

Farm Animal Welfare Audit Systems – Based on Science and Sound Audit Practices

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■ Introduction

For the pork producer, today's world is very different than even 10 years ago. Today, the processor and retailer have requirements that go further than ever before. The requirements are expected to increase over time until the entire product chain, including the farm of origin, is understood by and accountable to the final consumer. This paper will summarize the history of animal welfare pressures that bring us to the need for audits and it will describe the elements in a successful animal welfare audit. While other society issues are also of importance to advancing pork production (McGlone, 2001), this paper will focus on issues related to pig welfare.

■ History of USA Animal Welfare Movement

Issues of farm animal welfare are a recent part of the history of developed countries. It is logical to conclude that concern for animal welfare is possible when the population is well-fed with low-cost animal products. Animal welfare is generally not a society issue where people are hungry. The flip side of this issue is that when society becomes relatively affluent it can afford to provide simple (or even elaborate) comforts to animals that serve humans.

The modern concern for farm animals began in England with the 1964 book *Animal Machines* written by Ruth Harrison (Harrison, 1964). In that book, Harrison wrote of the cruel and unacceptable 'modern' production practices that were found on British farms. The book prompted a technical committee to form and issue a report the following year (Brambell, 1965). The report, chaired by Zoologist F. W. Rogers Brambell found selected unacceptable practices on commercial farms. The report went on to suggest farm animals should have

five basic freedoms (called 'the original five freedoms'). Animals, the Brambell report concluded, should be able to:

- Stand up
- Lie down
- Turn around
- Stretch its limbs
- Make normal postural adjustments

The farm animal industries, scientists and some activist organizations objected to the original five freedoms because they were based too much on space requirements and not enough on important welfare needs like the need for food and shelter and protection from pain and distress.

In 1993, the UK Farm Animal Welfare Council (Farm Animal Welfare Council, 1993) published more precise freedoms that they considered to be more directly tied to farm animal welfare. The 'new five freedoms' are said to be, that farm animals should have:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury, and disease
- Freedom to express normal behavior.
- Freedom from fear and distress

So which of these 10 freedoms might be an 'issue' for typical commercial pork production? Sows in gestation and farrowing crates can not turn around and in this sense they can not make normal postural adjustments. Sows are limit fed to avoid obesity (meaning they are sometimes hungry; Fullwood and McGlone, 2001; Meunier-Salaun et al., 2001). Male piglets are castrated (which is known to be painful; McGlone and Hellman, 1988; McGlone et al., 1993). And then there is a host of other potentially distressing events in the life of the pig such as weaning, transport and exposure to novel environments (such as the processing plant). One can easily conclude from this list is that the industry has some challenges ahead.

All of this happened in the UK. This has little direct effect on the USA, however, indirect potential effects could be significant. The UK movement is one of animal *welfare*. From the 1960's to today, the UK industry has self-imposed 'higher' standards on its producers. During this same period, a modern movement developed that espoused the *rights* of animals including farm animals.

In the early 1970s, an Australian philosopher named Peter Singer gave some lectures in New York City. He had in his class a number of people including the socialist activist Henry Spira. Henry and Peter became life-long friends and colleagues.

Singer published the first edition of his book *Animal Liberation* in 1975 (Singer, 1975). Since then, there were two reprints and updates in 1990 and 2001. Singer advocates a utilitarian approach where the continuum between pain and pleasure is assessed and a decision is made with the objective of maximizing pleasure and minimizing pain. The utilitarian view of animal rights is just one view and not all animal rights activists support this view.

The view in favor of animal rights that leads the philosophical discussion was proposed by Tom Regan (1983). He argues against Singer's approach and argues that if animals and people have no discernable differences (say in pain perception), then there is no basis to allow painful practices in animals. Regan argues in a more black-and-white manner that animals have a right to life and therefore we should not eat them at all (nor do research on them or hunt them). Regan's view is that we should not cause harm to animals because we have assigned them moral rights as persons or subjects.

Both Singer's and Regan's views, while having different underpinnings, lead one to the same conclusion. Presumably with Singer's argument if animals led a happy and healthy life, we would be adding pleasure to the world, and if the animals were painlessly killed, then we could eat them. Regan's view does not allow us to eat animals unless we can show they are 'different' from us or that they have 'no interests' that would be lost if we killed them.

Henry Spira, an early student of Singer, bought into the Singer philosophy whole-heartedly. He did not seem to buy into Regan's view as much as he did the Singer view. PETA, now a well-known activist organization, was formed in the mid 1980s as an organization opposed to biomedical research. PETA leaned more towards the Regan view (including putting Regan on the speaker's circuit to places like Texas Tech University¹). Still, PETA very much liked Singer's conclusions and they supported sales of his book as a call for action (to liberate animals, especially).

Henry did not like violence. PETA would not renounce violence and they were in fact the spokesperson for animal liberation front (ALF) terrorist organizations. Henry Spira did not subscribe to PETA's brand of activism. Henry preferred a

¹ Regan visited the Texas Tech University campus in September, 1989, sponsored by a student organization (Lutherer and Simon, 1992) and PETA. He spoke about the need to abolish animal research on campus. A few months later, the Texas Tech campus experienced a break-in where a laboratory was damaged and research cats were stolen.

quiet approach at first, followed by increasing activism. An example of Henry Spira's interaction with McDonald's is contained in Peter Singer's book *Ethics Into Action* (Singer, 1998).

Henry first started attempting to talk with McDonald's upper management in the early 1990s. After a lack of success at gaining access to the top management, he bought 65 shares of McDonald's stock and attempted to introduce a resolution at their annual meeting. The resolution read in part, that McDonald's would "...take all reasonable steps to assure that animals raised, transported and slaughtered for McDonald's products are treated humanely." According to Singer's account (Singer, 1998), Henry made repeated attempts to meet and negotiate with McDonald's including preparation of anti-McDonald's ads intended to force McDonald's to change policy.

In 1997, according to Singer (1998), Henry met with McDonald's senior staff and to avoid a negative 'campaign', McDonald's agreed to hire Temple Grandin to audit welfare of animals at plants that supply meat to McDonald's.

Interestingly, during this time, PETA was not very active in the food animal industries. One speculation is that Henry inhibited PETA from entering this area.

Henry passed away from cancer on September 15, 1998. After his death, PETA then began a more organized and sustained attack of food retailers.

On August of 1999, PETA launched its McCruelty campaign. The campaign objective was to boycott McDonald's due to 'foot-dragging' on animal welfare. In September of 2000, McDonald's increased (or initiated) animal welfare standards. In October of 2000 they suspended purchases of one beef plant due to animal welfare concerns. PETA then called off its 14-month McDonald's boycott. This is not to say that McDonald's reacted to PETA. However, it is clear that PETA and McDonald's were (and are) aware of each other's activities.

In January of 2001 PETA turned its attention to Burger King with its Murder King campaign. In June, 2001 PETA turned off its 6-month boycott immediately after Burger King introduced farm animal welfare guidelines.

In July of 2001, PETA announced its boycott of Wendy's with its Wicked Wendy's campaign. In September, 2001, PETA turned off its 3 month negative campaign when Wendy's established its welfare standards.

As you can see, the time line from start of boycott to company policy change became shorter. The history is reliable enough now to predict that most 'campaigns' can be successful in a few months. PETA is realizing Henry's

dream of getting the attention of food retailers. They have moved more recently to 'campaigns' against grocery stores where their success in causing corporate change has been slower than in the retail food outlets.

■ **NCCR/FMI Get Involved**

One of the approaches taken by the food retailers was to establish animal welfare advisory committees or councils. These groups include Dr. Temple Grandin, animal welfare teachers/scientists and some industry representatives. They issued recommendations that the retailers often adopted. The food retailers began to conduct site visits to commercial farms to assess both production systems and animal welfare within the production systems.

Retail food restaurants and grocery stores have their own trade associations just as the pork industry (and other animal industries do). The National Association of Chain Restaurants (NCCR) and the Food Marketing Institute (FMI) represent retail food restaurants and grocery stores, respectively. NCCR and FMI formed a joint animal welfare advisory committee. This group has issued three reports at this time (June 2002, January, 2003 and June 2003).

The NCCR/FMI committee reviewed industry guidelines. They have accepted some guideline components and not accepted others. They tend to increase space allowances relative to industry standards. They are operating much like they agree with the 'original 5 freedoms.' They have said little about the 'new 5 freedoms' or about welfare of individual animals within systems – yet.

It appears to this industry observer that an iterative process has begun. The guidelines will be established, goals will be set to improve welfare and the industry will be assessed again and the bar will be raised again. This will continue as long as someone in the chain is willing to pay for the change.

The most lasting change to date has been the increase in cage size for hens producing eggs for McDonald's. Egg producers report that they have incurred an increase in cost of production of 12.9 to 15.3 cents per dozen that have this and other 'increased' standards (Smith, 2000). It is clear that some egg laying operations are providing more space to hens and the speculation is that these producers are paid more for these eggs than for conventional eggs produced using hens with less space. This relationship (to provide more space for hens) was developed between the buyer and the seller – without direct involvement of trade associations such as NCCR and FMI.

How much more retailers are willing to pay and how much more producers are willing to give remains to be seen. It is clear, that for a producer to implement a

change that directly increases the cost of production, they would be at a production cost disadvantage compared with other producers. So change that costs real dollars (ex., providing more space) will either have to accompany a market premium or if everyone implements the change, then the market forces can adjust equally for all producers.

One major point that the NCCR/FMI has made is that after guidelines are agreed-upon, on-farm audits will begin. An excerpt from the June, 2003 Animal Welfare report includes the following:

NCCR-FMI Audit Program

As specific producer organization guidelines are approved, audit forms and documents are developed and auditor training sessions held to certify auditors for the NCCR-FMI Animal Welfare Audit Program (AWAP). To date, audit forms, documents and training sessions have been completed for livestock slaughter, dairy, chicken slaughter and egg production. There are more than 30 auditors certified. To schedule an audit, view the audit documents or sign up for auditor training, visit the AWAP Web site at www.awaudit.org.

In an effort to streamline the auditing process for egg producers, the United Egg Producers (UEP) has added the NCCR-FMI audit to the approved list of auditors for UEP's Animal Care Certified program. As a result, an NCCR-FMI AWAP audit can fulfill the auditing component of UEP's Animal Care Certified program."

One can see that the wording is strong. NCCR/FMI seem to be saying that audits are required without actually saying that they are required. They also are saying that *their* audit program is acceptable to the UEP, but interestingly, they do *not* say that the UEP audit program is acceptable to the NCCR/FMI. One is left to wonder.

A reasonable conclusion is that audits are strongly encouraged by the NCCR/FMI. It seems that they can not require them or at least they can not require audits from a single audit firm. An equivalent requirement would be if the beer company 'required' that the bar also use their garbage removal company. That is racketeering and anti-trust laws forbid such strong-arm tactics. Still, they can require audits or any other measure of quality. The NCCR/FMI members are free to set product requirements such as the percent lean and this product size and that food safety standard and a given animal welfare assurance.

■ Lessons from ISO 9000:2000

Principles of the International Organization for Standardization (ISO) are associated with a quality process. One of the most applicable ISO standard is the standard of Best Management Practices or Quality Management – this is ISO 9000 or 9001. The updated or current version is ISO 9000:2000 (named for the year of update).

ISO 9000 principles² include the following:

- Customer focus
- Leadership
- Involvement of people
- Process approach
- System approach to management
- Continual improvement
- Factual approach to decision making
- Mutually beneficial supplier relationships

Best Management Practices include an emphasis on customers, people, processes, continual improvement and factual-based decision making. The ISO 9000:2000 customer focus enforces the idea that organizations depend on their customers. Organizations should understand current and future customer needs. And organizations should strive to meet and exceed customer expectations. How might these principles apply to farm animal welfare?

First we must define who the customer is to the producer. One might think it is the pork processor (Tyson, Smithfield, etc.). Or, the customer could be the consumer. But the reality is that the pork producer's customer is really the seller of its product – the food retailers. Food retailers include fast food restaurants, conventional restaurants, food service and grocery stores.

What are the food retailers' 'needs' in terms of animal welfare? What are their current expectations? What is their future needs likely to be? A quality organization will be responsive to their customers' needs of today and in the future. A quality organization would have an internal audit to assure the process is of high quality and they would have an independent audit to assure their customers that they are doing what they say they are doing in the area of animal welfare. The third-party audit will also provide the producer and the customer with information on which production methods are in place, which will

² See: <http://www.iso.ch/iso/en/iso9000-14000/iso9000/qmp.html>

open up discussions about which production methods might be desirable in the future.

■ Why be audited?

An internal assessment (or audit) is a good idea. The internal audit provides feedback to management about what is happening on the farm. It allows for continual improvement in the process. It provides factual data that can be used in the internal continual improvement program. And finally, the internal audit provides documentation that can be reviewed by an independent auditor.

The ISO 9000:2000 process gives these reasons to have an independent audit:

Deciding to have an independent audit of your system to confirm that it conforms to the standard is **a decision to be taken on business grounds** - if for example:

- - it is a contractual, regulatory, or market requirement
- - it meets customer preferences,
- - it is part of a risk management program
- - it will motivate your staff by setting a clear goal for the development of the management system.

All of these reasons apply directly to farm animal welfare. Animal welfare audits will be (and in some cases, basically are) a market requirement. They will meet customer (food retailer) preferences. It will reduce risk by identifying workers who abuse animals, or more importantly, elevate animal welfare in the company to a level that abuse would be prevented. Having an independent animal welfare audit will motivate staff to have clear goals and on-site, internal documentation to support their quality management.

Phillips (2002) gives six benefits to an effective audit process (these apply to internal and third-party audits).

- Reduced operating costs through better efficiency
- Improved safety performance (of people and animals)
- Improved customer satisfaction
- Improved morale (after the initial concept is discussed and the process is initiated, people develop pride in their good performance)
- Reduced barriers between departments (and between management and workers)

- Survival (this relates to customers needs for quality and animal welfare accountability to a few vocal consumers)

■ What might be audited?

Audits of farm animal welfare can hope to find or not find four main items. These include:

- Use of certain production systems (ex., tethers, crates, pens, etc.)
- Sound group animal welfare
- Sound individual animal welfare
- Signs of animal abuse

The auditor can quickly determine which production system is in use on the farm. This level of information can be garnered by almost any reasonable person. If the farm uses gestation and farrowing crates, a quick look will confirm that fact. Are the crates narrow or wide? That would require some knowledge of the width of gilts and sows (and how they change over age and stage of gestation) and the common widths of crates. And it would require observing animals in the crate for their 'normal postural adjustments.' On-farm records are not needed; but a central record in the office might be helpful. It might say, our production system includes, x, y, and z. This is then confirmed on the animal farm.

Sound group welfare is also relatively easy to audit. What percentage of the pigs are sick? What percent of animals are currently being treated with antibiotics? Do they have a high rate of lameness, injury, mortality or morbidity? And so on. Records help documents the conditions prior to the audit and they should be able to confirm the situation today (the day of the site visit).

Signs of individual animal welfare can only be audited by observation of the individual animals. Furthermore, experience and training with that specific species and age of animal will be required if its welfare is to be determined. What percent of individual animals have lameness, injuries, etc.? Can the auditor detect a lame sow? Can the auditor see which pigs have an acute health problem and are these being observed and treated? Only experienced professionals can collect this information.

Each item has variable difficulty in detecting in an audit. An audit is a snapshot of what is happening on the farm. If the farm has three sites and the auditor visits only one site, then the odds of finding animal abuse are about 33% -- assuming the auditor can spot animal abuse in a unit in which, at the moment, animals are not being abused (this requires professional auditors).

■ Elements of A Successful Third-Party Animal Welfare Audit

Qualifications of the Audit Firm

Before the third-party audit is conducted, one must select auditors and an audit firm. The audit firm is the organization that manages the process and stores the raw data from the audit. The auditor is the person who goes to the farm and conducts the audit. Sometimes the audit firm employs the auditors and sometimes they are independent contractors. The questions to be asked about the audit firm are the following.

Is the audit management firm independent?

A truly third-party audit firm is independent from all entities in the production chain. The audit firm, to be independent, must *not* be associated in any business way with the producers, the producers' trade associations, the processors, the processors' trade associations, the retailers, or the retailers' trade associations. If the one link in the production chain manages the audit process, then the process is not truly independent.

Independence also means that the audit firm does not receive money from corporations or trade associations to oversee the process. If a firm received money from one trade association, then the impression could be had that the process would favour that link in the chain. Likewise, production, processing or retailers cannot own any part of the audit firm if a claim of independence is to be made.

Clearly, some group (producers, processor or retailer) must hire the audit firm and pay them. This payment for auditing and training to establish procedures must be made with the idea that the work to be performed is to be performed under the direction of the audit firm without interference by the audited farm. Furthermore, the audited farm must be open and honest about records and production methods.

Does the firm have sufficient liability insurance?

Because the farms are allowing people to enter their farms, there is a potential for problems. Auditors could be injured. Auditors could sexually harass farm workers. Auditors could say something to make the farm workers angry and disrupt their work. Auditors could collect incorrect data or incomplete data (called errors and omissions). The audit firm must be able to support its reports with internal work papers. These internal work papers (owned by the auditor and the audit firm) will be available to (a) answer specific questions posed by

the client or its customers and (b) be supportive of the audit firm's report in case of litigation. Without detailed internal audit firm work papers, a professional audit can not be conducted.

Who will 'own' or control the audit data?

The data generated will be sensitive to the producer. The producer will not want the animal welfare audit data made public in most cases. Will the audit firm control access to the data or will the producer? In the FACTA (Farm Animal Care Training & Auditing) model, the producer alone controls the use of the audit data. It does not go into a database that others can use unless the producer directs the data to be sent somewhere. The producer sends the audit data to customers that might be interested. In other models, the audit firm passes the audit results on to customers who can access the data in a database held by the audit firm and its collaborating organization³.

Qualifications of the Auditor

An auditor could have different qualifications depending on the audit process and the audit management firm. The most qualified auditor would have education, experience and training with the species that they are auditing. There are some that feel anyone can be trained to be an auditor. This may be true in some systems, but not in others. For example, in a processing plant, the live animal component is short and relatively simple. Animals are unloaded, they are held briefly, they are moved to the stunning area and they are stunned and exsanguinated. There is relatively little variation in these steps within a given plant. But on the farm one can find a great many production systems and management practices among sites (and certainly among farms). Much more professional judgment is needed on the farms than in the plant (although professional judgment is needed in the plant audit as well). FACTA believes that auditors on the farm must have the following qualifications:

- Education in animal science or veterinary medicine
- At least 2 years on-farm experience with that species
- Specific training on audit processes

Lowering the qualifications of the auditors could lower the cost of the audit. However, the quality of the audit will be also reduced. If the audit is performed by minimally or inadequately qualified auditors, then it will be viewed as a cost with no chance of adding value to the farm. If the auditors are professionals with experience with that species, then the farm is more likely to be valuable to

³ At this time, in both the UEP/ARPAS and SES/NCCR/FMI models, the trade associations hold the audit data but they allow the producer to indicate who may access the data.

the farm. An audit will be valuable to the farm if it provides management with factual information that it can use to improve its methods and its productivity. Objective, third-party audit data should be an integral part of the fact-based continual improvement program of the farm.

Elements of a Sound Audit

A sound audit begins with an opening session with management. During this session, the auditors review the purpose of the audit and the audit plan. The audit plan will include how many sites and how many animals within sites will be visited. This should be pre-arranged and planned-for ahead of time. The exit briefing should also be planned. We recommend a brief daily exit briefing and a longer, end-of-the-week preliminary exit briefing.

The site visit then begins. For the audit to be most successful, the specific farms to be visited should not know the audit will take place. The farms to be visited are best visited 'cold' so they do not have time to clean up or otherwise alter the way things are on that farm. However, the office or the farm management must know the audit will take place. They must establish biosecurity rules and the order of visits to farms.

Usually, farm staff accompany the independent auditor. This is not required if the farm staff is fully informed (and trained) that independent audits can take place any time.

During the conduct of the audit, the auditor takes notes and asks questions. Auditor questions are for two purposes: to gather information and to clarify data already collected. The auditor is not trying to catch people doing things wrong.

Nor is the auditor there to consult with the farm. When major welfare issues are observed (such as animals in severe pain), the auditor should indicate corrected action is needed immediately. In all other cases, the auditor is not to indicate corrective actions needed at the time of the site visit (or afterwards either).

The animal welfare audit identifies issues, but does not make judgments about welfare being adequate or inadequate. Rather, the welfare audit concludes that the farm is or is not in compliance with its own policies. If the farm is not in compliance with its own policies, time should be given for the farm to address these concerns.

The Audit Report

The audit report, at least in the FACTA program (<http://www.factallc.com>), is the property of the producer. The farm can do with the report as they wish. We recommend that they post the summary report on their web page and give a copy to their customers. The audit summary report is a one-page report that indicates that the audit has taken place and that the farm complies with certain standards.

The farm will also receive a more detailed audit report. This report has the details of the averages and variation of measures collected at the farm or plant. These details can be used as a factual snapshot that can be managed. The 3rd-party report should reflect the internal reports. The internal reports can also be used in the continual improvement program.

The auditor will also collect details that are commonly referred to as working papers. These working papers are not given to the customer. These working papers contain exact farm numbers or names, the animal inventories, sampling methods and raw data. The reason the working papers are not given to the client is that these are numbers that the producer does not want anyone to see – they are confidential farm records. Even the customers (food retailers) do not need this information. And activists certainly do not need this information. It is held in confidence, free from the public eye. Only by being held from public view will the producer be willing to collect the information for use in its continual improvement program.

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