In Depth: Global Animal Partnership



GAP Case Studies

This section provides background on Global Animal Partnership (GAP) and an overview of GAP's:

- Standards
- Certification process
- Audit process

- Label use guidelines
- Marketing support
- Costs

GAP Background

Mission. Global Animal Partnership (GAP) is a 501(c)(3) non-profit organization based in Austin, Texas, dedicated to "working collaboratively to facilitate and encourage continuous improvement and higher welfare in animal agriculture." GAP maintains multi-tiered certification standards ("Step Levels" 1-5+) for each species. The more rigorous an operation's welfare standards, the higher the "Step Rating" it may receive. Notably, GAP neither audits nor certifies farm businesses; it simply sets standards. It accredits independent certification companies to conduct audits and award GAP certifications on its behalf.

History. GAP began as the Animal Compassion Foundation, a program of Whole Foods Market® (WFM) created in 2005. In 2008, WFM renamed the program and spun off GAP as its own independent non-profit entity so that GAP could partner with other retailers and foodservice outlets. Notably, WFM and GAP are still significantly intertwined. First, they continue to share some management personnel, though GAP is looking to develop its next generation of leadership from outside WFM's ranks. Second, in 2011, WFM established a procurement policy of buying only GAP-certified fresh meats. As a result, according to GAP, the vast majority of current GAP-certified farm and ranch businesses maintain GAP certification in order to sell (or continue to sell) fresh meats into the WFM supply chain. GAP is currently working to build relationships with other retailers and foodservice outlets nationally and internationally.



For a Range of Farm Businesses. GAP certifies individual farm businesses, producer groups, and marketing groups. Notably, GAP provides certifications to "multi-step operations" (where the entire operation is step-rated but holds different step levels at the same time), "split operations" (where only part of the operation is step-rated) and "shared operations" (where two or more suppliers share one operation). GAP defines "operation" as a "farm, ranch, or other location that raises animals." Ultimately, every "operation" along the supply chain of a Step-rated product must be audited and certified.

Standards. Distinctively, GAP establishes standards but does not conduct audits or issue certifications. Farmers must apply to GAP-accredited independent verification companies for GAP-certification. Further, GAP maintains multi-tiered standards for each covered species, allowing farm operations to become certified at six different "Step Ratings", forthcoming (1-5 or 5+), depending on which species-specific tier of GAP standards their operations meet. For example, according to GAP:

Pigs raised in Step 1 systems typically live in a permanent housing structure and are provided the space to express natural behavior. In Step 2, they live in an enriched indoor environment. Pigs in Step 3 systems have access to the outdoors. In Step 4, they live continuously on pasture, with access to housing. In Step 5 and Step 5+, pigs live continuously outdoors on pasture and may only be housed during extreme weather conditions. At Step 5+, pigs spend their lives on a single farm, and are processed at a mobile or on-farm slaughter facility.

Animals covered. GAP currently covers the following animals:

Bison

- Pigs
- Beef cattle (not dairy)
- Meat sheep

Broiler chickens

- Turkevs
- Meat goats (not dairy)

In early 2017, GAP will add laying hens to its coverage with the release of new laying hen standards.

Where Sold. As mentioned, WFM supported the development of GAP for its own producers and now purchases only GAP-certified fresh meats. As a result, the vast majority of farm businesses maintaining or seeking GAP-certification are doing so to participate in the WFM supply chain (directly or indirectly). GAP is working to develop new retail and foodservice partners most recently announcing a partnership with Compass Group USA. To see a full list of where GAP products are sold, click here.

Looking Forward. GAP will publish new standards for broiler chickens, beef cattle, and laying hens. Additionally, according to GAP, it will continue to broaden its relationships beyond WFM. Specifically, GAP intends to develop its next generation of leadership from non-WFM personnel and continue building new partnerships (beyond WFM) in the retail and foodservice industries.

GAP STANDARDS

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

Standards Development

GAP uses a multi-stakeholder approach in developing (or revising) its standards. GAP seeks guidance and input from species-specific working groups, including producers and industry experts. Next, GAP creates draft standards, posts them for public comment; acknowledges comments and responds where appropriate; reviews comments and re-drafts where necessary; and submits draft standards to the Board of Directors for final review and approval. Once GAP finalizes a set of standards, it issues a Certification Manual to the accredited certification companies with audit-specific details for the new standards. Recently, GAP added a "field testing" component to their standard development process, where standards are trialed in the field prior to being finalized.

Stages of Life Covered

GAP's standards cover breeding, hatching, weaning, on-farm life, and transport. GAP does not have its own standards for slaughter. Instead, it generally requires that slaughter operations meet **American Meat Institute (AMI) guidelines** and industry audit norms. GAP does not require additional audits of slaughter facilities provided the facility has a current third-party industry audit that meet its criteria. Currently, GAP does not require industry slaughter standards be met for broiler chickens and beef cattle, but anticipates that this will change in the near future as AMI revises the guidelines for these species.

Record-Keeping Requirements

Though GAP's record-keeping standards vary slightly across species, GAP generally requires:

A FARM PLAN REGARDING:

- Feeding and water
- Animal health
- Routine husbandry procedures
- Management of outdoor areas
- Emergency procedures
- Environmental management

A RECORD OF:

- Traceability, birth to slaughter
- Daily flock incidences
- Medication & treatment
- Procedures for bringing animals on site & biosecurity policies for employees and visitors
- Employee training

Note: Requests for Deviation

A farm may apply to carry out a practice or use a substance that GAP standards generally do not permit. To do so, they submit a **Deviation Request Form** to GAP and the certifier. (While GAP-accredited certifiers make certification decisions, GAP must evaluate all deviation requests.)

GAP CERTIFICATION PROCESS

GAP certifies individual farms, producer groups, and marketing groups. Every individual farm within the supply chain of a product must be certified in order for the final product to be marketed as Step-rated. The certification process described below applies to individual farms. For more information about the certification process for individual farms and other entities, review the **GAP Policy Manual**.

STEP ONE

Review GAP Standards & Policies

- Read GAP standards, standard clarifications and the GAP Policy Manual to confirm your farm will comply with relevant standards and policies.
- Formally confirm that your slaughter facilities comply with relevant GAP and industry association standards and audit norms by supplying a copy of the third-party industry audit.

STEP TWO

Submit Application

- Contact a GAP-accredited certifier for a quote on audit costs, to schedule an audit and to inquire about the audit process.
- Submit an application for certification to the certifier.
- **Note:** Certifiers and GAP treat your business information as confidential.

STEP THREE

Facilitate an Audit

- Your GAP-accredited certifier will conduct an audit in accordance with GAP standards.
- Generally, an audit consists of one auditor spending one day on-site examining your facilities, animals and records.
- Note: Certifiers and GAP treat observations and information collected during the course of the audit as confidential.
- For more information on the audit process, see <u>next page</u>.

STEP FOUR

Obtain Certification & Use Label

- The certifier will make a certification determination.
- Your operation will be rated at the highest Step on the "5 Step" scale (1-5+) for which all aspects of it qualify.
- Certification status is good for 15 months.
- Note: You may appeal certification decisions and submit formal complaints regarding other program concerns.

STEP FIVE

Recertification & Changes to Certification

- Every 15 months, you must apply for recertification and undertake a recertification audit.
- At any time, you may seek a Step upgrade by providing the certifier relevant evidence (documents, photographs, statements).
- During the certification cycle, you are responsible for reporting to the certifier any changes that may potentially impact your Step rating. You must report these changes prior to the change going into effect; failure to report changes can result in suspension or revocation of certification.
- **Note:** Your certification may be suspended or terminated for various reasons, as set forth in the **GAP Policy Manual** Chapter 6.

GAP AUDIT PROCESS











Step 2

Animals

Step 3 Records

GAP-accredited certifiers conduct audits of facilities, animals and records to assess and potentially certify your operation's conformance with GAP standards and policies.

When Are Audits Required?

- Initially: A GAP-accredited certifier conducts an audit as part of the initial certification application process.
- For recertification: To maintain certification, you must undertake an audit between the 13th and 15th months of your certification periods.
- Unannounced: GAP-certifiers do not conduct unannounced audits.

Who Conducts Audits?

• Generally: GAP does not conduct GAP-certification audits. Instead, it requires that farmers and ranchers seeking GAP certification apply to one of three independent, GAP-accredited certification companies to be audited and certified:

GLOBAL ANIMAL PARTNERSHIP 5-STEP® CERTIFIERS







Earth Claims, LLC (USA & Canada)



AUS-Meat Limited (Australia & New Zealand beef & sheep only)

- Background & Training: Certifiers must apply to GAP's Certifier Accreditation Program and become accredited by GAP before conducting any audits. Certifiers must submit an annual application for each species they perform audits for, which includes:
 - Proof of an auditor and reviewer training program specific to the GAP program
 - Proof of an administrative team training specific to the GAP program
 - A list of auditors and reviewers that will be conducting GAP audits, complete with a description of each individuals relevant education and experience
 - All of their audit forms and related certification documentation for approval prior to use

Impartiality: According to GAP, the fact that they work with independent certifiers means that
 "farmers, consumers, and retailers alike can be confident that Step ratings are fair, accurate, and
 free of any conflict of interest."

What Happens During an Audit?

The audit process varies somewhat depending on the type of entity being audited. However, all audits are based on GAP standards and GAP-approved audit forms. Generally, the audit process involves the following steps. (For more information about the audit and certification process for specific kinds of business entities, review **GAP Policy Manual** Chapters 4-6.)

Pre-audit: Off-farm activity

- **First contact.** After you submit your application to the GAP-accredited certifier, an auditor will contact you to schedule a time for the audit. During that call, the auditor will explain the audit process and answer your related questions.
- Note: Two choices. If you are in the United States, you currently have two choices for GAP-accredited certifiers/auditors: EarthClaims LLC and IMI Global. These companies have similar audit processes but different fee structures, as discussed on page 11. Contact both companies to seek quotes before applying to one:

EarthClaims LLC: **info@earthclaims.com** or 202-596-5592 IMI Global: **info@imiglobal.com** or 303-895-3002

Audit: On-farm activity

- Discussion. The auditor will meet with the individual responsible for the farm's day-to-day
 management to discuss what the audit will entail, and to address questions. The auditor may
 also meet with employees, transporters and catching crew members, depending upon the
 operation.
- Observation of facilities and animals. The auditor will observe the facilities and animals for compliance with relevant GAP standards.
- Review of Records. The auditor also reviews relevant records, examining farm policies and processes; ensuring a traceable "chain of custody" demonstrating that each species was born, raised on and transported between only GAP-certified operations; medical treatments; incidences of lameness; and other records listed on page 3.
- Exit Interview. At the end of the audit, the auditor will meet with you to summarize his or her
 findings and provide you with an overview of observed nonconformances, if any. During
 this meeting, you have the opportunity to provide corrections, clarifications and additional
 information.
- **Overall length.** The length of the audit varies depending on the size and complexity of the operation. According to GAP, most audits of individual operations take one day or less.



- Note: Video & Technology Alternative. In place of on-site observation by an auditor, a farm
 or ranch may submit video or other "electronic monitoring records" to enable certification
 review of limited, specific operational procedures, including:
 - Catching (broiler chickens)
- Herding (turkeys)
- Crating (broiler chickens)
- Loading (turkeys, pigs, beef cattle)

For more information on video & technology, review GAP Policy Manual Chapter 4.

Post-Audit: Follow-Up & Corrective Action

- **Determination.** After the exit interview, the auditor submits the audit form to a separate reviewer, who makes one of three determinations:
 - 1) Your operation complies with GAP standards for a specific Step level and is certified accordingly;
 - 2) Your operation has correctable (non-"critical") non-conformances;
 - **3)** Your operation fails the audit because the auditor was denied entry to areas of the operation, there is a "critical" non-conformance or there are significant animal welfare concerns.
- Corrective Action. If the certifier deems that your operation has correctable non-conformances, it will provide you with a Corrective Action Plan (CAP) form identifying and describing them. You must complete and return the CAP within three weeks (to avoid the certification period being shortened), describing the steps you have taken or will take to correct the non-compliances and a schedule for doing so. The certifier will not grant certification until all compliance concerns identified on the CAP are corrected.
- **Denial.** If your farm is denied certification, you may reapply at any time.

Do GAP-Certifiers Audit Slaughter Facilities?

Generally, no. GAP's standards do not require that certifiers audit slaughter facilities unless the facility does not have an existing animal welfare auditor. Rather, they require that slaughter facilities follow certain industry association guidelines and industry-specific audit norms. For example, for pigs and "red meat species" at all Step-levels, the animals must be:

- Stunned and rendered insensible prior to slaughter
- Slaughtered at a facility that has passed and holds a current annual third-party animal welfare
 audit using the American Meat Institute's Recommended Animal Handling Guidelines and
 Audit Guide (July 2013 edition), where the plant must pass all the core criteria and all secondary
 criteria, and have an overall minimum score of 90%

Slaughter facilities must provide a copy of their written in-plant segregation and traceability protocol outlining how Step-rated animals, and differing Step-ratings if applicable, are kept segregated from non-Step-rated animals and product.

Currently, GAP has no slaughter requirements for boiler chicken and beef cattle operations. However, GAP has stated that it plans to publish such standards in the near future, and that the standards will take a similar approach to those for pigs described above.

Additional Inspection Information

For additional information on the GAP audit process, review **GAP Policy Manual** Chapters 4-6, including the following figures:

Audit Process Flowchart	Chapter 4, Figure 1
Certification Process Overview	Chapter 4, Figure 2



GAP LABEL USE GUIDELINES













GAP is currently developing a label use guide. In the meantime, only the following GAP label rules are publicly available. For questions on GAP label topics not covered here, contact GAP **directly**.

Required Marketing Claims

For Step-certified products, the following marketing claims must be added to box/carton labels:

STEP	MARKETING CALLOUT
1	No Cages, No Crates, No Crowding Certified to Global Animal Partnership standards by [insert certifier(s)] www.globalanimalpartnership.org
2	Enriched Environment Certified to Global Animal Partnership standards by [insert certifier(s)] www.globalanimalpartnership.org
3	Enhanced Outdoor Access Certified to Global Animal Partnership standards by [insert certifier(s)] www.globalanimalpartnership.org
4	Pasture Centered Certified to Global Animal Partnership standards by [insert certifier(s)] www.globalanimalpartnership.org
5	No Physical Alterations Certified to Global Animal Partnership standards by [insert certifier(s)] www.globalanimalpartnership.org
5+	Animal Centered: Entire Life on Same Farm Certified to Global Animal Partnership standards by [insert certifier(s)] www.globalanimalpartnership.org

Labeled Product Authorization Program – Approval Needed

GAP permits makers of retail-ready packaged items containing GAP-certified ingredients to join a Labeled Product Authorization (LPA) Program in which they pay a \$0.05 fee (per case) to utilize the relevant GAP 5-Step certification seal. The party that will ultimately be marketing the product is the party responsible for the fee. LPA program participants need to complete an application and receive program approval prior to using this seal. The application includes the following information:

- Identification of retail-ready items
- Manufacturers of items
- Animal product ingredients in items
- Chain of custody
- Sources of animal product ingredients
 Sample labels for approval

To use the relevant GAP Step label on a bulk product—any product that is not retail-ready—the entire supply chain used to produce the bulk product must be GAP-certified. There is no fee or approval process to use the GAP label on bulk products.

USDA-FSIS Label Approval

As described in the **USDA-FSIS** section, prior to use of the GAP label, approval by the United States Department of Agriculture (USDA) Food Safety & Inspection Service (FSIS) is required.



GAP MARKETING SUPPORT

Marketing Your Products

Historically, GAP promotes GAP-certified producers, as well as retailers and foodservice partners selling GAP-certified products, by listing them and displaying their logos on GAP's website.

Next Steps: Support to Producers

In 2017, GAP plans to launch its "Adding Value Program," which aims to support GAP-certified producers by:

- Providing a more comprehensive list of Step-rated products on GAP's website
- Offering dedicated social media support and promotional activity
- Distributing species-specific brochures
- Providing processor sourcing support and carcass utilization support for raw material providers
- Offering the opportunity to subscribe to GAP's new benchmarking program
- Launching a Producer Resources program

GAP COSTS

Just the audit. Applicants pay the costs of the certification audit (initially and again every 15 months as part of recertification) directly to the certifier. The certifier pays \$100 from every audit to GAP. The applicant does not pay GAP any fees directly.

Fees vary per certifier. In the United States, there are two GAP-accredited independent verification companies you may apply to for GAP certification and auditing. Each company has its own fee structure:

	IMI GLOBAL	EARTHCLAIMS, LLC
Cost	Depends on species and complexity of operations.	\$1,650 flat fee
	Example:	
	 Beef: Initial audit of single operation \$1750 (plus travel). Recertification audit = \$1,500 (plus travel). 	
	 Chicken with integrator: Initial audit of single operation = \$1450 (plus travel). Recertification audit = \$1000 (plus travel). 	
Auditor Travel Costs Extra?	Yes	No
Group/Integrator Discounts Negotiable?	Yes	Yes

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



COLD SPRING RANCH

North New Portland, Maine



Owner Gabe Clark and his herd of Angus cattle on Cold Spring Ranch.

Operation Profile: 150 Angus stockers / year

Certification: GAP Step 4

Background

Gabe Clark started Cold Spring Ranch in 2005, when he purchased a 240-acre failed dairy farm in Maine to raise Angus stockers. In his first year, Gabe processed 24 calves. Today he and his wife, Molly, process around 150 cattle per year. They sell to restaurants, Bates College, directly to the public, and a significant portion of their sales are to Whole Foods Market® (WFM). Gabe says he raises his cattle free-ranging throughout the year and provides a 100% grass diet.

Getting Certified

Currently, Cold Spring Ranch beef products are rated as Global Animal Partnership Step 4, GAP's "pasture-centered" level. In 2007, WFM bought Wild Oats, where Gabe was selling products. When WFM required that fresh meats be GAP-certified, Gabe sought and maintained GAP-certification so that he could continue to sell to WFM.

Gabe says, "I didn't have to change a thing about my operation to participate." He just had to tweak methods of record-keeping "to formally document what I was already doing."

Gabe pays certification costs for his farm, the three farms from which he purchases calves, and his processor. He covers the other operations' costs because, as he sees it, he is "asking them to do more," in terms of GAP's record-keeping requirements. Currently, he pays his GAP-certifiers and processor certifiers over \$10,000 per year.



A stunning panoramic view of Cold Spring Ranch.

GAP Certification Outcomes

Product Differentiation. In Gabe's view, America's agriculture economy has evolved in such a way that the beef cattle farmer has two business models to choose from and/or work towards: (1) high-volume (low-cost) production with low profit margins or (2) high profit margins on low-volume (higher-cost) production. According to Gabe, for the latter model, the price premiums that drive the higher profit margins have to be justified by some meaningful product differentiation.

Gabe points to GAP standards as giving him "negotiation power." "As they add more requirements," he explains, "it gives me more safety with the markets that request them." Each new animal welfare standard is another hurdle that a competitor might not aim to surmount.

Market access. WFM is Cold Spring Ranch's single largest customer. Gabe appreciates the reliable sales outlet, though notes that his ability to benefit from this market access is limited by the numbers of cattle he can produce given his land base.

10%+ Premiums. Gabe contracts with three Maine cow-calf operations for his GAP-certified cattle. He states that he pays them at least a 10% premium, part of which is to compensate them for their efforts complying with GAP's requirements. Over time, he has been able to pass those costs along to WFM. (Note: Farms that do not sell directly into WFM may still sell animals to farms that do, and benefit from related premiums. With that in mind, Gabe advises farms to contact their closest WFM to ask about which local farms sell directly to the store).

Supporting Local Economies. Gabe and his three calf providers "essentially joined forces to have enough acres to make enough animals to meet a market." As a result, he looks at WFM, GAP, and the premiums GAP contributes to earning, as mechanisms for supporting the local farmers with whom he works.

Improved Animal Welfare. According to Gabe, strict welfare standards—like early castration and late weaning—are "just good management" in that they reduce stress and trauma that can contribute to illness.

Why Certify with GAP?

"You want to have your product be worth something? Differentiate it," advises Gabe. For producers who are already close to meeting GAP standards and could potentially develop a relationship with WFM or another farm that sells into WFM, "the barrier is just knowledge of opportunities and the potential benefits."

MARY'S FREE RANGE CHICKEN PITMAN FARMS

Sanger, California



Operation Profile:

- Processes 500,000+ chickens per week
- Produces and processes non-certified turkeys & ducks

Certification: GAP Steps 3, 4 & 5

Background

Mary's Free Range Chicken ("Mary's") is produced by Pitman Farms, a family-owned business in Sanger, California, that has been raising poultry for three generations. One generation ago, Pitman Farms was a traditional poultry operation. According to David Pitman, the family turned to higher welfare practices based on an interest in the links between animal welfare and food safety, increasing discomfort with the welfare of conventionally raised animals and rising consumer demand for higher welfare alternatives.

About 90% of the 500,000 chickens processed each week under the brand are GAP Step-3 certified. The remaining 10% are certified at Step levels 4 and 5. Chickens are sourced from Pitman Farms and other California-based GAP-certified farms, as well.

Getting Certified

Mary's received GAP certification in 2008. According to David, Mary's pursued certification because customers had started asking, "What certification are you using?", and David suspected that "the days were numbered" of companies confirming operational information to customers "by affidavit on company letterhead." The trend was arcing toward the need to "verify."

Mary's had already been selling its products to Whole Foods Market® (WFM) prior to GAP's launch, and was required to obtain GAP certification in order to continue doing so. David said that GAP's flat fee approach to audits made program participation palatable.

According to David, in order to become GAP-certified, Mary's had to make some changes to its operation. For example, it had to add hay bales and eucalyptus branches as enrichments to its chicken-houses. Mary's also had to create more infrastructure to supply shade and water outside. Finally, to comply with GAP's record-keeping requirements, Mary's had to start administering more detailed and varied paperwork.

David explains that Mary's also had to "gently" bring suppliers on board with GAP by (1) discussing the pros and cons of participation; (2) paying for retrofits and improvements needed to meet GAP standards (like adding enrichments and doors for outdoor access); (3) paying for initial and annual certification costs (Mary's pays approximately \$1,750 per audit per farm); and (4) offering them a premium. According to David, Mary's helps supplier farms prepare for audits on a continuing basis. Specifically, Mary's farm supervisors visit the farms to help ensure proper audit preparation and also conducts "pre-audits" to "give them a taste of it" before the official audit.

GAP Certification Outcomes

Increased Sales. Mary's started producing pasture-raised chicken in 2005 and had trouble selling the product. In 2008, they sought and received Step 5 certification, and sales doubled. It did so, David thinks, "because there was a simple scorecard system. Looking at a quick [Step] 5 or a quick [Step] 3, [consumers] can quickly understand the difference."

Product Differentiation. Mary's leverages its GAP certification in marketing. It uses the GAP logo on its products. Additionally, its website contains an "Animal Welfare" section dedicated to describing "What Makes Our Chicken Different?" The website includes a chart of select GAP standards for Step Levels 3 through 5.

Premiums. David reports that Mary's Chicken pays a 10% premium to its GAP-certified supplier farms. This is, in part, to cover the increased effort and costs of record keeping, enrichments, and "free-range" conditions.

Trickle Down Animal Welfare. Mary's Chicken has expanded its operations and sources from multiple farms which then must be GAP-certified.

Why Certify with GAP?

David recalls feeling slightly overwhelmed the first time he read through all of GAP's welfare standards. However, he points to the following as what he believes to be benefits of pursuing GAP certification:

- Consumers are demanding more humane treatment of farm animals and "being third-party verified brings confidence to the consumer."
- It is required by Whole Foods Market®.
- The audit has a flat fee per farm (Mary's certifier is EarthClaims LLC).
- "What I like about GAP is the fact that it's a scorecard." In David's experience, the step levels help consumers differentiate among products and even between GAP-certified products.
- David suggests GAP may be increasingly relevant outside the WFM context. Two other retailers have purchased chicken from Mary's on the basis of it being GAP-certified.
- Finally, David speculates that even smaller farms targeting local markets (like those in California processing 500 pasture-raised chickens per week) might benefit from GAP certification to differentiate their products and explain their higher prices to consumers.



Owner David Pitman and his family on Pitman Farms.