

Policy Manual



Humane Farm Animal Care

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PART 1: DESCRIPTION OF THE ORGANIZATION

A. Mission Statement

The mission of Humane Farm Animal Care (HFAC) is to improve the welfare of farm animals by providing viable, credible, duly monitored standards for humane food production and ensuring consumers that certified products meet these standards. (ISO §4.5.3.a.)

HFAC may not provide any products or services that could compromise the confidentiality, objectivity, or impartiality of its certification process and decisions. (ISO §4.2.o.3.)

B. Statement of Scope

HFAC certifies single operations, Pooled Product Operations, and Producer Groups that raise, handle, and/or process (slaughter) the following types of livestock:

- Beef cattle
- Dairy cows
- Pigs
- Sheep
- Broiler chickens
- Laying chickens
- Turkeys
- Goats
- Young Dairy Beef

In addition, HFAC certifies manufacturing operations that produce products that include animal-based raw materials from HFAC-certified operations.

HFAC also offers a program of granting recognition to restaurants that further HFAC's goals of expanding use of livestock production systems that provide for humane treatment of farm animals through the purchase and use of HFAC-certified products. Such restaurants are provided with a "Certificate of Recognition," but they are not permitted to use the HFAC certification mark nor are they allowed to make claims of certification by HFAC.

HFAC conducts its certification activities in a manner that is nondiscriminatory. (ISO §4.1.). HFAC makes its services accessible to all applicants whose activities fall within its scope of operations (ISO §4.1.2.). Access to HFAC's certification program is not conditional upon the size of the operation nor is it contingent upon membership in any association or group (ISO §4.1.2.). Certification of operations is not contingent on the number of certificates already issued (ISO §4.1.2.).

C. Accreditation Status of the Certification Agent

HFAC is accredited by USDA's Audit, Review and Compliance Branch to ISO/IEC Guide 65, the international norm for management of certification agencies. HFAC's product certifications for operations based within the United States are accredited under ISO/IEC Guide 65:1996 by the U.S. Department of Agriculture.

D. Legal Status and Ownership

Humane Farm Animal Care is a 501(c)(3) non-profit corporation incorporated pursuant to the applicable provisions of the District of Columbia Nonprofit Corporation Act.

Humane Farm Animal Care provides independent verification and certification that the care and handling of livestock and poultry meets the welfare standards set by Humane Farm Animal Care. Operations

certified by HFAC may identify products that meet these standards with the “Certified Humane” label. Humane Farm Animal Care’s certification program is a voluntary, user-fee based service available to producers, processors, and haulers of animals raised for food.

The Certified Humane Raised and Handled ® Certification Program was created by Humane Farm Animal Care . HFAC owns the Certified Humane Raised and Handled® certification trademark.

E. Funding Sources for the Certification Agent

HFAC is partially funded by fees generated by the certification process. HFAC’s certification program is generously supported by contributions received from the public and humane organizations that are supportive of HFAC’s mission. Current information of humane organizations providing financial support may be obtained from HFAC’s website, or from the office, upon request.

PART 2: THE CERTIFICATION PROCESS

A. Certification Categories

HFAC certifies single operations, Pooled Product Organizations, and Producer Groups that raise, handle, and/or process (slaughter) the following types of livestock:

- Beef cattle
- Dairy cows
- Pigs
- Sheep
- Broiler chickens
- Laying chickens
- Turkeys
- Goats
- Young Dairy Beef

B. Billing Rates for Certification Services

1. Application Fee

HFAC charges a \$50 Application Fee for operations submitting an application for Initial Certification. Operators must also pay an Application Fee of \$50 each time they submit their Application for Renewal of Certification in order to cover administrative costs associated with processing the application.

2. Inspection Fee

An operation’s Inspection Fee covers the cost of one full inspection per year. Follow up inspections in the same year will only be conducted if a problem is identified which requires further on-site investigation. Operations requiring follow-up inspections will be charged the regular inspection fee to cover the cost of the inspector’s time as well as the actual costs (travel, food, lodging) incurred by HFAC to conduct the inspection.

Regular inspection fees: The HFAC fee for conducting inspections of a farm or processing operation is \$500/day/inspector. The HFAC fee for conducting inspections of a Product Manufacturing Operation (PMO), Pooled Product Operator (PPO) or Slaughter Facility is \$600/day/inspector

Shared inspection fees: Producers in close geographic proximity may split the cost of inspection fees if inspections are scheduled so that the inspector can visit the operations during one trip. In this case, the fee paid by each operation is calculated by multiplying the daily inspection fee by the number of days required to complete all of the inspections, divided by the number of producers participating in the shared inspection.

Subsidized inspection fees for small farm operations: Because HFAC receives contributions from the public and humane organizations, some funding may be available for the subsidization of inspection fees

for small operations, as defined in the chart below. Since there is no inspection fee, the farm and slaughter facility will be inspected when there is an HFAC inspector in the area.

Size of Farm Operations Eligible for Subsidized Inspection Fees	
Species covered by the application for certification by HFAC	Number of animals being certified is not greater than:
Beef Cattle	50 head
Broilers	100 head
Dairy	30 head
Goats	50 head
Layers	100 head
Pigs	50 head
Sheep	70 head
Turkeys	70 head
Young Dairy Beef	30 head

After successfully passing its Initial Review of the application for certification, an eligible operation may request funds to fully or partially cover its inspection fee. The request is made by submission to the HFAC office of a written statement of the reasons that the operation is unable to afford to pay the normal inspection fee. HFAC will review the information, determine whether the operation fits the eligibility requirements, and make the decision on whether the subsidy will be granted. Inspection subsidy funds are allocated on a first come, first served basis.

3. Certification Fees

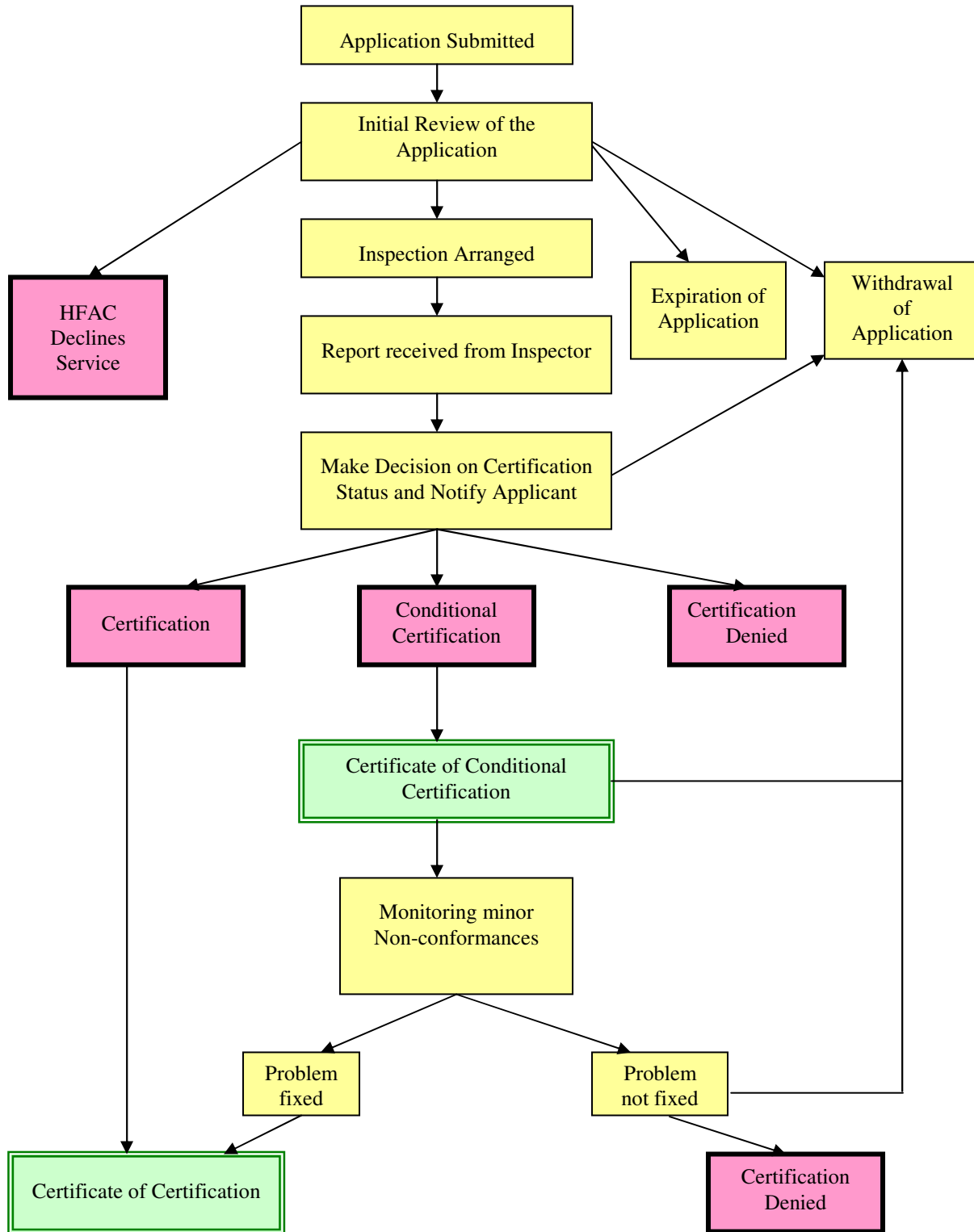
HFAC certification fees are based on the amount of product processed. The amount of the certification fees is specified in the *Certification Mark License Agreement* and the fee chart below:

CERTIFICATION FEES	
Cattle	0-25,000 animals = \$1.00/head 25,001-50,000 animals = \$0.75/head 50,001-75,000 animals = \$0.55/head 75,001-100,000 animals = \$0.40/head 100,001 – 200,000 animals = \$0.30/head 200,001-300,000 animals = \$0.15/head 300,001 – 400,000 = \$0.10/head
Pigs	0 – 35,000 animals = \$0.50/pig 35,001 – 65,000 animals = \$0.40/pig >65,000 animals = \$0.30/pig >100,000 animals = \$0.20/pig >200,00 animals = \$0.10/pig
Dairy Cows	\$.01/hundredweight (1/12 th cent/gallon)- milk
Goats	\$.005/gallon/milk \$0.20/head - meat
Laying Hens	\$.04/case of 30 dozen eggs
Broiler Chickens	0 – 6,000,000 = ¼ cent/pound > 6,000,001 = \$0.0017/bird >15,000,000 = \$0.0013/bird >30,000,000 = \$0.0009/bird
Sheep/lamb	\$0.20/head
Turkeys	¼ cent/pound
Young Dairy Beef	\$0.50/head

Certification fees covering processed products are due monthly. Payment for the products processed during a given month is due within 30 days of the end of the next month. At the discretion of the Executive Director, small operations may pre-arrange quarterly payments.

If a certified operator fails to pay its certification fees in a timely manner, HFAC staff contacts the certified organization to arrange a written payment schedule. If the operator does not remain current with the agreed-upon payment schedule, HFAC suspends the operation's certification. If the operation then pays all fees due to date, HFAC reinstates the certification using the same expiration date that was in effect prior to the suspension. At any time during this process, HFAC may pursue legal channels to collect accounts receivable due from a certified operation.

C. Initial Certification



1. Submitting an Application for Initial Certification

New applicants contact HFAC via phone, e-mail, or regular mail to obtain the information and forms necessary to apply for certification. HFAC sends the applicant:

- Application for Certification form which includes a questionnaire section designed to solicit detailed information about the operation’s management;
- Current version of the Policy Manual containing a description of the HFAC certification program; (The Policy Manual contains the standards used for auditing Product Manufacturing Operations.)
- Current version of the species standards relevant to the applicant’s operation.

The applicant completes the *appropriate application* for their operation in full. The applicant, or a duly authorized representative of the applicant, must sign the application. The applicant returns the following, to the HFAC office:

- Completed application form
- Application Fee

2. Initial Review of the Application

Once HFAC receives the completed application, the staff conducts an Initial Review of the application in order to ensure that:

- HFAC has the capability to perform the certification service with respect to the scope of the certification sought, the location of the applicant’s operation, and any special requirements (such as the language used by the applicant).
- The information submitted by the applicant indicates that the operation(s) in question appear to conform or are able to conform with the relevant standard(s).

If the operation fails Initial Review, the operator may correct the non-conformances noted on the Initial Review Checklist and resubmit the application within 6 months from the date on the Notification of Initial Review. HFAC does not refund the Application Fee to operations who have let their applications expire.

3. Withdrawal of the Application

The applicant may withdraw its application at any time and end the certification process at that point by sending a letter to the HFAC office containing notification of the withdrawal of the application. An applicant that withdraws its application shall be liable for the costs of services provided up to the time of withdrawal of its application according to the chart presented below.

Nonrefundable Fees	
Stage of the Certification Process	Status of Fee
Prior to Initial Review	Full refund of Application Fee
After Initial Review	Application Fee is not refunded
After Inspection	Inspection Fee is not refunded

4. Expiration of an Application for Initial Certification

If an operation fails to respond to notifications during the Initial Certification process prior to the issuance of a notification of certification decision, the application will expire 6 months after the date of application or latest notification letter, whichever is later.

HFAC considers submission of an application after the expiration date as a new application and requires payment of another Application Fee.

5. Planning and Arranging the Inspection

After the applicant's operation has satisfied the requirements of the Initial Review, HFAC prepares a plan for its inspection of the operator's operation. Staff reviews the list of HFAC inspectors to identify an inspector who:

- Is appropriately qualified to perform the tasks for the specific evaluation; and
- Has not been involved in, or been employed by a business or person involved in, the design, supply, installation or maintenance of products related to the operation to be inspected within 24 months of the inspection assignment.

As soon as possible, the inspector contacts the applicant to set up a time for the site visit. It is HFAC's goal to complete the inspection within 30 days from receipt of a completed application. If an operator has an objection to the use of a particular inspector, the operator may contact the Certification Program Coordinator (CPC) to explain the situation. At HFAC's discretion, another inspector may be assigned to inspect that location.

The applicant is responsible for paying the Inspection Fee of \$500.00/day/inspector for farm/livestock/poultry/operations or \$600/day/inspector for Product Manufacturing Operations (PMO), Pooled Product Operations (PPO) or Slaughter Plants. For operators with more than one site, inspectors may be able to complete more than one inspection per day depending on travel distance and inspection time required at each location. The Inspection Fee is due and payable to HFAC once inspection has been completed.

Inspectors then provide HFAC with a report on each inspected operation's conformity with all of the HFAC standards and policies relevant to the operation.

6. Making the Decision on Certification Status

a) Overview

HFAC evaluates each operation against all the standards related to the operation's scope (ISO §10). Information outside the scope of the standards shall not be considered when making the certification decision.

b) Decision Making Terminology

Minor Non-conformance: A single failure in following a procedure that, on its own, does not jeopardize the integrity of the Certified Humane Raised and Handled ® name, seal, or market claim.

Major Non-conformance: A failure that jeopardizes integrity of the Certified Humane Raised and Handled ® name, seal, or market claim. This can include the absence of a required procedure, the total breakdown of a policy or procedure, or multiple occurrences of minor non-conformances in the same procedural area.

Corrective Action: A procedure for resolving deviations from published policies and procedures.

c) Authority to Make the Certification Decision

In general, the Executive Director makes decisions regarding certification status unless there is a conflict of interest, in which case, the responsibility passes to another HFAC staffer.

d) Deciding the Certification Status of the Applicant's Operation

1) Certification

The operation is granted Certification if it complies with HFAC policies and the HFAC standards relevant to the operation (ISO §4.1.4); the applicant will receive a *Certificate of Certification* that is valid for one year from the date of its issue.

2) Conditional Certification

The operation is granted Conditional Certification if it has one or more Minor Non-conformances with respect to HFAC policies and/or the HFAC standards relevant to the operation.

A *Certificate of Conditional Certification* is issued during Initial Certification Process to allow an operation that has minor non-conformances to use the HFAC seal while making the corrective actions. In such cases, the *Certificate of Conditional Certification* is valid for 30 days from the certificate's date of issuance.

3) Denial of Certification

The operation is denied certification if it has one or more Major Non-conformances with respect to HFAC policies and/or the HFAC standards relevant to the operation. Multiple or repeated minor non-conformances may be collectively found to be considered as a Major non-conformance if, together, they jeopardize the effectiveness of the producer's Quality System.

The operation will be denied certification and will not receive any type of certificate. If the operation corrects the non-conformances and can show evidence of management of the operation in conformance with HFAC standards, the operation will be eligible to submit a new application for certification to HFAC.

7. Notifying the Applicant of Certification Decision

At the conclusion of the decision making process, HFAC sends the applicant written notification of the certification decision (ISO §11.b.). The notification includes the Inspection Report as an attachment.

A *Certification Mark License Agreement* is attached to the notification letter if the applicant has been granted Certification or Conditional Certification. The applicant must sign a copy of this document, which demonstrates the applicant's acceptance of the terms associated with certification and the responsibilities of a certified party, and return it to HFAC prior to being sent the certificate. HFAC provides an additional copy of the Licensing Agreement for the applicant's records.

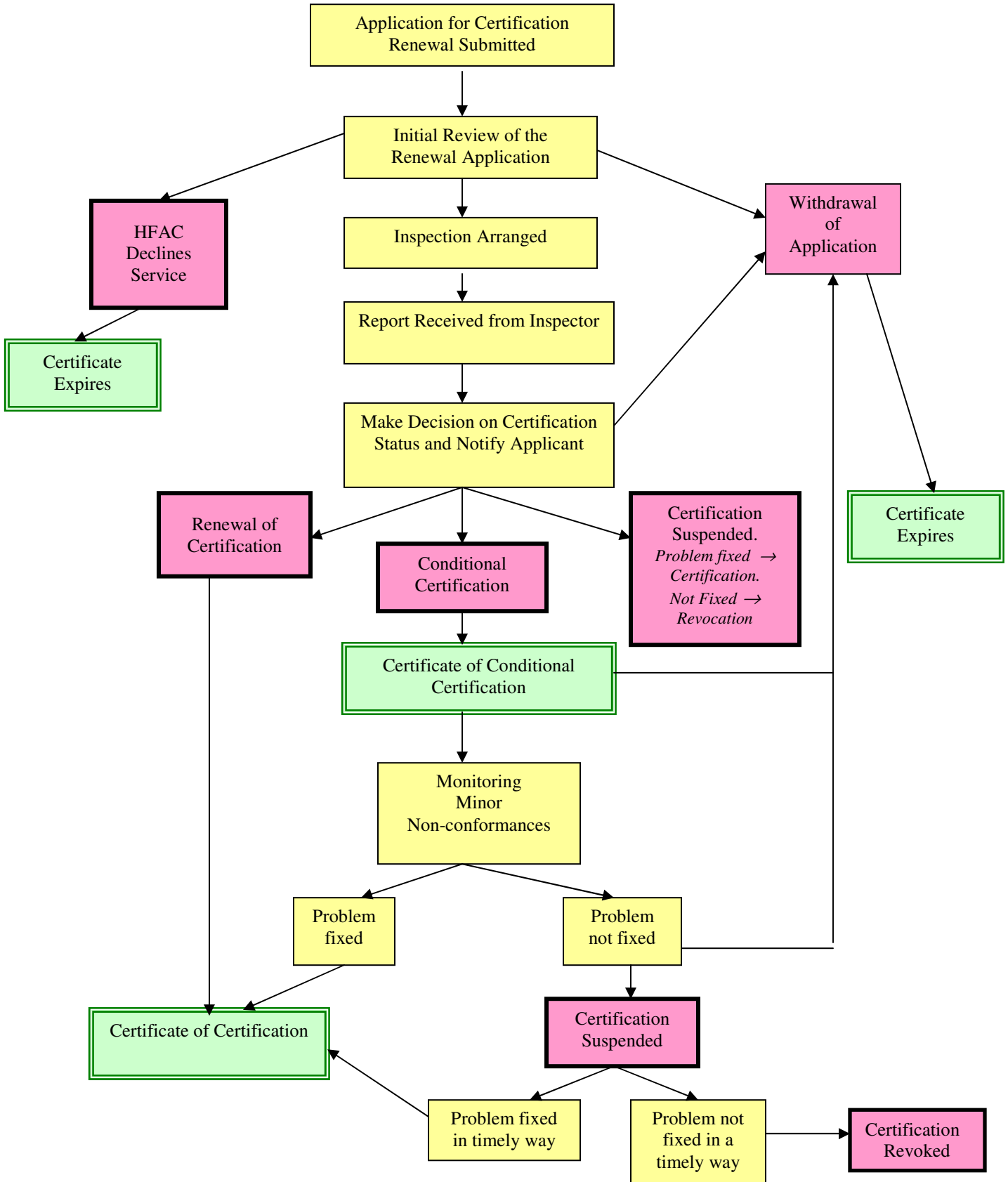
8. Monitoring Conditions Imposed for Correction of Minor Non-conformances

If there are Minor Non-conformances identified during the certification process, the applicant must address them within 30 days from the date of the notification letter. If all Minor Non-conformances have been corrected in a timely manner, the applicant will be certified. If the Minor Non-conformances have not been corrected, HFAC issues a *Notification of Denial of Certification*.

9. Issuing the Certificate of Certification

Once all certification requirements have been met, HFAC issues a *Certificate of Certification* to the applicant. The effective date of a *Certificate of Certification* shall be one year from the date of the certificate's issuance. The effective date of a *Certificate of Conditional Certification* shall be 30 days from the date of the certificate's issuance. The final step of the certification process is for HFAC to add information about the newly certified operation to the *Directory of Certified Operations*.

D. Renewal of Certification



1. Submitting an Application for Renewal of Certification

Operators in the HFAC Certification Program who wish to renew their certification must reapply annually and pay an annual Application Fee to cover the administrative costs of processing the application.

Approximately 60 days prior to the expiration of an operator's certification, HFAC sends the operator the documents necessary to renew certification. The operation receives:

- An application for certification renewal that is appropriate to the operation's scope--it includes a questionnaire designed to solicit information about changes made to the operation since submission of the previous certification application;
- The most recent version of the Policy Manual, if the previously sent version has been superseded; and
- The most recent version of the species standards relevant to the operator's operation, if the previously sent version has been superseded.

The operator completes the application for certification renewal. The applicant, or a duly authorized representative of the applicant, must sign the application. The operator returns the following, to the HFAC office:

- Completed application form, including the questionnaire; and
- Application Fee.

If an operator fails to submit documents and the Application Fee for Certification Renewal, the operator's certification expires as indicated on the operation's current certificate.

2. Initial Review of the Application

Once HFAC receives the completed application, the staff conducts an Initial Review (ISO §9.1) of the application.

If the operation fails Initial Review, the operator may submit the additional information required, or correct the non-conformances noted on the notification of the initial review and resubmit the application. However, delays caused by failure to pass the Initial Review are the responsibility of the Producer and may result in expiration of the Producer's certificate before completion of the process to renew certification. HFAC does not refund the Application Fee to operations who have let their certifications expire due to failure in the Initial Review process.

3. Withdrawal of the Application

The operator may withdraw its application at any time, resulting in expiration of the current certification on the date indicated on the certificate, by sending a letter to the HFAC office containing notification of the withdrawal of the operator's application. An operator that withdraws its application shall be liable for the costs of services provided up to the time of withdrawal of its application according to the chart presented in the section on Initial Application.

4. Planning and Arranging the Inspection

After the operation has satisfied the requirements of the Initial Review, HFAC prepares a plan for its inspection of the operation (ISO §9.2) as explained in the section on Initial Application.

5. Making the Decision on Certification Status

a) Overview

HFAC evaluates each operation against all the standards related to the operation's scope (ISO §10). Information outside of the scope of the standards shall not be considered when making the certification decision. Decision making terms and authority are detailed in the section on Initial Application.

b) Deciding the Certification Status of the Operation

1) Certification

The operation's certification is renewed if it complies with HFAC policies and the HFAC standards relevant to the operation (ISO §4.1.4); the operation will receive a *Certificate of Certification* that is valid for one year from the date of its issue.

2) Conditional Certification

The operation is granted Conditional Certification if it has one or more Minor Non-conformances with respect to HFAC policies and/or the HFAC standards relevant to the operation.

A *Certificate of Conditional Certification* is issued during the process for Renewal of Certification if it is necessary to extend the period of existing certification in order to cover the time between an unfinished certification process and an expiring certificate, a situation that may arise due to submission of a rebuttal or appeal. In such cases, the *Certificate of Conditional Certification* is valid for 30 days from the certificate's date of issuance.

3) Suspension of Certification

Essentially, the operation's certification is suspended if there are minor non-conformances that remain uncorrected.

4) Revocation of Certification

The operator's certification is revoked if its operation has one or more Major Non-conformances with respect to HFAC policies and/or the HFAC standards relevant to the operation. Multiple Minor Non-conformances may be collectively found to be considered as a Major Non-conformance if, together, they jeopardize the effectiveness of the producer's Quality System.

6. Notifying the Operator of Certification Decision

At the conclusion of the decision making process, HFAC sends the operator written notification of the certification decision (ISO §11.b.). The notification includes the Inspection Report as an attachment.

A *Certification Mark License Agreement* is attached to the notification letter if the operation has been granted Certification or Conditional Certification. The operator must sign and return a copy of this document, which demonstrates the operator's acceptance of the terms associated with certification and the responsibilities of a certified party, and return it to HFAC prior to being sent the certificate. HFAC provides an additional copy of the Licensing Agreement for the applicant's records.

7. Monitoring Conditions Imposed for Correction of Minor Non-conformances

If there are Minor Non-conformances associated with a certification the operator must address them within 30 days from the date of the notification letter. If all Minor Non-conformances have been corrected in a timely manner, the applicant will be certified. If the Minor Non-conformances have not been corrected, HFAC issues a *Notification of Suspension of Certification*.

8. Issuing the Certificate of Certification

HFAC issues a *Certificate of Certification* to the operator. The effective date of a *Certificate of Certification* shall be one year from the date of the certificate's issuance. The effective date of a *Certificate of Conditional Certification* shall be 30 days from the date of the certificate's issuance. The final step of the certification process is for HFAC to add information about the newly certified operation to the *Directory of Certified Operations*.

E. Certification Procedures for Pooled Product Operation:

1. Definition of Terms

A Pooled Product Operation (PPO) is an HFAC-certified operation that:

Buys products from individual production operations, which have been inspected by HFAC and found to be in conformance with HFAC standards but which are not certified individually.

Sells the pooled product under the name of the PPO.

Pays HFAC for the inspections of the operators from which it buys product for the pool and pays the certification fees for the pooled product that is being sold with the Certified Humane trademark on its label.

Must maintain complaints log.

Pooled Product Operations are an incentive for farmers to raise their animals in conformance with HFAC standards by creating a market where these humane production methods will be required in order to sell the product to a Pooled Product Operator. In this case the Pooled Product Operation is responsible for maintaining HFAC certification, which HFAC inspects and oversees.

2. Submitting the Application

For PPO applications, HFAC uses the same procedures for submitting an application as for an individual operator.

The PPO submits its application along with the individual application for certification for each of the producers participating in the pool.

The PPO pays a single application fee and pays the inspection fees for the individual operations being inspected for participation in the pool.

3. Inspection

The PPO operation, as well as each individual operation participating in the pool, is inspected annually, using the HFAC procedures for inspection of processors and producers respectively.

4. Certification Decision Process

Same as for individual processing and production operations.

5. Notification of operation's certification status

HFAC uses its usual procedures for notification of operation's certification except:

Notification of the production operation's level of conformance with the HFAC standards is sent to the PPO (not to the individual producer) including any notices of non-conformance. Along with the notification letter, the PPO also receives copies of the inspection reports for the individual farms.

The PPO provides corrective action forms to the producer, thereby creating a communication that links the producer's market with its conformance with certification standards. In turn, the PPO reports the participating producers' corrective actions to HFAC in order to link the producer's conformance to the PPO's certification.

6. Tracking corrective actions

HFAC uses its usual procedures for tracking corrective actions, except:

HFAC tracks the conformance of the individual operations selling to a PPO. The records for the production operations are filed under the name of the PPO and are further segregated and filed by farm name.

If a production operation does not make adequate corrective action, the Conditional Certification of this operation within the PPO expires and HFAC notifies the PPO that product from this individual operation can no longer be included in the pool carrying HFAC's seal.

If the PPO continues to purchase from the operation in violation, HFAC takes measures to revoke the PPO's certification.

7. Documentation of Handling done by PPO

All PPO's act as handlers and, as such, are responsible for maintaining the audit trail of certified products contributing to the pool as well as the certified pooled products sold. HFAC inspects the records of handlers, annually.

There are many types of handlers; some take physical possession of product and some do not. When acting as a handler that does take physical possession of product, a PPO may not repack or manufacture product in any way while it is in their physical possession. (If these activities do occur, the PPO is considered to be a Product Manufacturing Operation).

8. Documentation of Processing done by PPO

PPO's processing (slaughter) facility(ies) will be inspected annually by HFAC.

Processors' documents and records must be detailed enough to allow an inspector to confirm that there has been no co-mingling of certified and non-certified product during processing. Auditing the product produced through an input/output audit is an important part of checking for conformance with HFAC's standards.

F. Certification of Product Manufacturing Operations (PMO)

1. Definition of Terms

Animal-based Raw Materials: Products that come directly from a live or slaughtered animal, up to and including the use of only harvest and post-harvest handling processes.

Some examples of animal-based raw materials include: raw milk, fresh eggs in the shell, whole meat carcasses, raw wool fleeces, raw animal hides, etc.

Some examples of postharvest handling:

- Straining, cooling, and containerizing raw milk
- Cleaning and packing whole eggs

Input/Output Reconciliation: An audit that assesses the output of product against the supply of ingredients or, in the case of trading operations, the volume of sales against the volume of purchases.

Manufactured Product: A product that is produced with the use of one or more manufacturing processes. If the product is comprised of one ingredient, it is a single-ingredient product; if the product contains more than one ingredient it is a multi-ingredient product (*Please refer to the chart at the end of these definitions for examples.*)

Manufacturing: To process or package agricultural products, including: cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing products in a container (excluding). Manufacturing does not include enclosing raw materials in containers during their post-harvest handling.

Product Manufacturing Operation (PMO): A business that produces products containing animal-based raw materials, possibly in combination with other types of ingredients.

EXAMPLES OF PRODUCT MANUFACTURING OPERATIONS				
Animal Based Raw Materials	→	→	Product Manufacturing Operation → →	Manufactured Products
Raw Milk	→	→	Dairy Processor → →	<ul style="list-style-type: none"> • Pasteurized whole milk • Skim milk • Cream • Dry milk powder • Ice cream (multi-ingredient)
Eggs in the Shell	→	→	Egg Processor → →	<ul style="list-style-type: none"> • Bulk liquid eggs • Egg whites • Powdered eggs • Baked goods containing eggs (multi-ingredient)
Whole meat carcass	→	→	Food Processor → →	<ul style="list-style-type: none"> • Cut and packaged fresh meat • Jerky sticks • Pre-cooked chicken chunks • Canned meat in meat broth • Vegetable beef stew (multi-ingredient)
Raw Animal Hide	→	→	Tannery → →	<ul style="list-style-type: none"> • Leather • Leather Shoes (multi-ingredient) • Leather furniture covers
Wool Fleece	→	→	Wool Mill → →	<ul style="list-style-type: none"> • Cleaned fleece • Wool yarn • Wool sweater (multi-ingredient)

2. Standards For Product Manufacturing Operations

Manufacturers of all products carrying the Certified Humane seal or certification claim must be duly authorized by HFAC to use the seal on the product, as verified by a listing of the product on their application for certification. For a product to be listed, the PMO must:

- a) Formulate products so that all animal-based ingredients are produced by HFAC-certified operations.
- b) Ensure sufficient product identity and segregation of HFAC-certified ingredients and products carrying the HFAC label during storage, handling, and/or manufacturing,
- c) Keep records sufficient to show conformance with HFAC standards for:
 - Sourcing ingredients,
 - Product segregation, and
 - Complaints to operators (ISO §15). (Must maintain a complaints log).
- d) Conform with all HFAC standards for label and seal use.

3. Submitting the Application

For PMO applications, HFAC uses the same procedures for submitting an application as for an individual operator.

To maintain/renew its certification to use the Certified Humane seal, a PMO must submit an updated application annually.

4. Processing the Application

HFAC processes the application by performing an Initial Review to ensure that all required information has been submitted, and that it seems to conform with the standards.

If the application is sufficient, HFAC assigns the file to an inspector, who is specifically qualified to assess manufacturing operations.

5. Inspection

The PMO is inspected annually, using the HFAC procedures for inspection of individual operators.

When verifying the application for certification of a PMO, an HFAC inspector reviews each product to determine whether the manufacturer:

- Has developed a sourcing plan for obtaining HFAC-certified product for each of the animal based-ingredients in the PMO's product(s),
- Ensures sufficient product segregation of HFAC-certified products during storage, handling, and/or manufacturing,
- Keeps records sufficient to show conformance with HFAC standards for:
 - Sourcing ingredients,
 - Product segregation
 - Complaints to operators (ISO §15). (Must maintain a complaints log.)
- Has designed product label(s) that conform with HFAC's regulations on use of the Certified Humane seal use and certification claims.

This procedure is also used when a new product is added to the line of a PMO that has already been granted authorization to use the Certified Humane seal.

When a PMO applies for renewal of certification, HFAC reviews the above-mentioned points and also verifies the composition of a PMO's products through an annual Input/Output Reconciliation using records for product produced since their last certification date.

6. Certification Decision Process

Same as for individual operations.

7. Notification of operation's certification status

HFAC uses its usual procedures for notification of operation's certification.

8. Tracking corrective actions

HFAC uses its usual procedures for tracking corrective actions.

9. Certification Process and Issuance of Certificates

The Executive Director reviews information and makes a decision on each PMO's operation and individual product(s).

G. Certification Procedures for Producer Groups

1. Definition of Terms

Producer Group (PG): A close-knit group of producers that uses similar production practices, markets their products in common, and is managed by an Internal Control System. A Producer Group certification may also cover processing (slaughter) and manufacturing operations managed by the group.

Internal Control System (ICS): The system used by a Producer Group to provide oversight of the group's activities and conformance with certification standards and policies. An ICS performs many functions for the members of the PG including inspecting production operations, monitoring Minor Non-conformances, and keeping records.

2. Requirements of Producers to be Certified as a Producer Group

HFAC has specific requirements for producers who desire certification as a Producer Group.¹ The producers must:

- a) Use farming practices that are uniform and reflect a consistent process or methodology;
- b) Produce similar products;
- c) Be managed under one central administration that is uniform and consistent;
- d) Establish and implement their own system of internal control, supervision, and documentation of production practices, as well as other important aspects of each member's operation, to insure conformance with HFAC certification standards;
- d) Maintain a program of education to insure that all members understand the applicable certification standards and policies and how they apply to their specific operations;
- f) Utilize centralized processing, manufacturing, distribution, and marketing facilities and systems; and
- g) Complaints to operators (ISO §15). (Must maintain a complaints log.)

3. The Internal Control System

When a Producer Group applies to HFAC for certification, HFAC determines whether to require 100% of the producers to be inspected by HFAC or whether the Group's Internal Control System (ICS) may provide the information HFAC needs to evaluate the producers' conformance with standards and procedures. HFAC may rely on the ICS for inspections if HFAC has determined that the ICS's records mirror HFAC's own findings and the ICS:

- a) Inspects all operators at least annually;
- b) Inspects all new operators before including them in the Producer Group;
- c) Performs inspection in a manner that is rigorous enough for HFAC to use the resulting information to determine operators' level of conformance with HFAC's standards;
- d) Appropriately addresses instances of non-conformance;
- e) Maintains adequate records of inspections; and

¹ HFAC requirements for certification of Producer Groups are based on *IFOAM Accreditation Criteria for Programmes Certifying Organic Agriculture and Processing (Grower Groups)*, May 1998, page 23.

- f) Assists the operators in understanding and conforming with HFAC's standards.

In cases that HFAC determines that its own inspection of 100% of the operations is unnecessary, impractical or not feasible due to time constraints, accessibility, or other extenuating circumstances, HFAC requires the Internal Control System to ensure conformance with all relevant HFAC standards and policies. The ICS may also be used to monitor and document on-farm handling, processing, and manufacturing operations associated with the Producer Group. The ICS is responsible for all documentation and record keeping for the Group's management.

HFAC requires every ICS to submit a plan for implementation that documents that the ICS is managed in a manner that is in conformance with HFAC procedures. The plan must include the name of the person who will act as the ICS Administrator and the names of the group's internal inspectors. (see Section 5.a).

The ICS must be established and functional before HFAC will accept the Producer Group as a potential client. HFAC may adapt its forms to meet the specific needs of a Producer Group if necessary, and/or may allow the Producer Group to use its own formats on a case-by-case basis if it can be shown to HFAC's satisfaction that all requirements are being met and are verifiable in a way that is practical for HFAC to use.

The ICS must maintain the following records with copies of a representative sample of the records sent to HFAC as requested by HFAC:

- a) All producer records, farm management plans, and Collective Agreements;
- b) Signed agreement between HFAC and the Producer Group regarding implementation of the ICS and the name of the ICS Administrator;
- c) ICS administrative procedures including:
 - Copies of the forms used for internal control;
 - Records of violations and sanctions;
 - Records of removal of members of the Producer Group; and
 - Procedures for appeal.
- d) Ensuring competence for all ICS inspectors;
- e) Documentation demonstrating that the PG members have received instruction about the HFAC Standards;
- f) Current list of producer members and date of entry in program;
- g) Copies of all ICS inspections;
- h) Records of violations of HFAC standards and/or policies noted during the ICS's inspections of producers including the details of the ICS's management of the investigation of the violation, and where appropriate, the actions taken in response to a confirmed violation; and
- i) Records showing that the ICS Administrator has reviewed the inspections of the group's members including comments about the inspection and management of violations noted by the inspector.

HFAC may inspect a Producer Group twice during the first year of the Group's participation in the HFAC certification process. In that case, the first inspection gathers information to provide an overview of the operation; the second inspection provides further evaluation of the Group including an assessment of the implementation and accuracy of the ICS.

Every year thereafter, the ICS must complete its inspections of the producers and send the documentation of the inspections according to its stated schedule. Failure of the ICS to complete its inspections thusly could jeopardize the certification of the entire Producer Group.

In addition to its inspection of the ICS during its annual inspection of a Producer Group, HFAC inspects a minimum of 10% of the Group's producers. HFAC's (CPC) determines the number of producers that must be examined by an HFAC inspector. The CPC bases his/her decision on the following factors:

- a) The number and size of operations associated with the Producer Group;
- b) The degree of uniformity of the associated operations;
- c) The complexity of the current production systems;
- d) The Group's familiarity with HFAC practices and standards;
- e) The types of production practices used during the last 5 years;
- f) The effectiveness of the Group's ICS; and
- g) Previous inspection findings and certification conditions.

If a Producer Group uses one or more feedlots, processors, or PMO's as part of its system, HFAC will inspect each of these facilities used for HFAC-certified animals and products.

Unannounced inspections of Producer Groups by an HFAC inspector may be made in accordance with the terms outlined in the Producer Agreement

4. Inspections of Producers by the Internal Control System

In addition to reviewing the farm management plans, the ICS must include at least the following information in its inspection reports:

- a) Name of the producer, name(s) of anyone else assisting the producer with the operations, producer identification number (where applicable), date of last inspection by the ICS, date of last HFAC inspection;
- b) Who was present at the time of the inspection by the ICS;
- c) Amount of stock being raised;
- d) Feed and health care inputs.
- e) Condition of the producers' stock. If there is a problem, it should be indicated whether this problem is anticipated only during the current year or whether the problem is likely to reoccur.
- f) Age of stock at the time of the ICS's inspection.
- g) Estimated date of production of product.
- h) Estimated amount of production.
- i) Comments from the producer regarding the certification, management of the Producer Group, etc.

5. Documentation

In order to maintain the integrity of HFAC products produced by Producer Groups, all records must be current, accurate, and complete. The Administrator of the ICS, must compile, maintain, and provide the required documentation to HFAC as requested by HFAC.

Documentation includes but is not limited to:

- a) Application

HFAC requires information to be filed at the ICS office for each member of the Producer Group. Yearly updates must be submitted which cover all changes to information reported on the initial form. This information can be the internal inspection report.

Because Producer Groups are much more complex than single production units, the ICS must also complete a Producer Group Plan describing its own activities and send it to the HFAC office. The Producer Group Plan identifies the ICS's Administrator who deals directly with HFAC on all topics concerning

certification and who is responsible for the administration of the Group's ICS. The Producer Group Plan must also identify the people responsible for ICS inspections, monitoring production, and education of the Group's members about HFAC requirements. Any change to the staff member holding the position of ICS Administrator must be reported promptly to the HFAC.

b) Letter of Intent and Producer Agreement

A Producer Contract for each producer must be filed. For producer groups where individual Letters and Agreements are impractical, HFAC's Executive Director may allow the use of a collective agreement. In this case, the collective agreement must be signed by each of the producers associated with the Producer Group.

c) Production Records

The information contained in production records must present detailed information about the management practices used during the past year.

d) Producer Records

Producer records must include, but are not limited to the following:

- 1) Name of producer;
- 2) Identification number (where applicable);
- 3) Date of entry into the Producer Group;
- 4) Delivery records showing date, quantity, lot number, and delivery location; and
- 5) Sales records that include date of sale, quantity sold, method of transportation.

e) Handling Records

Producer Groups that act as handlers are responsible for maintaining the audit trail of certified products. There are many types of handlers; some take physical possession of product and some do not.

When acting as a handler that does take physical possession of product, a Producer Group may not repackage or manufacture product in any way while it is in their physical possession unless the operation/system also includes a Product Manufacturing Operation (PMO). PMO's are required to submit relevant HFAC application forms and undergo inspection as detailed in other parts of this Policy Manual.

f) Processing Records

Though the processing (slaughter) facility(ies) will be inspected annually by HFAC, the ICS provides the necessary assurance of daily quality control. In order to conform with this requirement, the Manager of the processing operation must review the inspection documents generated by the ICS inspection so that corrective actions may occur promptly. Corrective actions taken in response to inspections must be recorded.

Processors' documents and records must be detailed enough to allow an inspector to confirm that there has been no co-mingling of certified and non-certified product during processing. HFAC audits processing activities by application and inspection procedures as detailed in this Policy Manual.

6. Evaluation of Producer Groups and their Members

Evaluation of Producer Groups and their producers is similar to the procedures used for other producers except that, as previously stated, HFAC requires different types of information for the evaluation of a Producer group and must assess both the production units and the ICS's effectiveness during the inspection. Other than that, HFAC uses the same procedures for:

- Initial review,
- Withdrawal of the application;
- Arranging the inspection; HFAC's overall inspection of the Producer Group and its members can occur over the course of more than one distinct inspection event;
- Receiving the inspector's report;

- Making decisions on certification status;
- Notifying the operator of the certification decision;
- Monitoring Minor Non-conformances;
- Receiving the licensing agreement; and
- Issuing the certificate of certification.
- Certification Renewal

H. Amending the Scope of a Certification Already Granted

Sometimes an operation makes changes to its scope after the HFAC has granted a Certificate of Certification (ISO §12.4). Such changes may occur if an operation changes the types or amounts of products certified or it makes significant changes to its management or organizational structure (ISO §4.6.2.c.). In the case of an operation making such changes, HFAC requires the operation to notify HFAC of the changes to the operation and to withhold products produced under the changed procedures pending review by the certification body (ISO §13.2).

Changes to HFAC's program content may also affect an operation's conformance with HFAC standards and policies (ISO §4.6.2.c.).

In cases of significant changes to either the operation or the certification requirements, HFAC performs additional review and issues an amended *Certificate of Certification* if necessary (ISO §13.2). When HFAC issues an amended certificate, the operator receives written notification saying that the existing *Certificate of Certification* must be sent to the HFAC office within 10 days from the date of notification. If an operator does not return the obsolete *Certificate of Certification* within the time frame specified, HFAC initiates procedures for Suspension of Certification.

I. CONTROLLING THE CERTIFICATION MARK

1. Certification Mark License Agreement

HFAC controls ownership, use, and display of its certification mark (shown below) through the Certification Mark License Agreement. (ISO §14.1)

The Certification Mark License Agreement defines and documents HFAC's legal rights to deal with incorrect references to the certification system or misleading use of licenses, certificates or marks found in advertisements (ISO §14.3) including a requirement for operators to supply HFAC with samples of participant's packaging, advertising, or promotional materials bearing the HFAC mark upon HFAC's request.



*Meets the Humane Farm Animal Care Program standards, which include nutritious diet without antibiotics, or hormones, animals raised with shelter, resting areas, sufficient space and the ability to engage in natural behaviors.

Please see the Certification Mark License Agreement for complete details.

PART 3: THE INSPECTION PROCESS

A. What to Expect during Inspection of a Livestock Operation

The inspection of a livestock operation generally includes the following:

- Opening Meeting between the inspector and the operator to discuss the schedule and procedures to be used for the inspection.
- Interviews with the farm manager(s) and employees to verify their knowledge of HFAC requirements and to ascertain their roles and responsibilities.
- Inspection of documents and farm records, including information provided by veterinarians, feed suppliers, and other parties who provide goods and services to the farm. The inspector also investigates the records used to document the types of products used in the management of the operation as well as the records used to trace animals.
- Observation of the procedures for managing and caring for stock in order to verify the level of the operation's conformance with HFAC standards and policies. This includes investigation of items such as: animal nutrition, housing, sources of stock, systems for animal identification, husbandry practices, handling systems, stock condition, implementation of animal health plans, availability of emergency action plans, management of casualty animals, and the general environment of the operation.

During the inspection, the inspector uses a detailed checklist to document observations and information about the farm's conformance with each of the HFAC standards. Non-conformances are recorded and designated as either "minor" or "major" (for more information, see the definitions of these terms in the "Certification" section.)

The on-site inspection concludes with an Exit Interview between the inspector and the farm manager(s). This meeting allows the inspector to summarize the findings of the inspection and to provide the operator with an overview of the non-conformances noted. It also provides an opportunity for the operator to supply corrections, clarifications, or additional information.

Once back in her/his office, the inspector writes a detailed Inspection Report and sends it, along with the Inspection Checklist, to the HFAC office.

B. What to Expect during Inspection of a Livestock Hauling Operation

The inspection of a Hauling Operation follows the same general procedures used on a farm, with the on-site inspection focusing on: appropriate vehicle maintenance, truck condition, appropriateness of the truck for the species being hauled, animal loading procedures, hauling, unloading procedures, and management of casualty animals.

C. What to Expect during a Processing Facility Inspection

When inspecting a processing facility, the inspector uses the HFAC inspection procedures to focus on: maintenance of equipment and facilities, traceability of animals and product ingredients, appropriate handling systems for live animals, animal unloading at the processing plant, stock sources, animal identification, stock appearance, slaughter protocols, management of casualty animals, and emergency action plans.

D. What to Expect during an Inspection of a Producer Group

During the inspection of a Producer Group, an HFAC inspector assesses both the production units and the effectiveness of the Internal Control System (ICS). The inspection of a Producer Group has three main

components: Assessments done in the ICS office, assessments done in the field, and activities to conclude the inspection.

Assessments in the ICS Office focus on evaluating the Producer Group's Internal Control System to verify that all management systems are fully implemented and to review producer files for accuracy and completeness. Inspectors evaluate such aspects as the ICS's ability to:

- Provide copies of the standards to producers in a language or format that producers understand;
- Use individual inspection reports to assess operator conformance;
- Inspect each producer at least annually;
- Fully document inspection visits;
- Inspect new operations prior to adding them to the roles of the Producer Group;
- Take appropriate actions when a nonconformance is suspected or detected; and
- Maintain an educational program for the producers.

Assessments in the field focus on inspecting some of the producer's farms and comparing the results to the results of the Producer Groups' inspection of the same operation. The HFAC inspector will also perform a Witness Audit, to evaluate the processes used during an inspection conducted by the ICS.

The inspection of a Producer Group concludes with the inspector's analysis of the non-conformances and presentation of a summary of the audit activities and findings to the managers of the Producer Group during an Exit Interview. The inspector submits findings to HFAC in a written Inspection Report.

E. What to Expect during an Unannounced Inspection

HFAC may perform unannounced inspections in order to assess an operation's continued conformance with HFAC standards and procedures. The operator's signature on the "Producer Agreement" on the *Application* form confers consent that during the term of the operator's certification, unannounced inspections by HFAC inspectors are acceptable to the operator.

In general, unannounced inspections are performed using the same procedures as routine inspections except that the inspector contacts the operator to arrange for the inspection no more than 24 hours prior to arrival at the certified operation. Inspectors may perform unannounced inspections without any notice to the operator, but in practice a lack of arrangements for the inspection can lead to the inspector's arrival at an operation at a time when the personnel required to participate in the inspection are absent.

PART 4: RIGHTS AND RESPONSIBILITIES

A. Rights and Responsibilities of Certified Operations

1. Conforming with the program

HFAC grants a certification certificate to each operation that successfully completes the certification process. Certified parties must continuously manage their operations in conformance with HFAC standards and policies. Operators are required to report to HFAC changes to the management practices documented on their most recent Farm Questionnaire that may potentially affect its conformance with HFAC certification requirements (see details in §5.A. of this Policy Manual).

2. Cooperating with certification processes

Cooperation between HFAC and its clients is essential to the success of the certification process. Lack of cooperation can delay the certification process and can be the source of increased certification costs, and in some cases may lead to denial or revocation of certification. When parties apply to HFAC for certification, they must:

- Allow HFAC access to their records, including personnel information, financial documents and tax returns,
- Allow on-site inspection of their operation,
- Respond to communications regarding their certification in a timely and appropriate manner,
- Pay certification fees in a timely manner, and
- Provide other types of information reasonably necessary for HFAC to evaluate the operation's level of conformance with HFAC's certification requirement.

3. Making appropriate certification claims

Certified parties may make a certification claim only for only products produced, in conformance with HFAC standards and policies, by parties duly certified by HFAC.

4. Protecting the certifier from disrepute

Certified parties must protect HFAC from disrepute by making only accurate claims about the HFAC certification program, its standards, and policies.

5. Discontinuing use of certification claims

If an operation's certification is revoked, the operation must discontinue use of certification claims and return its certification certificate to the HFAC office.

6. Limiting the certification claim

Parties using the HFAC seal, certification mark, and certification claims shall limit the claims made regarding their certification to statements related to their operation's conformance with HFAC standards.

7. Protecting the use of the certification claim

HFAC's certification documents may only be utilized to substantiate the growers claim that a product is indeed certified by HFAC. The rights associated with HFAC certification are not transferable. The HFAC name and the "Certified Humane" logo are registered trademarks; unauthorized use is strictly prohibited.

8. Using the certification claim correctly in advertising and marketing

The certification mark may be used by certified livestock production and processing operations. Businesses that manufacture products containing HFAC-certified raw materials may also use the certification mark

after receiving formal certification from HFAC. Terms for use of the seal, certification mark, and certification claims are fully described in the HFAC Licensing Agreement applicable to the operation.

B. Rights and Responsibilities of the Certification Agent

1. Public Access and Confidential Business Information

a) Confidentiality is Critically Important at HFAC

Improper dissemination, disclosure, or unauthorized use of confidential information could result in irreparable harm to both HFAC and its certification clients. As a condition of their employment, HFAC Employees and all other personnel agree to safeguard confidential information, to use it only for HFAC business, and to refrain from disclosing it to others (ISO §4.10.1).

Disclosure, breach or misuse of confidential information may be subject to disciplinary action up to and including immediate termination. Such actions may be subject to legal action. Upon termination of employment, contractual relationships, or volunteer relationships with HFAC, personnel agree to return all confidential information, together with all copies in their possession, custody, or control.

b) Conforming with Information Requests

When HFAC receives a phone or written request for specific information, the person receiving the request uses the lists below to determine whether any of the information requested is considered to be confidential.

If the request does involve confidential information about a certified party, HFAC requires written permission from the certified party before releasing the information (ISO §4.10.2). Where the law requires information to be disclosed to a third party, HFAC will inform the affected party of the release of confidential information (ISO §4.10.2). Non-confidential information may be released without notification.

HFAC files are fully accessible to HFAC's accreditors who are bound by confidentiality agreements with HFAC. HFAC is not obligated to inform a client of an accreditor's review of confidential information related to the client's application, inspection, evaluation, or certification.

All confidential information as defined by this policy is stamped "CONFIDENTIAL" upon receipt by HFAC.

c) List of Information Available to the Public by Request

The following information is considered to be non-confidential and is provided to the public:

- Information about the authority under which the certification body operates (ISO §4.8.1.a.);
- Documentation of the rules and procedure of the certification system (ISO §4.8.1.b);
- Information about the evaluation process for each type of product certified (ISO §4.8.1.c.);
- A description of the means of HFAC's financial support (ISO §4.8.1.d.);
- Fee structure for certification (ISO §4.8.1.d.);
- Rights and duties of applicants, including those related to use of the "Certified Humane" (ISO §4.8.1.e.) label;
- Information on complaints, appeals, and disputes process (ISO §4.8.1.f.);
- List of all parties certified by HFAC (ISO §4.8.1.g.);
- Names of staff, members of the Board of Directors, and HFAC Committees;
- List of inspectors used by HFAC;
- The Standards and Policy Manuals;
- Certification certificates;

- The certification status of any current or former HFAC-certified client; and
- Accreditation certificates.

d) List of Confidential Information

The following information is considered to be confidential and not available to the public:

- Any recipe, formula, process, or equipment which is considered essential to the business of the certified party;
- Information, materials, documents, records, memoranda, lists, plans, discussions, actions, and projects marked as “Confidential” by HFAC personnel;
- All information related to the inspection and evaluation of parties applying to HFAC for certification;
- Meeting minutes and correspondence of staff, committees, and the Board;
- All application, inspection, and certification information, including related correspondence; with the exception of those items listed above as public;
- Other than funding sources as mentioned in the previous section, all financial information regarding HFAC, its employees and its clientele;
- Personnel files, including the staff, Board Members, Committee Members, contractors, and inspectors.
- Details of the accreditation of the HFAC certification program; and
- Other information as declared “confidential” by the client.

2. Release of Documents for Review by other Certifiers

At times, HFAC documents (typically the Inspection Report) are needed by another certifier to facilitate additional certification activities through document review. This may occur when a party certified by HFAC applies for another certification such as “organic”, “Salmon Safe,” or other eco-label. In order to save time and money, information verified by one certifier may be used to facilitate another certification process.

HFAC releases certification documents to other certifiers only with written consent of the affected certified party. Upon receipt of a signed document authorizing HFAC to release the operator’s documents, HFAC sends the documents to the other certifier.

Certifiers wishing to obtain HFAC documentation must contact the certified party directly to initiate the process of HFAC’s release of certification documents.

HFAC’s certification documents may only be utilized to substantiate the producers claim that as product is indeed certified by HFAC. The rights associated with HFAC certification are not transferable. The HFAC name and the “Certified Humane” logo are registered trademarks; unauthorized use is strictly prohibited.

PART 5: CONTINUED CONFORMANCE

A. Continued Conformance with Certification Requirements

Operators are required to manage their operations as they described in their HFAC questionnaire and other plans and in conformance with HFAC standards and policies.

Any changes to the operator's system that may potentially affect its conformance with the certification program must be submitted in writing to HFAC and approved prior to its implementation. (ISO §13.2) This includes, but is not limited to changes to:

- Legal, commercial, or organizational status;
- Premises, equipment, facilities, or other resources;
- Organization and management (e.g. key management staff); and
- Management procedures significant to the operation's conformance with HFAC certification requirements.

Depending upon the nature and extent of the changes, HFAC may require a complete or partial on-site inspection of the system prior to approval. If HFAC finds that the changes to the operation conform with certification standards and policies, an updated Certification Certificate will be issued if the information on the existing certificate no longer accurately represents the operation.

If HFAC becomes aware of a non-conformance through an operator's submission of an amended plan for the operation, surveillance activities, receipt of a complaint about the operation, or other means, HFAC will send the operation a *Notification of Non-conformance* to provide the operator with information about the areas of its non-conformance with HFAC standards and policies. HFAC also supplies a *Corrective Actions by Operators* form to be used by the operators to submit information about the corrective actions as they are completed.

The operation has 30 days from the receipt of notification to correct the non-conformance and submit verification of their actions to HFAC. Should the operator fail to correct the non-conformance within that timeframe, HFAC will begin procedures for suspension or revocation of the operation's certification.

B. Suspension of Certification

HFAC may suspend an operation's certification for any of the following reasons:

- Failure to maintain continued conformance with HFAC standards and policies in a manner that results in an uncorrected Minor Non-conformance.
- Failure to correct Minor Non-conformances as specified in the procedure for "Renewal of Certification".
- Failure to return the *Certificate of Certification* within the time frame specified in the procedure for "Amending the Scope of a Certification Already Granted".
- Implementing significant changes to approved systems without prior written notification to HFAC.
- Failure to pay inspection/certification fees.

The timeframe allowed for correction of non-conformances associated with a suspended certification is 30 days from the date of the *Notification of Suspension of Certification*. If the operation supplies evidence to HFAC of successful corrective action by that date, HFAC will confirm that the suspension has been lifted by sending a *Notification of Resolution of Nonconformance to the Operation*.

If the operator does not rebut within 30 days from the date of *Notification of Suspension* or does not supply evidence of successful corrective action, HFAC suspends the operation's certification and begins the process of revocation by sending a *Notice of Revocation of Certification*.

If an operator's certification has been suspended, HFAC may repeat only the parts of the certification procedure necessary to ensure that the operation is in conformance with HFAC standards and policies (ISO §11.b.).

C. Revocation of Certification

HFAC may revoke an operation's certification for any of the following reasons:

- Failure to maintain continued conformance with HFAC standards and policies in a manner that results in a Major Non-conformance.
- Failure to resolve the issues associated with suspension of the operation's certification in a timely manner.
- Deliberate misrepresentation of facts to HFAC, other regulatory agencies, or the public, in which case, HFAC may proceed with revocation without first suspending the certification.

In the *Notice of Revocation of Certification*, HFAC notifies the operator of the opportunity to rebut the facts on which the revocation is based. The time frame for rebuttal of the non-conformance is 30 days from the date of the letter of notification sent to the operation. If the operator does not rebut within 30 days, HFAC revokes the operation's certification and removes the operation from the HFAC *Directory of Certified Operations*. The operation must return its *Certificate of Certification* to HFAC within 10 days of the date of revocation.

If the operation corrects the non-conformance associated with the revocation and presents evidence to HFAC, documented in writing, of consistent management of the operation in conformance with HFAC standards for at least 6 months after making the corrective action, the operation will be eligible to submit a new *Application for Certification* to HFAC.

If an operation's certification has been revoked, HFAC must repeat the entire certification procedure if the operation applies for certification in the future.

PART 6: RESOLVING CONFLICTS

A. Rebuttal of Certification Decisions

If an operator feels HFAC's decision on its certification status is in error, the operator may present information to rebut a condition on certification or denial, suspension, or revocation of certification. To make a rebuttal, the operator must send HFAC, in writing, the reasons for disagreement with HFAC's decision along with evidence to support the operator's ideas. HFAC must receive the rebuttal letter within 30 days from the date of the letter of notification sent to the operation.

Upon receipt of a rebuttal, the original decision maker reviews the information and decides whether the decision on the operation's certification status should be changed. The decision maker must communicate the decision on the rebuttal to the operator within 30 days from the date of receipt of the letter of rebuttal.

B. Appeals of Certification Decisions

An Appeal may be made by an applicant or participant who objects to a certification decision made by HFAC in regard to his/her operation (ISO §§4.2.p and 7). All other types of problems may be addressed under policies on "Complaints" or "Disputes".

1. Submitting the Appeal

All appeals must be submitted, in writing to the HFAC office, within 30 days of the date of the notification of the decision under consideration. The appeal must state the reason for the appeal and be accompanied by documented evidence establishing the grounds for the appeal.

2. The Appeals Committee Considers the Appeal

The Executive Director notifies the Appeals Committee of the receipt of an appeal as soon as possible. The Chair reviews the appeal and the accompanying documented evidence and determines whether new evidence warrants reconsideration of the original decision.

If reconsideration of the decision is justified, the Chair notifies all other committee members and conducts an Appeals hearing. If necessary, the Appeals Committee will order an additional inspection of the operation.

3. The Appeal Committee Considers the Appeal

If the Appeals Committee does not think a new ruling is warranted, or the appellant is dissatisfied with the Appeals Committee's ruling on the appeal, the appellant may request that the appeal be taken to the HFAC Board. If needed, Appeals must be handled through the appropriate court nearest the HFAC office.

4. Notification of the Appeal Decision

At the conclusion of the Appeal Hearing, HFAC will notify the appellant of the results of the Appeals process in writing through a certified letter directed to the operator's last known place of business.

5. Certification Status During the Appeals Process

All decisions related to the certification status of the operation remain in force until the appeal is settled.

6. Cost of the Appeal Process

The cost of the appeal is the responsibility of the party initiating the appeal.

7. Records of the Appeals Process

HFAC retains files containing complete documentation of all Appeals for a minimum of five years after the case has been closed. The records document the specifics of the case, the actions taken by HFAC and other parties in the case, and the effectiveness of HFAC's actions. (ISO §§7.2.a.-c.)

C. Disputes

A Dispute is a disagreement between the HFAC and another party that is not lodged as a Complaint or an Appeal of a certification decision. An example of a dispute would be a disagreement between a HFAC and an applicant or participant over payment of fees.

Disputes are handled using the same procedures as complaints.

D. Complaints

1. Overview of Procedures for Handling Complaints

HFAC strives to operate its certification program with due diligence. However, HFAC recognizes that an important part of due diligence is careful and complete management of complaints such as:

- Complaints regarding the conduct of personnel, including staff, Certification Committee, contractors, inspectors, and members of the Board of Directors;
- General complaints regarding the decisions and/or functions of HFAC; and
- Complaints regarding the operations certified by HFAC. (ISO §4.2.p. and ISO §7.1)

Complaints lodged by operations certified by HFAC regarding decisions pertaining to their own certification are handled under the policy on “Appeal of Certification Decisions”.

In order for HFAC to act on a complaint, its subject must be under the organization’s authority such as: disregard of standards and/or operating procedures, arbitrary judgments, non-professional behavior, financial mismanagement, unethical behavior, discrimination, un-timeliness, violation of conflict of interest, or breach of confidentiality.

Because of the wide variation in the types of complaints that may be received by a certifier, HFAC manages complaints on a case-by-case basis by designating an Investigator and a Resolution Body to address each valid complaint. The Investigator examines and analyzes the veracity of the complaint. The Resolution Body decides the outcome of the investigation of a complaint.

2. General Procedures for Handling Complaints

In order for this policy to apply fully, the complaint must be submitted in writing and must be accompanied by documenting evidence. A complaint must contain a full explanation of the perceived problem including:

- Dates of events associated with the complaint;
- The names of the involved parties;
- Evidence documenting the claims made in the complaint; and
- The signature of the complainant.

Upon receipt of a complaint, the Executive Director performs a preliminary assessment of the complaint’s validity and determines whether or not to proceed with a full investigation. HFAC acknowledges a complaint within five business days of its receipt by:

- Notifying the complainant of the results of its preliminary assessment of the complaint;
- Reporting to the complainant on the possibility for further action; and
- Sending the complainant a copy of HFAC’s policy on “Responding to Complaints about the Certification Agent.”

If, after its preliminary assessment, HFAC deems the complaint to be completely invalid or irrelevant, HFAC explains this conclusion to the complainant in its letter of acknowledgement and gives the complainant 30 days to substantiate the validity of the complaint.

If the preliminary assessment shows that the complaint is valid, the President of the HFAC Board of Directors appoints an Investigator and a three-person Resolution Body. All of HFAC’s personnel involved in investigating or resolving complaints must be free of commercial, financial, and other pressures which might influence the complaint process or decisions.

Once an investigation has been completed, the Resolution Body communicates its decision, in writing, to the complainant as well as to the subject of the complaint. HFAC reserves the right to inform its accreditors, regulatory authorities, certified parties, and the general public of the outcome of complaint procedures. HFAC routinely discloses all complaints involving the Certified Humane program to the USDA as part of its accreditation audit.

HFAC retains files containing complete documentation of the complaint, its investigation, and its resolution for a minimum of five years after the case has been closed. The records document the specifics of the case, the actions taken by HFAC and other parties in the case, and the effectiveness of HFAC's actions. (ISO §§7.2.a.-c.)

3. Procedures for Handling Specific Types of Complaints

a) Complaints about How HFAC Operates

Filing a Complaint and Appointing an Investigator for a Complaint about HFAC Operations

Complaints regarding the conduct of all HFAC personnel, excluding the Executive Director, but including other members of the Board of Directors, staff, members of committees, inspectors, and contractors, and all other personnel associated with HFAC are directed to the Executive Director who acts as the Investigator.

Complaints regarding the Executive Director shall be directed to the President of the Board who acts as the Investigator in this case.

Complaints regarding the decisions and/or procedures of HFAC shall generally be directed to the Executive Director. The Executive Director acts as the Investigator for all such cases unless there is a conflict of interest. In that case, the President of the Board handles the complaint.

In all cases, HFAC reserves the right to appoint a different Investigator who is knowledgeable about the subject of the complaint and who has no conflicts of interest, either positive or negative, with the complainant, with HFAC or with any other parties involved in the case. If necessary, the Resolution Body for the case appoints an alternate Investigator.

Investigating Complaints about how HFAC operates

The Investigator may take up to 30 days to review the complaint and, if necessary, gather additional information from the complainant, third parties named as sources of information in the complaint, and other parties likely to have information relevant to the investigation.

As soon as the Investigator has compiled sufficient information to determine that the complaint is justified, the investigator contacts the subject of the complaint and presents all substantiated information related to it. The Investigator requests a full explanation or clarification of actions taken by the subject relevant to the complaint, giving the subject 30 days from date of notification to respond.

At the conclusion of this 30-day response period, the Investigator reviews all information related to the complaint, formulates a written recommendation, and submits the recommendation to the Resolution Body. The document may contain suggestions for corrective actions and/or disciplinary measures.

Resolving Complaints about how HFAC operates

The HFAC Board of Directors serves as the Resolution Body for all complaints related to HFAC personnel and the procedures of HFAC except for those naming one or more members of the Board as subjects. In this case, HFAC constitutes a three person Resolution Body comprised of people who are familiar with the subject of certification, but not directly involved with HFAC. All members of the Resolution Body must be acceptable to both the complainant and the subject of the complaint.

The Resolution Body shall decide on corrective actions and/or disciplinary measures within 30 days of receipt of the report from the Investigator.

b) Complaints about Operations Certified by HFAC

Filing a Complaint and Appointing an Investigator

HFAC may receive complaints regarding 1) operators certified under the HFAC program, 2) applicants for certification, or 3) parties using the HFAC certification seal and/or claim on their private-label products, from any concerned party. Complaints submitted in writing are directed to the HFAC Executive Director who determines the course of the ensuing investigation. Complaints that are only submitted verbally may be investigated at the discretion of the Executive Director.

Investigating Complaints about Operations Certified by HFAC

The investigation may take up to 30 days to review the complaint and, if necessary, gather additional information from the complainant, third parties named as sources of information in the complaint, and other parties likely to have information relevant to the investigation.

As soon as the Investigator has compiled sufficient information to determine that the complaint is justified, HFAC contacts the subject of the complaint and presents all substantiated information related to the complaint. HFAC requests a full explanation or clarification of actions taken by the subject relevant to the complaint, giving the subject 30 days from date of notification to respond. If necessary, an on-site visit to the operator's business will be conducted.

At the conclusion of this 30-day response period, HFAC reviews all information related to the complaint, and takes appropriate action which may include conditions for corrective actions and/or disciplinary measures.

Any party against whom HFAC has taken action for a violation, has the right to appeal under the policy, "Appeal of Certification Decisions".

PART 7: SETTING OR MODIFYING STANDARDS, POLICIES, AND PROCEDURES

A. Standards

The Humane Farm Animal Care certification program was formed to certify farms that conform with the Humane Farm Animal Care (HFAC) standards for production of various species of livestock. These standards incorporate scientific research, veterinary advice, and the practical experience of the farming industry.

Some of the reasons that HFAC may recommend a standards change are:

- New information from scientific research, veterinary practice or practical experience;
- Input about the existing standards from certified producers or other stakeholders in the HFAC certification program;
- The need to create new standards to expand the types of operations that may be certified by HFAC;
- Accreditation requirements demand a change in the standards; and
- Federal, state, or international regulations require a change in the standards.

The standards sometimes require non-substantive changes such as corrections of grammar, spelling, formatting, and other minor adjustments. Because these revisions do not result in changes that affect operators or consumers, they may be drafted, reviewed, and approved by the Executive Director, or others under her/his direction.

1. Drafting Animal Welfare Standards

Proposals for new or modified standards usually originate in the Scientific Committee. Staff, especially the CPC, may also generate new or modified standards for review by the Committee or may assist the Committee with the drafting process. Operators and other interested parties may submit suggestions for changes to the standards via the staff.

The following information must accompany a proposal for new or modified standards:

- Submission date;
- Party requesting the change (including contact information);
- References submitted in support of the change;
- Title and Version of the document to be changed;
- Recommended placement of the revised language (submission on the text in revision mode highly recommended); and
- Other documents affected by the proposed change.

The Executive Director ensures that the proposed standard meets or exceeds industry norms and regulatory statutes. This may involve consultation with experts in the fields of certification, accreditation, production practices, or other specialties.

2. Review by Producers

After the Scientific Committee has agreed upon the text of the new or revised standard, HFAC staff distributes the draft to the affected producers to solicit their comments. The Executive Director establishes

an appropriate timeframe for submission of comments, not less than 14 days from date of distribution to the producers.

CPC compiles the comments received during the public comment period and incorporates additional comments from the Scientific Committee into the draft. ED incorporates any additional comments received and compiles one draft to send to the Standards Committee.

3. Review by the Standards Committee

Next, the Standards Committee considers the proposed standard. The Standards Committee is comprised of representatives of a range of constituencies interested in and affected by the HFAC Standards. Review of proposed changes to the HFAC Standards by the Standards Committee enables the participation of representatives of all parties significantly concerned. Committee members are encouraged to solicit opinions on the changes to the standards from the parties they represent.

The CPC and Executive Director set the timeframe for the Standard Committee's review, but must allow at least 14 days from the date the materials are sent to the committee members. Extensive changes to the documents may require longer review periods. Committee decisions are made using the procedures in Section 2.C. of the Administrative Procedures Manual titled, "Committees". Decisions on standards and their associated implementation dates made by the Standards Committee are presented as recommendations to the Humane Farm Animal Care Board of Directors, which makes the final decision on the standards.

Standards relevant to handling of HFAC animal products by PMO's and other handlers of non-living animal products are modified and created under the direction of and approved by the Executive Director, who coordinates these efforts in conjunction with appropriate experts. Comments on such standards may be solicited by HFAC and received from stakeholders at any time. As the salient points of this aspect of the HFAC program and standards are relatively simple, these standards generally do not need to undergo frequent or substantive revision.

4. Making the Decision to Change the Standards

The HFAC Board of Directors may:

- Adopt the recommendation of the HFAC Standards Committee;
- Decide to make no change; or
- Choose to adopt a modified version of the HFAC recommendation.

If the HFAC board does not adopt the recommendations of the HFAC Standards Committee, the HFAC Board must document its reasons for doing so. The Board conveys its decision on adding to or modifying the standards, and any documentation explaining the basis of their decision, to the HFAC office within 5 working days of making the decision.

5. Updating Documents

HFAC updates and distributes the affected manual, form, or other document(s) according to its Document Control procedures.

6. Implementing Changes

HFAC takes into account the views expressed by members of Scientific Committee, the Standards Committee, the HFAC Board, and any other party who may have submitted an opinion, before deciding on the precise form and the effective date of the changes. HFAC gives due notice of all changes it makes in its requirements for certification, notifying operators through letters and/or newsletter.

After making changes in the standards, HFAC verifies that each certified operator or operator applying for certification implements the revised standard. This usually occurs at an operator's next annual inspection, but HFAC may choose to verify standards changes earlier through unannounced inspections, additional inspections, or requirements for submission of documentation of changes from the operators (ISO §6.).

7. Interpreting Standards

When there is any need for an interpretation of an HFAC Animal Care Standard, the Scientific Committee develops the interpretation and publishes it in a letter, newsletter or other form and be sends it to all affected parties (ISO §4.1.3.).

B. Policies

HFAC makes changes to the contents of its Policy Manual using a procedure that enables the participation of all significantly affected parties (ISO §4.2.e.). Any significantly affected party may submit proposals for changes to policies. The Executive Director submits substantive changes to policies to the HFAC Board of Directors, which makes final decisions on policies.

The policies sometimes require non-substantive changes such as corrections of grammar, spelling, formatting, and other minor adjustments. Because these revisions do not result in changes that affect operators or consumers, they may be drafted, reviewed, and approved by the Executive Director or others under her/his direction.

HFAC gives due notice of all changes it makes in its requirements for certification, notifying operators through faxes, e-mail, letters and/or newsletter (ISO §6.).

When there is any need for an interpretation of the HFAC Policy Manual, the ED develops the interpretation and publishes it in a letter, newsletter or other form and be sends it to all affected parties (ISO §4.1.3.).

C. Procedures

Because procedures are used to implement policies that are established by the Board in a process that has included wide participation, the Executive Director is charged with the responsibility to set and update procedures.

PART 8: PROGRAMS FOR NON-CERTIFIED BUSINESSES THAT USE HFAC-CERTIFIED PRODUCTS

A. Purpose of the Programs

HFAC's primary focus is on certification of operations that use humane practice to raise and process live animals. In order to broaden the market for products from humanely-raised animals, thus increasing the opportunities for farmers who use humane animal production practices, HFAC has developed programs that allow other types of businesses to indicate to the public that they use HFAC-certified products.

B. Restaurants

1. Overview

HFAC recognizes that, through their purchases of HFAC-certified product, restaurants further HFAC's goals of expanding use of livestock production systems that provide for humane treatment of farm animals.

In addition, HFAC's recognition of restaurants increases public familiarity with HFAC and its mission as well as providing public acknowledgment to restaurants that purchase HFAC products.

Although HFAC does not certify restaurants, it does grant recognition to those that make a written application showing the sources of HFAC-certified product. The recognition program also establishes a means for HFAC to check on restaurants to verify that their claims about use of HFAC-certified product are legitimate.

2. Standards for Restaurant Recognition

In order to be recognized by HFAC, restaurants must:

- Submit a written application for recognition to HFAC disclosing the sources of HFAC-certified products that they purchase,
- Purchase HFAC-certified product, when available,
- Maintain systems for identifying HFAC-certified product and keeping it separate from similar products that do not carry the HFAC seal; and
- Notify HFAC of changes to their purchasing and management systems that relate to use of HFAC-certified products.

3. Submitting the Application for Restaurant Recognition

A restaurant submits information about its purchasing system to HFAC using the form called "Application & Decision Record: Restaurant Recognition."

4. Processing the Application

HFAC processes the application by reviewing the information provided by the restaurant to verify that:

- The producer references by the restaurant is duly certified by HFAC,
- The product purchased by the restaurant is the type that is actually produced by the HFAC-certified operation,
- The operation's systems for identity preservation are sufficient to identify HFAC-certified product and keep it distinct from similar products.

All findings and decisions related to recognition are recorded.

- If HFAC finds that the application is in conformance with HFAC's standards, HFAC prepares and sends to the restaurant, a "Notification of Restaurant Recognition" along with a "Certificate of Recognition."

- If HFAC finds, upon review of the information submitted by the restaurant, that the information is inaccurate, unclear, that there are discrepancies related to the products sourced from HFAC-certified operations, or the operation does not meet the HFAC standards, HFAC contacts the restaurant to investigate the issue(s). The Certificate of Recognition is not issued until all non-conformance have been resolved.

5. Surveillance of Recognized Restaurants

Restaurants applying for recognition must agree to report to HFAC any significant changes to the information reported on their application and to supply any additional information needed by HFAC, upon request.

HFAC routinely includes restaurants in its system for marketplace surveillance.

Restaurants must grant HFAC permission to perform on-site inspections, including unannounced inspections, at HFAC's discretion. HFAC also retains the authority to require restaurants holding a Certificate of Recognition to submit any and all records related to HFAC-certified products within 30 days of the date of HFAC's request for the documentation, or to surrender the Certificate of Recognition.



Humane Farm Animal Care

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