



2025 Procedure for Conducting United Egg Producers Animal Welfare Audits of Cage-free Pullets



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I. Purpose (Authorization of Cage-free Pullet Housing)

- This document details steps and standards in order to achieve authorization to supply cage-free pullets to a UEP Certified Cage-free [hereafter referred to as the “Program”] Program Participant. It outlines audit procedures and the roles and responsibilities of various groups involved in the process, including:
 - Auditing firms and individual auditors,
 - Authorized Pullet Suppliers, and
 - UEP Program Administrators.
- The UEP Certified Program is voluntary and implements science-based animal welfare standards and husbandry practices, providing confidence to customers and consumers that the hens that produce the eggs they purchase and consume are raised to satisfactory animal welfare standards.
- **This document is generally limited to information regarding UEP Certified Cage-free Pullets and does not include all details relevant to UEP Certified or UEP Certified Cage-free.** For additional details, please see the United Egg Producers Animal Husbandry Guidelines for Cage-free Housing or the United Egg Producers Animals Husbandry Guidelines for Cage Housing.

II. Audit Scope

- Audits are limited to:
 - Cage-free pullet housing
 - Other extensive housing systems may be audited as cage-free, for example, pasture and free-range.
 - An audit does not exist for cage pullet housing; as such, cage housing is not eligible for auditing or inclusion.
- Areas within the audit are:
 - Emergency Preparedness and Response
 - Health, Biosecurity, and Euthanasia
 - Housing and lighting
 - Personnel and training
 - Handling and transportation associated with pullet flocks.
 - Beak trimming and treatment

III. Definitions

Definitions are provided as they pertain to UEP Certified, UEP Certified Cage-free, and UEP Cage-free Pullet Housing.

- **Auditing Firm or Audit Service Provider** – Third-party audit service provider (American Humane, FACTA, Humane Farm Animal Care, USDA, and Validus) requested by a Program Participant to conduct the UEP Animal Husbandry audits.
- **Auditor** – Qualified individuals contracted by the auditing firm to conduct animal husbandry audits.
- **Authorized Farm** – A location consisting of one or more pullet barns. Typically, this is established by postal code address but may also include adjoining pullet barns owned and operated by the same management team. Authorized farms successfully completed a UEP Cage-free Pullet audit, adhere to all other required UEP Certification standards, and are in good standing with the UEP Certified.
- **Beak Treatment** – A procedure performed at the hatchery utilizing infrared technology to blunt beaks.

- **Beak Trimming** – Also referred to as hot-blade trimming. Removing a portion of a bird’s beak utilizing a specialized instrument designed to cut and cauterize simultaneously.
- **Cage-free Pullet** – A pullet coming from an Authorized Cage-free Pullet Farm. This young, immature hen has not yet started regularly laying.
- **Certificate of Conformance (COC)** – A documented statement, provided by a contracted source, stating that the employees performing the services have received the proper training and are routinely monitored to ensure that the activities are conducted according to the *UEP’s Animal Husbandry Guidelines* Example: equipment maintenance for beak trimming/treatment.
- **Company** – Headquarters for one or more egg Farms that have received Animal Husbandry Certified status through Certification. This includes all Farms and affiliates that are controlled or managed by the company. This designation is primarily needed for the online Certification administration tool (commonly referred to as the “Portal”) and may not be applicable to all Program Participants. See Program Participant hierarchy for additional details.
- **Contracted Source** – A service entity contracted by the Program Participant to provide various production services such as beak-trimming, vaccinating, handling, transportation, cleaning, or disinfection. This term does not apply to caregivers, maintenance, or others who are regularly in the barns, even if they are contacted labor.
- **Layer Barn** – An enclosed or open shelter that provides food, water, and protection for an established number of pullets.
- **Parent Company** – A company designated by the Program Participant to oversee other companies. This designation is primarily for the UEP portal and may not apply to all Program Participants. See Program Participant hierarchy for additional details.
- **Program Participant** – The entity that holds and manages the UEP Cage-free authorization number.
- **Program Participant Administrator** – The internal manager in charge of administering the Program for a Program Participant. This position is the liaison between the Program Participant and UEP or the auditing firm.
- **Pullet Supplier** – Program Participant that maintains Farms which are authorized to supply pullets to UEP Certified cage-free Program Participants.

- **Random Audit** – Third-party audit utilizing the relevant audit checklist and other pertinent guidelines and documents to ensure conformance to standards.
- **Re-Audit** – An audit limited in scope to verifying conformance with items identified in an initial audit as non-conforming.
- **Requested Audit** – An additional audit of a Program Participant’s Farm requested by UEP, outside of the yearly audit. This may be requested any time during the year, including before or after a randomly selected audit. This audit may be counted as the annual random audit at the discretion of the UEP Administrator.
- **Row** – A line of equipment containing multiple columns and tiers.
- **Scratch Space** – A solid floor surface containing litter to allow hens to perform natural scratching behaviors. Scratch space is synonymous with litter floor space.
- **Tier** – A series of rows of equipment on the same level, often placed one above the other to make up multiple levels of tiers.
- **UEP Administrator** - UEP staff member overseeing Program operations and the liaison between UEP, the auditing firm, and the Program Participant.

IV. Audit Frequency & Selection of Farms and Barns

- 100% of pullet housing used to supply UEP Certified Cage-free must be audited prior to supplying to a UEP Certified Cage-free farm.
- Audits shall include 100% of the cage-free pullet barns on the Farm.
- Farms with both cage- and cage-free pullet housing shall report both housing types, with auditor confirmation of the cage pullet barns. However, cage pullet barns shall not be audited.
- After an initial inspection, yearly Pullet Farms will be randomly selected for auditing at a targeted >10% rate. Barns on the selected farms shall be audited at $\geq 50\%$.

A. New Applicants

Prior to authorization, new Farms must complete the following:

- File an Application for Authorization,
- Pay administrative and other applicable fees,
- Pass an audit on 100% of the cage-free barns.

B. Active Authorized Program Participants

- Authorized Farms must maintain the UEP Certified Cage-free Pullet standards on all cage-free pullet barns, but Authorized Pullet Suppliers are not required to maintain the UEP Certified Cage-free Pullet standards on all pullet facilities.
- Farms can only be authorized after an initial successful audit. Barns on an authorized farm may be added anytime.
 - Added pullet barns shall be included in the auditing process during the next scheduled audit.
- Farms selected for an audit must meet or exceed the requirements detailed in the UEP Certified Cage-free Guidelines and this document to remain in good standing.
- Active authorized Pullet Suppliers will be audited as new applicants in instances where both ownership and management change. Active Authorized Program Participants shall be audited under standard procedures for all of the following:
 - PP name change
 - PPs granted a request for a new Certification number
 - When the PP comes under new ownership but remains under the same management
 - Splitting or spinning off Farms into new Program Participants
 - Combining Farms currently under UEP Certification or Authorization.

V. Desk Audits

Determining When a Desk Audit Should Be Conducted in Lieu of an On-farm Audit. Se

- Desk Audits for pullet facilities shall utilize the same Desk Audit Subcommittee as the UEP Certified Cage-free Program and follow the same guidance. For additional details, please see the Desk Audit section of the Procedures for Conducting United Egg Producers Cage-free Audits.

VI. Responsibilities

A. Auditing Firms

1. Auditing Firm Standards for Auditors

- Prior to conducting a UEP audit, an auditor must complete the following at a minimum:
 - Auditing firms shall administer training specific to the Certification to any auditor newly conducting Certification Audits.
 - Auditing firms shall provide annual training on good general auditor/auditing practices.
 - The auditing firm shall ensure all auditors conducting Certification audits are PAACO Poultry Certified (except for auditors who have conducted a Certification audit prior to 2020; laying hen specific PAACO training preferred).
 - Auditing firms must ensure that auditors conducting UEP Certified audits have signed a letter of understanding/confidentiality, which protects the interests of the auditee and the Program. The auditing firm is responsible for maintaining these records.

2. Auditor Standards

- Prior to conducting a UEP Certified audit, an auditor must complete the following:
 - Receive formal audit training.
 - Auditors must attend annual training with a UEP Administrator, which will cover any updates and points of clarification regarding the Program.
 - Auditors must attend annual training offered by the auditing firm, or equivalent, on general auditor/auditing best practices.
 - The auditor must review and know all materials associated with the Program, including materials that may be presented to the auditing firm throughout the year.
 - The auditor must maintain PAACO poultry certification (except for auditors who have conducted a Certification audit prior to 2020; laying hen specific PAACO training preferred).
 - The UEP Administrator may grant a temporary exception for new auditors to accommodate the limitation of PAACO training being offered on a limited basis.
 - The auditor must sign a letter of understanding/confidentiality, which is to be maintained by the auditing firm that protects the interests of the auditee and the Program.
 - Receive and understand *UEP's Animal Husbandry Guidelines for UEP Certified Cage-free Pullet Housing* and any reference or supplemental material in this document.
 - Meet any additional requirements set forth by the auditing firm.
- Auditors working for an approved auditing firm, currently: USDA, Validus, or FACTA, are eligible to perform UEP audits.
- The same auditor should not conduct the audit for the same Farm for more than 3 consecutive audits.

3. Scheduling the Audit

- Farms and pullet barns shall be randomly selected for auditing at the established auditing levels unless otherwise indicated by the UEP administrator.
- Auditors will contact each Program Participant to schedule and perform an audit within 7 days of notification.
 - Allows time for Farms to gather records and ensure management representatives are present.

- The auditor or auditing firm will contact the Program Participant
- The auditor should send a list of documents that are likely needed during the audit to the auditee prior to arriving. This does not limit the documents that may be requested during the audit.
- The Program Participant's Administrator is responsible for ensuring all audits at the necessary level are successfully completed before the required audit completion dates, as established in this guidance document.
- Audits must be completed by November 30
 - Program Participants should receive final notification by November 10 if they have not completed their audit.
- When Program Participants request to reschedule or are unresponsive to the auditor:
 - Follow the instructions on the Audit Reschedule Form (Exhibit XIII), which includes notifying UEP.
 - Failure of reasonable efforts of contact by the Program Participant will result in the loss of certification at the end of the year. In this event, the Program Participant must apply as a new applicant, and an audit of all Farms and pullet barns will be required.

4. Biosecurity Protection

- Proper biosecurity is critical to the layer industry. Auditors are required to adhere to all Program Participant biosecurity protocols. The following is a recommendation. Any conflicts between an auditor and the Program Participant regarding biosecurity protocols shall be addressed to the UEP Administrator.
- The auditor is responsible for ensuring all necessary biosecurity supplies are obtained prior to conducting the audit. This includes:
 - 1) Verifying what supplies are required/recommended with the Program Participant.
 - 2) The Auditing Firm may provide auditors with necessary biosecurity supplies.
 - 3) The Program Participant may provide auditors with necessary biosecurity supplies. If the Program Participant does not provide biosecurity supplies, costs may be charged as part of the auditing service.
- If not required by the Program Participant or Auditing Firm, respirator masks and eye protection may be worn at the auditor's discretion.
- Multiple audits at farms owned by separate Program Participants are not to be conducted on the same day; however, if the same Program Participant owns several Farms, multiple audits may be scheduled for the same day upon Program Participant's approval.
- Auditors should continue to follow the Program Participant's biosecurity protocol with a maximum of 5 days of downtime between facilities allowed.
- When pullet barns at a Farm are positive for Salmonella Enteritidis (SE), they remain part of the audit scope; however, it is recommended that these barns be audited after negative facilities/pullet barns.
- Biosecurity garb may be changed between each pullet barn at the Program Participant's discretion.
- The audit order sequence should be conducted as follows, with preference given to number 1:
 - 1) SE negative pullet barns before SE positive pullet barns
 - 2) Younger flocks before older flocks

5. Associated Program and UEP Administration Charges

- Program Participants will be charged for conducting the annual audits and any re-audits if required due to non-conformance.

- Costs are determined at the discretion of and paid directly to the Auditing Firm. The audit fees must be discussed and agreed upon before conducting the audit so that all parties fully understand the applicable costs. Auditing fees must be standardized to not create unfair hardship for small producers. Costs will include:
 - Auditing fee as established by the auditing firm.
 - Additional fees may include:
 - Travel expenses directly related to the audit.
 - Biosecurity supplies, if applicable
 - Other related expenses
- All pullet barns shall be filed with UEP via the audit preference within the Portal each year, and Program Participants will be charged according to the pre-audit time necessary to review the records.
- *The 2023 UEP Administration Fees* are as follows [FC = flock capacity]:

Member Certified	Admin Base Fee	FC 1 – 10,000 = \$25
		FC 10,001 – 20,000 = \$50
		FC > 20,000 = \$200
Non-Member Certified	Admin Hen Fee	FC 0 – 99,999 = \$0
		FC > 99,999 = FC × 0.0005
	Admin Base Fee	FC 0 – 49,999 = \$200
		FC > 49,999 = \$400
	Admin Hen Fee	FC 0 – 99,999 = \$0
		FC > 99,999 = FC × 0.008

*Current at the time of development of this document. Fees may be updated anytime by the UEP Board.

6. Opening and Closing Meetings

- Conduct an open meeting prior to beginning the audit with reference to Exhibit XIV.
- The objectives of the opening meeting:
 - Clarify the auditing plan by reviewing past audits and any corrective action taken, restate the audit scope, and reference the *UEP Cage-free Guidelines*.
 - Review the expected biosecurity protocols.
 - Set ground rules and provide opportunities for the Program Participant representative(s) to ask questions.
 - Discuss any possible bird-handling activities that can be observed during the anticipated time of the audit. Example: (bird moving, beak trimming, euthanasia, etc.)
 - Describe audit failures (section I) and inform the auditee that a failing nonconformance is observed the auditee can choose to continue the audit or immediately end it.
 - Confirm resources available to the auditor.
 - Confirm the closing meeting time.
 - Describe the anticipated benefits of the audit.
 - It is recommended that the Program Participant provide a knowledgeable representative for the auditor to act as a guide and to address questions and provide clarification during the audit.
- Conduct a closing meeting after the audit has been conducted.
 - The objectives of the closing meeting are:

- Present audit observations to the Program Participant representative(s).
- Explain any required corrective action necessary and follow-up procedures.
- Keep the discussions brief; meetings must clarify the audit findings rather than justify the audit method.
- Record the meeting minutes and note the attendees' names and titles.
- When the closing meeting is done, check the box on the audit checklist confirming that items were discussed with the Program Participant.

7. Document Control

- The auditor shall complete the following:
 - Audit checklist(s)
 - Audit worksheets noted in the exhibits section to help provide guidance on performing various verification techniques.
 - Other supporting documentation as outlined throughout this audit tool guideline.
- Auditors shall thoroughly review documentation, records, and husbandry practices at each selected pullet barn.
- Audit results are confidential and shall only be released to the Auditing Firm and the UEP administration.

B. United Egg Producers

1. Program Development and Administration

- Maintenance and updating of the production and rearing guidelines to improve laying hen and pullet welfare.
- Maintenance and updating all other supplemental documents and exhibits pertaining to the Program.
 - Auditing firms may maintain additional documents and exhibits unique to their firms, as necessary. The UEP Administrator is not responsible for maintaining such documents.
- The UEP Administrator shall approve the auditing firm for each Program Participant. Auditing firms may be changed at the UEP Administrator's discretion.
- UEP maintains a list of Authorized Pullet Suppliers and Certified Program Participants.
- UEP maintains a list of completed UEP audits performed at the selected Farms for each authorized Pullet Supplier.
- UEP may require an additional audit for a Program Participant during the calendar year.
 - The UEP Administrator will provide the request to an Auditing Firm of the UEP Administrator's choice.
 - Associated costs will be charged to UEP.
 - This audit may or may not be announced at the discretion of the UEP Administrator.
 - The audit will be limited to authorized farms.

C. Program Participants

1. Implementation of Program

- Program Participants shall return calls pertaining to an audit within 5 business days.
- Auditors shall notify UEP using the Reschedule Form (Exhibit XIII) if the Program Participant does any of the following:
 - Does not submit to the request for an audit.
 - Reschedules an audit.
 - Delays an audit.
 - Does not return a message left by the auditor to schedule an audit.
- If a Program Participant does not submit to the audit request within the allocated 5 business days, but the auditor has already incurred costs, such as transportation, the Program Participant may be charged accordingly.

2. Certificates of Conformance (COC)

- Program Participants may provide a COC for contracted sources providing a service.
- COCs must include the following:
 - Name and address of the contracted source of the service
 - A detailed description of the service and training provided to the employees performing the service, including dates and pullet barns serviced, as applicable.
 - Name of the Program Participant representative responsible for verifying that employee practices conform to all applicable guidelines when services are provided
 - Description of the frequency that employees are monitored
 - This must be done at least daily during the applicable activity.
- Contractors are responsible for maintaining documents supporting COC statements.
- Refer to Exhibits X and XI for acceptable COC examples.
- COCs shall only be evaluated for items that cannot be observed during an audit.
 - Example: If handling occurs during an audit, handling shall be observed and scored according to the practices witnessed rather than rewarding points based on the COC provided.
- A COC does not override any observations made by the auditor.

3. Auditor Safety

- Program Participants must ensure that pullet barns are free of unsafe conditions that may affect audit completion. For example, walkways must be free of operating conveyors, safe for passage, and have adequate light.
- A Program Participant representative must always accompany an auditor.
- Step ladders or suitable platforms must be provided to inspect the top tiers, as applicable.
- Electrical wires shall not be exposed.
- Auditors may refuse to complete audits when evident hazards are present.
 - If hazards are not corrected in a timely manner that will allow the audit to continue, the auditor should contact the third-party auditing firm for whom they are conducting the audit. The auditing firm must report the incident to the UEP administrator.

4. Equipment Supplied and Meeting Basic Needs

- Program Participants are responsible for providing auditors with the following:

- A flashlight for examining aspects of housing and pullets (if applicable)
- Equipment to monitor the concentration level of ammonia.
- Equipment used to routinely determine the light intensity
- A tape measure for measuring equipment and other space criteria.
- A safe means to inspect all bird housing equipment, including tiers, waterers, etc.
- Other material requested by the auditor is required to complete the audit.
- Accommodations for bathroom, water, meals, and other basic needs if difficult to obtain due to Program Participant's biosecurity or other factors.

5. Uncontrollable Circumstances

- Program Participants that fail an audit due to uncontrollable circumstances (i.e., disease outbreak) may provide written detailed information for consideration by the auditor, identifying the following:
 - Cause
 - Date(s) of occurrence
 - Corrective or preventative action implemented.
 - Farm management verification demonstrating continued conformance with UEP guidelines.
- Auditors shall review documentation during the audit to determine overall Program conformance.
 - Documentation must include written approval from the UEP Administrator
- If the information to support such circumstances is unavailable, the Program Participant fails the audit and must request a re-audit.

6. Availability of Records and Documentation

- Program Participants must do the following:
 - Maintain records and documentation that auditors will use to determine Program conformance.
 - Provide records to the auditor upon request.
- At a minimum, these records must include the following for each Farm:
 - Name, location, and number of pullet barns.
 - For cage-free pullet barns:
 - pullets per pullet barn.
 - Date(s) of hatch for pullets in each pullet barn.
 - Date(s) pullets were beak trimmed/treated, if applicable.
 - Date(s) of personnel training, including for beak trimming/treatment and pullet handling.
 - Date handling and transportation occurred.
 - Records supporting audit form items.
 - Copy of completed audit checklist from the previous audit.
 - COCs for all applicable services provided by contracted sources.

VII. Completing the Audit and Review

A. Assigning Points

- Point values are allocated based upon specific husbandry practices and preassigned except for the noncompliance section.
 - Assign all points when criteria are fulfilled.
 - No partial points are awarded.
- When pullet barns indicate nonconformance, mark “yes” for the appropriate item.

- Record details in the comments section, such as the pullet barn number.
- In general, any nonconformance observed should be immediately brought to the attention of the Program Participant representative. It is best practice not to wait until the closing meeting to introduce a non-conformance.
- Contact the auditing firm when assistance is required in determining conformance. Though not preferred, an audit may be placed on hold until a final determination is made as to conformance.

B. Audit Results

- Transfer the total points to the “Scoring System” section to assign a final audit score.
- Check “Pass” or “Fail”
 - If failed, denote the reason(s) for failure.
- If any pullet barn fails, then the entire Farm fails.
- Successful completion of audit(s) are required for authorization to supply to a UEP Certified Cage-free Program Participant.

C. Failing Audit Criteria

- Failure to meet the following audit criteria will result in audit failure:
 - Willful acts of abuse or neglect.
 - A “yes” in the nonconformance section
 - Scoring ≤ 80%. (2024 Cage-free Pullet ≤ 80 points)
- Report reasons for failure through appropriate supervisory channels immediately.

D. Re-audits

- Program Participants that failed an audit may correct the nonconformance and request a re-audit to be scheduled and completed within 30 days of the original audit with the original auditor.
 - If the original auditor is unavailable, exceptions may be granted by the UEP Administrator. This may include allowing either more than 30 days or a different auditor to conduct the audit.
- Program Participants shall remain authorized pending the outcome of the re-audit.
- Re-audits shall be limited to the item(s) noted as nonconforming in the original audit.
- The auditor shall notify the Program Participant representative of new items identified as nonconforming and request immediate corrections.
- If re-audit results in a failure, the Corrective Action Committee shall be convened to review the situation. The special committee will determine the future status of the Certification member.
- A Program Participant not agreeing with the results may request an official appeal via the UEP Dispute Resolution Process.
- Appeal results will supersede the original audit results.
- To calculate:

$\text{Re-audit score} = \text{original audit score for conforming items} + \text{re-audit item scores}$
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E. Dispute Resolution Process

- Verifying conformance to *UEP Certified Guidelines* lies solely with trained auditors chosen to lead the audit.

- Unresolved audit-related issues may be submitted for arbitration under the UEP Dispute Resolution Process.
 - The written formal request must be submitted to the UEP Administrator within 48 hours of the audit/re-audit completion.
 - If a Farm fails an audit/re-audit, the issue shall be presented to the Corrective Action Committee for review and resolution.
 - The Program Participant shall remain in good standing under the Program until the UEP Administrator finalizes the determination.

F. Ensuring Program Integrity

- To ensure the integrity of the Program, oversight, and review may sometimes be requested outside of the standard third-party audit(s).
- When evidence is provided to the UEP Administrator that an Authorized Participant may not be in conformance with the required standards, a review process must be initiated by the Certification Administrator. Evidence may include, but is not limited to, video, photos, documentation, or testimony from a credible source and may include publicly available evidence (i.e., undercover video and available police reports).
 - At the discretion of the UEP Program Administrator, the Corrective Action Committee shall be convened to review the case. However, the Corrective Action Committee must be convened if:
 - The Program Participant fails an audit due to nonconformance regarding willful acts of abuse or neglect (Section I.3.).
 - The scope of the review must remain in line with the established Certification standards.
 - The review should focus on the indicated Farm but may be expanded to include all Program Participant's Farms.
 - Materials both common to the audit and additional may be requested from the Program Participants and may include, but are not limited to, training forms, pullet placement documentation, interviews with management and caregivers, and written descriptions and testimony. The Program Participant must provide all materials in a reasonable time, usually within 5 business days following receipt of the written request.
 - A requested audit may be initiated.
 - Failure of the Program Participant to respond to requests may result in termination of Certification status. It is the Program Participant's responsibility to ensure UEP has updated contact information, ensuring prompt communication can be made.
 - In the instance of failure to respond, Certification status may be revoked without convening the Corrective Action Committee.
 - Incurred expenses by UEP or an auditing firm, which are the direct expense due to the request of the UEP Administrator, shall be paid by UEP.
 - Examples of included expenses are the cost of a requested audit, UEP staff's time, and UEP's travel expenses.
 - Costs not covered include additional time required by Program Participant personnel to respond to the inquiry, biosecurity supplies, and any losses due to suspension or revoking of Certified status.
 - If the Program Participant is found to be out of conformance with the Authorization standards, a corrective action plan must be submitted to the Corrective Action Committee. This plan must include a root cause analysis, detailed planned actions to bring the Program Participant into conformance with the Certification Standards, and a reasonable timeline for implementation.

- Authorization Status is at the discretion of the Corrective Action Committee and shall be based on the presented evidence. Status shall be designated as:
- No change/Active
 - Evidence does not support the Program Participant was out of conformance.
 - The Program Participant is working toward a resolution, and the Corrective Action Committee has determined that nonconformance does not warrant suspension.
 - An additional audit may be requested.
- Suspended
 - To be reactivated once the corrective action plan is fully implemented.
 - An additional audit must be conducted indicating conformance.
- Revoked
 - The applicant may not be certified for at least 1 year after notice. After which, the Program Participant may reapply for Authorization as a new applicant.
- Corrective Action Committee
 - Composed of 1) UEP Program Administrator, 2) a representative from an Auditing Firm, 3) the chair or vice-chair of the UEP Scientific Committee for Animal Welfare
 - The Auditing Firm should be a firm that did not conduct the last audit at the Farm being reviewed.
 - If the chair or vice-chair of the Scientific Committee is unavailable or they deem it appropriate, another representative from the Scientific Committee may be substituted.
 - The committee should seek advice and input from experts as appropriate.

VIII. Distribution of the Audit Checklist

A. Submitting the Checklist

- Submission processes established by the auditing firm must be followed.
- The auditing firm shall submit the audit checklist to UEP within five business days.

B. Data Recorded to Manage the Program

- Auditing firms must record the following information on a spreadsheet or using another management system:
 - Name and address of the UEP registered Program Participant
 - Name and address of the Farm
 - Date of the audit
 - Auditor's name
 - Audit pass/fail status.
 - Re-audit pass/fail status, if applicable
 - All copies of the audit checklist(s) and re-audit checklist(s), including electronic versions and emails containing the checklist, must be destroyed within 30 days after the information has been entered.
 - Data stored in the UEP Portal will be maintained for at least seven years.
- Information within the spreadsheet or another management program must be retained through the end of the following certification cycle. Example: results submitted in 2023 shall be destroyed at the end of 2024.

IX. Checklist Questions and Procedure

- Complete a separate audit checklist for each audited pullet barn.
 - It is recognized that some components of the audit that apply across a Program Participant may be conducted at a central location. At the auditor's discretion, they may complete a single audit for the Farm and submit worksheets for the layer barns.

Cage-Free Pullets:

- Review schematics or Program Participant-developed self-assessment of cage-free pullet barns to identify space allocation measurements.
- Auditors must verify the information by taking measurements in sections or a sampling of sections.

A. Section I – Non-conformance

1. Were any willful acts of abuse or neglect observed during the audit?
 - If the auditor witnesses a willful act of abuse, if reasonably and safely possible, the auditor should immediately intervene to stop the situation. The incident should be immediately reported to the farm representative. Although an automatic failure, the audit may be complete at the discretion of the auditor.
 - Willful acts of abuse or neglect are events outside of normally accepted production practices that intentionally cause pain and suffering, including but not limited to malicious hitting/beatings of a bird.
2. Are feed and water available and kept so that it remains in a fresh condition?
 - Feed must be provided at least once each day.
 - Evidenced by documented records, such as computer-generated data or hand-written recording charts.
 - Feed and waterers must be relatively free of contamination.
 - Observe the construction of equipment to determine whether manure deflects away from feed or water troughs.
 - Litter, feces, or other contaminants in feed or water indicate nonconformance.
 - Water pressure must be maintained for proper operation of the dispensing system.
 - The manufacturer's recommendation for water pressure shall be utilized unless there is documented evidence for other pressures.
 - Program Participants shall demonstrate to the auditor how the facility controls and monitors water pressure.
 - Monitoring of the water system must be evident.
 - Review established frequency and documentation of monitoring.
 - Frequency must be $\geq 1/\text{week}$.
 - Test the drinking systems in at least 4 sections/areas of the barn to ensure proper functioning.
3. Does the housing environment generally resemble cage-free housing with perches or other elevated structures, scratch space, and generally create an environment that will allow the bird to learn to navigate cage-free housing?
 - Inspect the facility to ensure basic components of cage-free housing are included to allow pullets sufficient access and learning opportunities include:
 - Perch or other elevated structures,
 - Scratch space with litter

- Though there are no specific space or resource requirements, the auditor should examine all aspects of the barn and assess if it is generally sufficient to provide a cage-free pullet experience.
- Non-conformance examples could include hens locked in a system depriving them of access to the scratch area, grossly inadequate resources such as providing only enough perch for a few hens, or grossly overcrowding, preventing pullets from accessing the resources.

B. Section II – Emergency Preparedness and Response

1. Is a current, written Emergency Preparedness and Response Plan (EPRP) available?

- The farm plan must cover likely emergencies or catastrophes for that area, including disease outbreaks, as applicable.
- The plan must be readily available to all employees.
- Established and documented procedures must be provided. The plan must include:
 - Address of the farm the plan is specifically for. If an address doesn't exist, it must include the farm's GPS coordinates or directions from the nearest town.
 - An internal and external communication plan that identifies key personnel responsible for carrying out and communicating the plan both on-farm and off-farm
 - Emergency contact numbers, including key management, veterinarian, electrical power company, fire, police, and regulatory agency contacts.
 - The plan's location must be easily identified, readily accessible, and available both on-farm and off-farm.
 - Maps of the farm that include the location of:
 - utility access points,
 - utility shutoff,
 - fire extinguishers, and
 - emergency water sources
- The plan must have evidence that it has been reviewed, and if needed, updated within the last 12 months.
- Evidence of non-conformance can include, but is not limited to, personnel listed who are no longer with the farm or barns that exist on the farm that are not listed on the EPRP.

2. Are fire extinguishers readily available, and is there documentation of an annual inspection and servicing program for the fire extinguishers?

- Examine documentation of the service plan indicating fire extinguishers have been examined and serviced within the last 18 months.
- Fire extinguishers must be placed at each end of a building, in each corridor between barns, in electrical areas, and in areas of high combustion.

3. Are combustible materials kept away from ignition sources?

- At least two feet of gravel, cement, or other non-combustible material must be around the pullet barn.
- Grass or vegetation around the pullet barn should be less than 4 inches.
- Pallets stored outside must be kept away from combustible buildings at a distance roughly equal to or greater than the stack's height.
- Examine the barn to ensure other combustible materials are not stored near ignition sources.

4. Is there documentation of quarterly walk-throughs inspecting electrical components?

- A monthly inspection of electrical components should be completed, and at a minimum, a quarterly report must be completed. This can be part of another inspection but must demonstrate that the inspection specifically looks at electrical components.
 - Documentation must indicate the date the inspection was completed, such as the name, date, and signature of the employee conducting the audit.
 - Proof could also be in the form of work orders that indicate at least quarterly inspection.

5. Is there documentation of a yearly inspection and cleaning of all heaters?

- Examine documentation indicating heaters were inspected and cleaned within the last 12 months.
 - It is preferred that a certified heating technician conduct inspection and cleaning. Documentation should include the company's name and the date of the inspection and cleaning.
 - Other personnel may conduct the inspection and cleaning if an SOP is provided on procedures and documentation with the name of the inspection and the date inspection occurred.

C. Section III – Health, Biosecurity, and Euthanasia

1. A. Is a written bird health plan that has been reviewed and signed by a veterinarian within the last 12 months available?

- Established and documented procedures must be provided. The plan must include:
 - Procedures and records of vaccinations,
 - Procedures for observation of all birds for injury, signs of disease, and changes in flock behavior (e.g., feed and water intake),
 - Procedures for managing sick and injured birds,
 - Procedures and records of treatment,
 - Procedures for controlling internal and external parasites,
 - Procedures for identifying treated birds and records indicating treatment type, dates of treatment, route of administration, and quantity of medications used,
 - Procedures for euthanizing birds, including timely euthanasia criteria,
 - Tolerance levels of flock performance,
 - Investigating causes of morbidity and mortality,
 - And targets of other aspects of flock health.

B. Does a valid Veterinarian-Client-Patient Relationship (VCPR) exist?

- VCPR requires the caregiver and veterinarian to work together to ensure the health and welfare of the birds on the farm. A VCPR means a veterinarian has assumed responsibility for making medical judgments regarding the health of the birds and the need for medical treatment, and caregivers have agreed to follow the veterinarian's instructions. Such a relationship can exist only when the

veterinarian has sufficient knowledge of the animal to make a preliminary diagnosis and is personally acquainted with the keeping and care of the birds.

- The farm must have a valid VCPR demonstrating that the producer and veterinarian work together to ensure the health and welfare of the birds on that farm. Verification must be dated within the last 12 months.
 - A VCPR can be confirmed by:
 - Dated and signed bird health plan,
 - Dated veterinary feed directives,
 - Dated medical prescription labels,
 - A dated farm visit report from the veterinarian,
 - Or a letter from the veterinarian confirming the relationship.

2. A. Is the euthanasia method(s) identified in the farm's written procedures and as described by caregivers align with the most recent version of the AVMA Guidelines for the euthanasia of animals?

B. If a containerized gassing method is utilized, is there a written SOP that conforms to the most recent version of the AVMA'S Guidelines for euthanasia and depopulation?

- Procedures should help ensure timely and humane euthanasia. Established and documented procedures must be provided.
- Program Participants must have detailed euthanasia and depopulation procedures that utilize methods approved by the American Veterinary Medical Association, American Association of Avian Pathologists, or USDA.
- The plan must include:
 - Euthanasia methods that are approved for use on the farm.
 - Guidance on how to identify compromised birds in need of euthanasia.
 - Which employees are allowed to perform bird euthanasia, and how proper training of these employees is conducted and tracked. Specific employee names or positions do not need to be listed in the written procedures.
 - Alternative procedures may be utilized with documentation from an accredited animal care individual, deeming the alternate euthanasia practices acceptable.
 - Documented training with those who perform the procedure(s) must be reviewed.
- Unavailable written training records result in non-conformance.
- Alternative procedures may be utilized with documentation from an accredited animal care individual, deeming the alternate euthanasia practices acceptable.
- Documented training with those who perform the procedure(s) must be reviewed.
- Unavailable written training records result in non-conformance.

3. A. Are key flock performance indicators (KPIs) critical limits set and parameters regularly monitored, recorded, and tracked?

- Established and documented procedures must be provided. Electronic documentation is equivalent to other document types.
- The plan could include:
 - KPIs should be individualized for each Program Participant's operation and could even be customized on the barn level, as determined most appropriate by the Program Participant.
- Examine documents indicating that key flock performance indicators are tracked and charted daily. KPIs may include egg production, feed usage, feed conversion ratio, bird weight, etc.

B. Are action steps appropriately identified and implemented when critical limits are reached?

- Documented corrective action that reasonably would address the issue must be indicated for all items reaching established critical limits.
 - Producer Resource: International Poultry Welfare Alliance Key Welfare Indicators Book.
4. A. Are key flock health indicators (KHIs) actively monitored, recorded, and tracked?
- KHIs must include mortality, culls, morbidity, and injuries.
 - Established and documented procedures must be provided. Electronic documentation is equivalent to other document types.
 - The plan must include:
 - KHIs should be individualized for each Program Participant's operation and could even be customized on the barn level, as determined most appropriate by the Program Participant.
 - However, at minimum, mortality (birds found dead) and culls (birds euthanized) must be individually tracked, and efforts to identify causes of deaths and causes of culls at the barn level. Body condition and eye health are also frequently tracked.
 - Examine documents indicating that key flock performance indicators are tracked and charted daily. Examples of additional KHIs may include egg production, feed usage, feed conversion ratio, bird weight,
- B. Are action steps appropriately identified and implemented when critical limits are reached?
- Documented corrective action that reasonably would address the issue must be indicated for all items reaching established critical limits.
 - Producer Resource: International Poultry Welfare Alliance Key Welfare Indicators Book.
5. Is there documentation and evidence to indicate flocks are assessed at least daily for health and welfare?
- Compromised birds must be identified and provided proper treatment or euthanized according to established protocols that align with the Authorization standards. Established and documented procedures must be provided. The plan must include:
 - Observe for indicators that pullets are inspected daily and compromised or dead hens are attended to.
 - Review daily records showing inspection of all pullets and removal of dead or compromised pullets.
 - During the assessment, observe for evidence of decaying carcasses, injured hens, or any other indicators suggesting less than daily inspection and attention to compromised hens, resulting in non-conformance.
 - No more than 1 dead bird should be observed per 4,000 birds assessed.
6. Is there a written policy to ensure escaped hens without access to food and/or water are collected and provided care or euthanized routinely? If so, is there evidence that this policy is implemented?
- Established and documented procedures for catching loose pullets, including from manure pits, must be provided.
 - Procedures must include frequency and method of capture.
 - Frequency should be $\geq 1/\text{day}$.
 - The written policy should include humane ways to capture and identify the disposition of the pullet.
 - A checkoff showing the barns were examined should be completed.
 - Tools to help capture loose pullets, such as chicken leg hooks or netting, are evidence policy is implemented.
 - Employees should be interviewed to ensure they are familiar with the policy.

- Evidence of carcasses, except in barns that compost pullets in the pit as stated in their procedures or severely compromised hens in the manure pit or under slats, would be nonconformance, and no points shall be awarded.
 - Several live pullets in pits or under slats is evidence that the policy is not adequate or fully implemented, and no points shall be awarded.
7. Does the Program Participant have a biosecurity plan consistent with the National Poultry Improvement Plan (NPIP) Biosecurity Principles?
- Review policies relative to visitors and observe the application of these policies, which may include a utilized visitor log, visible signage explaining policy, and/or perimeter security measures.
 - Documentation of a successful audit (i.e., NPIP on-farm biosecurity audit) shall be accepted as proof of conformance.
 - Evidence of implementation must also be present. Review the Program Participant's rodent, pest, and animal control program to ensure measures are maintained, such as the utilization of a line of separation, placement of maintained bait boxes, maintaining the structure to prevent infestation, etc.
 - If no 3rd-party biosecurity audit is available, conduct the NPIP biosecurity audit to confirm conformance.
 - Note, completion of the audit will not be applicable for USDA indemnity or any requirements outside of the Authorization.
 - NPIP Biosecurity Audit Checklist: <https://www.poultryimprovement.org/documents/auditform-2018biosecurityprinciples.pdf>
 - <https://www.poultryimprovement.org/documents/NPIPBiosecurityPrinciplesTemplate.pdf>
 - <https://www.poultryimprovement.org/documents/AuditGuidelines-BiosecurityPrinciples.pdf>
8. Does the facility have an SOP that details the procedures used to prevent or mitigate outbreaks of feather pecking and cannibalism?
- A written SOP must be available that details mitigation methods and criteria for when a therapeutic trim would be conducted.
 - Resources for Producers:
 - https://www.featherwel.org/featherwel/Portals/3/Documents/advice_guide_V1.2-May-2013.pdf
 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69374/pb10596-feather-pecking-050309.pdf
 - <https://www.farmhealthonline.com/US/disease-management/poultry-diseases/poultry-feather-pecking/>
9. Is there documentation and evidence that barns are cleaned between flocks?
- Established and documented procedures must be provided. The plan must include a method of cleaning and who was responsible for overseeing the cleaning process.
 - Documentation must be available for the date and confirmation that cleaning of the barn meets the farm's required standards (i.e., dated signature of the manager).

D. Section IV – Housing and Lighting

1. Are birds provided access to elevated structures within the first 4 weeks of life?
 - Documentation must be kept and available that details when access to the floor and all other components of the pullet barn are provided. Documentation must include the following:
 - The date and time restriction ended.
 - Verify birds have access to the required components.

2. Are the birds provided access to the floor and all other components of the pullet barn by 6 weeks of age, or by 9 weeks of age in a system that allows the pullets more than 3 feet of vertical movement?
 - Documentation must be kept and available that details when access to the floor and all other components of the pullet barn are provided. Documentation must include the following:
 - The date and time restriction ended.
 - General process for removing the restriction.
 - If 9 weeks is utilized, the documentation must include details on the equipment that qualifies it for 9 weeks vs. 6 weeks.
 - B. Auditor should verify this information.
 - If no doors or other barriers that could prevent access to the scratch area are present, award all points.

3. Is light intensity at least 5 lux in all areas of the barn except for dark brooding spaces?
 - Program Participants must assess lighting on a routine basis in various locations using a light meter to measure light intensity.
 - Documented processes and records of regular assessment must be reviewed.
 - The minimum light intensity must be measured ≥ 1 time a month, maintained by the Program Participant, and verified by the auditor.
 - The auditor should utilize equipment provided by the Program Participant and randomly sample the lighting throughout the barn.
 - Light intensity must be measured under normal production lighting conditions. Additional lighting utilized for inspections or audits should not be assessed.
 - If lighting is external to the living system, position the light meter in front of the feed trough at approximately half the height of the equipment column and, if applicable, at a middle distance between overhead lights. If lighting is internal to the living system, such as rope lighting running through the living system, then the reading should be taken within the living system at pullet height near the waterer or feeder.
 - For an open-sided pullet barn design:
 - The frequency of measurements may be reduced to twice a year if the minimum light intensity level has a history of conformance.
 - If there are curtains that can be closed, documented history must include results from light intensity measurements when the curtains are closed.
 - Light intensity must be sufficient to visually inspect the condition of the feed delivery and water systems and the physical condition of pullets in each tier. The light must also be sufficient and uniform so that the well-being of the pullets can be readily observed.
 - If management supplements normal production light to examine individual pullets in tiers and nests with a portable light source, such as a flashlight, to increase light intensity:
 - Observe Program Participant personnel procedures to inspect pullets.
 - When light meters are not available for routine measurement by the Program Participant, initial testing must be completed and the following documented:

- Results
 - Type of light meter
 - Locations tested within the pullet barn.
 - Date
 - Light meter calibration
 - Management must maintain records for lighting system maintenance, including the replacement of bulbs and the type of bulbs utilized.
 - The auditor shall review indicated records.
4. After 10 days of age, is a minimum of 4 hours of continuous darkness provided in each 24-hour period?
- Documented procedures must be reviewed.
 - Timers or other electronic programming is acceptable. Evidence indicating adherence to the Certification standards must be recorded if lights are manually operated.
 - Award all points for an open-sided layer barn design.
 - Up to 21 days shall be allowed with an expert recommendation (i.e., breeder company manual, breeder company expert, veterinarian, etc.). Documented evidence of this recommendation must be provided.
5. Does the ventilation system allow for continuous flow of fresh air for all pullets?
- Program Participants must demonstrate that fans operate properly and mechanically operated louvers on pullet barns open to allow adequate airflow.
 - Records demonstrating routine equipment checks to ensure the system's proper functioning must be provided for each pullet barn.
6. Is the Barn maintained?
- Inspect the facility to ensure it is maintained in a manner that will not cause injury to the birds and so that it operates in a manner sufficient to maintain bird health and welfare. Inspection should include, but is not limited to:
 - Manure belts, curtains, shields, or other mechanisms utilized to mitigate bird fecal contamination shall not allow manure from above tiers to pass down through lower-level tiers onto pullets or into water or feed troughs.
 - Observe maintenance of the system so that it is performing adequately.
 - Points will be deducted for nonconformance unless management can present current purchase orders or invoices for scheduled repairs to correct the items observed.
 - Slats, fencing, and other items designed to keep birds in/out should be maintained so that birds cannot pass the barrier and that it does not pose a risk of injury.
7. For barns with automatic feeding and ventilation, are standby generators and alarm systems provided and monitored for barns with automatic feeding and ventilation?
- For environmentally controlled pullet barns:
 - Standby generators and alarm systems must be present and function properly.
 - Review the emergency plan.
 - Review documents that describe:
 - Alarm and standby generator system

- The method used to test the system.
 - Verify the physical presence of the generator and alarm system.
- For open-sided type housing, using hand feeding and natural air movement:
 - Generators and alarm systems are not required.
 - The Farm must have a protocol for monitoring the flock’s well-being and a written emergency plan.

E. Section V – Personnel and Training

- Maintaining public trust and consumer confidence is critical to the egg production industry; hence, UEP considers employee training vital to assuring the welfare of pullets.
- Good training of caregivers is essential for bird welfare. Program Participants should develop a training program to help ensure.
- The UEP Certified training videos and other UEP Certified materials are a good basis for developing a training program. However, they are not designed or intended to be the only materials provided. Program Participants should modify and supplement training to best meet the needs of their operation. In-person and hands-on training are the most critical aspects of training.
- The *UEP Animal Husbandry Guidelines* must be presented in both English and Spanish for all Authorization Program Participants for training purposes to ensure individuals are qualified.

1. A. Does the Farm have an established process for reporting animal abuse?

- A clear process should be evident. It is recommended that the process be written and displayed, but this is not required.
- The policy does not need to include an anonymous method to report, but this is encouraged.

B. Can caregivers generally convey the Farm’s zero-tolerance policy for willful acts of abuse and how to report abuse?

- Ask a caregiver to describe the policy. They should be able to explain the policy but not be expected to recite it. Examples may include, “I would report it to my manager,” “I would call the 1-800 number displayed on the wall”, or “If I saw my manager, I would report it to the director of animal welfare.”

2. Does the Farm have someone designated to oversee hen welfare?

- Someone involved with the Program Participant should be identified to oversee and champion pullet welfare.
- This individual may or may not have other responsibilities within the Program Participant or pullet barn.

3. Does the Farm conduct an internal assessment of the facility, birds, caregivers, and procedures?

- Internal assessment must be recorded in some manner and could include a simple written indicator of the date the assessment occurred. It should be at least annually.

4. Is there documented annual training utilizing the UEP Certified training videos or equivalent? If equivalent training is provided, it must include the aspects in the UEP Certified training videos, including Basics of

Good Hen Welfare, How to Assess Hen Behavior, Tenets of Audits, Aspects of Good Housing, Proper Handling, and Good Transport Techniques.

- UEP Certified training videos 1, 2, and 3 must be viewed before the employee enters a barn with live birds.
 - UEP Certified training videos 4, 5, 6, 7, 8, and 9 should be viewed within the first 3 months of working with live birds.
 - Request to view the documentation of training that covers the above topics and verify the training of specific employees by confirming the date
 - Verify that the individual employees are trained as described by asking employees how long they have been with the Program Participant and verification they have received the relevant training.
 - U.S. Poultry and Egg's [Poultry Handling and Transportation](#) training can be utilized instead of the UEP Certified training.
5. Were members responsible for handling birds on-farm, including catching crews, knowledgeable and skillful in properly handling pullets, including on best practices for walking through a flock?
- Request to observe the catching crew practices employed for the transporting and handling of pullets when transport is occurring during the audit to verify.
 - Training policy, annual records, or COC must indicate the following:
 - Specific training for handling of pullets.
 - Training dates, names, and signatures of individuals trained.
 - Name and signature of a Program Participant or contracted source representative supervising the training program.
 - The policy and guidelines shall provide information relative to the following:
 - Preparation and capture of pullets for transfer.
 - Handling practices employed.
 - Equipment used for transporting pullets.
6. Have personnel responsible for euthanizing and depopulating pullets in a humane manner received annual training based on UEP Guidelines (i.e., guidelines, video, demonstrations, etc.)?
- Review training documentation to confirm that employees are trained annually.
 - Training must have occurred within the last 12 months.
 - Check for specific employees, such as those working on the day of the audit.
7. Have all poultry caregivers, including contract employees, signed the Code of Conduct form, which indicates their commitment to key components of animal welfare including zero tolerance for willful acts of abuse? Service crews provide CoC.
- All personnel handling a Program Participant's hens shall sign a Code of Conduct form referenced as Exhibit XV including but not limited to the following:
 - Beak trimming
 - Catching
 - Transport
 - A COC indicating all crew signed the Code of Conduct may be accepted if an external or contract crew is utilized.

8. Is there documented annual fire safety training for all employees?

- Review employee training records and fire mitigation training materials.

G. Section VI - Handling and Transportation

- Handling applies to the transfer and movement of pullets at Farms, including during the end of lay.
- Transportation applies to the movement of pullets between Farms.
- Euthanasia applies only to layers at the Farm and does not extend to pullet or slaughter facilities.

1. Does the Program Participant have an SOP that describes best practices to ensure bird welfare during handling and loading at their facilities that aligns with the Certified Guidelines? The SOP(s) must include all aspects listed in question VI.3.

- Review Program Participant records.
 - Water pressure distribution records must be examined to verify that water was not withdrawn prior to removal.
 - Feed availability and depopulation records from at least 48 hours before the depopulation date must demonstrate that feed was available for populated sections.

2. Were pullets handled in a manner to avoid bone breakage, injury crowding, and piling? When caught, were pullets held in a comfortable, upright position with both hands or carried by both legs with no more than 3 birds in each hand?

- Observe any handling or transportation occurring on the Farm during the audit, regardless of whether it happens in the randomly selected pullet barn(s).
- If handling is being conducted, observe the handling of 100 pullets.
 - If 95% are correctly handled, the item complies.
- If no handling or transportation occurs during the audit, conformance shall be assessed via COC, training documents, and/or documented procedures, AND request personnel to demonstrate handling on a few pullets. Including:
 - Determine compliance-based documentation and this observation

3. Review the Program Participant's policy and guidelines for handling pullets or review the COC.

- Observe any handling or transportation occurring on the Farm during the audit, regardless of whether it happens in the randomly selected pullet barn(s).
- If handling is being conducted, observe the transportation process for conformance to the below areas.
- If the transportation of birds is not observed during the audit, the following questions should be confirmed via documentation, which may include COC(s) and/or SOPs, which indicates explicit conformance to these individual points.
 - A vague COC such as "All Authorization standards were followed" shall not constitute conformance).
- If the barn did not have a transportation event (loading or depopulation) in the last 12 months, award all points and proceed to the next section.

A. Was the catching and transport crew advised of guidelines before work began and supervised by experienced personnel?

- Interview the transport crew to confirm they are aware of proper handling techniques.
- Confirm years of experience with pullet transportation of the supervising individual.
- Verify through a superior's signature or initials on the dated document and review of appropriate procedures to confirm the catching and transport crew was advised.

B. Were pullet carts used to move pullets from the growing barn to the layer barn?

- Any use of equipment or carts where pullets are hung upside down is not allowed and will result in non-conformance.
- Were carts used to move pullets from the barn to transport vehicles?
- Request to view carts to ensure the removal of pullets does not cause physical harm.

C. Was the transport vehicle and other applicable equipment clean?

- Vehicles must be reasonably clean before loading.
 - Examine at least two transport vehicles for conformance. Transport vehicles should be clean of almost all feces and other debris prior to loading.

D. Were all cages or panel doors closed on the transport vehicles before transporting pullets?

- Examine at least 2 transport vehicles, confirming all doors are closed. A single door not closed is a non-conformance.

E. Does the stocking density in the carts and transport containers allow all birds to sit comfortably in a single layer simultaneously and are right-side up?

- Examine at least 20 carts. Two cages overstocked results in non-conformance.

F. Is there a process in place to ensure drivers of the transport vehicle are aware of climate conditions and make necessary adjustments to keep birds thermally comfortable?

- Examine a transport vehicle and confirm that the set-up matches the SOP, such as slates in place as appropriate for the weather.
- Interview the transport driver and confirm they have been in communication with the farm or other management and are aware of the required transport vehicle set-up and the process to follow in the case of an emergency, such as truck breakdown or turnover.

H. Section VII - Beak Trimming and Treatment

- Review Program Participant records, contracted source records, and policies for beak trimming/treating.
- If records show the Program Participant did not trim or treat beaks:
 - Mark "no," award all points, and proceed to the next portion of the audit.
- If the Program Participant or a contracted source trimmed beaks:
 - Mark "yes" and determine conformance for remaining elements

1. Are personnel performing beak trimming or treatment properly trained and monitored regularly for quality control?

- Documentation verifying that the beak-trimming/treatment crew was trained and monitored shall include the following:
 - Names of trained individuals and their respective training dates
 - Names of individual monitoring the process and cleanliness of the equipment
 - Description of the procedure
 - Trimming/treatment date

- Hatch date for chicks in the audited layer house
 - Observe the beak trimming process on 100 chicks or pullets when applicable.
 - If 95% of the chicks or pullets are trimmed and handled properly and documentation supporting training and monitoring is available, the facility is in compliance.
2. Is all equipment used for beak trimming or beak treatment clean and well-maintained?
- Program Participant records or COC for maintenance and equipment cleaning records must verify that beak trimming/treatment machines are cleaned at least daily.
 - Equipment cleaning shall be documented and verified by a Program Participant representative during the trimming/treatment process or a COC provided indicating the contractor or hatchery conducted this.
3. Is infrared beak treatment performed at the hatchery in accordance with the equipment manufacturer's Quality Assurance standards? Provide COC.
- Verify the documents and that COC specifically indicates the equipment manufacturer's Quality Assurance standards were followed.
4. Is hot-blade trimming carried out when birds are 10 days of age or younger? If contract service is used, provide a COC.
- Verify that beak trimming or treating is completed within the number of days stated from the date of hatch for the chicks transferred to the layer house through the Program Participant records or contracted source records.
5. Does trimming and treatment result in no more than one-third of the upper beak being removed?
- Examine 50 birds and determine if more than 1/3 of the beak has been removed.
 - Three or more birds with more than 1/3 of the beak removed is a nonconformance.
6. Does the facility have a written SOP that details procedures for ensuring feed and water are freely available and easily accessible to birds after trimming or treatment, along with nutritional modifications? Provide documentation for adherence.

Verify through documented records, or a COC with dates correlating with beak trimming to ensure that a modified diet to meet the chicks' needs during this time for a minimum of 1 week.

- Documentation may include a statement from a poultry nutritionist or other individuals with specific knowledge pertaining to the nutritional needs of beak trimming, such as an academic, scientific committee, or an animal care/production expert.
 - Nutritional supplements are not required if birds are not trimmed, or beak treatment is used.
7. Is therapeutic beak trimming only used in response to an outbreak of cannibalism and feather pecking? Provide documentation that mitigation methods failed to solve the problem.
- If a second trim was utilized, confirm that the Farm followed its SOP prior to conducting the trim.
 - Verify documentation indicating the nature and prevalence of the outbreak.
 - Verify documentation indicating mitigation methods failed to solve the problem.

X. Exhibits

- The exhibits listed below are to assist auditors in making sound decisions about the acceptability of each Program performance element.
 - **Exhibit I** – Procedure for Conducting UEP Animal Husbandry Audits of Cage-Free Pullets
 - **Exhibit II** – Caged Layers Audit Checklist. See Excel document. Located in the Caged Procedures.
 - **Exhibit III** – Cage-Free Layers Audit Checklist. See Excel document.
 - **Exhibit IV** – Checklist-Assessment of Measures Implemented to Prevent Commingling of Certified and Non-certified Eggs.
 - **Exhibit V** – Procedures for Calculating Average Cage Space. Available in Caged Procedures
 - **Exhibit VIa** – Layer Barn Worksheet- Cage Space Verification, Section I Question 1a Part II Option 1. Located in the Caged Procedures.
 - **Exhibit VIb** – Layer Barn Worksheet- Cage Space Verification Section I Question 1b Part II Option 1. Located in the Caged Procedures.
 - **Exhibit VIc** – Layer Barn Worksheet- Cage Space Verification Section I Question 1b Part II Option 1. Located in the Caged Procedures.
 - **Exhibit VII** – No longer in use.
 - **Exhibit VIII** – No longer in use.
 - **Exhibit IX** – No longer in use.
 - **Exhibit X** –Certificate of Conformance for Beak Trimming and/or Treatment.
 - **Exhibit XI** – Certificate of Conformance for Handling and/or Transportation.
 - **Exhibit XII** – Layer Barn Worksheet – Average Cage Space Question 1a Part II Option 1. Located in the Caged Procedures.
 - **Exhibit XIII** – Reschedule Form.
 - **Exhibit XIV** – Opening and Closing Meeting Checklist.
 - **Exhibit XVa** – Code of Conduct for Poultry Caregivers.
 - **Exhibit XVb** – Contracted Source Code of Conduct.
 - **Exhibit XVI** – DPCS Manual – Records and Documentation Requirements
 - **Exhibit XVII** – Desk Audit Procedures
 - **Exhibit XVIII**- Cage-Free Pullet Audit Checklist. See Excel Document

**Certificate of Conformance for Beak Trimming and/or Treatment
Section III**

Exhibit X



Service Provider _____
Service Provider address _____

Our customer _____, being recognized by UEP as an Authorization Program Participant, has requested that we provide this COC to confirm that as a service provider, we are meeting the husbandry guidelines as identified in UEP's Animal Husbandry Guidelines for the service of beak trimming/treatment. We further understand that our customer must annually be audited by a third-party independent auditor, and this COC will be among the records that the auditor will review. Our company will maintain records to demonstrate compliance with the elements of this certificate.

Therefore, by a checkmark below, we confirm that our company has met the following guidelines:

Training _____, UEP's training video section on beak trimming, is used to train all new members of the beak trimming crew and is periodically shown to the entire crew.

For Beak Trimming During Growing Period

1. _____ The chicks were beak trimmed/treated at 10 days or younger.
2. _____ If necessary, a second trim was conducted before pullets were 8 weeks old.
3. _____ Crew has been trained and is monitored by a supervisor for quality control.
4. _____ If trimming, approximately 2 days before and 2 to 3 days after beak trimming, vitamin K or Vitamin C was added to the water or feed.
5. _____ The levels of feed and water were adjusted until the beaks were healed.
6. _____ The blade and guide holes of the beak trimmer/treatment were cleaned daily.

For Beak Trimming/Treatment at Day Old at Hatchery

1. _____ The beak trimming/treatment crew has been trained and is monitored by a supervisor for quality control.
2. _____ The beak trimming/treatment machine is cleaned daily.

Service Provider Name & Title

Signature

Program Participant Name & Title

Signature

Date

**Certificate of Conformance for Handling and/or Transportation
Section V**

Exhibit XI



Service Provider _____

Service Provider address _____

Our customer _____, being recognized by UEP as an Authorization Program Participant, has requested that we provide this COC to confirm that as a service provider, we are meeting the husbandry guidelines as identified in UEP's Animal Husbandry Guidelines for the service of Handling and/or Transportation. We further understand that our customer must annually be audited by a third-party independent auditor, and this COC will be among the records that the auditor will review. Our company will maintain records to demonstrate compliance with the elements of this certificate.

Therefore, by a check mark below, we confirm that our company has met the following guidelines:

Training

1. _____ UEP's training video section on Handling and Transportation was viewed as training of the handling and transportation crew for the moving of pullets or spent hens.
2. _____ All members of the catching and moving crew have been trained and are knowledgeable and skillful in handling pullets or spent hens with care.
3. _____ Hens or pullets were handled in a manner to minimize bone breakage and injury.
4. _____ Hens were held in a comfortable, upright position with both hands or carried by both legs with no more than 3 birds in each hand?
5. _____ Pullet cage carts or spent hen cage carts were used for flock removal from the barn.
6. _____ Pullets or hens were loaded into clean, well-maintained transport containers and vehicles.
7. _____ Pullets or hens were loaded into each transport container at a density appropriate for the weather conditions.
8. _____ The cage and panel doors of transport vehicles were closed securely so that hens could not escape.

Service Provider Name & Title

Signature

Program Participant Name & Title

Signature

Date

Authorized Reschedule Form

Exhibit XIII



Authorization audits will be announced. The auditor will provide a 7-day notice to the Authorization Program Participant being audited. This form shall be completed by the auditor or the Program Participant and submitted to the UEP Program Administrator and the auditing firm when the Program Participant:

1. Wishes to reschedule or delay the audit OR
2. Avoids the audit scheduling process entirely by not returning messages left by the auditor in an attempt to schedule the audit.

This form must be submitted to UEP to get approval for a delay/reschedule

Instructions for use

1. When the above situation arises, the Authorization Program Participant will complete this form and send it to Dr. Larry Sadler at UEP: lsadler@unitedegg.com
2. When necessary, Dr. Larry Sadler or his designee will contact the Authorization Program Participant to discuss the reason for the rescheduling/delay.
3. Dr. Larry Sadler or his designee will indicate if the rescheduling/delay is approved.

To be completed by the Authorization Program Participant or Auditor:

1. Name and address of the Program Participant and
Farm: _____

2. Name of the Program Participant representative requesting: _____

3. Name of the individual sending the form to UEP: _____

4. Date audit is rescheduled, delayed, or no response provided: _____
The date form was sent to UEP: _____

Please state the reason for reschedule/delay:

Authorized Reschedule Form

Exhibit XIII



UEP's response to Authorization Program Participant:

To be completed by UEP

1. Date the form was received by UEP:

2. Authorized Cage-free Pullet Farm #:

3. Total number of occurrences by the Authorization Program Participant:

4. Action taken by UEP:



- Conduct an opening meeting, including as appropriate:**
 - Introduction of participants and their roles;**
 - Confirmation of audit purpose, scope, and criteria;**
 - This confirms why the audit is taking place (purpose), the boundaries of the audit as limited to the requirements or audit criteria (scope), and audit requirements referenced in the guidelines, procedure, and checklist (criteria)
 - Also, confirm checklist areas evaluated, point structure, and information about conditions under which the audit may fail (listed in the procedure) or be terminated (such as lack of cooperation, safety, access to records, and areas within the scope of the audit)
 - Confirmation of audit timetable and other relevant arrangements;**
 - Methods and procedures to be used to conduct the audit;**
 - Briefly confirm the option selected and methods used to perform the audit
 - Confirmation of formal communication channels;**
 - Offer the opportunity for the auditee to ask questions;**
 - Confirmation that the auditee will be kept informed of the audit process during the audit;**
 - This confirms that the auditee will be advised of the audit progress and identified non-conformances during the audit
 - Confirmation that the resources and facilities needed by the auditor are available;**
 - Confirmation of confidentiality matters;**
 - Confirmation of relevant work safety, emergency, and security procedures for the auditor; and**
 - Confirmation of the availability, roles, and identities of auditee guides.**

Opening and Closing Meeting Checklist

Exhibit XIV



- Conduct closing meeting, including as appropriate:**
 - Present audit findings and conclusions;**
 - Provide positive feedback
 - Discuss the next steps in the report distribution process;**
 - The checklist approval process, including the timetable
 - Information about any appeal system on the conduct or conclusion of the audit; and**
 - Offer the opportunity for the auditee to ask questions.**

Code of Conduct for Poultry Caregivers
Section VI Question 2

Exhibit XVa



Employee Name _____ (Print)

Date _____

1. Fresh feed must be available daily. If not, correct the problem or contact a supervisor.
2. All lights must be in working order. If the lights are not in working order, correct the problem or contact a supervisor.
3. Air should be moving through the barn at all times. If fans, air inlets, or curtains are not in working order, correct the problem or contact the supervisor.
4. Water must be available at all times. Water supply issues must be corrected or brought to the attention of the supervisor.
5. Shelter must be appropriate for the hen's age, type, and production. Correct the problem or notify a supervisor if you should see broken or worn-out equipment, including cages, nest boxes, perches, litter areas, netting, and fencing.
6. Biosecurity rules and standard animal welfare practices need to be obeyed. Contact a supervisor if biosecurity rules are not being followed by other employees.
7. Safety rules of the farm must be followed. Contact a supervisor if the safety rules of the farm are not being obeyed.
8. Injured or sick hens need to receive care. Contact a supervisor if you have questions about the action to be taken with such hens.
9. Proper euthanasia of sick, injured, or cull hens will be conducted by a trained employee. Contact a supervisor if you are unable to perform this task.
10. Dead hens will be removed from the hen living area daily and properly disposed of. Contact a supervisor if the procedure is not being followed by all employees.
11. All hens (live or dead) will be handled with respect and dignity. Proper handling and catching methods to minimize stress must be followed. Any person not adhering to this must be reported to a supervisor.
12. There is zero tolerance for willful acts of abuse and neglect. Any observed incidents will be reported immediately to management or via the established reporting mechanism.

I understand animal abuse is illegal and will be reported to the proper authorities. Failure to adhere to the Code of Conduct may also result in disciplinary action, up to and including termination.

Employee Signature: _____

Supervisor Signature: _____ Program Participant: _____

Contracted Source Code of Conduct
i.e., Beak Trimming/Treatment, Catching, Transportation, etc.
Section VI Question 2



Employee Name _____ (Print)

Date _____

1. Water must be available at all times. Water supply issues must be corrected or brought to the attention of the supervisor.
2. Biosecurity rules and standard animal welfare practices need to be obeyed. If biosecurity rules are not being followed by other employees, contact the supervisor.
3. Safety rules of the farm must be followed. If the safety rules of the farm are not being obeyed, contact the supervisor.
4. Injured or sick hens need to receive care. Contact the supervisor if you have questions about the action to be taken with such hens.
5. Proper euthanasia of sick, injured, or cull hens will be conducted by a trained employee. Contact the supervisor if you are unable to perform this task.
6. Dead hens will be removed from the hen living area daily and properly disposed of. Contact the supervisor if the procedure is not being followed by all employees.
7. All hens (live or dead) will be handled with respect and dignity. Proper handling and catching methods to minimize stress must be followed. Any person not adhering to this must be reported to the supervisor.
8. There is zero tolerance for willful acts of abuse and neglect. Any observed incidents will be reported immediately to management or via the established reporting mechanism.

I understand animal abuse is illegal and will be reported to the proper authorities. Additionally, failure to adhere to the Code of Conduct may result in disciplinary action, up to and including termination.

Employee Signature: _____

Supervisor Signature: _____ Program Participant: _____



Reviewed and Approved by the United Egg Producers Board
Reviewed and Approved by the United Egg Producers Committee for Animal Welfare
Significant contributions by the UEP Audit Subcommittee
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