THIS ARTICLE IS SPONSORED BY THE
MINNESOTA DAIRY HEALTH CONFERENCE.

UNIVERSITY OF MINNESOTA

College of Veterinary Medicine

VETERINARY CONTINUING EDUCATION

ST. PAUL, MINNESOTA
UNITED STATES OF MINNESOTA

National Council of Chain Restaurants' and
Food Marketing Institute's Animal Welfare Audit Program

Eric C. Hess
SES, Inc.

The Animal Welfare Audit Program (AWAP) is an auditing program built around the needs of the member businesses of both the National Council of Chain Restaurants and the Food Marketing Institute (NCCR and FMI). These two groups represent approximately 80 percent of the chain restaurant and retail food business in the United States, respectively. The program is overseen by both the NCCR and FMI, and it is administered by SES, Inc. (SES). The auditing is conducted by independent professionals that have been trained and certified according to AWAP program requirements.

The overall AWAP program is structured around accepted conformity assessment protocols defined by the American National Standards Institute (ANSI). By using the ANSI model, the program has supporting documents that define the roles and responsibilities of all participants; identifies procedures for appeals; and details the function of the program, including the schedule and means for reviewing/revising audit and program guidance documents. This critical aspect of the program creates a predictable system that prevents participants, auditors and data users from having to keep up with a "moving target" and makes the program transparent in its function and requirements. All of the AWAP program documents are publicly available on the program website at http://www.awaudit.org.

The AWAP program includes a strict quality assurance/quality control (QA/QC) program and provides third party independent audits. These aspects were required by the members of NCCR and FMI. The strict QA/QC enhances the representativeness and accuracy of audit data. The third-party nature of the audits ensures audit objectivity. These two factors, QA/QC and third-party auditing, combine to give the end data users, NCCR and FMI, confidence in the program and its results, allowing them to agree to accept a single audit. This will reduce the potential for an operation to have multiple audits, by multiple NCCR and FMI members, using different audit tools.

The AWAP audit tools were developed around industry guidance for animal welfare. The American Meat Institute provided animal welfare guidance for the slaughter industry. Guidance for livestock and poultry production was provided by the National Pork Board, National Chicken Council, National Turkey Federation, National Cattlemen's Beef Association and the Dairy Quality Assurance Program/National Milk Producer's Federation. Caged egg layer welfare guidance was provided by the United Egg Producers. These guidance materials were reviewed, commented on and recommended for endorsement by a committee of technical experts assembled by NCCR and FMI. In some cases the technical experts recommended alterations or additions to the industry guidance.

Once the guidance materials were endorsed by the NCCR and FMI, the AWAP Program Administrator (SES), in coordination with NCCR and FMI and the committee of technical experts, developed audit tools based on the endorsed guidance.

Per AWAP protocol, each audit tool is reviewed annually. This review addresses public and industry comments that have been submitted to SES, NCCR or FMI. If necessary, the audit tools can be modified during this review process. The anniversary date for each audit tool's review is the date the first auditors were trained in the use of the audit tool.

An AWAP audit identifies non-conformances relative to the endorsed industry guidance, including any NCCR and FMI exceptions or additions. There are two types of non-conformances: 1) non-conformances that can be self verified by the producer/facility, and 2) non-conformances that require visual confirmation that they have been corrected. The visual confirmation must be made by an AWAP certified auditor. All of the audit forms are publicly available on the program website http://www.awaudit.org.

Participation in AWAP is voluntary. An NCCR and FMI member (customer) may request that one or more of its suppliers go through an AWAP audit. The frequency that an operation is audited is determined through negotiation between the customer and the supplier. For multi-farm operations, the auditing frequency can involve a random sub-sampling approach, a systematic approach that leads to all farms being audited in a set time period, or any variation between these scenarios.

The audit is not scored but non-conformances are identified and grouped into two categories based on the means a producer or facility must use to show that the non-conformances have been corrected. The audit is not designed to be a pass/fail audit; rather, the interpretation of results is left to the end data user. As with audit frequency, audit result interpretation is a factor that should be discussed between the customer requesting the audit and the supplier who is being audited. Depending on the audit results a facility has the right to appeal findings or correct non-conformances.

Auditors are trained and certified by SES. The auditor pool is drawn from the professional consulting arena, professional auditors, food safety specialists, producers, academics, extension personnel, veterinarians and other professionals with the pre-requisite education or experience. Auditors must attend a training class; pass an examination; have their education, residences, work history and social security numbers independently verified through a background check; conduct a minimum number of audits per year, attend annual refresher training and have acceptable performance during unannounced oversight of their audits. The AWAP QA/QC program includes auditor oversight. Approximately one in ten audits will be directly overseen by SES personnel. The oversights ensure the producer and data users that audits are conducted according to AWAP criteria.

When a facility chooses to have an AWAP audit it will fill out an audit request application and send it to SES. Along with the application, the facility will pay the program administrative fee. This fee is used to operate the program, including the auditor oversight portion of the QA/QC program. When SES receives the application it posts the application

on a secure portion of the AWAP website. Only auditors that are certified in the type of audit posted will be able to view the application. Audit applications, as well as all other site-specific audit information is considered confidential and all auditors sign AWAP confidentiality agreements. The confidentiality agreements are intended to protect audit requestors.

Auditors interested in conducting the audit will have seven days to submit a fixed price bid to conduct the audit. At the end of seven days the bidding is closed and the bids are sent to the audit requestor who will choose the auditor to conduct the audit. The audit requestor will notify SES of the auditor selection and pay the fixed price audit fee. The audit fee is then put in a trust for the auditor, to be paid when the audit is complete. Advance payment of the audit fee further provides for truly independent third party audits since the auditor's payment can not be impacted by the audit findings.

After the audit is conducted the complete audit form is reviewed for completeness and internal consistency. When it has passed through this QA/QC process it is scanned into a web-based database and the audit requestor is given a security code to access the audit results. Distribution of the audit results and the security code is controlled entirely by the audited facility.

If an audit point is appealed, the data is flagged on the website. The AWAP Technical Committee will review the appeal and make a binding judgment. If the appeal is upheld, the audit data will be adjusted as appropriate.

If a facility chooses to address a non-conformance it will have 30 days to correct non-conformances that require written self verification. A facility has 60 days to correct non-conformances that require visual verification of the correction. Both of these timeframes begin once the audit data is presented to the operation.