

EGG LABELS AND CERTIFICATIONS: WHAT DO THEY MEAN?

By Jeanne Yacoubou

RECENT POLLS AND SURVEYS SUGGEST THAT CONSUMERS are becoming more and more concerned about farm animal welfare. In a May 2003 poll, Gallup reported that 62 percent of Americans support passing strict laws concerning the treatment of farm animals. A 1995 national survey conducted by Opinion Research Corporation reported that 93 percent of respondents agreed that farm animal pain and suffering should be reduced as much as possible. Eighty-nine percent disapproved of keeping hens in battery cages. Furthermore, 82 percent felt that the meat and egg industries should be held legally responsible for making sure that farm animals are protected from cruelty.

Some consumers are willing to do more than simply make proclamations about animal ethics. A 1999 survey by the Animal Industry Foundation found that 44 percent of consumers would pay 5 percent more for meat and poultry products labeled as 'humanely raised.' This is generally understood to mean that the farm animals received care above and beyond what the animal industries currently provide to the almost 10 billion animals raised for food in the United States each year in systems commonly referred to as 'factory farms.' As a result, several organizations have developed 'animal welfare' certification programs establishing elaborate sets of standards that seek to enhance the lives of animals raised for food.

Vegetarians concerned about animal rights and people leaning toward vegetarianism because of animal welfare concerns may be interested to discover what the 'animal welfare' labels stipulate for laying hens and 'free-range' egg production. The appearance of "USDA Organic (Organic)" or several different animal welfare labels on some egg cartons may suggest that chickens live in bucolic settings where they can freely engage in natural behaviors, such as dust bathing, pecking for worms, and roosting, at all times. The lives of the laying hens under some of these programs are better than those of the billions of chickens conventionally raised in an environment with several to a small cage without the ability to flap their wings. In certain programs, cages are prohibited. However, it appears that laying

hens raised 'humanely' are almost always in large buildings under artificial light. The 'free-range' chickens may be given 'access' to the outdoors but usually do not use it. Nor do they have to go outside to be labeled 'free-range,' despite a policy statement told to us by the Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) that 'free-range' implies that animals are outside at least 50 percent of the time.

"The 'free-range' chickens do not have to go outside to be labeled 'free-range.'"

In the following summaries about each 'humane' label, we observe that laying hens raised under the standards of all but one 'humane' certification program are routinely beak trimmed. The male chicks of 'humanely' raised laying hens are 'euthanized' under all of these programs.

USDA ORGANIC

The USDA created the National Organic Program (NOP) in 2000 after approximately 10 years of research and instituted it for the first time in 2002. According to Joan Shaffer of the Public Affairs Office of the USDA, "[T]he NOP is a marketing program. It has nothing to do with food safety or nutrition. If you want to know why the USDA started it, you'll have to ask Congress because Congress instructed USDA to create and implement the program."

One of the reasons for the NOP may have been to standardize the term 'organic,' which food manufacturers increasingly put in use during the 1990s. Now, the organic market is one of the fastest growing markets in the food industry, one that is currently growing by 20 percent each year. USDA organic eggs and egg products are at the top of the list of the biggest sellers among all organic food products, but organic egg sales currently represent only 2 percent of all egg sales in

the United States. Since much of the wording of the national organic standards pertaining to animal food products is similar to that of the 'animal welfare' label programs, we have included this label in our analysis of 'animal welfare' labels.

In general, the language of the organic laws pertaining to eggs leaves much room for interpretation. For instance, organic poultry are to be given "access to the outdoors." Shaffer said the organic law stipulates that "[T]o provide access to the outdoors, the producer must open the poultry house in a manner that provides the poultry with egress from the poultry house."

"Beak trimming is acceptable under organic law."

Cyd Szymanski is the CEO of NestFresh Eggs of Colorado, a company producing some eggs certified 'organic' by the USDA and some eggs certified 'humane' by "Certified Humane Raised and Handled (CHRH)." She said, "Having a door, open or closed, in the henhouse constitutes 'access to the outdoors' for some organic producers." In keeping with this assessment, Kristi Weidemann of the nonprofit group Eco-Labels, a division of Consumers Union, told us that the USDA responded to their questions in an interview about the phrase "access to the outdoors" by saying that "no outdoor access is required" but "an undetermined amount is involved." Weidemann stated that these two statements "are confusing but aren't meant to conflict. The situation is that poultry are provided with an undetermined amount of access to the outdoors, but they are not required to go outside (i.e., leave their enclosure). In other words, it's as if the door to your home was opened, but you didn't leave."

Free-Range

Interestingly, the term 'free-range' does not appear in the NOP's wording with respect to organic eggs, even though it may seem that 'access to the outdoors' implies that the birds are 'free-range.' Our own inquiry into the term 'free-range,' as defined by the USDA, is commonly believed to apply only to animals raised for meat because the regulation wording states meat but does not mention eggs. "Free-range refers to birds, typically," said Amanda Eamich of the Food Safety and

Inspection Service (FSIS) branch of the USDA, which is responsible for the inspection and identification of egg products. "The term could apply to laying hens if it is shown through animal production protocols/vet records/producer affidavits to be truthful." She said 'free-range' implies that "at least 50 percent of the animal's time must be spent outside, or it would be misleading. This is a policy that we can apply to each label bearing this claim because they must be submitted for approval before use." Although Eamich suggests that the USDA can apply this policy, The VRG questions its enforceability. If this were a requirement for the use of 'free-range' on egg cartons, very few USDA-certified organic eggs would be 'free-range,' even though some producers make this claim on their packaging.

David Borden, Chief of the American Marketing Service (AMS) Poultry Standardization Branch of the USDA, said, "The terminology 'free roaming' is recognized by USDA as descriptive terminology for livestock (meat-producing animals other than poultry). Under current AMS policy, egg-laying flocks that have continuous access to the outside environment may be identified as 'free-range' layers (including egg-laying production facilities certified as 'organic' by a certifying agent accredited by USDA in accordance with the National Organic Program). These labeling requirements remain consistent with policy applied by FSIS officials."

By comparison, the European Union has distinguished the terms 'free-roaming' and 'free-range,' both in relation to laying hens. Free-roaming birds are cage-free in large henhouses; free-range birds actually go outdoors.

Cage-Free

A related term used frequently on egg cartons is 'cage-free.' Borden stated, "A regulatory definition for 'cage-free' has not been codified by USDA, and the Food and Drug Administration regulations do not contain a definition for the descriptive terminology." Even so, Borden said, "Prior to labeling officially identified shell eggs as originating from 'cage-free layers,' an AMS representative would verify that the eggs are produced in a cage-free facility and procedures exist to maintain the identification and segregation of the eggs during processing and packing." The AMS monitoring occurs "at least semiannually." The AMS is responsible for the 40 percent of all eggs in the United States that are graded and sized under the voluntary shell egg grading program and placed in cartons displaying the USDA grade shield. The Food and Drug Administration has jurisdiction over the remaining 60 percent of eggs.

Amanda Eamich of the FSIS branch of the USDA provided more insight into the use of the term 'cage-free.' "AMS may certify that birds are cage-free if producers want to pay for the animal production practices certification," she said. "The statement [on the packaging] has to say something to the effect that the eggs are from chickens that were raised cage-free or were free-range." Cage-free or free-range hens were most likely raised in large flocks in henhouses under artificial light.

Borden explained the relationship between the terms 'free-range' and 'cage-free.' "Although a flock may be identified as 'cage-free,' it does not imply that the flock is also 'free-range,' as stated in the above policy. However, eggs originating from a free-range flock may use a labeling claim indicating that the eggs were produced in a cage-free facility. Prior to authorization use of such terminology on officially identified shell eggs, an AMS representative must verify the labeling claim and procedures established to maintain identity of such eggs."

Beak Trimming

Another issue of concern to animal welfarists is, in the wording of the NOP, "physical alterations that promote the animal's welfare and [are done] in a manner that minimizes pain and stress." Most notable is debeaking, although this term does not appear in the organic laws. Szymanski of NestFresh Eggs stated, "The term 'debeaking' is really a misnomer. Even though some producers may cut off a substantial portion of the beak without anesthesia, humane producers will only trim the egg tooth in the first 10 days of life to prevent aggression in the flock. Beak trimming is acceptable under organic law." The law, however, does not specify how beaks should be trimmed or how much should be removed.

Patricia Hester of the Department of Animal Sciences at Purdue University responded to our questions about beak trimming at the request of Adele Douglass of CHRH. Hester stated, "The egg tooth,... found on the tip of the upper beak of the avian embryo... [and used by the] chick emerging from the shell during the hatching process... to chip its way out of the shell,... falls off of the tip of the upper beak immediately after emerging from the shell."

So, what is actually trimmed? Further clarification by Hester revealed, "[B]eaks not only vary in size within a given hatch but over the several days that are required to trim larger flocks." This makes it difficult to say with certainty how much of the beak is actually trimmed. To provide some standardization to CHRH, the scientific advisory committee of which Hester is a part recommends, "[T]he length of the upper beak

distal from the nostrils, which remains following trimming, should be two to three millimeters."

According to Hester, "Beak trimming is accomplished by a precision automated cam-activated beak trimmer with a heated blade (1200° F)... The beak trimmer has a guide, usually with three separate holes arranged horizontally, for the insertion of the bird's beak. The diameters of the holes are usually $\frac{9}{64}$, $\frac{10}{64}$, and $\frac{11}{64}$ inches... to allow the operator to tailor the selection of the hole size to the individual bird whose beak is being trimmed... The chick's upper beak should be inserted into a selected guide hole when the blade is at the top of the cycle. The blade should then be dropped down to make the cut. The heated blade should be in contact with the beak for about two to three seconds to cauterize the blood vessels to prevent hemorrhaging."

It appears that the beak trimming standard followed by CHRH is based on what is left of the beak after trimming, not on what is actually trimmed.

Forced Molting and Humane Molting

Forced molting is traditionally accomplished by a total feed withdrawal, often performed in complete darkness over several days. Now, the egg industry's leading trade organization, the United Egg Producers, recommends that forced molting be phased out, but this is not the same as 'humane' forced molting. The 'humane' molt or 'full-feed' molt reduces the protein level to a level appropriate for non-laying hens, but Szymanski emphasized it "is not a deficient feed molt. The hens are never without food or water." The 'humane' molt, which is "...accomplished by rendering the birds' food nutritionally lacking in protein and/or adjusting lighting, is...sometimes done by organic egg producers... to give the hens' bodies a rest from constant egg production so that, once egg production resumes after the molt, the egg shells will be strong again."

She also said, "Most organic producers don't molt at all but lay their birds in a single cycle. We only molt if we need to adjust the rotation of the flocks. Since egg sales are seasonal with Fourth Quarter having a large increase in sales, adjustments sometimes have to be made to have the eggs available when they're needed."

Organic producers often perform beak trimming and sometimes use 'humane' forced molting. Joan Shaffer of the USDA Public Affairs Office points out, "Before any alteration can be performed, it must be addressed and justified within the producer's organic systems plan approved by the producer's USDA Accredited Certifying Agent.... When appropriate,

producers are encouraged to support their plan with scientific and regulatory documents.”

Male Chicks

A third issue surrounding egg production is the killing of male chicks. A little more than half of all chicks are male and therefore unable to yield the target product, eggs. Also, they are of a species bred for its egg-laying abilities, not for the quality of its meat. As a result, Szymanski said the male chicks are always euthanized. The organic standards regarding eggs do not address the issue of male chicks.

To become USDA Certified Organic, an egg producer has to pay an independent third-party certifier approved by the USDA. Egg producers who are certified organic are permitted under the NOP to produce conventionally raised eggs as well, even at the same facility, as long as safeguards are taken to keep the two separate.

ANIMAL WELFARE INSTITUTE

The Animal Welfare Institute (AWI) is unique among all the certification programs considered in this report because it requires that facilities are ‘family farms.’ This means that the owner and principal caretaker of the animals raised for food is a family farmer who relies on the farm for his livelihood. The AWI’s rationale for

this stipulation is that only family farmers have the time and the motivation to care for farm animals as individual animals, a cornerstone of the AWI’s animal welfare philosophy. The Institute is also unique among the certification programs considered here in that it prohibits dual production systems, i.e., the raising of some animals conventionally and others ‘humanely’ or less intensively. Farmers must raise *all* animals of a species for which the farmers are approved by the AWI according to the AWI’s standards. The AWI does not charge farmers for inspections, audits, or participation in their program; the AWI subsidizes the program itself. In exchange for abiding by the standards, farmers have the rights to use the AWI name for marketing purposes.

The AWI uses the ‘Five Freedoms’ as the foundation for its animal welfare programs. However, Wendy Swann of the AWI emphasizes that their standards were developed by their staff in consultation with leading scientists and animal welfarists around the world. Ultimate responsibility for the standards rests with the AWI and not a scientific advisory committee. “Our standards are living documents that are constantly evolving as a result of new research, our farm experiences, and feedback from our farmers,” she said.

Under the AWI program, laying hens “must be provided continuous, unobstructed access to clean, nutritious pasture,” Swann stated. “The primary living

SUBSCRIBE to Vegetarian Journal

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Payment Enclosed (check or money order)

Please charge my (circle one) MC / Visa: # _____ Expires: ____ / ____

Send \$20 for one year of the quarterly *Vegetarian Journal*; in Canada and Mexico, please send \$32; other foreign subscribers, please send \$42 in U.S. funds with a postal money order or by MasterCard/ Visa. Send payment and subscription information to The Vegetarian Resource Group, P.O. Box 1463, Baltimore, MD 21203. You can order online at www.vrg.org/journal/subscribe.htm. You can also order over the phone by calling (410) 366-8343, Monday through Friday 9-5 EST. Or fax your order to (410) 366-8804. Please e-mail vrg@vrg.org with any questions.

space must be outdoors. The birds should be allowed to make the choice—that is, they wouldn't be forced outside—but everything about the building, the outdoor area, and the flock itself should encourage birds to go outside whenever they choose to, except between nightfall and dawn when the risk of predation is greatest or in cases of extreme weather.”

The AWI standards stipulate certain characteristics of pastures that some other certifying programs, such as the National Organic Program, do not. Since chickens prefer to move in groups, the AWI requires multiple ways to access the outdoors and requires that those openings be substantial enough to encourage the birds to go in and out as they wish. “That’s why a very small doorway where a chicken can pass in single file wouldn’t be used because chickens (in natural group sizes—which we advocate) establish a hierarchy, and a subordinate chicken may be reluctant to or prevented from accessing a single, small door,” Swann said.

Likewise, the AWI stipulates that chickens must have access to shade that can be provided naturally (with tall grass, bushes, trees, and other things that occur in the environment) or artificially (with shaded areas constructed of wood, metal, canvas, or other materials) and secure shelter (mobile or stationary housing). Because chickens may feel vulnerable to predators in an open field or in a field surrounded with only tall trees where birds of prey may perch, the chickens will not want to take advantage of the pasture. There should be shrubs, hedges, or some other kind of shelter from predators close to the area where they are foraging. Hens cannot be caged under any circumstances under the AWI program.

Environmental enrichment is a major concern for the AWI. The standards require that hens be able to “socialize; have room to move, walk, stretch, and perch; make nests with provided nesting materials in nest boxes; and have access to the outdoors as well as to pasture in which birds can peck for food, scratch, and dust bathe,” Swann emphasized. “Our standards make it mandatory that the lives of laying hens are as natural as possible.”

Debeaking and forced molting are prohibited under the AWI standards. “Our standards seek to create an environment that minimizes aggressive behaviors, making debeaking unnecessary. Forced molting through food withdrawal and/or total darkness is not in keeping with the ‘Five Freedoms,’” Swann said.

Unlike the CHRH and FF programs, which do not address the issue of the killing of male chicks at all, the AWI states that it is still developing its policy on this

point. The AWI does advocate the use of dual-purpose breeds so that male chicks can be raised for meat or for breeding hens. Swann said, “In the event that chicks are culled, killing by suffocation and live grinding are not acceptable. Controlled atmosphere killing with a mixture of argon and carbon dioxide is the preferred method of killing and might be mandatory. We are researching other methods as well.”

At the present time, the AWI does not certify any egg producers under its program. AWI conducts announced audits, as the farmers agree in the affidavits they sign, at least once a year and more times as necessary.

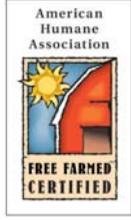
UNITED EGG PRODUCERS CERTIFIED (Previously Animal Care Certified)

The United Egg Producers (UEP) is an organization that represents the approximately 200 egg companies in the United States that generate 96 percent of the 65 billion eggs produced annually in the U.S. In 2002, UEP launched an ‘animal welfare’ label certification program. The “Animal Care Certified” label appeared on most egg cartons in almost all supermarkets because companies producing more than 80 percent of all eggs participate in the UEP label program. Almost 98 percent of all layer flocks in the United States are housed indoors and raised in cages in this \$5.3 billion American egg industry.

“Animal Care Certified” gave the public the impression that the laying hens were raised under conditions other than being crowded into battery cages, debeaked, and deprived of food and/or light to be forced to molt. In 2005, under pressure from several animal rights groups and the Better Business Bureau, the Federal Trade Commission (FTC) ordered the UEP to remove the label from egg cartons, stating that “the label misleads the public regarding how laying hens are currently raised.” Mary K. Engle, Associate Director of the FTC’s Division of Advertising Practices, said the FTC directive stated that egg companies had until April 1, 2006, to remove all the labels from egg cartons. Mitch Head, a UEP spokesperson, was quoted in newspapers throughout the nation claiming he disagreed that the “Animal Care Certified” label was misleading. The UEP agreed to remove it because it was becoming a “purgatory” for the egg producers and hurting business. Head also claimed that a UEP national survey showed that consumers did **not** find the “Animal Care Certified” label on egg cartons misleading.

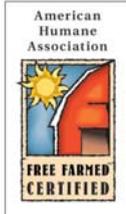
The UEP program is voluntary, although most egg producers adhere to it. An “independent scientific

EGG LABELS AND CERTIFICATIONS

Graphic Logo					
Label Standard	Animal Care Certified Label by United Egg Producers Trade Assn. (Ordered by the FTC to be withdrawn by April 2006; changed to United Egg Producers Certified Label)	Animal Welfare Approved Label by Animal Welfare Institute	Certified Humane Raised and Handled Label by Humane Farm Animal Care	Free Farmed Certified Label by American Humane Association	USDA Organic Label by the National Organic Program; overseen by the United States Department of Agriculture and the Agricultural Marketing Service of the federal government
Motivation	Economics and animal welfare	Animal welfare	Animal welfare	Animal welfare	Standardized marketing of organic foods
Fees	Details not available	No	Yes	Yes	Yes
Announced Inspections	Yes	Yes	Yes	Yes	Yes
Development of Standards	Independent scientific advisory committee appointed by the United Egg Producers	Animal Welfare Institute with international expert consultation and review	Independent scientific advisory committee appointed by Humane Farm Animal Care	Independent scientific advisory committee appointed by American Humane Association	United States Department of Agriculture in conjunction with the National Organic Standards Board
Antibiotics	Details not available	Permitted for disease treatment only	Permitted for disease treatment only	Permitted for disease treatment only	Prohibited
Growth Hormones	Prohibited (for laying hens by government regulation)	Prohibited	Prohibited	Prohibited	Prohibited

EGG LABELS AND CERTIFICATIONS

(CONT.)

Graphic Logo					
Label Standard	Animal Care Certified/United Egg Producers Certified Label	Animal Welfare Approved Label	Certified Humane Raised and Handled Label	Free Farmed Certified Label	USDA Organic Label
Access to Outdoors or Pasture	Not available	Required (except during inclement weather)	Not required	Not required	Required (temporary confinement permitted)
Space Requirements	Approx. 7 in. x 8 in. Increased to approx. 9 in. x 8 in. by April 2008.	Allows expression of natural behaviors	1ft. x 1ft. to 1ft. x 1½ ft. for a laying hen (depending on housing setup)	1ft. x 1ft. to 1 ft. x 1½ ft. for a laying hen (depending on housing setup)	Not specified
Indoor Lighting	Continuous dim lighting permitted	Natural light required	8 hours minimum, 6 hours continuous darkness per day	8 hours minimum, 6 hours continuous darkness per day	Natural light required
Continuous Confinement to Slatted or Wire Floor or Cage	Permitted	Prohibited	Prohibited	Prohibited	Not addressed
Beak Trimming	Permitted without analgesia: first trim before 11 days old, second before 8 wks.	Prohibited	Permitted without analgesia in laying hens before 11 days of age	Permitted without analgesia before 11 days of age	Alterations must be performed to ensure animal welfare and in a manner that minimizes pain and stress
Forced Non-Feed Molting	Prohibited	Prohibited	Prohibited	Prohibited	Not addressed
Forced 'Humane' Molting	Permitted	Prohibited	Under review	Prohibited	Not addressed
Killing of Male Chicks	Not addressed	Under review	Not addressed	Not addressed	Not addressed

advisory committee consisting of agriculture and animal behavior experts from universities, government agencies, and the American Humane Society” established the guidelines. The committee was headed by Jeffrey Armstrong, Dean of Agriculture and Natural Resources at Michigan State University, who willingly sent us several research papers used to support the committee’s recommendations. Among the recommendations (interestingly, largely unchanged from the standards for the “Animal Care Certified” program) are 67 to 86 square inches per caged bird, beak trimming when needed, and non-feed withdrawal molts only (after January 1, 2006). These “scientifically-based” recommendations are requirements of the UEP label program.

Egg companies that wish to be UEP-certified must also implement the Animal Husbandry Guidelines on 100 percent of the company’s production facilities, file a Monthly Compliance Report to assure UEP that the company is meeting the guidelines, and pass an annual audit conducted by USDA or Validus (an independent certifying company). Once requirements are met, egg companies may use the UEP Certified label. “Produced in Compliance with United Egg Producers Animal Husbandry Guidelines” appears under the label’s green check mark enclosed in a semicircle with “United Egg Producers Certified” appearing in the semicircle’s black border.

CERTIFIED HUMANE RAISED AND HANDLED

Humane Farm Animal Care (HFAC) is a nonprofit organization whose mission statement reads in part: “...to improve the lives of farm animals by providing viable, credible, and duly monitored standards for humane food production and ensuring consumers that certified producers meet these standards.” HFAC’s Animal Care Standards are based on those of the Royal Society for the Prevention of Cruelty to Animal’s Freedom Food label and approved by a scientific advisory committee composed of scientists, veterinarians, and people involved in the animal industry. The American Society for the Prevention of Cruelty to Animals (ASPCA) and the Humane Society of the United States (HSUS) are among the many animal welfare organizations that endorse this animal welfare food label.

At the time of this writing, approximately 55 companies representing many hundreds of farms in the U.S. and Canada are approved to use the Certified Humane Raised and Handled (CHRH) label on their products. Adele Douglass, Executive Director of HFAC, said the label, used by animal producers certified by HFAC, confirms “the meat, egg, or dairy products that people

buy come from animals who were allowed to perform natural behaviors and that the animals received no sub-therapeutic antibiotics or added hormones, had nutritious food, and were handled humanely during transportation and slaughter.” Currently, 13 restaurants in the United States display this label because they serve animal products that are Certified Humane Raised and Handled.

To certify a producer, HFAC investigates the producer’s operation by conducting onsite inspections according to detailed audit checklists, interviewing staff, and reviewing company records. To be inspected,

“The killing of male chicks is not addressed in these programs.”

producers pay an inspection fee of \$400 per day. Some small producers may request a waiver of that fee as defined in the HFAC policy manual. According to Douglass, “The inspectors are university professors in veterinary medicine or animal science that we pay to do the inspections.” The CHRH program is overseen by the USDA’s ISO-accredited program, which means that the USDA verifies that the CHRH program is administered as it purports to be.

Producers that pass the certification process are certified for one year and subsequently allowed to carry the CHRH label on their products. To remain part of the program, the producers are re-inspected annually. HFAC reserves the right to revoke certification for different reasons. Revocation may occur “if the producer fails to follow approved procedures or makes changes to approved systems without prior written notice to HFAC,” Douglass stated.

Producers certified to use the CHRH label may run dual operations, where only some of the animals are raised according to the CHRH standards while the rest of the animals are raised conventionally. Douglass points out, however, “There must be a completely separate geographical location to allow that. We do not allow split operations on the same farm or in close proximity to each other.” Dual operators have to “commit to phasing out the non-CHRH section, and the non-CHRH section must be in a completely different geographical location,” Douglass said. “We allow this since our mission is to change the way animals are raised in the U.S. There must be incentive to make those changes.”

Regarding animal welfare issues, the CHRH certification prohibits cages but does not require that laying hens have access to the outdoors. The CHRH standards prohibit forced molting by feed withdrawal. The issue of forced molting by other methods, such as by providing a nutritionally deficient diet and/or by manipulating light cycles, is still under consideration. Douglass said, "I don't have an answer for you on the issue of molting without feed withdrawal. We would have to see if the nutrient-deficient feed molting method causes suffering to the bird. Molting is natural in birds. It rejuvenates them. The difference in nature and in production is that, in nature, the birds molt when they are ready; in production, they are forced to molt at the same time. The issue is complicated because, if the birds are not molted when their lay cycle is over, they are processed and a new flock comes in. If they are molted, they have another lay cycle, and there is no need to get a new flock of birds. We will have to see what the research shows on this issue."

Beak trimming is permitted in laying hens without analgesia in the first 10 days of life as a 'preventative measure' to reduce the risk of cannibalism in high-density hen houses. Beak trimming is not an issue for chickens raised for meat "because the broilers do not live long enough for cannibalism to become a problem," Douglass said. The CHRH standards do state, however, that "the practice of beak trimming is contrary to the principles of the standards.... The need for beak trimming is being constantly reassessed and will be thoroughly reviewed in the light of research currently being carried out. Producers will be required to phase out beak trimming/tipping as soon as the causes of cannibalism and ways of preventing it have been identified."

The killing of male chicks is not addressed. Douglass said, "Our producers start with the chicks

when they arrive at the hen house. What happens at the hatchery is beyond our control at this time." The CHRH standards state that HFAC is currently developing standards for hatcheries.

FREE FARMED CERTIFICATION PROGRAM

The Free Farmed (FF) label was initiated in 2000 by the American Humane Association (AHA). The Free Farmed program states that it used the Royal Society's 'Five Freedoms' as well as other animal welfare standards to formulate its own standards. The Free Farmed standards are similar in wording to the Royal Society's standards.

The FF certification program prohibits cages for laying hens, but it does not require access to the outdoors. On the issue of forced molting, we were referred to a section of the Free Farmed standards that states, "Hens must not be induced to molt." Kathryn Jahnigan, a Public Relations Associate for the AHA, indicated that this includes molts involving modified diets and/or lighting regimes as well as total feed and/or light withdrawal molts.

FF states in its standards that beak trimming "is contrary to the principles of American Humane standards." In the FF program, however, beak trimming without anesthesia is permitted in laying hens as a measure to prevent the risk of cannibalism. It is permitted only once before the tenth day of life. Jahnigan said, "Only the hook at the tip of the upper mandible may be removed." Nevertheless, the standards state, "Beak trimming or tipping which stops at the mandible is allowed." Unlike the CHRH standards, FF standards do not indicate that producers will be required to phase out beak trimming/tipping as soon as research identifies the causes of cannibalism and ways of preventing it.

Bequests

VRG depends on the generous contributions of our members and supporters to continue our educational projects. Though the world may not become vegetarian in our lifetimes, we realize that we are planning and working for future generations.

- ◆ Your will and life insurance policies enable you to protect your family and also to provide a way to give long-lasting support to causes in which you believe. Naming The Vegetarian Resource Group in your will or life insurance policy will enable us to increase our work for vegetarianism.
- ◆ One suggested form of bequest is: *I give and bequeath to The Vegetarian Resource Group, Baltimore, Maryland, the sum of _____ dollars (or if stock, property, or insurance policy, please describe).*
- ◆ To be sure your wishes are carried out, please speak with your attorney specifically about writing the correct information in your will.

The issue of male chicks is not covered in the FF standards. "Male chicks are not discussed in the FF standards because the reality is that male chicks are not in laying operations," Jahnigan said. The question remains what happens to the male chicks produced at the hatcheries from which the female chicks come. The FF standards do say that AHA is currently developing standards for hatcheries.

The FF certification process is lengthy and involves much documentation and an announced onsite inspection. Producers who pass the assessment, independently verified by the third party certifier OneCert, and pay the required fees are granted the rights to use the FF logo on their products and in their marketing materials. Certification is renewable annually. According to the EcoLabels description of the FF program, "The goal of the program is to become self-sufficient based on fees for licensing." Currently, 10 meat, egg, and dairy producers in North America are certified under this program.

Producers certified under the FF program are permitted to operate dual-production systems, i.e., raising some animals under the FF standards and others conventionally. An example is the cage-free operation of Gemperle Farms, now known as Sun Valley. Gemperle is a leading supplier of 'cage-free' eggs to Trader Joe's. In 2006, Farm Sanctuary, a farm animal welfare group, accused Gemperle of supplying Trader Joe's with battery eggs produced under horrid conditions. However, Jahnigan said, "Free Farmed certified hens cannot be kept in the same facilities as non-certified hens, and obviously only the hens raised according to Free Farmed standards can bear the Free Farmed Certified label."

CONCLUSIONS AND FOOD FOR THOUGHT

The UEP label, which represents approximately 98 percent of all laying hens, allows cages, but all of the other welfare labels considered in this report prohibit battery cages. Therefore, we can say that the remaining 2 percent of all laying hens are better off than those billions of chickens that are raised conventionally in a small cage environment because cages are prohibited. However, consumers may have misconceptions about what constitutes 'free-range,' 'cage-free,' or 'organic' hens and their eggs.

We have seen in this report that "USDA Organic," "Certified Humane Raised and Handled," or "Free Farmed" on egg cartons means that laying hens raised 'humanely' are almost always in large buildings under artificial light. 'Free-range' chickens may be given 'access' to the outdoors but usually do not use it, nor do they have to go outside to be labeled 'free-range.' 'Free-range,' 'cage-free,' or 'organic' chickens generally do not live in settings where they can freely engage in natural behaviors at all times.

Laying hens producing 'cage-free,' 'free-range,' or 'organic' eggs typically do have their beaks trimmed, like the 98 percent of chickens living in battery cages. Some form of induced molting may occur. In general, issues surrounding the treatment of male chicks are not addressed by the egg-certifying agencies.

Jeanne Yacoubou is Research Director for The Vegetarian Resource Group and holds master's degrees in philosophy, chemistry, and education. She wrote *Vegetarian Certifications on Food Labels — What Do They Mean?* for VJ Issue 3, 2006.

NOTES FROM THE VRG SCIENTIFIC DEPARTMENT

CONGRATULATIONS!

Congratulations to Sarah Ellis for being chosen as chair elect of the American Dietetic Association Vegetarian Nutrition Dietetic Practice Group. Sarah does the nutrition analyses for the recipes appearing in *Vegetarian Journal*.

AMERICAN ACADEMY OF FAMILY PHYSICIANS SCIENTIFIC ASSEMBLY

Thank you to Arnold Alper, MD, and Jay Lavine, MD, who helped us give information to more than 500 health professionals at our outreach booth in Washington, D.C. Common questions included how vegetarians could obtain calcium and protein. As one attendee stated to us, "This is the most useful information I'll pick up all day." Kudos also to VRG's members, who enabled us to provide *Vegetarian Journal* subscriptions to more than 60 of the doctors who came by the booth. Perhaps this information will influence medical professionals and their patients.