

USDA GIVES PRODUCERS FREE REIN OVER “FREE RANGE” PRODUCT LABELS

Animal Welfare Institute





Introduction

Food label claims on animal products provide one of the only lines of communication between producers and consumers. Producers are able to convey important information to consumers, such as the product's nutritional value and the producer's animal-raising practices. Consumers can then make purchasing decisions based on the information provided—thus helping producers determine what consumers value.

While label claims allow for honest communication between the two parties, they can also be used to take advantage of well-meaning consumers who are willing to pay more for certain products. Animal-raising claims are increasingly important to consumers and many studies show a willingness to spend more money for products demonstrating a commitment to high-welfare animal-raising practices.

One animal-raising claim that producers often use on chicken, turkey, and duck products is “free range.” A majority of consumers believe that free range birds are given plenty of space to roam outdoors where they can perform most of their basic natural behaviors. In order to see if this is how free range birds truly live, the Animal Welfare Institute (AWI) investigated the label-approval process of the US Department of Agriculture (USDA) for the free range label claim. The records demonstrated that of the nearly 100 products reviewed, a majority had evidence of outdoor access in their file. Many producers even submitted evidence that they encourage birds to use the outdoors and that they provide outdoor enrichments.

However, the investigation also showed several weaknesses of the free range claim. First, the claim can be used misleadingly because USDA's free range definition is ambiguous and allows practices that do not meet consumer expectations. Second, while most producers provided some proof of outdoor access, USDA's lax approval process allows producers to use the claim despite providing insufficient evidence to support it.

After reviewing government label files, AWI determined that, on its own, the free range claim as currently defined and approved by USDA cannot guarantee that birds were provided with outdoor access that is in line with consumer expectations. Nevertheless, consumers can use the claim as a first step in determining if farmers allowed their birds the opportunity to spend quality time outdoors. Consumers would need to do additional research, however, such as visiting the farm or speaking with the producer. To avoid this added step, and to make the free range claim more meaningful, USDA must improve both the free range definition and the process by which it approves the claim.

Is There a Legal Definition for the Free Range Label Claim?

In 1957, Congress passed the Poultry Products Inspection Act (PPIA) in order to protect society from harmful and misbranded poultry products. According to the law, misbranded products jeopardize proper regulation of commerce, harm the public, and destroy markets for properly labeled products. In order to prevent such consequences, the PPIA gives USDA the authority to regulate label claims.

One way a product can be considered misbranded under the law is if the label is misleading. It is therefore USDA's responsibility to stop misleading claims from ever reaching consumers. The Food Safety and Inspection Service (FSIS), USDA's public health agency, is responsible for ensuring products are not sold with misleading label claims. The agency must review and approve ingredient and nutritional information, along with animal-raising claims, before a company may use the information on a label. Free range is considered an animal-raising claim, and therefore FSIS must approve labels with the claim prior to product distribution.

Through its meager attempts to standardize the claim, FSIS acknowledges its authority over the use of the free range label claim. The agency maintains three free range definitions—none of which are legally binding because they are only found in guidance documents. According to FSIS' *Meat and Poultry Labeling Terms* guidebook, free range means that birds have "been allowed access to the outside." However, in its *Turkey Raised by the Rules* guidance and through its inquiry-based information web pages ("AskKaren" and "AskFSIS"), FSIS states that free range means "continuous, free access to the out-of-doors for over 51 percent of a birds life, i.e., through their normal growing cycle." At the same time, AskFSIS also uses a slight variation of this definition, stating that the claim means "continuous, free access to the out-of-doors for over 50 percent of a bird's life." The agency does not define "continuous, free access."

Producers are required to submit evidence to ensure compliance with the agency's ambiguous free range definitions. But FSIS provides conflicting instructions on what is needed for approval of the claims—further fueling the confusion over what it means to be free range. According to the agency's *Animal Production Claims Outline of Current Process*, producers should submit an affidavit (or other documentation) stating that birds have outdoor access. However, according to AskFSIS and AskKaren, producers need only provide a description of the birds' housing conditions.

WHAT DOES FREE RANGE MEAN?

FSIS' Free Range Definition Requires:

- access to the outdoors (for slightly over half their lives—according to some, not all, agency statements)

FSIS' Free Range Definition Does Not Require:

- a minimum amount of space per bird*
- a minimum size and number of doorways to the outdoors per flock*
- continuous outdoor access throughout the day
- access to vegetation
- access to shade
- access to soil
- protection against predators
- protection against adverse weather

* This is to ensure all the birds can go outside at one time

What Makes a Free Range Claim Meaningful?

As FSIS definitions suggest, an essential tenet of the free range claim is ensuring that birds have outdoor access. However, stating simply that birds have outdoor access does not paint a clear enough picture of their living conditions. For instance, outdoor access could mean that birds have large grassy fields to roam. Conversely, it could mean that they are crammed indoors with a small exit to a patch of outdoor concrete devoid of vegetation, or a variety of other less-than-optimal living conditions. Thus, outdoor access should not be the sole defining factor of the free range claim.

In order for a producer to properly illustrate that their birds are free range, they must address several characteristics in addition to outdoor access. Producers should provide evidence that birds have easy, continuous access to vegetation, shade, and soil; protection against predators and adverse weather; and outdoor space that is at least as big as the indoor space so all of the birds can utilize it.

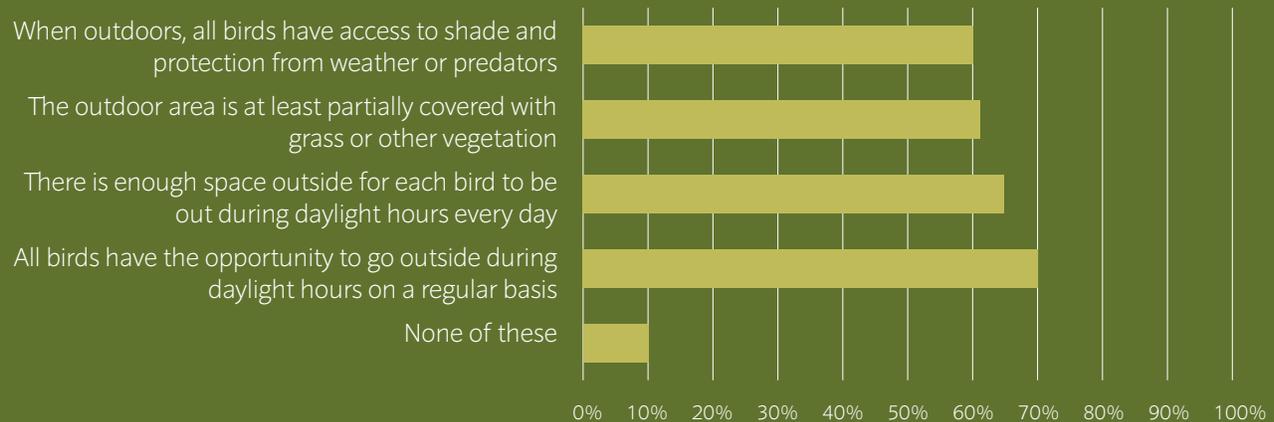
When consumers pick up a poultry product bearing a free range label claim, they expect that the producer has addressed all of these elements. In a recent survey commissioned by AWI, a majority of those surveyed believed that a free range label claim should mean that all birds have the opportunity to go outdoors every day during daylight hours, and that the outdoor space is covered with grass or other vegetation. Additionally, a majority of those surveyed believe that birds should have access to shade and protection from weather and predators. The majority of survey participants across income, educational, and employment spectrums agreed with these statements.

The following sections describe what AWI discovered during its research of the FSIS label approval process for the free range claim.

WHAT CONSUMERS FEEL THE FREE RANGE CLAIM SHOULD MEAN

In October 2015, AWI commissioned a national survey to gather information on consumer expectations of the free range label claim.¹

What should a free range label on poultry (chicken, turkey) mean? Check all that apply:



¹ From Harris Poll: "This survey was conducted online within the United States between October 23-27, 2015 among 2013 adults (aged 18 and over) by Harris Poll on behalf of AWI via its Quick Query omnibus product. Figures for age, sex, race/ethnicity, education, region and household income were weighted where necessary to bring them into line with their actual proportions in the population. Propensity score weighting was used to adjust for respondents' propensity to be online. Respondents for this survey were selected from among those who have agreed to participate in our surveys. The data have been weighted to reflect the composition of the adult population. Because the sample is based on those who agreed to participate in the online panel, no estimates of theoretical sampling error can be calculated."

Strengths of the Free Range Label Claim

In 2011, in order to determine if the current definitions and approval process for the free range claim are sufficient to ensure honest free range access and that consumer expectations are met, AWI initiated an investigation into FSIS' label approval process. AWI requested files from FSIS through the Freedom of Information Act (FOIA). AWI did not receive a single record for three years—even after amending the FOIA request to ease FSIS' burden, and making multiple attempts to communicate with the agency. In fact, AWI only obtained the records after suing the agency for undue delay.

After finally receiving FSIS' files, AWI analyzed over 2,000 pages of records, which contained label approval files for 23 poultry brands and almost 100 products using the free range claim. The records were not detailed enough to offer a complete picture of the animal-raising practices used to substantiate the claim. They did, however, shed enough light on the raising practices to show that for over 80 percent of products AWI reviewed, producers submitted evidence that birds are given some measure of outdoor access—the fundamental element of the claim.

A majority of producers also provided evidence of other important tenets of the free range claim. They did this through affidavits, third-party certificates, and, in one case, pictures of the outdoor living conditions. For several products, producers submitted affidavits stating that they maintain a minimum space requirement per bird and provided information about the type of doorways used for birds to access the outdoors. However, not all producers who submitted affidavits gave FSIS this level of detail; in many cases, the producer only submitted a statement asserting that they provided outdoor access.

Some producers also submitted third-party certificates to help substantiate the free range claim. Third-party certification requires the farm to be audited by an independent third party intended to ensure compliance with the third party's animal-raising standards. Of the 88 products AWI reviewed, 27 submitted third-party certificates from the nonprofit animal welfare-rating program, Global Animal Partnership (GAP) and/or from organic certifiers. According to the stipulations of organic certification, animals are required to have year-round access to the outdoors, shade, shelter, and exercise areas. Several of the producers with GAP certifications showed that they encourage birds to use the outdoor space by providing vegetation, easy access to the outdoors, and enough outdoor space to accommodate all birds at once.

Thus the free range claim holds some value—particularly when compared to undefined claims such as “humanely raised” and “sustainably farmed.” FSIS allows producers to make up their own definitions for humane and environmental claims—even allowing minimal industry standards. Thus, there is less chance that these latter claims are meaningful. (To learn more about humane and environmental stewardship claims, please read AWI's report *Label Confusion: How “Humane” and “Sustainable” Claims on Meat Packages Deceive Consumers*.)

There are major limitations, however, to AWI's positive findings concerning the free range claim. While the claim may have some value, there are a number of issues that FSIS must address in order to close loopholes that producers can use to their advantage (and to the consumers' disadvantage). For instance, while organic and GAP certification can be valuable in understanding how producers raise their animals, neither certification necessarily ensures meaningful use of the free range claim. The next section will focus on these and other weaknesses of the free range claim.





Weaknesses of the Free Range Label Claim

Visiting farms and seeing firsthand how farmers raise animals is the surest way for a consumer to decide which poultry products to purchase. However, this is extremely impractical for most consumers; ideally, consumers would be able to rely on the free range claim alone. Unfortunately, this is currently not the case, because of the weaknesses associated with the government's definition and its approval process for the free range claim.

FSIS' Ambiguous Free Range Definition Allows for Misuse of the Claim

As noted above, consumers believe that free range birds are allowed to roam outside in grassy areas where they can perform natural behaviors like dust bathing, scratching, and pecking for bugs. However, FSIS' definition allows for a variety of interpretations, many of which do not meet consumer expectations. The definition simply states that "animals are allowed access to the outdoors." This definition leaves open the opportunity to use the claim disingenuously. For instance, a producer could still use the free range claim even if that producer merely provides a small access point from an indoor enclosure to a small outdoor space with no grass, dirt, or space to roam. In AWI's survey, only 10 percent of those surveyed found this type of outdoor space adequate for the free range claim. Additionally, since there is no minimum amount of time that a bird must have access to the outdoors, producers could open a small access point for only 5 minutes a day and still use a free range claim. In fact, a bird could live indoors for their entire life and still be considered free range, because "access to the outdoors" is not equivalent to ensuring that birds spend time outside.

FSIS' other definitions require birds to have "continuous, free access to the out-of-doors." The only difference between the two definitions is how much of their lives birds need to have this access—one definition stating it must be over 50 percent, another stating it must be over 51 percent. While these definitions provide stronger guidelines for producers, they still allow for practices that are inconsistent and that do not meet consumer expectations. For example, producers are still able to provide one small door (making it difficult for all birds to go outside) that leads to a barren lot—the only difference being that birds must have access to the lot for at least 50 (or 51) percent of their lives.

Even worse: according to FSIS, producers do not actually have to meet the agency's free range definition. Producers are able to confine birds inside for more than half their lives and still use the free range claim, as long as the producer states on the label how many days the birds had outdoor access. AWI has reviewed nearly 100 different products with a free range claim, and has yet to see this on a package label. In any case, if producers did state on the label the number of days birds have outdoor access, consumers may not grasp the significance of this number.

FSIS' Substantiation Requirements Allow for Insufficient Free Range Evidence

In addition to FSIS' ambiguous free range definition, the agency maintains insufficient substantiation requirements, which allows for misuse of the claim. According to the records AWI received, FSIS approved 17 products with a free range label claim even though the label approval files showed zero substantiation for the claim. In these cases, FSIS has no knowledge of what happens on the farms.

A marginal improvement from approving a claim with no substantiation is approving a claim solely based on an affidavit. In a 2014 survey commissioned by AWI, a majority of participants believed that a brief statement signed by the producer was not enough evidence to substantiate claims similar to free range. According to the records AWI reviewed, FSIS approved the free range claim on 44 different products after producers submitted only a short affidavit. Some of these producers provided some detail of their raising practices, but AWI maintains that affidavits alone are insufficient to substantiate the claim.

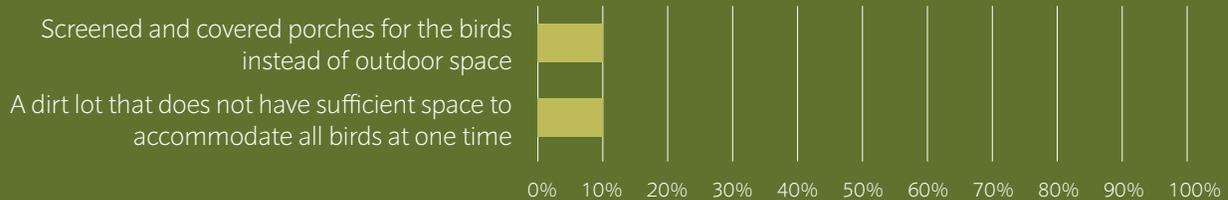
Third-party certification is a significant improvement over producer affidavits. As discussed above, the FOIA records showed that producers submitted organic and/or GAP certification for a majority of the products. FSIS approved the claims on 5 products after producers submitted organic certification and claims on 25 products after producers submitted GAP certificates to substantiate the claims. (The latter number includes 3 of the 5 that submitted organic certification.) Third-party certifications, such as GAP and organic, can be valuable windows into how producers raise their animals. However, neither GAP nor organic certification necessarily equates to free range or range grown.

Producers with an organic certification are required by law to give birds year-round access to the outdoors, shade, and shelter. However, USDA currently allows porches, which are small enclosures attached to barns, as outdoor access for organically raised poultry. The department's own organic advisory board has indicated that outdoor access means more than this. FSIS has stated that it does not consider porches as free range because they do not constitute free and continuous access to the outdoors, suggesting that, at least in terms of outdoor access, free range requirements are higher than organic requirements. Thus, organic certification does not necessarily imply that free range requirements are satisfied.

GAP certification is a step-rated program—the levels range from just above industry standards to high-welfare pasture-based farming. FSIS' label approval files show that FSIS has approved the claim no matter the step rating. For example, under Step 3, producers give birds continuous access to the outdoors. For chickens, however, the standards go on to explain that producers only need to provide a quarter of the space outside that they do inside. This is equivalent to giving each bird about the same space as a CD case, making it impossible to truly provide free and continuous access to the outdoors for all birds.

WHAT CONSUMERS BELIEVE THE **FREE RANGE CLAIM SHOULD NOT MEAN**

It is acceptable that producers of free range labeled chicken and turkey products provide:



Worse yet, for one product a producer only offered evidence of compliance with GAP Step 1, in which producers are not required to give chickens or turkeys any outdoor access. For two turkey products, a producer submitted Step 1 and Step 3 certification, suggesting that some birds are given outdoor access while other are not. This however, is not the only possibility—producers may have provided outdoor access for the birds subject to Step 1 certification, but failed to meet other requirements of higher GAP levels. Along with GAP certification, producers submitted a short affidavit for the brands stating that birds had outdoor access. The label approval records show no indication that FSIS tried to resolve these discrepancies. The contradictory evidence only adds to the confusion surrounding the free range claim and increases the risk of misleading the public.

Even when producers have third-party certificates meant to indicate raising practices in line with consumer expectations of free range, it is possible that the practices do not, in fact, meet such expectations. A recent undercover investigation by the organization Direct Action Everywhere demonstrates this point. The investigation took place at Diestel Farms, a major producer of “range grown” turkey. The company submitted GAP Step 3 certificates as substantiation for several of its turkey products. Yet, Direct Action’s investigation suggested the birds were indoors with no access to the outdoors during the time investigators visited Diestel’s operation. The company stated that it kept birds indoors at the request of USDA due to concerns about avian influenza. While the company may have had reason for keeping the birds confined, the range grown claim should not be allowed on products from birds who aren’t able to spend a majority of their lives outdoors, let alone those who have never been outside.

There is also the question of what percentage of farms participate in USDA Organic and GAP certification programs. Producers often use hundreds of farms to supply a single brand-name product. The label approval records were unclear as to whether all farms supplying birds for a free range product met a free range standard. It is possible that only a small percentage of farms were actually third-party certified. Additionally the records do not shed light on the number of third-party certified farms that received audits from the certification program.

Farmers Who Use the Claim Correctly May Be Harmed

Producers using a free range claim on chicken, turkey, and duck products are able to sell their goods for a premium price. Consumers believe they are getting meat from animals who were able to spread their wings, forage for insects, roam outdoors, and perform most other natural behaviors. Many studies show this is important to consumers. In fact, in a recent survey conducted by American Humane, 95 percent of those surveyed said that they are “very concerned” about the welfare of farm animals.

Unfortunately, producers who are meeting consumer expectations are harmed and may lose the incentive to do so when FSIS’ current definition and label approval process allows inappropriate use of the free range claim. Producers who are properly using the claim incur elevated costs for providing space for birds to roam, while other producers can circumvent this cost by only providing small enclosed spaces. Both sets of producers compete in the same market. Thus, misleading label claims can not only harm the public, but also destroy markets for properly labeled products.



FARM SANCTUARY



JESSICA REEDER

The Solution

While AWI's investigation demonstrates that there are several strengths to the free range claim, the current claim alone is not sufficient to assure consumers that animals were provided proper outdoor access.

In order for FSIS to increase consumers' ability to rely on the free range claim, the agency must change its definition for the claim and the process by which producers are allowed to substantiate the claim. The definition needs to include several animal husbandry elements that are both integral to true free range access and in line with consumer expectations.

AWI recommends that FSIS' definition require outdoor access during daylight hours for at least 51 percent of the birds' lives and require that birds be provided with an outdoor space equal to or greater than the indoor space. Birds should also have access to shelter (natural or structural) that protects them from adverse weather conditions and provides shade. Additionally, the definition should require that at least half of the outdoor space have vegetative cover, and that barns housing the birds have more than one access point to the outdoors.

FSIS should also require applicants for the free range, free roaming, and range grown label claims to submit, at minimum, a signed affidavit, accompanied by an animal care protocol and photographs that (a) apply to all operations where birds are raised and (b) document compliance with all conditions described in the preceding paragraph.

If FSIS amends the definition of free range to incorporate the above recommendations, there will be more consistency among producers, and label claims will help producers and consumers have an honest dialogue through the free range label claim.



Free Range Label Files Reviewed by AWI

COMPANY/ BRAND NAME	LABEL CLAIM	DEFINITION	EVIDENCE
Andronico's Chicken and Turkey	Free Range	A, B	Affidavit asserting the definition
BN Ranch Turkey ²	Free Range	D	Affidavit asserting the definition
Bristol Farms Chicken and Turkey	Free Range	A, B	Affidavit asserting the definition
Bristol Farms Organic Chicken	Free Range	B	Affidavit asserting the definition; Certificate of Organic Production
D'Artagnan Capon Chicken, Goose, and Turkey ³	Free Range	No definition provided	No records located
Diestel Turkey Ranch Turkey ⁴	Range Grown	H	Affidavit asserting the definition
Diestel Turkey Ranch AHC Young Turkey ⁵	Range Grown	H	Affidavit asserting the definition
Diestel Turkey Ranch Black Forest Turkey	Range Grown	H	Affidavit asserting the definition; GAP Certificate of Compliance: Step 1
Diestel Turkey Ranch Ground Turkey	Range Grown	H	Affidavit asserting the definition; GAP Certificate of Compliance: Steps 1 & 3
Diestel Turkey Ranch Natural Young Turkey	Range Grown	H	Affidavit asserting the definition; GAP Certificate of Compliance: Steps 2 & 3
Diestel Turkey Ranch Naturally Roasted Young Turkey	Range Grown	H	Affidavit asserting the definition; Certificate of Organic Operation; GAP Certificate of Compliance: Steps 1 & 3
Diestel Turkey Ranch AHC Organic Young Turkey	Range Grown	H	Affidavit asserting the definition; Certificate of Organic Operation
Diestel Turkey Ranch Petite Young Turkey	Range Grown	H	Affidavit asserting the definition
Diestel Turkey Ranch Premium Young Turkey	Range Grown	H	Affidavit asserting the definition; GAP Certificate of Compliance: Step 5+
Fulton Valley Farms Chicken and Turkey	Range	A, B	Affidavit asserting the definition
Fulton Valley Farms Non-GMO Chicken	Range	B	Affidavit asserting the definition; GAP Certificate of Compliance: Steps 3 & 4
Gelson's Finest Young Turkey ⁶	Free Range	A	Affidavit asserting the definition; GAP Certificate of Compliance: Steps 3 & 4
Golden Sierra Farms Turkey	Range Grown	H	Affidavit asserting the definition
Mary's Chicken	Free Range	B	Affidavit asserting the definition; GAP Certificate of Compliance: Steps 3 & 4
Mary's California Bronze Chicken	Free Range	B	Affidavit asserting the definition; on-farm pictures; GAP Certificate of Compliance: Step 5
Mary's Duck ⁷	Free Range	C	Affidavit asserting the definition
Mary's Heritage Turkey	Free Range	A	Affidavit asserting the definition; GAP Certificate of Compliance: Step 5
Mary's Non-GMO and Cornish Chicken	Free Range	B	Affidavit asserting the definition; GAP Certificate of Compliance: Step 3
Mary's Organic Turkey	Free Range	A	Affidavit asserting the definition; GAP Certificate of Compliance: Step 3; Certificate of Organic Production
Mary's Turducken	Free Range	A, B, C	Affidavit asserting the definition
Mary's Turkey ⁸	Free Range	A	Affidavit asserting the definition; GAP Certificate of Compliance: Step 3
Mary's Project Chicken	Free Range	B	Affidavit asserting the definition; GAP Certificate of Compliance: Step 3
Maverick Ranch Chicken and Turkey	Free Range	No definition provided	No records located

Melani Chicken	Free Range	B	Affidavit asserting the definition
Misty Knoll Farm Turkey	Free Range	No definition provided	GAP Certificate of Compliance: Step 3
Nature Ranchers Turkey	Free Range	A	Affidavit asserting the definition
Norbest Turkey	Free Range	E	Affidavit asserting the definition
Northwest Farms Chicken	Free Range	F	Affidavit asserting the definition; Certificate of Organic Production; GAP Certificate of Compliance: Steps 3 & 4
Pitman Family Farms Chicken and Duck ⁹	Free Range	B, C	Affidavit asserting the definition
Ranger: The Free Range Chicken	Free Range	No definition provided	No records located
Rocky The Free Range Chicken	Free Range	No definition provided	No records located
Shelton's Chicken and Turkey ¹⁰	Free Range	No definition provided	No records located
Shelton's Young Turkey	Free Range	G	Affidavit asserting the definition
Snackmasters Turkey Jerky ¹¹	Range Grown	H	Affidavit asserting the definition
Sweet Water Creek Chicken, Duck, and Turkey ¹²	Free Range	A, B, C	Affidavit asserting the definition
Sweet Water Creek Non-GMO Turkey	Free Range	A	Affidavit asserting the definition; GAP Certificate of Compliance: Step 3
Whole Foods Turkey ¹³	Free Range	A	Affidavit asserting the definition; GAP Certificate of Compliance: Step 3

KEY	DEFINITION
A	"The first three weeks the birds are kept inside, at approximately three weeks of age, the barns are opened up by using bird doors or side doors on the side of the barns. The turkeys are allowed to roam freely in the open yards attached to the barns. The turkeys are moved to range pens at six to seven weeks of age. This will help the turkeys have lots of room to roam around as they grow larger. This will give each bird about eight square feet per turkey." (Turkey provided by Pitman Farms.)
B	"The first three weeks the birds are kept inside, at approximately three weeks of age, the barns are opened up by using bird doors or side doors on the side of the barns. The chickens are allowed to roam freely in the open yards attached to the barns. The chickens stay in these houses until market." (Chicken provided by Pitman Farms.)
C	"The first three weeks the birds are kept inside, at approximately three weeks of age, the barns are opened up by using bird doors or side doors on the side of the barns. The ducks stay in these houses until market." Alternatively, "the ducks are moved to range pens at six to seven weeks of age. This will help the ducks have lots of room to roam around as they grow larger. This will give each bird about eight square feet per duck." (Duck provided by Pitman Farms.)
D	"Unlimited access to the outdoors is allowed once the birds are fully feathered and brooding stage is over. This occurs at approximately 35 days of age." On label definition: "Once [turkeys] are old enough—at 8 weeks [56 days] of age—they are free range with unrestricted access to outdoors." Note: the two definitions have different age of first access to the outdoors. (Birds provided by Grimaud Farms.)
E	"Turkeys... have been raised in barns which allow the birds free access to the outdoors in the months of March through December."
F	"The chickens... will have access to outside yards during their growth. Letters of assurance stating the methods of the growout operation and the feed formulation will be on file at Draper Valley Farms, Inc." (Chicken provided by Draper Valley Farms.)
G	"All the turkeys that we supply to you are free-range turkeys. After a short brooding period (for the birds' protection) of four to six weeks, the turkeys are raised in outdoor pens and are never confined in any buildings."
H	"All turkeys past the age of approximately 35 days are allowed out doors access to range areas (range environment)." (Turkey provided by Diestel Turkey Ranch.)

² Two products: Young White Turkey and Young Heritage Turkey.

³ Six products: American Wild Turkey, Heritage Turkey, Capon, Goose, Poussin, semi- boneless Poussin.

⁴ Twelve products: barbecue seasoned smoked, naturally oven roasted, uncured pastrami seasoned, chipotle peppered, herb oven roasted, peppered oven roasted, honey roasted, southwestern Cajun style, naturally smoked, Natural Young Turkey, Young Turkey breast with ribs, and Young Turkey.

⁵ American Heirloom Collection.

⁶ Two products: Turkey and Non-GMO Turkey.

⁷ Five products: Smoked Duck, Ground Duck, Duck Fat, Duck Leg Confit, and Non-GMO Duck.

⁸ Five products: Turkey Breast, Brined Turkey, Non-GMO Turkey, Turkey injected with seasoning, and Ground Turkey.

⁹ Four products: Halal Zabiha Chicken, Silkie Chicken, Boneless Skinless Duck, and Pekin Duck.

¹⁰ Seven products: Chicken Breast, Chicken Thigh, Whole Chicken, Ground Turkey, Turkey Breast, Turkey Drumsticks, and Boneless Turkey Breast.

¹¹ Two products: Hot and Spicy Turkey Jerky and Original Turkey Jerky.

¹² Five products: Duck, Non-GMO Duck, Country Style Duck, Turkey, and Chicken.

¹³ Two products: Turkey and Non-GMO Turkey.



MIKE SUAREZ

Animal Welfare Institute

Since its founding in 1951, AWI has been alleviating suffering inflicted on animals by people. AWI works to improve conditions for the billions of animals raised and slaughtered each year for food in the United States. Major goals of the organization include eliminating factory farms, supporting high-welfare family farms, and achieving humane transport and slaughter of farm animals. AWI works to effect change in the way farm animals are treated, and ensure that individuals who choose to consume animal products can purchase them from farmers who raise their animals to the highest standards.

Animal Welfare Institute • 900 Pennsylvania Avenue SE, Washington, DC 20003 • www.avionline.org

USDA Gives Producers Free Rein over "Free Range" Product Labels • December 2015