken	Sustainably Farmed	2013	●	No application received
Plainville Farms All Natural Turkey	Humanely Raised	2013	●	No application received

BRAND/PRODUCT	CLAIM	YEAR	SUBSTANTIATION PROVIDED TO AWI	
Plainville Farms Ground Turkey	Humanely Raised	2019		• Affidavit/testimonial
Plainville Farms Uncured Ham	Humanely Raised	2018		• Operational protocol • Certificate: American Humane
Royal Dutch Veal	Humane	2020		Nothing relevant to claim in application
Royal Dutch Veal	Sustainable	2020		Nothing relevant to claim in application
Simply Sausage French Country Recipe Fresh Pork Sausage	Humanely Raised	2014		• Affidavit/testimonial • Internet page
Smart Chicken	humane treatment; raised ... the right way; spacious, free roam farms	2020		No application received
Smart Chicken	sustainable practices	2020		No application received
Stew Leonard's Lamb	Humanely Raised	2020		No application received
Strauss Ground Beef	Free Raised	2017		No application received
Strauss Ground Beef	Agriculturally Sustainable and Environmentally Friendly	2017		No application received
Strauss Veal Chorizo	Free Raised	2017		• Operational protocol
Strauss Veal Chorizo	Agriculturally Sustainable and Environmentally Friendly	2017		Nothing relevant to claim in application
Thomas Farms Ground Lamb	Humanely Raised	2018		No application received
Thomas Farms Ground Lamb	Sustainable	2018		No application received
Trader Joe's Chicken	Sustainably Farmed	2017		No application received
Tribali Beef Patties Mediterranean Style	We begin with meats sourced from ranchers who raise animals humanely	2021		• Certificate: GAP (Step 4, expired at time of application), Organic • Grassfed affidavit
Tribali Breakfast Sliders Pork and Sage	We begin with meats sourced from ranchers who raise animals humanely	2021		No application received
Tribali Chipotle Chicken Patties	We begin with meats sourced from ranchers who raise animals humanely	2021		• Certificate: GAP (Step 3), Organic
Tribali Thai Style Turkey Patties	We begin with meats sourced from ranchers who raise animals humanely	2021		• Certificate: Organic
True Story Organics Ham	Raised Humanely	2021		• Certificate: Organic
True Story Organics Oven Roasted Turkey Breast	Raised Humanely	2021		• Certificate: Organic
Waterhill Organics Beef	Humanely Raised	2021		• Affidavit/testimonial • Certificate: Organic • Transport and slaughter audits
Waterhill Organics Chicken	Humanely Raised	2021		No application received
Waterhill Organics Turkey	Humanely Raised	2021		No application received
Wegmans Lamb	Humanely Raised	2020		No application received
Wisconsin Meadows Beef	Humanely Raised	2020		No application received



Animal Welfare
Institute

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