

FACTA, LLC Animal Welfare Cage Free Layer Audit Tool and Standards



FACTA, LLC ("FACTA") is a nationally recognized leader in designing cutting-edge and pragmatic training, verification, and certification tools. Our team works to create and implement socially responsible on-farm company policies to protect livestock, brand, and profits in an economically sensible manner. We strive to ensure that FACTA's standards not only meet market expectations but exceed them. As such, all audits will be conducted by PACCO certified auditors.

The audit is comprised of six sections, the 1st of which covers corporate responsibilities. In this section, various general polices or programs in place to ensure animal welfare (AW) and verification of relationships with a veterinarian and nutritionist, among other things are verified. Beak trimming (2) and molting (3) are only completed if applicable to the system. Section 4 evaluates the AW of birds on-farm and will be completed **for each laying hen house** observed during the audit. Specific housing requirements will be calculated for each laying hen house audited. Section 5 of the audit tool discusses catching and transportation of spent hens to processing plants. If applicable, FACTA requires the SOPs are in place to ensure humane catch and transportation of spent hens to a processing plants. If possible, a FACTA auditor will observe catch and transportation of spent hens and complete section 6 of the audit.

The AW auditor will award points for each standard in compliance, except for questions labeled as "major non conformances", which are scored on a pass or fail basis. A total of 10% of the Company's laying hen houses must be audited. Each layer house serves as an individual audit. Should one or more houses fail, the entire company will not receive FACTA's Humane Certification until a corrective action has been documented and a re-audit has been conducted of the house(s).

The following scenarios will result an audit failure:

1. Not meeting the requirements of any major non-conformance criteria.

Any major non-conformance will result in the immediate failure of that audit section. The audit will still be completed in its entirety but a corrective action and re-audit are required.

2. Willful acts of animal abuse or neglect.

During the audit, if an AW auditor witnesses a willful act of abuse or neglect this will result in an immediate failure of the audit. If this occurs and it is safe to do so the AW auditor should immediately report this incident to the site representative. Willful abuse and neglect is determined by, **but not limited to**, hitting, kicking, or other forms of malicious intent to cause harm to a bird, aggressive handling such as picking up and/or carrying a bird by one wing, head or neck, at any time.

3. Any audit section receiving a score less than 80% is an audit failure.

Any section that receives a score of 79% or lower will require a re-audit of that section after a corrective action has been submitted and approved by FACTA. After the corrective action has been approved, a re-audit of that section will be conducted within 30 days. Further instructions for submitting corrective actions and the re-audit process are below.

Corrective Actions/Re-audit:

A corrective action and re-audit are required for every failure described previously. Corrective actions must be submitted within 7 days of the audit failure to FACTA. The corrective must include, at a **minimum**, the details of which type of failure occurred, why it occurred, and what steps the company has/will take to address the circumstance(s) that led to failure (major non-conformance, willful act of abuse or neglect, or a score of less than 80%). FACTA recognizes that some corrective actions may take longer than 7 days to complete. FACTA may extend the timeline on corrective actions on a case by case basis. Once FACTA has approved the corrective action a re-audit must occur within 30 days from the initial audit date unless otherwise approved by FACTA.

Corporate Policies and Responsibilities - Section #1

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|--|--|-----------------------------|
| 1.1.0 | Does the company have a written program for animal welfare describing how the program is operated throughout the company? | Document and verify written program. | Major Nonomfor mance |
| 1.2.0 | Does current senior management sign off on the animal welfare program annually? Is there an annual review of documented operating procedures? | Document and verify. | Major Nonconfor mance |
| 1.3.0 | Does the company have an internal auditing inspection process in place? If so, how frequently is it to be completed? | The company must have an internal auditing inspection in place at least annually . Document and verify that this is being followed consistently. | Major Nonconfor mance |
| 1.4.0 | Does the company have a certified veterinarian available for consultation as needed? | Verify veterinarian-client relationship by one of the following ways • Documented letter signed by veterinarian pertaining to veterinarian-client relationship. • Viewing vaccination/medication prescriptions. • Veterinarian-client contract. | Major Nonconfor mance |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|---|--|-----------------------------|
| 1.5.0 | Does the company have a certified poultry nutritionist responsible for formulating diets for laying hens? | Verify nutritionist-client relationship by one of the following ways • Documented letter signed by nutritionist pertaining to nutritionist-client relationship. • Viewing formulation records. • Nutritionist-client contract. | Major Nonconfor mance |
| 1.6.0 | Are employee(s) trained in layer welfare? Are on-site workers going through an orientation program, i.e., are employees trained in layer welfare before handling live animals? Do on-farm employees have a documented layer welfare training program conducted annually for all employees involved in handling of live animals (multilingual, if necessary; verbal translation of materials at time of training is acceptable)? | Any individual that is responsible for animal welfare/care or handling must be trained. This includes; on-farm employees and growers. Orientation training must be completed prior to any individual being responsible for animal care or handling. Orientation at minimum must cover; the Company's animal abuse policy, humane handling and euthanasia if applicable. On-farm employees must also have documented annual training of animal welfare. Training records should include: Name(s) of trainees. Name(s) of trainer. Date(s) of training. Description of procedures and/or polices trained on. | 10 |
| 1.7.0 | Does the company have a written euthanasia protocol that adheres to AVMA guidelines? | Verify that the company has a written protocol including all euthanasia methods utilized on-site and that all methods follow the AVMA guidelines for the euthanasia of poultry. | 10 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|--------|---|--|--------------------|
| 1.8.0 | Are employees trained on methods of euthanasia in compliance with the company's protocol and AVMA guidelines at orientation and on an annual basis? | Verify that employees are trained on euthanasia methods at orientation and annually. | 10 |
| 1.9.0 | Does the Company have a written Emergency response plan and contacts in place in case of fire, weather, power outages and other natural disasters? | Emergency contacts must include the name and phone numbers of all individuals notified in emergency situations. Emergency plans must include, at a minimum, a plan for fire, weather related issues, and power outages. | 10 |
| 1.10.0 | Does the company lighting program require a minimum of 8 hours of light and minimum of 6 hours of dark? | Verify that the company has a written lighting program. Light can be provided artificially or naturally. If artificially provided, a minimum of 0.5 foot-candle is required. | 10 |
| 1.11.0 | Does the company have a written maximum and minimum temperature policy based on the age of the birds? | Verify that the company has a written temperature policy. | 10 |
| 1.12.0 | Does the company have a written bio-security plan that discusses how to prevent rodent and pest access to laying hens? | Company must have a written bio-security plan that includes rodent management (i.e. maintaining bait boxes, managing vegetation, feed spills, restricting access of flies, rodents or other pests, etc.). | 10 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|--------|--|---|--------------------|
| 1.13.0 | Is there a company policy on managing litter, ventilation, drinking systems and/or feed formulations? | Company must have a written program that discusses managing litter, ventilation, drinking systems and/or feed formulations in order to maintain appropriate paw integrity. Paw integrity is verified by using the National Chicken Councils (NCC) guidelines and example. Use the AAAP Paw Scoring System (Appendix 4) to score paws as either a 0 or 1. | 10 |
| 1.14.0 | Is there evidence of prohibited backfilling within the Company? | Backfilling is prohibited unless it is in response to catastrophic event and FACTA has been notified beforehand. The company must have a backfilling policy that details the events in which backfilling may be acceptable and state that FACTA will be notified before backfilling occurs. | 30 |
| 1.15.0 | Does the Company have a written action plan or protocol in order to prevent pecking and cannibalism in cage free laying systems? | In cage free systems, pecking and cannibalism can occur which severely impacts the welfare of laying hens. The company must have a written action plan or protocol in place to prevent pecking and cannibalism. This plan or protocol must include steps to resolve pecking or cannibalism if they occur. FACTA recognizes that beak trimming is a way to reduce the occurrence of pecking or cannibalism and allows it only if completely necessary. If beak trimming is practiced, the auditor must complete the beak trimming section of the audit. | 20 |
| | Corporate Policies and Respons | sibilities - Section #1 | 130 |

Beak Trimming Policies and Practices - Section #2

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|---|---|--------------------|
| 2.1.0 | Does the company preform beak trimming on laying hens? | If yes, continue with the rest of <i>Beak</i> Trimming Policies and Practices- Section #2. If no, mark N/A and continue on to the Molting Policies and Practices Section #3. *If beak trimming occurs at the hatchery before pullets are placed in houses this section still needs to be completed. | Yes or N/A |
| 2.2.0 | Does the company have a written protocol detailing how to properly beak trim that includes how to maintain equipment in order to effectively beaks trim without causing unnecessary pain? | Manufacturer recommendations should be followed regarding care of the beak trimming equipment. Blade and guide holes should be cleaned regularly. The company must have a written protocol detailing how to properly beak trim following manufacturer recommendations. Review company records for assurance that the equipment is cleaned daily; the cleaning must be documented and verified by a company representative. | 10 |
| 2.3.0 | Does the beak trimming crew receive training and monitoring for quality control? | Review training records and visually observe beak trimming if possible. Training records must include: Name(s) of trainees. Name(s) of trainer. Date(s) of training. Description of procedures and polices trained on. Compliance is considered if training documentation is present and no more than of birds out of 100 (0.03%) are improperly trimmed or handled. If an observation of beak trimming is not possible, the auditor must look at past training records from the farm or hatchery. | 10 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|--|---|--------------------|
| 2.4.0 | Was the first trimming completed by 10 days of age by a trained individual? | Review company records and verify that trimming was completed within 10 days of hatch. | 5 |
| 2.5.0 | If a second trim was needed, was trimming complete by 8 weeks of age or younger by a trained individual? | If a second trim was not conducted award 5 points. If a second trimming was conducted, review dated records to ensure a second trim did not occur later than 8 weeks post hatch. | 5 |
| 2.6.0 | Are nutritional supplements provided before and/or after beak trimming? | Review dated records maintained by the company to assure Vitamin C or K has been added to the diet before and/or after to help with coagulation. | 5 |
| 2.7.0 | Are adjustments made to feed and water level until beaks were healed? | Review records and verify that employees are routinely observing water and feed systems for a week or more after beak trimming. Verify beaks have healed and rations were returned to normal. | 5 |
| | Beak Trimming Policies and Practices - Section #2 | | 40 |

Molting Policies and Practices - Section #3

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|--|--|--------------------|
| 3.1.0 | Does the company use a molting program? | If yes, continue with the rest of the molting section. If no, mark N/A and continue on to catching and transportation. | Yes or N/A |
| 3.2.0 | If molting occurred, was a nutritionally adequate diet with added supplements made available throughout the molt with oversight by a poultry nutritionist? | Review documentation and records. Records must demonstrate that a modified diet was provided and nutritionist involved. Document the nutritionist's name. This can also be verified by: • Statement from the nutritionist regarding the diet formulation during the molting period. • Direct contact with nutritionist. • Contract between nutritionist and company. • Feed formulation order form with nutritionist name present. | 10 |
| 3.3.0 | Is water provided at all times during the molting process? | Document the auditor findings and that molting process meets FACTA guidelines. Water must be available at all times. | 10 |
| 3.4.0 | Is weight loss and mortality monitored during the molt? | Records must not show a loss in weight of layers exceeding 30% of the starting weight. Review records pertaining to mortality, expressed as a percentage (%) of total layers in the house during the molt. | 10 |
| 3.5.0 | If molting occurred, were layers exposed to a minimum of 8 hours of light? | Review company policy or records. | 10 |
| | Molting Policies and Practices - | Section #3 | 40 |

Housing Requirements and Farm GMP Audit Section #4 (*Filled out for each Layer House)

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|---|--|--------------------|
| 4.1.0 | Is someone responsible for animal welfare in the live operations department? | Verify the employee and credentials. Document the name and title of the employee. | 5 |
| 4.2.0 | Signature of the site manager ensures corrective action is taken when a laying hen's wellbeing is jeopardized by injury. | Obtain the signature of the caretaker or grower responsible for the laying hen's well-being. | 5 |
| 4.3.0 | Are the emergency contacts and emergency plans in place in case of fire, weather, power outages and other natural disasters available on site? | Emergency contacts and plan must be visibly available on site. Emergency contacts must include the name and phone numbers of all individuals notified in emergency situations. Emergency plans must include at a minimum plan for fire, weather, and power outage. | 10 |
| 4.4.0 | Is there a company written? lighting program available on farm and is it being followed? For artificial light, is there a minimum of .5 foot candles in the housing? | Verify that there is a written lighting program in place or available on the farm. Verify the program is being followed. A minimum of .5 foot candles must be provided for artificial light. All areas must be in compliance. | 10 |
| 4.5.0 | Is the company written maximum and minimum temperature policy based on the age of the birds in each house or primary rest area for range layers available on-site? | Verify that the company has a written temperature policy. | 10 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|--------|---|---|--------------------|
| 4.6.0 | Is/are the grower(s) following the company's euthanasia protocol that adheres to the AVMA guidelines? | Verify that euthanasia method follows company's protocol and AVMA guidelines. Verification can be done verbally or visually. | 10 |
| 4.7.0 | Is the written bio-security program available on-site and being followed? | Verify that the written protocol is available on-site and grower(s) is/are following the protocol (i.e. check bait boxes if applicable). | 10 |
| 4.8.0 | Is the written litter maintenance plan available on site? Is/are grower(s) following the litter maintenance plan? | Verify that the written litter maintenance plan is available on site. Grower(s) must be following the litter maintenance plan. | 5 |
| 4.9.0 | Are the drinkers and feed levels such that the layers can access them at all times? | Layers must be able to access feed and water at all times on the farm until the feed withdrawal period (prior to shipment to the processing plant). | 5 |
| 4.10.0 | Are feed lines and nipple waters in proper working order and well maintained? | Verify that all feed lines and nipple waters are free from debris or litter, and in proper working condition. Auditor must two separate water and feed lines. | 5 |
| 4.11.0 | Is there a minimum of 1 nipple waterer per 10 hens? | Verify that at least 1 nipple waterer per 10 hens is available. | 15 |
| 4.12.0 | Is there a minimum of 1.5 inches of double-sided trough space per bird provided? | Verify feeder space. | 25 |
| 4.13.0 | Are mortality and culls being checked and documented at a minimum of once daily? | Verify the cull and mortality are removed and recorded at least once a day. | 5 |
| 4.14.0 | Is there a minimum of 1 square footage (sq.ft.) of space requirements for laying hens? Total floor space should exclude nest boxes. | Laying hens must have at least 1 sq.ft. of space. | 40 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|--------|--|---|--------------------|
| 4.15.0 | Is at least 15% of the total sq. ft footage available littered? | Verify that at least 15% of the total square footage is littered so that hens can dust bathe and exhibit other natural behaviors. | 20 |
| 4.16.0 | Is the ammonia level in the growing house below 25 ppm? | Document ammonia levels from a digital ammonia reading device. Take the ammonia reading at least three times throughout the house at bird height. | 25 |
| | Are corrective actions taken when this level is exceeded? | Document any corrective actions recorded due to high ammonia levels. | |
| 4.17.0 | Is the litter in the house dry and of good quality so that hens may forage and dust bathe? | Verify that litter is dry and well maintained by preforming the "squeeze test" in at least 3 areas of the floor. To conduct a squeeze test, remove the top portion of the litter and grab a handful of litter. Squeeze the litter and if it doesn't form a clump, then the litter is dry and in an acceptable condition. If litter clumps together, the litter is considered too wet and unacceptable. | 15 |
| 4.18.0 | Is the gait score averaged over the flocks assessed above .75? | See U.S. Gait Scoring System. | 20 |
| 4.19.0 | Is there a minimum of 6 inches of linear perch space available per hen? | Verify perch space. Perches must be wide enough so that birds can effectively wrap around the perch. | 40 |
| 4.20.0 | Are at least 20% of the perches elevated higher than 12 inches and is there at least 10 inches of horizontal distance between perches? | Studies indicate that elevated perches are preferred by hens during the evening, therefore, FACTA requires that at least 20% of the total perches available be elevated at least 30 cm (10 inches) to accommodate this natural behavior. | 20 |
| 4.21.0 | Are all perches in good and proper working condition? | Verify that perches do not have sharp edges that can cause injuries to hens and are in proper working order. | 5 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|--------|---|---|-----------------------------|
| 4.22.0 | Is there at a minimum 9 square feet of nest space per 100 hens? | Verify nest space per 100 hens. | 20 |
| 4.23.0 | Are nests in proper working condition and well maintained? | Nests should have the appropriate flooring to encourage egg laying. Nests should also be well maintained, free of unnecessary debris, clean and have no sharp edges. | 5 |
| 4.24.0 | Was there any evidence of backfilling the flock? | Backfilling is prohibited unless it is in response to catastrophic event and FACTA has been notified beforehand. Review flock records to ensure that no backfilling occurred without FACTA being notified. | 30 |
| 4.25.0 | Did the auditor witness any acts of animal abuse or neglect? | Animal abuse or neglect is a major nonconformance. Abuse and neglect include, but are not limited to, hitting, kicking, or other forms of improper handling. | Major Nonconfor mance |
| | Housing Requirements and Farm GMP Audit Section #4 | | 365 |

Catching and Transportation Welfare Audit- Section #5

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|---|---|--------------------|
| 5.1.0 | Does the Company transport spent hens to a processing plant? | If yes, the Company must have the written policies in place to ensure humane catch and transportation. When possible, the auditor should observe a catch and transportation and complete <i>Catching and Transportation Welfare Audit – Section #6</i> . FACTA recognizes that observing catch and transport of spent hens may not be possible. In that case, the company must have written policies in place and the auditor must complete this section. If the Company does not transport spent hens then mark N/A and skip <i>Section #6</i> . | Yes or N/A |
| 5.2.0 | Is someone responsible for layer welfare during catch and transportation? | Verify the employee and credentials. Document the name and title of the employee. | 5 |
| 5.3.0 | Signature of the site manager ensures that corrective action is taken when a layer's well-being is jeopardized by injury. | Obtain the animal welfare statement signature from the employee. | 5 |
| 5.4.0 | Are employees trained in layer welfare? Are on-site workers going through an orientation program, i.e., are employees trained in layer welfare before handling live animals? Does the live haul department have a documented layer welfare training program conducted annually for all employees involved in handling of live animals (multilingual, if necessary; verbal translation of materials at time of training is acceptable)? | Orientation training must be completed and documented prior to catchers being responsible for animal welfare. Catchers must have documented continual training of animal welfare in order to prevent animal abuse or neglect. Training records must include: Name(s) of trainees. Name(s) of trainer. Date(s) of training. Description of procedures and polices trained on. | 10 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|--------|--|---|--------------------|
| 5.5.0 | Does the live haul department have an emergency plan and phone numbers available? Are emergency contacts and emergency plans available on | Emergency contacts must include the name and phone numbers of all individuals notified in emergency situations. Emergency plans must include, at a minimum, a plan for fire, weather related | 10 |
| | site/trucks for emergencies such as fire, weather and power outages? | issues, and traffic accidents. | |
| 5.6.0 | Is water available to the birds at all times before they are removed from their housing? | The company must have a written policy. Review company policy and records. | 10 |
| 5.7.0 | Was feed withdrawn no more than 12 hours prior to moving the layers from their housing? | Review policies and records. | 10 |
| 5.8.0 | Does the company have a written temperature protocol for birds during transportation? | The company must have a written policy and auditor must verify policy. | 10 |
| 5.9.0 | The number of birds in the catcher's hand depends on the size of the bird and should not cause injury to the birds. Catchers should carry no more than three birds per hand. | The company must have a written policy on the number of birds carried during catching. The policy must state that hens are never to be handled by the legs, and never by one wing, head or neck, at any time. The policy must also state that hens must always be supported to reduce struggling as the bird is placed in the coop without hitting the sides or edges of the coop | 20 |
| | If the company is using mechanical loaders, they must do so in a manner to prevent harm or injury to the layers. | Mechanical loaders should be observed and in no way set up to cause injury or harm to a layer during the loading process. | |
| 5.10.0 | Does the company use carts to move pullets from the growing house to the laying house? | Verify and document what procedures are in place. | 5 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|--------|--|--|--------------------|
| 5.11.0 | Is there a documented protocol in place to address coop damage and make necessary repairs? | Describe the protocol. This would be a protocol to make fixtures to broken metal, rough flooring and nonworking doors to minimize injury opportunities during transport. | 10 |
| | Catching and Transportation Welfare Audit- Section #5 | | 95 |

On- Farm Catching and Transportation Welfare Audit- Section #6

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|--|---|--------------------|
| 6.1.0 | Did catchers remove layers carefully and place them into the transport coop so as to avoid bone breakage or injury? | Visually verify at loading or inspect records. | 30 |
| 6.2.0 | Visually inspect 120 coops for condition. Document the number of cages that are in proper condition. Live haul coops must be large enough for the birds to lie down and move around without being pinned by other birds in the cage. | At least 97% of 120 coops should be in "proper condition" would be the number of coops free of broken metal objects, working doors and bent metal. Gates or doors on each coop must close completely to prevent the accidental escape of birds during transport. The coops must be free of gaps four inches or more. | 15 |
| 6.3.0 | Are catchers carrying three birds per hand or less? | Visually verify that catchers are not: Carrying more than 3 birds per hand. Handling hens by one wing, neck, or head, at any time. Visually verify that catchers are: Supporting hens in order to reduce struggling as the hen is placed in the coop without hitting the sides or edges of the coop | 20 |
| 6.4.0 | Does the live haul department have an emergency plan and phone numbers available? Are emergency contacts and emergency plans available on site/trucks for emergencies such as fire, weather and power outages? | Verify emergency plans are available in truck. | 10 |

| Q# | Audit Tool | Verification/Guideline Process | Numerical Value |
|-------|--|--|-----------------------------|
| 6.5.0 | Did the auditor witness any acts of animal abuse or neglect? | Animal abuse or neglect is a major nonconformance. Abuse and neglect include, but are not limited to, hitting, kicking, or other forms of improper handling. | Major Nonconfor mance |
| | On- Farm Catching and Transportation Welfare Audit- Section #6 | | 75 |

Summary Sheet and Score

| Audit Section | Possible Points | Actual Points | Percentage (%) |
|--|--------------------|------------------|----------------|
| | | | |
| Corporate Policies and Responsibilities - Section #1 | 130 | () | |
| Beak Trimming Polices and Practices – Section #2 | 40 | () | |
| Molting Policies and Practices – Section #3 | 40 | () | |
| Housing Requirements and Farm GMP Audit - Section #4 | 365 | () | |
| Catching and Transportation Welfare Audit- Section #5 | 95 | () | |
| On-Farm Catching and Transportation Welfare Audit – Section #6 | 75 | () | |
| Major Non-Conformances – Sections# 1-6 | Pass/Fail | () | |