In Depth: Certified Humane®, a program of Humane Farm Animal Care



HFAC Case Studies

This section provides background on the Certified Humane® (CH) certification program, a program of Humane Farm Animal Care (HFAC), and an overview of HFAC's:

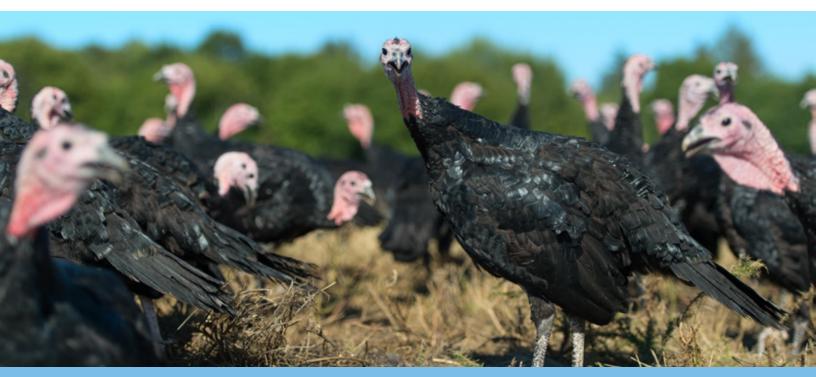
- Standards
- Certification process
- Audit process

- Label use guidelines
- Marketing support
- Costs

HFAC Background

Mission. The Certified Humane® certification program (CH) is an international program of Humane Farm Animal Care (HFAC), a 501(c)(3) non-profit organization dedicated to "improving the lives of farm animals in food production from birth through slaughter" by "driving consumer demand for kinder and more responsible farm animal practices."

History. HFAC was founded in 2003 to promote and administer CH. Since then, HFAC has certified over 144 companies and over 5,000 farms for compliance with HFAC standards.





For a Range of Farm Businesses. HFAC certifies single operations, producer groups, beef marketing groups and its own category of "pooled product operations" – entities that (1) buy products from individual production operations that have been inspected by HFAC and found to be in conformance with HFAC standards (but are not certified individually), and (2) sell the pooled product under the PPO's name. Additionally, HFAC certifies "Product Manufacturing Operations" (PMOs) – entities producing products that include animal-based raw materials from HFAC-certified operations. Restaurants may apply to be certified as PMOs, as well.

Standards. HFAC's standards cover birth through slaughter and are driven by HFAC's philosophy that "animals must be free to do what comes naturally." Accordingly, HFAC states, "chickens must be able to flap their wings and dust-bathe, and pigs must have the space to move around and root." Likewise, cages, crates and tie stalls are prohibited, and animals must be fed a diet of "quality feed, without animal by-products, antibiotics or growth hormones." Finally, "producers must comply with food safety and environmental regulations," and "Livestock processors must comply with the **American Meat Institute (AMI) guidelines**, a slaughter standard written by Dr. Temple Grandin, a member of HFAC's Scientific Committee." Poultry producers must comply with the Poultry Slaughter Standards written by the HFAC Scientific Committee.

Animals covered. HFAC's standards cover the following animals:

Bison

- . Dia
- Beef and dairy cows
- Pigs
- Broiler chickens
- Dairy, fiber and meat sheep

Dairy, fiber and meat goats

- Laying hens
- Turkeys

Where Sold. Relative to AWA and GAP, products with CH's Certified Humane Raised and Handled[®] label are sold by the widest variety of distributors, retailers and restaurants. They can be found in the United States, Brazil, Canada and Peru. To search for CH products, click **here**.

Looking Forward. HFAC states that, in 2003, the CH program covered approximately 143,000 farm animals, and that, today, it covers over 100 million. According to HFAC, they are unlikely to cover other animal species in the near future. Rather, they are focused on continuing to promote the existing program, including its newer "Free Range" and "Pasture Raised" labels.

HFAC STANDARDS

Each certification program covered in this guide requires compliance with standards covering various aspects of farm animal husbandry. Below is an overview of how HFAC develops its standards; which stages of life its standards cover; and HFAC's record-keeping requirements. To review all HFAC standards, click **here**.

Standards Development

HFAC states that it developed its standards in conjunction with a "40 member Scientific Committee...comprised of animal scientists and veterinarians from the United States, Canada, Europe, and South America." Typically, according to HFAC, proposals for new or modified standards originate within this committee. However, HFAC staff, operators and other interested parties may also generate new or modified standards for review by the committee.

After the Scientific Committee agrees on the text of a new or revised standard, HFAC distributes the draft to producers potentially impacted by the proposed standard for their comments. HFAC's Standards Committee compiles comments from this "public comment" period, incorporates other comments from the Scientific Committee, considers the proposed standards, and then presents final recommendations to the HFAC Board of Directors, which makes the final decision on whether to adopt the recommendations or make no change.

Stages of Life Covered

HFAC's standards cover "birth through death." They focus on feed and water, environment, animal management, health, transportation and slaughter. In addition, HFAC does traceability audits on all products.

Record-Keeping Requirements

HFAC's record-keeping standards vary slightly across species. However, HFAC generally requires:

A FARM PLAN REGARDING:

- Training program for caretakers
- Animal health
- Emergency procedures (for fire, flood, interruption of food, water, electricity)
- Use of medication

A RECORD OF:

 Dated production data. For example, for broiler chickens: incoming and outgoing birds, mortality (with reasons), feed provided and consumed, water provided, temperatures, ventilation setting and ammonia levels.

Note: Standards Deviation Requests

If you believe you are complying with the spirit of a standard, but achieving that result through practices different than the standard specifies, you may contact HFAC and request a deviation. The relevant species subcommittee of the Standards Committee will determine whether or not to permit it.

HFAC CERTIFICATION PROCESS

HFAC certifies farms, producer groups, beef marketing groups, product manufacturing operations (including restaurants) and "pooled product operations," described above. The certification process described below applies to individual farms. For more information about the certification process for individual farms and other entities, review the **HFAC Policy Manual**.

STEP ONE

Review HFAC Standards & Policies

- Read the HFAC standards for the species you wish to certify and the HFAC Policy Manual to confirm your farm will comply with relevant standards and policies.
- Confirm that your slaughter facilities are agreeable to being inspected for compliance by an HFAC auditor.

STEP TWO

Submit Application

- Review the application process and submit an application form and a \$75 application fee to HFAC.
- Note: HFAC treats your business information as confidential.

STEP THREE

Schedule & Facilitate an Inspection

- After you apply, HFAC will undertake an Initial Review of your application to evaluate whether your operation is capable of complying with HFAC standards.
- If your application satisfies the Initial Review, an HFAC inspector will contact you to schedule and conduct an inspection (audit). To learn more about the inspection process, including costs, see next page.
- Note: You may appeal a certification decision or enter a dispute resolution process for other program concerns.

STEP FOUR

Obtain Certification & Use Label

- HFAC will make a certification determination.
- Approved operations will be provided a Certification Mark License Agreement governing label use
- The certification fee will follow the HFAC Fee Schedule.
- Certification is valid for 1 year.
- Note: You may appeal a certification decision or enter a dispute resolution process for other program concerns.

STEP FIVE

Recertification & Changes to Certification

- HFAC-certified businesses must renew their certification annually by submitting a completed application form and application fee. The renewal process begins about 60 days before a business' certification expires, and includes generally the same steps as the initial certification
- You must notify HFAC if you change the types or amounts of products certified or you make significant changes to your management or organizational structure. You must withhold products produced under the changed procedures until HFAC has reviewed the changes (possibly resulting in an Amended Certificate of Certification).
- Note: Your certification may be suspended or revoked for non-conformances, as set forth in the HFAC Policy Manual.

HFAC INSPECTION PROCESS



HFAC employees conduct audits, which it calls "inspections," to assess and potentially certify your operation's conformance with HFAC standards and policies. HFAC inspects processes, facilities, animals, and records.

When Are Inspections Required?

- Initially: HFAC conducts an inspection as part of the initial application process.
- **Annually:** After certification, HFAC conducts inspections annually as a part of the certification renewal process.
- **Unannounced:** HFAC may perform unannounced inspections in order to assess an operation's continued conformance with HFAC standards and policies.
 - Unannounced inspections are performed using the same procedures as routine inspections except that the inspector does not contact the operator about the inspection more than 24 hours prior to arrival at the certified operation.
 - Inspectors are permitted to perform unannounced inspections without any prior notice to the operator, but, according, to HFAC, some notice is normally given to ensure that the needed personnel can participate.
- For Program Assessment: Periodically, HFAC selects random member farms to audit (also unannounced) in order to assess the effectiveness and consistency of the HFAC auditing program, as well as the performance of its auditors. Random audits may cover a full farm or just a particular species or management practice.

Who Conducts Inspections?

- Generally: HFAC contracts with approximately 30 inspectors. In creating a plan for the inspection, HFAC first determines which aspects of your business need to be inspected and then determines who from the HFAC list of inspectors is most qualified to conduct the inspection.
- Background & Training: All of HFAC's inspectors are required to either have a Masters or Ph.D. in animal science or a veterinary degree. Additionally, each inspector has expertise in a specific species. All inspectors participate in an inspection-training program. After the initial training, each auditor is accompanied by a more experienced auditor during at least his or her first two audits. After the apprentice inspections, the experienced inspectors evaluate the new inspectors to determine whether or not the new inspector needs additional training.

• Impartiality: HFAC states that it seeks to ensure that the chosen inspector has not been involved in (or employed by a business or person involved in) the design, supply, installation or maintenance of products related to your operation within 24 months of the inspection. All inspectors fill out a declaration of interest form so that HFAC can ensure they are not inspecting an entity with which they have a relationship. If you object to the use of a particular inspector, you may contact the Director of Certification to explain the objection. At HFAC's discretion, another inspector may be assigned.

What Happens During an Inspection?

The inspection process varies somewhat depending on the type of entity being inspected. However, it generally involves the following steps. (For information about the inspection and certification process for specific kinds of business entities, review the **HFAC Policy Manual** Part 3.)

Pre-audit: Off-farm activity

• **First contact.** An HFAC inspector will contact you to schedule the inspection visit. The inspector will explain and answer questions about the inspection process.

Audit Part 1: On-farm activity

- **Discussion.** The inspector will meet with you to discuss the inspection schedule and procedures. Next, the inspector will meet with farm managers and employees to discuss their roles and responsibilities and determine their knowledge of HFAC requirements.
- Observation of procedures, facilities, animals. The inspector will observe the procedures you use to manage and care for the farm animals in order to determine the level of conformance with HFAC standards and policies. Observed practices and procedures include animal nutrition and animal condition, housing, sourcing stock, animal identification methods, husbandry practices, handling systems, implementation of animal health plans, availability of emergency action plans, management of casualty animals and the general environment of the operation.
- **Review of Records.** The inspector reviews records listed on <u>page 3</u>; documents referenced on the Application for Certification; records related to tracing animals; records documenting the products used in the management of your operation; and information provided by veterinarians, feed suppliers and other parties who provide goods and services to your farm.
- **Exit Interview.** At the end of the inspection, the inspector will meet with you to summarize the inspection findings and provide you with an overview of the observed non-conformances, if any. During this meeting you have the opportunity to provide corrections, clarifications, and additional information.
- **Overall length.** The length of the inspection varies depending on the size and complexity of the operation, but average between a half day and full day.



Audit Part 2: Slaughter Facility

HFAC will inspect your slaughter facility to ensure it is compliant with HFAC standards. If it is not, either the slaughter facility must make the necessary changes to become compliant, or you will have to use another compliant slaughter plant in order to become certified. For livestock, HFAC requires that producers applying to the program have their animals slaughtered at facilities that meet **American Meat Institute (AMI) guidelines**. For poultry, HFAC requires that producers applying to the program have their animals slaughtered at facilities that meet the Poultry Slaughter Standards written by HFAC's scientific committee.

Post-Audit: Follow-Up & Corrective Action

- Determination. After the inspections, the inspector compiles an inspection report. Based on that report, HFAC makes one of three written certification determinations:
 - 1) Your operation complies with all relevant HFAC policies and standards and is awarded certification;
 - 2) Your operation has one or more "minor non-conformance" with the relevant HFAC standards and policies, and must make the required corrections within a 30-day period;
 - **3)** Your operation has one or more "major non-conformance" with the relevant HFAC standards and policies, and is therefore denied certification.
- Conditional Certification. An operation is granted "Conditional Certification" if it has one or more minor non-conformance with HFAC standards and policies. During the Initial Certification Process, HFAC may issue a "Certificate of Conditional Certification" to allow an operation with one or more "minor non-conformance" to use the HFAC seal while it is undertaking corrective actions. If operations with conditional certification do not correct "minor non-conformances" within 30 days, they are denied certification.
- Denial. If your farm is denied certification, you must wait six months before reapplying.

Additional Inspection Information

For additional information on the HFAC inspection process, review **HFAC Policy Manual** Part 3, including the following charts:

Initial Certification Process Flowchart	Part 2, D
Renewal of Certification Process Flowchart	Part 2, E

HFAC LABEL USE GUIDELINES



License Agreement. HFAC controls ownership, use and display of its certification mark through the Certification Mark License Agreement. This Agreement describes HFAC's legal rights to address incorrect references to the certification system or misleading use of licenses, certificates or marks found in advertisements. The Agreement also requires members to supply HFAC with samples of their packaging, advertising, or promotional materials bearing the HFAC mark upon HFAC's request. HFAC's Certification Mark License Agreement is not publicly available. For questions on label topics not covered here, contact HFAC directly.

USDA-FSIS Label Approval. As described in the **USDA-FSIS Labeling** section, prior to use of the Certified Humanely Raised and Handled[®] label, approval by the United States Department of Agriculture (USDA) Food Safety & Inspection Service (FSIS) is required.



HFAC MARKETING SUPPORT

According to HFAC, the program provides the following marketing support to its members:

- Internet Visibility. According to HFAC, the CH website averages over 12,000 unique visitors a month. The website directs visitors to where they can buy products with the Certified Humane Raised and Handled® label, lists CH-certified producers, and profiles CH farmers.
- **Downloadable Free App.** This App lists stores that sell products with the Certified Humane Raised and Handled® label, as well as which products are in each store.
- **Press Releases.** HFAC issues press releases for all new producers that successfully complete the Certified Humane® certification process.
- **Sourcing Outreach.** HFAC actively works with supermarkets and other retailers to find buyers for CH-certified products.
- **Promotion by Welfare Organizations.** HFAC claims that 6 "humane organizations" promote its program on their websites, in their publications and in targeted direct mailings, reaching national audiences.
- Media Visibility. HFAC highlights that numerous publications have profiled the CH program and directed readers to where to find products with the Certified Humane Raised and Handled[®] label.



HFAC COSTS

As set forth below, HFAC has annual application, inspection and certification fees. For some qualified "small operations," HFAC partially or fully subsidizes inspection costs.

Annual Application & Inspection Fees

Application for Initial Certification	\$75
Application for Renewal Certification fee (annual)	\$75
Inspection fee: Farm	\$700/day/inspector
Inspection fee: Processor, Product Manufacturing Operation, Pooled Product Operation, Slaughter and Handling Facility	\$800/day/inspector

Annual Certification Fees

HFAC's certification fees are based on the amount of product processed and the number of animals or animal products sold because they are certified, not because there is a label on the package. Certification fees are generally paid on a monthly basis, but small operations may be allowed to pre-arrange quarterly payments, at the discretion of HFAC's Executive Director.

CERTIFICATION FEES			
Cattle	0-25,000 animals 25,001-50,000 animals 50,001-75,000 animals 75,001-100,000 animals 100,001-200,000 animals 200,001-300,000 animals 300,001-400,000 animals	\$1.10/head \$0.82/head \$0.62/head \$0.47/head \$0.37/head \$0.22/head \$0.07/head	
Pigs	0-35,000 animals 35,001-65,000 animals 65,001-100,000 animals 100,001-200,000 animals >200,000 animals	\$0.55/pig \$0.45/pig \$0.35/pig \$0.25/pig \$0.15/pig	
Dairy Cows	Hundredweight of milk	\$0.015 (1/8 th cent/gallon)	
Goats	For milk For meat	\$0.008/gallon \$0.23/head	
Laying Hens	Case of 30 dozen eggs	\$0.07	
Broiler Chickens	1-6,000,000 birds 6,000,001-15,000,000 birds 15,000,001-30,000,000 birds >30,000,000 birds	\$0.003/lb \$0.0025/bird \$0.002/bird \$0.0015/bird	
Sheep/Lamb	Per head Per gallon	\$0.23 \$0.008	
Turkeys	Per pound	\$0.0023	
Young Dairy Beef	Per head	\$0.55	
Bison	0-500 animals 500-2500 animals > 2500 animals	\$1.00/head \$0.75/head \$0.50/head	

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Subsidies for "small operations." Upon request, HFAC may partially or fully subsidize the costs of inspections for qualified "small operations."

SIZE OF OPERATIONS ELIGIBLE FOR SUBSIDIZED INSPECTION FEES		
Species covered by the certificate application	Number of animals being certified is not greater than:	
Beef Cattle	50 head	
Broilers	100 head	
Dairy	30 head	
Goats	50 head	
Layers	100 head	
Pigs	50 head	
Sheep	70 head	
Turkeys	70 head	
Young Dairy Beef	30 head	

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Transition costs. Additionally, there may be costs associated with transitioning a farm to meet CH standards in preparation for an application for certification.

To review HFAC's Fee Schedule, click here.



ECHO FARM PUDDINGS ECHO FARM

Hinsdale, New Hampshire



Operation Profile: 100 cows (Milking Shorthorns & Jerseys)

Certification: Certified Humane®

Background

In 1987, Bob and Bonnie Hodge purchased 35 acres in Hinsdale, New Hampshire. Their goal was to start a 4-H club on the property – to show horses, sheep, and eventually cows. In 1990, their daughters, Beth and Courtney, convinced them to buy Milking Shorthorn heifers, and a dairy operation slowly formed. After returning from college, Beth and Courtney took over farm management and developed the Echo Farm Puddings business. Today, Echo Farm milks approximately 100 cows – half Milking Shorthorns and half Jerseys. Echo Farm sells its "Echo Farm Puddings" products through distributor United Natural Foods Inc., as well as at Whole Foods Market® (WFM), and various other retailers, primarily in New England and metro New York City.

Case Studies: Certified Humane®

Getting Certified

In 1999, the Hodges heard about an animal welfare certification program and applied when they realized that their operational practices complied with many of the program's standards. When one of the certification program's leaders, Adele Douglass, departed to found a new program, Humane Farm Animal Care (HFAC), the Hodges applied to HFAC for certification. Echo Farm was approved, making it the first dairy farm to become Certified Humane®.

According to the Hodges, they did not have to undertake significant transition costs to become HFAC-certified. They attribute this to being first-generation farmers who did not have to contend with revising longstanding practices that fall outside program standards. Currently, beyond the standard application fee of \$75, Echo Farm pays between \$900 and \$1000 for the inspection fee and certification costs—a "royalty," as Beth puts it, that Echo Farm pays HFAC per product with the Certified Humane Raised and Handled[®] label. However, according to Beth, the increased revenue that results from their certification, as well as the market access the certification enables, far outweighs these costs.

Beth reports that the HFAC inspections have been rigorous, particularly in the beginning, when the inspector would spend a full day at the farm. However, now that the program has familiarity with their operation, the inspector typically spends a half-day on site. Nonetheless, Beth says that she and her employees usually spend two full days preparing for the inspection to ensure that all relevant paperwork is readily accessible. Echo Farm has gone through the Corrective Action Plan process a few times for minor inconsistencies with HFAC standards, sometimes from standards being amended, but have been able to correct any deficiencies.



HFAC Certification Outcomes

Product differentiation & business growth. Beth believes that there is increasing concern from consumers about how farm animals are treated, and sees the Certifed Humane Raised and Handled® label—which she uses on the farm's website as well as on all of their product packaging—as providing validation for their business' animal welfare claims.

Also, according to Beth, the certification has opened doors to retail stores that the farm could not have otherwise accessed, such as Bread & Circus retail stores, which were eventually acquired by WFM. This increased market access has translated to increased revenues.

Improved farm practices & business organization. HFAC required stricter protocols than their family had been observing for keeping water and food separate from manure, for keeping concrete alleyways clear of mud, and for maintaining sufficient and well-organized records and emergency plans.

Technical & marketing support. HFAC has opened up marketing opportunities for Echo Farm Puddings by offsetting their costs in attending a trade show and providing them with marketing materials. It has also provided them technical advice on how they could improve animal welfare practices on their farm. Finally, being certified by HFAC has enabled Echo Farm to connect with other certified members who, in turn, have provided Echo Farm with marketing and technical advice of their own.

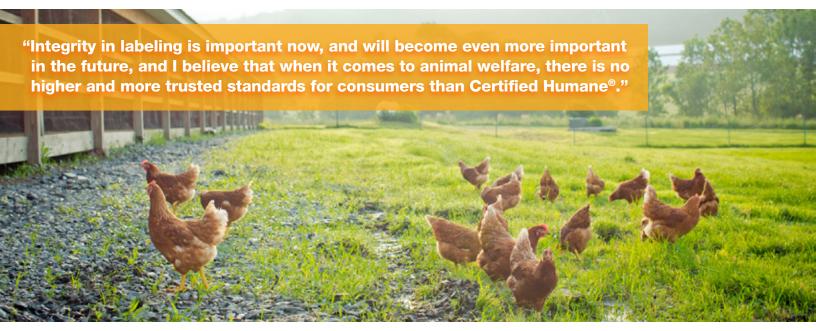
Why Certify with HFAC?

According to the Hodges, "With the increased scrutiny by both consumers and retail chains, being certified has helped our business grow, especially in the natural products sector, and it has helped to differentiate our products from others on the shelf. We believe that the majority of farmers will find that the standards make sense and complying actually improves a farm's productivity."

Case Studies: Certified Humane®

PETE & GERRY'S ORGANIC EGGS WARD FAMILY FARM

Monroe, New Hampshire



Hens grazing on a pasture on the Ward Family Farm.

Operation Profile:

- ≈ 40,000 hens
- Processes over 100,000 eggs per day
- Partners with 125 family farms in the eastern U.S.

Certification: Certified Humane®

Background

The Ward Family Farm was struggling in the 1980s, unable to keep up with industrial-scale egg producers. So when the third generation of Wards took ownership of the family farm, they took it in a new direction. Carol Ward Laflamme (Gerry's wife) and her cousin Peter ("Pete") Stanton shifted to cage-free, organic production, eventually becoming the first Certified Humane® egg producer nationally, and this shift has significantly benefited their business.

Fast forward to 2016 and the Ward family farm – now Pete & Gerry's – has several barns housing approximately 40,000 hens and processes just over 100,000 eggs per day. Additionally, Pete & Gerry's partners with 125 small family farms throughout the eastern United States who raise Pete & Gerry's hens. According to Jesse, Pete & Gerry's hens have access to the outdoors in good weather, lay their eggs in traditional nests and have dust areas to perform natural behaviors. Ninety-five percent of their product is sold in large retail stores throughout the East Coast. Pete & Gerry's sells some eggs through regional distributors to colleges and co-operatives, as well.

Case Studies: Certified Humane®

Getting Certified

To credibly distinguish themselves in a marketplace with unverified claims, Jesse and his family sought a program that certified compliance with strict "cage-free" requirements. In 2003, they chose Certified Humane® because they viewed it as trustworthy, found its standards to be robust and believed it could help them enter their target retail markets.

In order to become certified and maintain their certification, Jesse has had to make some changes including installing more scratching and dust-bathing areas, increasing the amount of available perching area and creating elevated perches that timid hens could use to remove themselves from the larger flock. Jesse reports that with every audit (which he notes are rigorous), the company has to make a few small changes. That said, he has found the "Corrective Action Plan" process to be very reasonable.

Beyond the standard application fee of \$75, Pete & Gerry's pays a few hundred dollars annually for its audit fee, as well as the audit fees for its supplier farms. It also pays the certification cost in the form of a royalty on products sold with the Certified Humane[®] label. Overall, Jesse has found the program fees to be "very reasonable."



Feeding the hens on Ward Family Farm.

HFAC Certification Outcomes

Benefit to animals. According to Jesse, the overall percentage of mortality over the life of the flock is lower than average for similar flock sizes. Moreover, their indoor scratching space and outdoor range areas allow the hens to exercise.

Case Studies: Certified Humane®

Case Studies: Certified Humane®

Cutting through market confusion. Jesse notes that with consumers increasingly skeptical about unverified claims made by producers, Certified Humane® helps differentiate Pete & Gerry's by providing important credibility. Pete & Gerry's use the Certified Humane® label on their website and all of their brand packaging.

Technical Advice. According to Jesse, Certified Humane[®] is a conduit for program producers to share ideas around how to comply with standards and improve welfare, such as roost design and nest design. Because the program provides technical advice and subsidizes program costs for small producers, Jesse believes it is accessible to producers of all scales.

Why Certify with HFAC?

Jesse Laflamme has this advice for farmers considering HFAC certification:

According to Jesse, a welfare-focused approach isn't "just good for our hens and the planet. It has also been good business." "Consumers are searching for alternatives to the traditional food system. Integrity in labeling is important now, and will become even more important in the future, and I believe that when it comes to animal welfare, there is no higher and more trusted standard for consumers than Certified Humane[®]."



A brood of hens exploring Ward Family Farm.