

# Dairy Deception

CORRUPTION AND CONSUMER FRAUD  
AT ALEXANDRE FAMILY FARM





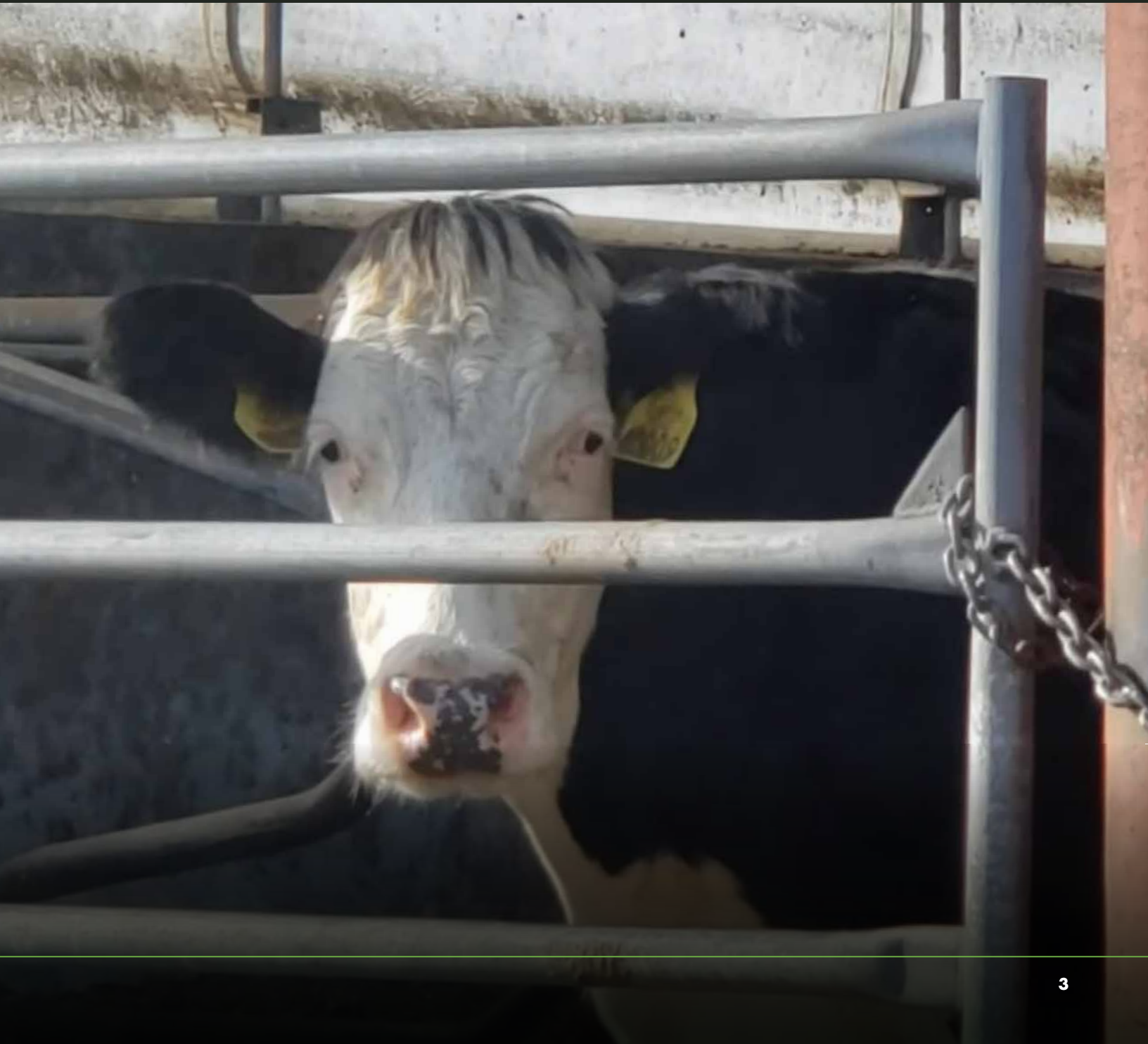
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DAIRY DECEPTION: CORRUPTION AND CONSUMER FRAUD AT ALEXANDRE FAMILY FARM

# Executive Summary





# Executive Summary

This report details the results of a consumer fraud investigation conducted by Farm Forward, with the help of rancher whistleblowers, that uncovered systemic deception, cruelty, and animal abuse by arguably the leading higher welfare, Organic, Certified Humane, and “regenerative” dairy operation: Alexandre Family Farm, LLC. Our own eyewitness experiences in investigating this report, coupled with extensive documentation—including video footage, photographic evidence, ownership documents, a veterinary evaluation from a large animal veterinarian who works in the dairy industry, and a review by leading animal welfare scientist Gail Hanson, DVM—together provide **damning evidence that Alexandre, in contrast to their public claims and certifications, practices a business model that ensures that cows routinely suffer egregiously and that diseased animals are sold into the human food supply chain.** Given Alexandre’s leading reputation in the industry, Alexandre’s failures suggest that decades of industrialization make it nearly impossible for modern dairies to produce their products in line with public expectations.

The enormous scale of preventable animal disease and suffering documented at Alexandre reveal loopholes in its certifications that function to deceive consumers, so-called **humanewashing**. Perversely, Organic certifications frequently function to **incentivize farmers to withhold needed medical treatment from diseased animals** and, polling shows,<sup>1</sup> aid in humanewashing by giving the public the false sense that these certification standards align with their values. Many manufacturers that incorporate Alexandre’s dairy into their own products—including toddler formula—highlight Alexandre’s welfare claims to increase their own sales, expanding the humanewashing (and such products may not identify Alexandre by name and so are hard for consumers to avoid).

One of the most dramatic findings of our investigation is that in more than a hundred videos and photos Farm Forward has documented dozens of cases of **serious violations** of even the relatively weak Organic, Certified Humane, and other certifications that Alexandre touts in its advertising, yet Alexandre retains those certifications.

Structural conditions in the dairy industry, and particularly in the Organic certification programs, may make socially unacceptable forms of animal suffering—like failure to adequately treat obvious injuries and illnesses—the rule rather than the exception. Given that these welfare problems are occurring in “best of the best” operations that, as of the release of this report, remain in good standing with their certifications, it is our recommendation that for the foreseeable future, consumers who wish to avoid animal cruelty steer clear of products made from cows’ milk.

<sup>1</sup> Grace Adecox, Kevin Hanley, Andrew deCoriolis, and Trevor McCarty, “Holding Companies Accountable: Humanewashing, Antibiotics, and Animal Welfare,” Data for Progress & Farm Forward, Aug 2023, accessed Jan 5, 2024, available [here](#).



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# Introduction







# Introduction

## The Historical Moment

When the country’s most diverse, lactose-intolerant, and environmentally conscious generation, Gen Z, turned its back on cows’ milk, it put industrial dairy’s back up against a wall. Americans’ annual cow milk consumption had already fallen by two-thirds between 1945 and 2022, from 45 gallons per person to 15.<sup>2</sup> Members of Gen Z drink even less than the rest of the public, in 2022 buying 20 percent less cows’ milk than the national average.<sup>3</sup> “We lost almost an entire generation of milk drinkers,” noted U.S. Representative Glenn Thompson (R-PA), leader of the House Committee on Agriculture.<sup>4</sup> Meanwhile, in 2022 just over 40 percent of U.S. households purchased plant milks<sup>5</sup> like oat, soy, and almond, which occupy ever-increasing footage of grocery store shelves: their global revenue of \$15 billion in 2015 is expected to grow to more than \$35 billion by the end of 2028.<sup>6</sup>

## The Labels

As the dairy industry tries to convince Gen Z that it offers a humane, desirable, relevant, and climate-friendly product, dairies apply appealing labels to milk cartons: “pasture-raised,” “grass-fed,” “eco-friendly,” even “carbon neutral,” and the recently introduced “regenerative.” Most of these labels are meant to convey in part—as phrased by Alexandre Family Farm, LLC (Alexandre)—“These are some happy grass grazed cows,”<sup>7</sup> “I am one happy cow,”<sup>8</sup> and “Life on our pastures is a happy one!”<sup>9</sup> But how can consumers know that these marketing labels and statements fairly represent the actual conditions on the farm, and aren’t simply more humanewashing?<sup>10</sup>



<sup>2</sup> 1945 figures from Judith Jones Putnam and Jane E. Allshouse, “Trends in U.S. Per Capita Milk and Cheese Consumption, 1909 to 2001,” United States Department of Agriculture (USDA) Economic Research Service, Jun 1, 2003, accessed Jan 5, 2024, available [here](#). 2022 figures from “Dairy products: Per capita consumption, United States (Annual),” USDA Economic Research Service, accessed Jan 5, 2024, available [here](#).

<sup>3</sup> Kim Severson, “Got Milk? Not This Generation,” New York Times, Apr 4, 2023, accessed Jan 5, 2024, available [here](#).

<sup>4</sup> Tom Venesky, “USDA Decision to Keep 1% Milk in Schools Seen as Positive Step,” Lancaster Farming, Feb 13, 2022, updated Dec 7, 2022, accessed Jan 5, 2024, available [here](#).

<sup>5</sup> “2022 U.S. Retail Sales Data For The Plant-Based Foods Industry,” Plant Based Foods Association, accessed Jan 5, 2024, available [here](#).

<sup>6</sup> “Revenue of the milk substitutes market worldwide from 2018 to 2028 (in billion U.S. dollars),” Statista, Nov 14, 2023, accessed Jan 5, 2024, available [here](#).

<sup>7</sup> Alexandre Family Farm, Facebook post, Apr 29, 2023, accessed Feb 7, 2024, available [here](#).

<sup>8</sup> Alexandre Family Farm, Facebook post, Sep 10, 2022, accessed Feb 7, 2024, available [here](#).

<sup>9</sup> Alexandre Family Farm, Facebook post, Jun 8, 2023, accessed Feb 7, 2024, available [here](#).

<sup>10</sup> “The Dirt on Humanewashing,” Farm Forward, Dec 2022, accessed Feb 7, 2024, available [here](#).



## The Certifications

Enter third-party certifications like “Certified Humane by Humane Farm Animal Care,” to persuade consumers that on-farm conditions are as humane and environmentally sound as the labels purport. And it’s working, at least for the dairies. Alexandre’s customers likely believe that they are supporting “happy cows.”<sup>11</sup> Well-intentioned consumers buy into both the label claims and certifications, paying a hefty premium for cows’ milk from the dairies that sell to “ethical” retailers like Whole Foods Market, which markets their partnership with Alexandre as “Restarting Dairy.”<sup>12</sup> Alexandre boasts a number of premium animal welfare certifications and was named a Whole Foods Market Supplier of the Year in 2021.<sup>13</sup> But given the evidence that we uncovered, Alexandre’s welfare claims appear designed to deceive.

## The Animal Welfare Violations

In more than 15 years of advocacy Farm Forward has seen the worst of the worst on factory farms. Yet our own eyewitness experiences combined with the videos, photographs, and research the rancher whistleblowers provided to us documenting Alexandre’s practices shocked even us.

Dozens of videos and photos depict Alexandre’s numerous indefensible animal welfare violations. **Far from indicating isolated incidents, or physical abuse of a few cows by “a few bad apples” among Alexandre staff, the footage points to routine management practices, driven from the top, that lead to systemic, egregious suffering.** In addition to what the videos depict, whistleblowers working with and around Alexandre provided photographic evidence of more than a dozen calves who were kept isolated from their mothers and died; whistleblowers also described serious lapses in management that resulted in, for example, the extreme suffering of hundreds of cows and the violent deaths of dozens of cows.

<sup>11</sup> E.g. S.G. Sweeny’s and K.O. DeLeon’s separate comments on Alexandre’s Facebook post, Sep 8, 2022, accessed Feb 7, 2024, available [here](#).

<sup>12</sup> “Restarting Dairy,” Whole Foods Market, accessed Jan 5, 2024, available [here](#).

<sup>13</sup> “Alexandre Family Farm Wins Nexty Award for Best New Mission-based Product at Natural Products Expo East 2021,” Associated Press, Sep 23, 2021, accessed Jan 5, 2024, available [here](#).



## The Report

The report's first section, "Animal Abuse at Alexandre," documents the condition of cattle videoed, photographed and/or witnessed by the whistleblowers or by Farm Forward staff, as well an assessment of video evidence from a large farmed animal veterinarian specializing in dairy. Their evaluations, along with an independent evaluation by farmed animal welfare expert Gail Hansen, DVM, all point to dismal welfare conditions at Alexandre.



The report's second section, "Animal Welfare Certifications Failed to Prevent Suffering," demonstrates that the certifications supposedly verifying Alexandre's welfare practices—USDA Organic, Certified Humane by Humane Farm Animal Care, and Regenerative Organic Certified—did not prevent, or apparently even detect, the abuses at Alexandre. In fact, documentary evidence indicates that the Organic program and Organic certifiers were notified of abuses and potential violations of Organic standards and yet the issues persisted. Sadly, when combined with the market pressures in the dairy industry, a requirement of the Organic program—the prohibition of the use of antibiotic treatment of animals marketed with the label—may have perpetuated and even *worsened* systemic animal suffering at Alexandre.

Third, in "Ripples of Humanewashing," this report shows that Alexandre's claims of ethical production expand through the market through food manufacturers who purchase its dairy products, including a company producing toddler formula. These "ethical dairy" companies spread Alexandre's deception far beyond the products that Alexandre sells directly to consumers.

**When the certifications with the highest animal welfare standards don't prevent appalling animal suffering even at the leading higher welfare regenerative dairy, we are left to wonder what is happening at other big dairies, and whether higher welfare dairy is possible for today's grocery markets. Given current market dynamics, big dairy may be a welfare problem that cannot be solved.**

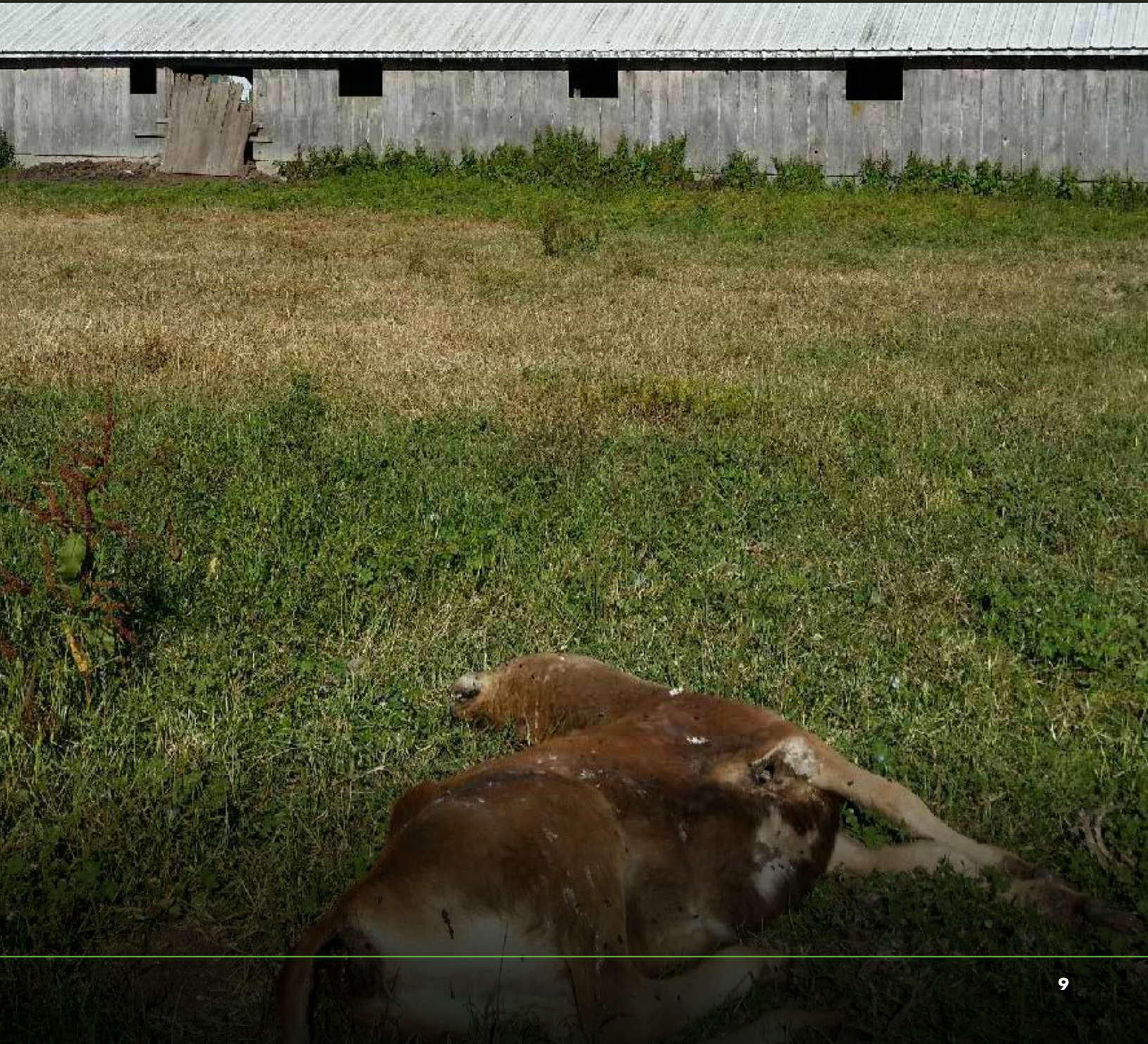
Widening the focus from just Alexandre, the appendix "Structural Suffering" explores how the organizational *structure* of large scale organic and conventional dairies depresses animal welfare and leads to the staggeringly high annual death rate for cows used for dairy, and suggests directions for future research.





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# Animal Abuse at Alexandre







# Animal Abuse at Alexandre

Farm Forward's investigation reveals a company that actively deceived consumers for years, with on-farm practices that put its public image to shame. While Alexandre has marketed itself as a leader in organic, higher welfare, and regenerative agriculture, earning itself industry [awards](#), [accolades](#), and [celebrity endorsements](#), cows<sup>14</sup> suffered egregiously.

## EVIDENCE REVIEWED BY FARM FORWARD

- Hundreds of videos taken by whistleblowers over a period of at least four years, beginning in 2019 and ending in 2023. Issues were repeatedly raised to Alexandre's management during this timeframe.
- Hundreds of photographs taken by whistleblowers of live and dead cattle owned or managed by Alexandre.
- Our recorded interviews with whistleblowers confirming firsthand and secondhand knowledge of how cows under the care of Alexandre were treated. Farm Forward staff conducted over a hundred hours of interviews with multiple whistleblowers.
- Affidavits confirming that at least one hundred cows sold at auction were owned by Alexandre.
- Records of conversations between whistleblowers and USDA staff.
- Brand records from the state of California confirming that cows visible in videos and photos bear the Alexandre brand.

<sup>14</sup> Although in the dairy industry "cows" can be a term reserved for cattle who have calved (as distinct from heifers who have not, as well as yearlings, calves, etc.), in this report we use "cows" in the conventional, everyday language sense to refer to female cattle.



## Incidents of Abuse, Neglect, and Mistreatment

Whistleblower photographs and interviews reveal critical incidents incriminating Alexandre's welfare practices, such as:

- **Dragging cows across concrete and gravel:** An incident of a live cow being dragged by a skid loader across a concrete pad and gravel for more than 50 yards, while six employees watched. When a new employee came onto the scene and confronted the six who were watching the cow being dragged, a long-term employees responded, "This is the way that we've always done it." **The incident was reported to Blake Alexandre, who seemed unconcerned and took no known action in response.** So far, we have received reports of two separate nonambulatory disabled cows being dragged alive across concrete by skid loaders at Alexandre.







- **Trampling to death:** In the same year that Blake and Stephanie Alexandre received the Organic Trade Association’s Organic Farmer of the Year Award, a whistleblower arrived at Alexandre to find more than 40 cows lying dead on the ground. Standing among them was an Alexandre employee who “looked like he’d seen a ghost.” The Alexandre employee reported that the operation had been out of hay for several days and that when the feed truck finally showed up, 800 or so very hungry cows dogpiled in their effort to get food, trampling more than 40 to death and injuring about 20 others to the point that they had to be euthanized.
- **Dehorning cows with no pain management:** Instead of following the common practice of disbudding calves before the horn buds attach to their skulls, Alexandre let more than 800 cows’ horns grow for 3–4 years, by which point they had fused to the skull, and then bloodily cut them off through live, innervated tissue—with no anesthetic, analgesic, or other pain medication.<sup>15</sup> To perform the procedure, employees used a sawzall on cows who were locked into stanchions. The cows’ resulting stress caused a decline in milk production, as they stopped eating and were scared to get milked.



According to a whistleblower, this cow, dehorned as a mature adult, belonged to Alexandre before being sold at an auction yard.

<sup>15</sup> The American Association of Bovine Practitioners (AABP) recommends that in dairy operations where calves are handled daily, disbudding or dehorning should be performed by 8 weeks of age, and that pain management should be considered the standard of care for all dehorning and disbudding procedures, using local anesthesia, systemic pain relief, and sedation when appropriate. See AABP, “Dehorning Guidelines,” Nov 2019, accessed Jan 24, 2024, available [here](#). Even before USDA strengthened its standards on Jan 22, 2024, it allowed only “performance of physical alterations as needed to promote the animal’s welfare and in a manner that minimizes pain and stress.” USDA, National Organic Program: “Organic Production and Handling Requirements: Livestock care and production practices standard,” Title 7 CFR § 205.238(a)(5), Jan 28, 2019, accessed Jan 27, 2024, available [here](#).



- **Deaths of calves isolated in hutches:** When we personally observed Alexandre from a public road, we witnessed calves kept individually isolated in plastic hutches without even a fenced patch of ground to set a foot outside.<sup>16</sup> A whistleblower showed us photos of Alexandre hutches with extremely poor sanitation, as well as photos of more than a dozen calves who were found dead in Alexandre hutches on just one day.
- **Approximately 80 heifers and their calves killed:** One season, about 80 heifers were “so skinny” and their calves were “so big” that the heifers couldn’t successfully calve. Alexandre staff shot the approximately 80 heifers with a .22 rifle, killing not only the 80 heifers but also their calves.

“People leave dairy all of the time. We know that. We see the growth in plant-based beverages. But we’re a reason to come back.”

- Stephanie Alexandre, Co-Owner and head of marketing, Alexandre<sup>17</sup>

- **Down cow ignored:** A nonambulatory, disabled cow, unable to stand or walk, was left out in the pasture for two weeks, mostly ignored until someone bothered to shoot her.



<sup>16</sup> Hutches are widely seen as inhumane, all the more so when they do not include fenced patches of ground that allow calves to step outside. See “Regenerative Organic Certified,” page 31 of this report.

<sup>17</sup> Stephanie Alexandre, in “Restarting Dairy with Alexandre Family Farm,” Whole Foods Market video, 3:53–4:00, available [here](#) and [here](#).





- **Calf head stuck in stanchion:** Stanchions are used to immobilize a cow for milking or medical treatment. A calf got her head stuck in a stanchion and was left there for three days. She became dehydrated, her eyes became sunken, and her head swelled from her efforts to get loose.



- **Inhumane teat cutting:** An Ayrshire cross who had mastitis and “was so sick she was getting toxic” was being milked unsuccessfully. To increase the flow of milk (into the organic milk supply), an Alexandre worker cut off a large portion of her teat—not just the tip—using a dirty pocket knife, without using any anesthetic, analgesic, or other pain management.







- **Cow stuck in a feed trough:** A cow who fell into the feed trough due to her hunger was unable to get out and suffocated.



- **Veterinary and hoof care:** For longstanding periods of time, Alexandre provided its herd no routine veterinary care or hoof care management.
- **Shipping sick, injured, lame cows:** As a general practice, as long as cows can board a transport truck, Alexandre loads them for auction, no matter how sick, injured, or lame they are.
- **Worst of the worst:** At auction, Alexandre cows often include “the worst of the worst”: animals in such poor condition that at an auction where animals in good condition fetch more than \$1 a pound, some Alexandre cows bring 5-10¢ a pound.





Alexandre's welfare practices are clearly out of step with the public image that Alexandre projects to its consumers. In addition to defrauding consumers, according to whistleblowers Alexandre has defrauded at least one certifier, bank, and organic program:

- **Certification fraud:** Alexandre composts dead cows. There can be pits with 60–70 dead calves, yearlings, heifers, and fully mature cows in the same field where living cows are pastured and eating the grass. At times, there are so many dead cow bodies being composted (along with fish meal) that flies become a major problem for the Alexandre herd. In a violation of organic rules, Alexandre **staff have been instructed to use backpack sprayers to spray down the entire herd with diesel fuel**, “combined with mineral oil to make it stick.” When a certifier announced a pending visit, **Stephanie Alexandre instructed staff to lie** by saying that the purpose of the backpack sprayers was to keep machinery from rusting.





- **Bank fraud:** When using its cows as collateral to obtain a bank loan, staff were instructed to move cows between fields to fool the bank’s inspector into believing Alexandre owned more cows than it actually did. Also, culled cows were deliberately left unculed in the DairyCOMP computer system, to give the impression that Alexandre owned more cows than it did, in a practice called “ghosting.”
- **Organic fraud:** In violation of organic rules, Alexandre topically treated a cow’s foot rot with tetracycline powder (an antibiotic),<sup>18</sup> and sold the cow as organic. There is no approved use of tetracycline topical treatment for foot rot, and using any antibiotic on a cow sold as organic is clearly prohibited by organic standards. In addition, Alexandre routinely used synthetic parasiticides to deworm the majority of its calves and later sold such calves on the organic beef market, a clear violation of organic rules.<sup>19</sup>

According to whistleblowers, **members of the Alexandre family have both actively and passively condoned Alexandre’s abuse, neglect, and mistreatment of cows.** For example, when Blake Alexandre was informed of a cow being dragged by a skid loader, he seemed unconcerned and took no known action in response. Stephanie Alexandre sewed denim eye patches that concealed cows’ infected and cancerous eyes from bidders at auction, and instructed Alexandre staff to lie to a certifier about backpack sprayers that were used to spray down the entire herd with diesel fuel. Blake and Stephanie Alexandre’s son Joseph Alexandre knew what was happening on site—he was on the farm on a daily basis, and sat in the weekly Thursday morning management meetings. Joseph Alexandre also instructed staff to wrap cows’ injured legs with duct tape.

**The incidents detailed above (and chronic conditions described below) do not result from the actions of “a few bad apples.” When good farmers encounter rotten apples, they toss them out. In contrast, situations like these have so regularly occurred at Alexandre for at least the past five years that they speak to an organizational system, company culture, and leadership approach that embraces—as part of the normal way of doing business—abuse, neglect, and mistreatment of cows, coupled with consumer fraud, certification fraud, and bank fraud.**

<sup>18</sup> In conventional (non-organic) dairy cattle, topical tetracycline is FDA approved for treating eye infections like pink eye.

<sup>19</sup> See USDA, National Organic Program: “Organic Production and Handling Requirements: Livestock care and production practices standard: Prohibited practices,” Title 7 CFR § 205.238(c)(4) and (c)(5), Jan 28, 2019, accessed Jan 27, 2024, available [here](#) and [here](#), as well as USDA, National Organic Program: “Administrative: The National List of Allowed and Prohibited Substances: Synthetic substances allowed for use in organic livestock production,” Title 7 CFR § 205.603(a)(23), Jan 28, 2019, accessed Jan 27, 2024, available [here](#).





## From Incidents to Ongoing Conditions

Additional video and photographic evidence, our own experiences as eyewitnesses, and the veterinarian's report all point to extreme humanewashing of persistent conditions at Alexandre.

Among the materials given to Farm Forward by whistleblowers were videos of more than a hundred cows sold by Alexandre at a cattle auction, a sample of which were reviewed by a veterinarian. These videos, along with interviews from the whistleblowers, paint a picture of a dairy operation that at best allowed cows to languish with painful diseases rather than treating or euthanizing the animals, and in all likelihood actively caused animals to suffer more by selling them into the beef supply chain while ill.

Farm Forward made the evidence available to a large animal veterinarian who regularly works in the certified Organic and conventional dairy industries.<sup>20</sup> The veterinarian analyzed the videos and wrote a detailed report that included an assessment of the health of cows documented in the videos and discussed, where possible, the conditions and management practices that may have led to the health outcomes documented.<sup>21</sup> When quoting the veterinarian, we have **bolded** some portions of their assessment to add emphasis.

While Alexandre's cows evidence dismally poor welfare in a variety of categories, for purposes of this report we limit our discussion to four:

- lameness and foot rot
- spinal trauma and hind end paralysis
- malnourishment and poor body condition, and
- eye disease and trauma.

Characterizing the videos as a collection, the veterinarian wrote, "**These videos demonstrate regular transport of severely lame and wounded animals unfit for transport to auction ... absolutely not in keeping with ethical norms and recommendations set by the state of California.**" The veterinarian continues, "several of these cases are **objectively severe** ... and some highlight a **chronicity that is unacceptable from a welfare standpoint**. Euthanasia should have occurred sooner, and these animals are clearly unfit for a sale/auction barn."<sup>22</sup>

<sup>20</sup> The veterinarian asked that their name not be made public for fear of backlash by actors in the industry where they are still employed.

<sup>21</sup> J. Doe, DVM, "Video Analysis for Farm Forward," Jan 20, 2024.

<sup>22</sup> "Culling" refers to eliminating undesirable animals from the herd, sometimes by euthanizing on farm, but more typically by selling to a slaughterhouse to be processed for beef or at an auction of livestock en route to the slaughterhouse. See [Appendix](#).





## “Unequivocally Inhumane”: Lameness and Foot Rot

“Severely lame” describes cows with lameness so debilitating or painful that they either have difficulty walking without severe pain or coxing, or completely lack the ability to stand (“nonambulatory disabled,” “downer cows” or “down cows”). “Severely lame” is an important classification for the veterinarian who analyzed the videos, because in their professional judgment **severely lame animals “should be transported for no reason other than veterinary care.”**

**On dairies, chronic lameness is one of the top four reasons that operators cull cows from the herd,** along with mastitis (inflammation of mammary gland due to physical trauma or microorganism infections), decreased milk production, and reproductive challenges.<sup>23</sup> Colloquially, farmers often refer to a swollen foot that a cow is not using as “foot rot,” though a diagnosis of true “foot rot” refers to a common necrotic (decaying) infectious disease caused by bacteria of the genus *Fusobacterium* or *Bacteroides*, usually as the result of animals standing in their own excrement.<sup>24</sup> Foot diseases—septic arthritis, pedal osteitis, interdigital dermatitis, hairy heel wart, foot abscess, joint infection, true foot rot, etc.—are the most frequent cause of lameness that leaves a cow unable to bear weight on her leg, that is, to be “severely lame.”<sup>25</sup>

### *Documented evidence*

In two videos, a mature jersey cross exhibits such significant right hind lameness that the veterinarian assesses her as “**severely lame**” and writes “**I do not think transport to and time in a sale barn/auction is appropriate.**” Notably, the bottom of the cow’s disabled leg is banded with duct tape. Farm workers may have attempted to hold a topical treatment against the cow’s leg by using **an improvised foot wrap made of duct tape.** According to whistleblowers, Blake and Stephanie Alexandre’s son Joseph Alexandre instructed staff to wrap problematic legs in duct tape, reinforcing a typical practice at Alexandre. Other dairies in the area commonly cover the site of a wound or infection with “vet wrap,” which is more expensive than duct tape. Vet wrap expands and contracts with changes in swelling, and sticks to itself but not a cow’s skin; in contrast, duct tape can severely restrict a swollen limb—or even cut into it when it swells—and needs to be ripped off.<sup>26</sup>

<sup>23</sup>J. Stojkov et al., “Management of cull dairy cows: Culling decisions, duration of transport, and effect on cow condition,” *Journal of Dairy Science* 103:3, Mar 2020, pp. 2636-2649, accessed Jan 9, 2024, available [here](#).

<sup>24</sup>Roslyn Biggs et al., “Cause, Prevention, and Treatment of Foot Rot in Cattle,” Oklahoma University Cooperative Extension, Aug 2019, accessed Jan 9, 2024, available [here](#).

<sup>25</sup>“See also Mary Garvey, “Lameness in Dairy Cow Herds: Disease Aetiology, Prevention and Management,” *Dairy* Mar 18, 2022, 3(1), pp. 199-210, accessed Jan 9, 2024, available [here](#).”

<sup>26</sup>Many foot-rot-like problems can be treated with antibiotics—but on an organic dairy like Alexandre, for a cow to retain her organic status, antibiotics can’t be employed. Instead of using antibiotics, organic farms can clean the area with surgical soaps, debride dead/diseased tissue, and then allow time for healing in a clean, dry, well-maintained area. In less severe cases, after debriding, even a topical treatment of salicylic acid and oregano oil, or betadine and honey, could be effective. The veterinarian notes, “Many common foot problems can be avoided by appropriate foot trimming, management of the environment (less manure and less moisture means less injury and less bacteria), and well maintained foot baths.” It is unknown whether Alexandre employed any of these preventative measures or treatments.



Another video depicts a red/white holstein heifer with “severe left front lameness, non weight bearing.” The vet writes, “Lameness of this severity is most often due to one of three causes: fracture, joint infection (sepsis), or foot abscess ... This case represents **the most severe lameness in a standing animal in this video series and is the clearest example of a severely lame animal that should not have been transported to an auction barn.**”

A fourth video of a mature holstein cow shows such severe left hind lameness that her rear left leg is totally non-weight bearing. The veterinarian assessed that the cause was

most likely septic arthritis/tendonitis and/or osteomyelitis of distal limb structures ... Disease has extended beyond the foot itself into the soft tissues higher up on the leg, involving joints and likely tendons. **This condition is extremely painful.** These can be treated surgically on farm by a skilled veterinarian, but prognosis remains poor and requires antibiotic therapy. Doing so is often prohibitively expensive and euthanasia is recommended. **Transport of an animal with disease this severe for any reason other than veterinary care is unequivocally inhumane.**

The World Organization for Animal Health, of which the United States is a member, recommends that animals be considered “unfit to travel” over land (for example, by truck to a sale/auction barn) if they “are sick, injured, weak, disabled or fatigued,” or “unable to stand unaided and bear weight on each leg,” or “cannot be moved without causing them additional suffering.”<sup>27</sup>

These severely lame animals were left untreated or were treated inadequately, which caused them considerable suffering. In the opinion of the veterinarian, in none of these cases should the animals have been transported to a sale barn. All of them were.

## “Long Term Progression”: Spinal trauma and hind end paralysis

Sadly, spinal cord injuries are among the most common injuries seen among cows used for dairy. These injuries can result from external trauma such as mounting by a bull; mounting by another cow; accidents in parlors, stalls, or while moving between areas; or from internal injuries due to traumatic calving as in a “hard pull, big calf, or a birth that was prolonged and not attended.” A typical progression includes, first, an acute phase with muscle weakness, poor muscle control resulting in clumsy movements (“ataxia”), and paralysis of the tail. Then many cows make a partial recovery, *often continuing to be milked through their recovery and the beginning of the final phase*, which involves chronic muscle wasting, decreased appetite, weight loss and (in what can be a death sentence for a cow used for dairy) decreased milk production. Even if her milk production keeps up, a cow with a spinal injury can be difficult to breed, which is required for the next cycle of milking, so most are culled after suffering from the trauma for 6-12 months.

<sup>27</sup> World Organization for Animal Health, “Transport of Animals by Land, Pre-Journey Period 3) Fitness to Travel,” Article 7.3.7, Terrestrial Code Online Access, accessed Jan 22, 2024, available [here](#).



### *Documented evidence*

In a case that the veterinarian who analyzed the video calls “**objectively severe**,” video evidence shows a mature holstein cross cow suffering from **the long term progression of a spinal cord injury experienced 6–12 months prior**, by the estimate of the veterinarian. The cow exhibits **Grade 3 hind end ataxia** [ataxia: poor muscle control resulting in clumsy movements; Grade 3: ataxia easily seen at the walk, with no need for manipulative tests or faster gaits to elicit], **a paralyzed tail, and fecal and urinary incontinence**. These types of spinal cord injuries are so accepted as commonplace in dairies that veterinarians are rarely called to treat them. The veterinarian who analyzed the videos in question writes, “I tend to see cows in this more chronic stage incidentally [by chance] on larger dairies, i.e. I’m basically never called specifically to evaluate or treat them ... I would not recommend she be in a sale/auction barn.”

## “Emaciation and Muscle Atrophy”: Malnourishment and poor body condition

According to the dairy vet who reviewed the video evidence, cows used for dairy typically become emaciated as a result of either malnourishment or the progress of an inadequately managed disease impairing their ability to nutritionally support themselves.

Veterinarians and dairy cattle farmers routinely assess a cow’s visible fat deposits associated with good health and nutrition and rate a cow’s body condition, sometimes labeling it with a Body Condition Score (BCS). A standard resource taught in veterinary schools indicates that the BCS is considered an “important management tool for ... reducing the incidence of metabolic and other peripartum disease,”<sup>28</sup> and that **a cow’s desired BCS should never fall below 2.5, as such low scores often “indicate significant problems.”**<sup>29</sup> BCS scores less than 2.25 are associated with disease, malnutrition, and/or stress so acute that they hamper productivity. A BCS score of <2 indicates a cow who is **emaciated**.

### *Documented evidence*

In two videos, a mature holstein cross discussed above has a “**poor body condition**,” **BCS 2.25**, and exhibits “**weakness**” and “**severe bilaterally symmetric hind end muscular atrophy**.”

In another video, a mature holstein cross with mild left hind lameness shows **BCS=2: “emaciated.”**

In another video, a mature jersey cross has **BCS 2.25** and is severely lame.

<sup>28</sup> Elanco Animal Health, “Appendix A: Body Condition Scoring in Dairy Cattle,” 1996, p. 4, available [here](#). Developed based on E.E. Wildman et al., “A Dairy Cow Body Condition Scoring System and Its Relationship to Selected Production Characteristics,” *Journal of Dairy Science* V. 65, I:3, Mar 1982, pp. 495-501, accessed Jan 5, 2024, available [here](#), and James D. Ferguson, David T. Galligan, and Neal Thomsen, “Principal Descriptors of Body Condition Score in Holstein Cows,” *Journal of Dairy Science* V. 77, I:9, Sep 1994, pp. 2695-2703, accessed Jan 5, 2024, available [here](#).

<sup>29</sup> Elanco Animal Health, p. 4. Some dairy producers and veterinarians consider a BCS of 2.25–2.5 transiently acceptable, especially between 1–3 months of lactation, to insure against the metabolic diseases that abnormally high BCSs can cause.





## “Unfit for Transport”: Eye disease and trauma

Eye diseases and eye injuries are not only extremely painful, but often disorienting for a cow due to her loss of a visual field. A wide variety of impacts and chemical exposures (such as chlorhexidine, anhydrous ammonia, etc.) can cause traumatic eye injuries in cows on dairies. Eye injuries occur in dairies large and small, conventional and organic. Eye diseases spring from various causes (in addition to secondary infections stemming from eye injuries), the most common being cancer, viral infection, and bacterial infection. Organic dairy farmers have a financial disincentive to treat a cow’s eye injury or illness with antibiotics, as doing so would cause her and her milk to lose their organic status.

Dismally, eye injuries and illnesses fall into the category of open wounds that some farms deem acceptable as long as they do not cause a decline in milk production. But cows with open wounds such as eye diseases and traumas are generally deemed unfit for transport, due to the risk of transmission of bloodborne pathogens to other cows. In addition, shipping sick cows in pain with open wounds is unquestionably inhumane.

### *Documented evidence*

Two videos show a mature holstein cow with a severe eye infection, evidencing severe swelling around her left eye, blepharospasm (uncontrollable eyelid twitching), and mucus and pus discharge from her eye socket. The veterinarian who reviewed the video provides the following analysis: “The three most likely causes here are cancer (lymphosarcoma, squamous cell carcinoma) of the eye/surrounding structures, pink eye (infectious keratoconjunctivitis), or trauma. Regardless of the underlying cause in this case, **this eye/orbit is severely infected. Recommended treatment is probably exenteration [complete surgical removal of the contents of the eye cavity] ...** That the condition is now a **painful open wound and potentially infectious** dictates either on farm treatment, culling or shipment directly to slaughter [that is, not an auction/sale barn].”

Another video shows a different mature holstein cow with severe acute damage in her left eye. An improvised eye patch dangles from tape attached to her outer eye socket. Compared to the cow mentioned in the above paragraph, the veterinarian writes, “this appears to be more **acute trauma with active hemorrhage** and is less likely to be caused by cancer or pink eye. Again, this is classified as an open wound, making this animal **unfit for transport to a sale barn/auction**. Treatment and





time for healing should have been provided on farm prior to shipment to sale barn.” The video was recorded at a sale barn, and the eye patch suggests an on-farm injury that occurred pre-transport.

We attended an auction that included cattle belonging to Alexandre. One of Alexandre’s, a mature jersey cow, bore a glued-on denim eye patch over her right eye. According to whistleblowers, Stephanie Alexandre and other staff make these eye patches out of the Alexandre family’s old blue jeans, and Stephanie also makes the garlic tincture that is sometimes placed in the eyes of cows with eye injuries, infections, or cancer. According to a whistleblower, hundreds of times when an Alexandre cow was suffering from an eye injury, eye infection, or eye cancer, **finely ground table salt was poured on the cow’s eye**, and then one of these denim patches was glued on, often gluing a cow’s eye shut in the process; out of hundreds of instances of pouring salt into a cow’s eye, this practice has helped a cow with her eye problem zero times.

We were present when the cow we had witnessed at auction had the patch removed from her right eye. Although we could easily see that the cow’s left eye was bulging from her head, we were not prepared for what we saw when the patch was removed from her right eye. First, the patch was glued on, and so stubbornly affixed that it had to be ripped off of the cow’s skin.

Second, once the patch was stripped off, we could see that not only was the right eye itself severely bulging from the cow’s head, but also had ruptured: that is, **the outer membrane of the eye had been disrupted and contents of the eye were extruding outside of the eye**, some of them hanging down. When we showed the dairy veterinarian the video we took of this cow, the vet noted that the three most likely causes of the cow’s right eye’s condition were primary trauma, cancer, or primary infection, and that “the character of the exudate suggests a chronic disruption ... Taken together [with her bulging left eye], my guess is is lymphosarcoma [cancer] is primary, causing exophthalmos [bulging] of both eyes—the right eye either had a more aggressive tumor and secondary infection or the exposure caused by exophthalmos led to eventual globe trauma, rupture and infection.” The veterinarian noted that the type of eye patch we witnessed and recorded “exacerbates the problem.”







According to a whistleblower, hundreds of times when an Alexandre cow was suffering from an eye injury, eye infection, or eye cancer, table salt was poured on the cow's eye, and then a denim patch glued on, often gluing a cow's eye shut in the process.

## Summary

**Alexandre has allowed abominable abuse, neglect and fraud to occur, repeatedly and driven from the top, through routine management practices condoned by members of the Alexandre family.**

Alexandre has invested heavily in certifications and marketing that function to deceive their customers while refusing to address the needs of cows suffering acutely from sickness, injuries, and poor health. Veterinary best practice would have been to adequately treat or euthanize these animals. Instead, Alexandre transported many of the cows to an auction barn and used the market to dump animals that were too sick, injured, or in ill health to be profitably kept on the farm.



DAIRY DECEPTION: CORRUPTION AND CONSUMER FRAUD AT ALEXANDRE FAMILY FARM

# Animal Welfare Certifications Failed to Prevent Suffering





# Animal Welfare Certifications Failed to Prevent Suffering

Alexandre is typical of a new generation of food animal companies that use a litany of certifications, third-party verification schemes, and marketing language to differentiate their products. We believe that it's critical to shine a light on the food animal companies being held up as the ethical leaders in an industry, and the certification and marketing schemes currently being deployed to help companies sell their products to conscientious consumers. At the writing of this report, **Alexandre is seen as the leading higher welfare dairy and holds certifications with at least five animal welfare standards**, including the USDA National Organic Program, Certified Humane by Humane Farm Animal Care, Regenerative Organic Certification, Real Organic Project certified, and OPT Certified Grass-Fed Organic Livestock Program™.<sup>30</sup>

Based on the evidence provided to Farm Forward and our extensive experience with certifications—including serving more than ten years on the board of Global Animal Partnership and serving on the committee that established animal welfare standards for Regenerative Organic Certified—we believe that **Alexandre likely violated dozens of standards of some of these programs**. The systematic failure of these programs, each with their own standards, auditors, and systems for verification, is deeply concerning. The certifications' failures to prevent the documented abuse, neglect, and mismanagement raise serious questions about the ability of these programs to protect farmed animals from abuse and to serve members of the public who attempt to buy higher welfare animal products.

## USDA Certified Organic

The USDA Organic program is one of the most widely recognized labels on food products. The USDA cites “increasing U.S. consumer demand for organic animal products such as meat and milk,”<sup>31</sup> and the Organic Trade Association reports that dairy and eggs is the third highest-selling organic category, now constituting close to 8 percent of total dairy and egg market.<sup>32</sup> Farm Forward's recent consumer survey found that favorability of USDA Organic among all consumers is extremely favorable, with 78 percent favorable and only 11 percent unfavorable.<sup>33</sup>



<sup>30</sup> Its other certifications include Orthodox Union Certified Dairy, KOF-K Kosher, Cornucopia Top Rating, and Land to Market certified, none of which have dairy-related animal welfare standards and audits.

<sup>31</sup> Sharon Raszap Skorbianski, “Organic Dairy and Beef Producers Face Limited Markets, Feed Grain Shortages,” USDA Economic Research Service, Nov 22, 2022, accessed Jan 5, 2024, available [here](#).

<sup>32</sup> Mollie McNeil, “Organic food sales break through \$60 billion in 2022,” Organic Trade Association, May 10, 2023, accessed Jan 5, 2024, available [here](#).

<sup>33</sup> Trevor McCarty, “US consumers would be concerned upon learning where meat really comes from,” Farm Forward, Nov 16, 2022, accessed Jan 5, 2024, available [here](#).



Consumer surveys indicate that shoppers, especially people who frequently buy organic products, believe that the USDA Organic program indicates humane treatment of farmed animals, and believe the standards to be more rigorous than they really are.<sup>34</sup>

Despite the high public regard for the USDA Organic program and belief among consumers that organic equates to humane treatment of farmed animals, the program has significantly less robust animal welfare standards than the more meaningful animal welfare certifications. Significant efforts by advocates (including Farm Forward) to improve the animal welfare standards of the organic program led in 2016 to the USDA adopting the Organic Livestock and Poultry Practices (OLPP) rule, which offered modest improvements for the housing and outdoor access requirements for cows and chickens raised in the organic program.<sup>35</sup> Unfortunately, even these modest improvements were repealed in 2017 by the Trump Administration. In 2023 the USDA issued new guidance under the Organic Livestock and Poultry Standards (OLPS) which strengthened some aspects of the animal welfare requirements, especially for dairy cattle and chickens raised for eggs. In issuing the new rules the USDA effectively admitted that the Organic program has been humanewashing, writing:

Inconsistencies in livestock practices and enforcement such as these have several detrimental effects on the organic market: producers can have significantly different production costs for the same organic product, and in some cases, consumers are unaware that not all organic products are produced with attributes they desire (e.g., outdoor access), resulting in consumers paying for an attribute they are not receiving.<sup>36</sup>

Organic producers will not be required to comply with the OLPS rules until January of 2025 at the earliest.<sup>37</sup>

Even though the OLPS rules are not yet in effect, **Alexandre’s treatment of cattle likely violated key animal welfare provisions of the current, *minimal* National Organic Program (NOP) standards.** In particular, Alexandre likely violated provisions related to promoting animal health through appropriate housing and sanitation practices that minimize disease,<sup>38</sup> and prohibiting withholding treatment from sick animals to preserve organic status.<sup>39</sup> If no medication allowed for organic production suffices to ease an animal’s suffering, organic livestock producers are then required to administer conventional treatment (such as antibiotics), resulting in the animal losing her organic status.

<sup>34</sup> “Research on Consumer Perceptions of Organic Food Standards for Treatment of Animals,” American Society for the Prevention of Cruelty to Animals, Apr 2014, accessed Jan 31, 2024, available [here](#).

<sup>35</sup> Farm Forward advocated for these rules in spite of the rules falling short of consumer expectations for farmed animal welfare. See the “Animal Welfare In the National Organic Program” report, Aug 2022, accessed Feb 7, 2024, available [here](#).

<sup>36</sup> USDA, Agriculture Marketing Service, National Organic Program (NOP); Organic Livestock and Poultry Standards, Title 7 CFR § 205, Nov 2, 2023, accessed Jan 16, 2024, available [here](#).

<sup>37</sup> USDA, available [here](#).

<sup>38</sup> “Establishment of appropriate housing, pasture conditions, and sanitation practices to minimize the occurrence and spread of diseases and parasites.” USDA, National Organic Program: Organic Production and Handling Requirements: Livestock health care practice standard, Title 7 CFR § 205.238(a)(3), Jan 28, 2019, accessed Jan 27, 2024, available [here](#).

<sup>39</sup> “Withhold medical treatment from a sick animal in an effort to preserve its organic status. All appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail. Livestock treated with a prohibited substance must be clearly identified and shall not be sold, labeled, or represented as organically produced.” USDA, National Organic Program: Organic Production and Handling Requirements: Livestock health care practice standard, Title 7 CFR § 205.238(c)(7), Jan 28, 2019, accessed Jan 27, 2024, available [here](#).





Perhaps more concerning than Alexandre's potential violation of Organic standards is the fact that a **whistleblower informed USDA Organic auditors of possible violations by Alexandre more than a year ago, and Alexandre's incidents of animal mistreatment seem to have persisted.** As documented by a USDA conversation record (below), a whistleblower spoke with NOP staff in October 2022. As reported to Farm Forward, the whistleblower informed NOP staff that Alexandre was frequently selling cows who were seriously ill, severely lame, and/or grossly mistreated. The whistleblower received no response until eleven months later (September 2023), when USDA said that they had conducted an investigation and found no violations. To our knowledge USDA did not require Alexandre to take any corrective action. Yet videos provided to Farm Forward documented sick and injured cattle reportedly owned by Alexandre as recently as January, 2024, and we personally witnessed a cow with advanced eye cancer and infection who had Alexandre's brand and was sold at auction in December 2023, more than a year after the whistleblower complained to NOP.



A stuck calf who died at Alexandre





*Conversation Record*

**CONVERSATION RECORD**

**Time:** 10:30am MST      **Date:** October 24, 2022  
 October 14, 2022  
 October 20, 2022

<input type="checkbox"/> VISIT	<input type="checkbox"/> CONFERENCE	<input checked="" type="checkbox"/> TELEPHONE	
<b>Location of Visit / Conference:</b>	Telephone call		<input checked="" type="checkbox"/> Incoming <input type="checkbox"/> Outgoing
<b>NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU:</b>	<b>COMPANY/ORGANIZATION NAME AND ADDRESS (CITY/STATE):</b>		<b>TELEPHONE NO:</b>
	[REDACTED] CA [REDACTED]		

**SUBJECT:** Multiple complaints and allegations against dairy farms and auction barns in California

**SUMMARY:** On October 10, 2022, the complainant left me a voicemail and asked that I return their call.

On October 12, 2022, at 9:52am I returned the call and we spoke for 50 minutes. The complainant and I spoke again on October 14, 2022. The complainant explained the following to me:

- The complainant explained that [REDACTED] organic dairy cattle in California. [REDACTED]

The complainant is concerned that some of the livestock may not be eligible for organic slaughter. The complainant stated that they would text message videos of cattle [REDACTED] paperwork that arrived with the cattle, and photographs of the animal's [REDACTED] to the NOP. The complainant also sent this information to [REDACTED] with Organic Certifiers.

[REDACTED]

The complainant alleged that most of these livestock were purchased from Humboldt Auction Yard, LLC (Humboldt) and that in addition to the lack of organic documentation, many of the animals sold were sick, could barely walk, were extremely thin, mistreated, and full of lungworm. [REDACTED]

- The complainant requested to remain anonymous during the conversation.

[REDACTED]

Conversation with USDA National Organic Program Lead Compliance Officer



The whistleblower reported Alexandre’s potential animal welfare violations via phone conversations conducted with USDA NOP Compliance Officer Emily Prisco on October 12 and 14, 2022. Before working at the USDA, Prisco worked for more than a decade at Aurora Dairy, one of the largest Organic dairies in the U.S. and an operation widely criticized as having violated the spirit of the Organic program<sup>40</sup> and given the lowest ranking for transparency by an independent Organic industry watchdog.<sup>41</sup> **The revolving door<sup>42</sup> between USDA regulators and large meat and dairy operations they are supposed to oversee should raise major concerns among the public about whether agencies like the NOP can effectively oversee the industry they are charged with regulating.**

## Certified Humane

The Certified Humane seal can be found on animal products sold in major supermarkets across the U.S., primarily on dairy and egg products. Despite their name, Certified Humane standards are widely viewed by farmed animal welfare experts as being only minimally above typical industry practices.<sup>43</sup> Products with the Certified Humane label are still raised on what are colloquially called factory farms. Farm Forward has criticized Certified Humane for humanewashing—for example by calling animal products from animals raised in total confinement in factory farms “Certified Humane,” by allowing genetic modifications that cause some Certified Humane poultry to grow so fast and put on weight so quickly that some animals lose their ability to walk, and by allowing Certified Humane producers to forcibly separate calves from their mothers in a fraction of the time that they would naturally wean.<sup>44</sup>



<sup>40</sup> Peter Whoriskey, “Why your organic milk may not be organic,” Washington Post, May 1, 2017, accessed Jan 6, 2024, available [here](#).

<sup>41</sup> Cornucopia Institute, High Meadow (Aurora Dairy) scorecard, accessed Jan 6, 2024, available [here](#).

<sup>42</sup> Joe Maxwell, “USDA Inc.: JBS is The Latest in Scandalous Job Swapping Between Government and Meat Industry,” Organization for Competitive Markets, Aug 4, 2017, accessed Jan 6, 2024, available [here](#).

<sup>43</sup> ASPCA’s Shop With Your Heart program refers to Certified Humane as “the baseline for better welfare.” They note several limitations of the program, including: “Feedlots for cows permitted for limited periods, with standards for space, shade and windbreaks that are lacking on conventional feedlots. Standards do not extend to breeding animals, nor do they ensure higher-welfare breeds for animals, including broiler chickens. 100% compliance verified by auditors on-farm every 12 months, except for Certified Humane ‘producer groups’ and ‘beef marketing groups,’ wherein participating farms conduct a percentage of their own audits. It is not possible to determine which products are from ‘producer group’ or ‘beef marketing group’ arrangements.” “Meat, Eggs and Dairy Label Guide,” American Society for the Prevention of Cruelty to Animals, accessed Jan 6, 2024, available [here](#).

<sup>44</sup> “The Dirt on Humanewashing,” Farm Forward, Dec 2022, accessed Jan 6, 2024, available [here](#).



**Even though Certified Humane’s standards leave much to be desired, video evidence provided to Farm Forward by whistleblowers reveals dozens of cases where Alexandre’s treatment of cattle likely violated the already low standards set by the Certified Humane program.** Specifically, Alexandre’s treatment of cattle likely violated Certified Humane standards, including those related to

- the diagnosis and treatment of sick animals,<sup>45</sup>
- provisions for foot care and prevention of lameness,<sup>46</sup>
- body condition scoring,<sup>47</sup>
- the transport of cows with low body condition scores,<sup>48</sup>
- the treatment or euthanasia of non-ambulatory animals,<sup>49</sup> and
- the conditions under which sick or injured animals must be euthanized rather than transported.<sup>50</sup>

The fact that Certified Humane approved Alexandre<sup>51</sup> to use the Certified Humane label despite dozens of glaring violations of Certified Humane standards, including standards that should disqualify Alexandre for being certified,<sup>52</sup> **raises questions about whether the Certified Humane program adequately or effectively audits businesses approved to use their label.**

## Regenerative Organic Certified

One of the newest marketing terms to enter the agriculture space is “regenerative.” While lacking a clear definition, “regenerative” is broadly accepted to mean agricultural practices that improve soil quality. For example, Alexandre is certified by “Land to Market,” a regenerative certification that includes no animal welfare standards. Alexandre also boasts Regenerative Organic Certified (ROC) a new certification aimed at this market that sets its mission to “rehabilitate soil, respect animal welfare, and improve the lives of farmers.” At its most ambitious, ROC aims to “consider all players in the farm system—from the soil microbiome to the animals to the workers,” and to address climate change through soil carbon sequestration and improved land management.



ROC offers three different certification levels, Bronze, Silver, and Gold. Alexandre was the first ROC certified dairy in the U.S., but it is not clear which level of certification Alexandre achieved. Despite Alexandre adorning its website’s homepage with the ROC logo and name, and listing ROC on its “Our Certifications” webpage, we understand that only a small percentage of Alexandre farms are actually ROC certified (fewer than 300 of the more than 5,000–9,000 cows raised by the

<sup>45</sup> Certified Humane, Humane Farm Animal Care Welfare Standards: Dairy Cattle, Edition 23, accessed Jan 8, 2024, “Handling” standard M14, “Rapid diagnosis and treatment,” available [here](#).

<sup>46</sup> Certified Humane, “Health” standard H5, “Lameness and foot care,” available [here](#).

<sup>47</sup> Certified Humane, “Nutrition - Food and Water” standard FW5, “Body Condition,” available [here](#).

<sup>48</sup> Certified Humane, “Transportation” standard T9, “Casualty animal transport,” available [here](#).

<sup>49</sup> Certified Humane, “Health” standard H4, “Non-ambulatory animal care,” available [here](#).

<sup>50</sup> Certified Humane, “Health” standard H14, “Euthanasia,” available [here](#).

<sup>51</sup> “Producers who are Certified Humane®,” Certified Humane, accessed Jan 6, 2024, available [here](#).

<sup>52</sup> The Certified Humane program policy manual states that an operator’s certification is revoked if the operation has one or more “Major Non-conformances” or in some cases “Multiple Minor Non-conformances” with Humane Farm Animal Care policies standards. See “Revocation of Certification” on page 14 of Certified Humane, Humane Farm Animal Care: Program Policy Manual, Edition 20, 2020, accessed Jan 8, 2024, available [here](#).





Alexandres, or roughly 3-6 percent). In this arrangement Alexandre benefits from the “halo effect”: while most Alexandre locations **are not** ROC certified, virtually all of Alexandre’s marketing describes their products as “Certified Regenerative.” Given that marketing, it is likely that most consumers assume that all of Alexandre’s products are ROC. Because ROC certifies only a small subset of animals raised by Alexandre it’s difficult to know whether the many abuses documented in this report were isolated to animals that were not certified by ROC. We have reason to believe that some of the injured, sick, and otherwise untreated animals who had been transported were likely certified by ROC. Even if all incidents of animal abuse were isolated to non-ROC operations, given Alexandre’s strong association with ROC we expect that the ROC would be concerned to learn of them, as they are incompatible with many of ROC’s standards.

Specifically, Alexandre’s treatment of cattle contrasts with ROC’s standards related to

- treatment of sick cows,<sup>53</sup>
- the use of cattle auctions to dispose of cows,<sup>54</sup>
- availability of sufficient feed and water,<sup>55</sup>
- abusive treatment that violates the Five Freedoms,<sup>56</sup>
- requirements to compassionately handle animals,<sup>57</sup> and
- prohibitions on the use of calf hutches.<sup>58</sup>

For example, individual calf hutches are widely considered inhumane,<sup>59, 60, 61, 62</sup> as they restrict calves’ movements and keep calves isolated from their mothers, other calves, and other cows. As reported in May of 2021, **Alexandre’s practice is to move calves to individual Agri-Plastics calf hutches within 24 hours of their birth, where they remain confined and isolated.**<sup>63</sup>

<sup>53</sup> Regenerative Organic Certified, Dairy Animal Welfare, “Treatment for sick, injured, or diseased animals is undertaken at the first reasonable opportunity to alleviate any unnecessary pain or distress. Operation does not withhold medical treatment from a sick animal in order to preserve certification status.” June 2020, “Health 5.1: General,” pp. 7–8, accessed Jan 6, 2024, available [here](#).

<sup>54</sup> Regenerative Organic Certified, “Culled animals, such as dairy bull calves, shall not be sent to standard livestock auction.” “Handling and Management 4.3: Disposition of culled animals,” p. 7, available [here](#).

<sup>55</sup> Regenerative Organic Certified, “Farming practices promote proper nutrition, avoiding malnutrition.” “Nutrition and Water 2.5: Malnutrition,” p. 4, available [here](#).

<sup>56</sup> Regenerative Organic Certified, “CT: Egregious violations of the five freedoms of animal welfare and/or any abusive treatment of **any** animals onsite, commercial or non-commercial” [bold emphasis in original]. “Base Requirements 1.3: Applicability,” p. 2, available [here](#).

<sup>57</sup> Regenerative Organic Certified, “Producers promote compassionate care and handling of animals.” “Handling and Management 4.1: General,” p. 5, available [here](#).

<sup>58</sup> Regenerative Organic Certified, “Operations do not use any type of permanent confinement that restricts mobility, and livestock live, eat, and sleep outdoors the majority of the time in alignment with the principles of the Five Freedoms.” “Environment and Shelter 3.3: Confinement,” p. 4, available [here](#).

<sup>59</sup> Jennifer Van Os, “Introduction: Why all the fuss about pair housing?” Two Heads are Better Than One: A Starter Guide to Pairing Dairy Calves, University of Wisconsin-Madison Extension, Nov 6, 2020, accessed Jan 6, 2024, available [here](#).

<sup>60</sup> Tim Carman, “Suit against Organic Valley calls separating cows from calves inhumane,” Washington Post, Jul 19, 2022, accessed Jan 6, 2024, available [here](#).

<sup>61</sup> “Baby calves must not be isolated in pens, confirms EU scientific body,” Compassion in World Farming, Mar 29, 2023, accessed Jan 6, 2024, available [here](#).

<sup>62</sup> Chas NewKey-Burden, “Dairy is scary. The public are waking up to the darkest part of farming.” The Guardian, Mar 30, 2017, accessed Jan 6, 2024, available [here](#).

<sup>63</sup> Tamara Scully, “Regeneration: Alexandre Family Farm The Blake and Stephanie Alexandre Family, Crescent City, California,” NODPA, Apr 12, 2021, updated May 17, 2021, accessed Jan 6, 2024, available [here](#).



For dairies that use calf hutches, it is generally agreed best practice to remove calves by the time they are 8 weeks old,<sup>64</sup> but Alexandre keeps calves in hutches for about 13 weeks according to Blake Alexandre,<sup>65</sup> and up to 21 weeks according to a whistleblower. Unlike many dairies—where calf hutches include very small fenced patches of ground so that isolated calves can spend time outside—the calves we witnessed on Alexandre’s property in December 2023 had no outdoor patches and could not step foot outside of their hutches. A veterinary expert who reviewed this report noted,

“Calf hutches were designed to minimize disease spread and are intended a shelter from exposure to bad weather, not as cages. Calves not able to step outside their hutches is a horrific perversion of use.”

- Gail Hansen, DVM, former state epidemiologist and state public health veterinarian for the Kansas Department of Health and Environment, and former Veterinary Senior Officer at the Pew Charitable Trusts



<sup>64</sup> Masoud Hashemi et al., “Small Scale Dairy Calf and Cattle Housing,” University of Massachusetts Amherst Extension, accessed Jan 7, 2024, available [here](#). See also industry resources, like “Those White Hutches On Dairy Farms – Are They For Veal Calves?,” Powered by Georgia Milk, accessed Jan 7, 2024, available [here](#), which states “calves are only kept in these hutches for about 6-8 weeks.”

<sup>65</sup> Tamara Scully, “Regeneration: Alexandre Family Farm The Blake and Stephanie Alexandre Family, Crescent City, California,” NODPA, Apr 12, 2021, updated May 17, 2021, accessed Jan 6, 2024, available [here](#).





We can report that as of December 2023 Alexandre still uses hutches on some of its sites, based on our own direct experience. Further, eyewitness photographs show that as recently as 2023, calves die in them. For example, more than a dozen calves were found dead in Alexandre hutches on just one day in August 2023.

In addition to seemingly disregarding ROC's animal welfare standards, Farm Forward was given evidence that Alexandre may have flouted ROC's land management standards and violated California state water quality laws in the process. Figure [34.A] appears to show staff at Alexandre collecting animals' body parts that have been decomposing on the land in stark contrast with ROC standards<sup>66</sup> and in ways that may have violated California regulations regarding coastal water protection.<sup>67</sup> While not an animal welfare violation, these images provide graphic evidence that Alexandre operations at large may have ignored core tenants of the ROC program.



ROC is a new certification, and Alexandre was the first dairy operation certified by ROC. If the conditions documented in this report represent common practices for farms marketing themselves as “regenerative,” we would encourage ROC to disqualify “dual operations” that violate the core animal welfare principles of the ROC program in their uncertified operations. In other words, if an operation like Alexandre cannot meet the animal welfare standards of the ROC program in their non-certified operations, they should be disqualified from ROC. Alternatively, if structural conditions in the dairy industry make maintaining high animal welfare standards impossible, or simply uneconomical, we encourage ROC and other regenerative certifications to drop dairy farms from the certification rather than give the impression to consumers that large scale commercial dairies can operate at a high level of animal welfare and environmental protection.



<sup>66</sup> Regenerative Organic Certified, “4.2 Waste: Operation does not illegally dump, bury, or burn waste.” Framework for Regenerative Organic Certified®, Version 4.1, Jun 27, 2023, accessed Jan 6, 2024, available [here](#).

<sup>67</sup> “When disposing of a carcass it is unlawful to deposit, permit to pass into, or place where it can pass into the waters of the state or within 150 feet of the highwater mark of the waters of the state under §FGC-5652.” Tracy Schohr, David Lile, and Laura Snell, “Livestock Carcass Management,” University of California Cooperative Extension, Summer 2019, accessed Jan 9, 2024, available [here](#). See California Fish and Game Code 5652(a), effective Jan 1, 2008, accessed Jan 9, 2024, available [here](#).





DAIRY DECEPTION: CORRUPTION AND CONSUMER FRAUD AT ALEXANDRE FAMILY FARM

# Ripples of Humanewashing







# Ripples of Humanewashing

Alexandre is a massive corporation with immense influence on the niche organic, higher welfare dairy market and beyond. Alexandre reports managing up to 9,000+ total head of cattle<sup>68</sup> and, as such, it is a closely watched and imitated dairy industry trendsetter.

The damage done by Alexandre is not limited to one company. The impunity with which Alexandre has operated despite the knowledge demonstrated by the whistleblowers who worked with Farm Forward sends a message to producers that they can continue to violate consumer expectations for animal welfare. Most insidiously, companies like Alexandre are used to market the entire dairy industry and beyond, giving a halo of respectability and credibility to the very factory farm corporations that destroyed traditional dairy operations and continue to make cruelty and abuse endemic.

The prime example of this dynamic is Alexandre's relationship with **Whole Foods Market** (WFM), and their promotion of Alexandre as a model of the kind of dairy that the retailer offers to conscientious consumers. Faced with growing consumer health concerns about drinking cow's milk and competition from retailers like Walmart vertically integrating into the dairy industry, WFM has responded by launching a partnership with Alexandre that promotes Alexandre's land management and animal welfare practices with the hope that they "bring dairy back into homes across the country."<sup>69</sup>



"Our relationship with Whole Foods has been very exciting. We talk at the core level of heart: what's meaningful, what's getting the best food to the consumer ... When I think about the consumers at Whole Foods, I think of them getting happiness out of our milk, getting joy, feeling that 'Wow I can drink dairy again.'"

- Stephanie Alexandre, Co-Owner and head of marketing, Alexandre<sup>70</sup>

"It's very exciting to walk into a Whole Foods anywhere in the country and to see our products on the shelf. And it gives us a tremendous sense of pride and it also highlights the fact that we are making a difference. It's a small difference, but what we're doing here on the farm is contributing in a positive way to the betterment of our society and humanity."

- Blake Alexandre, Co-Owner, Alexandre<sup>71</sup>

<sup>68</sup> Jonnah Perkins, "Interview: Blake Alexandre of Alexandre Family Farm," Land to Market, undated, accessed Jan 6, 2024, available [here](#).

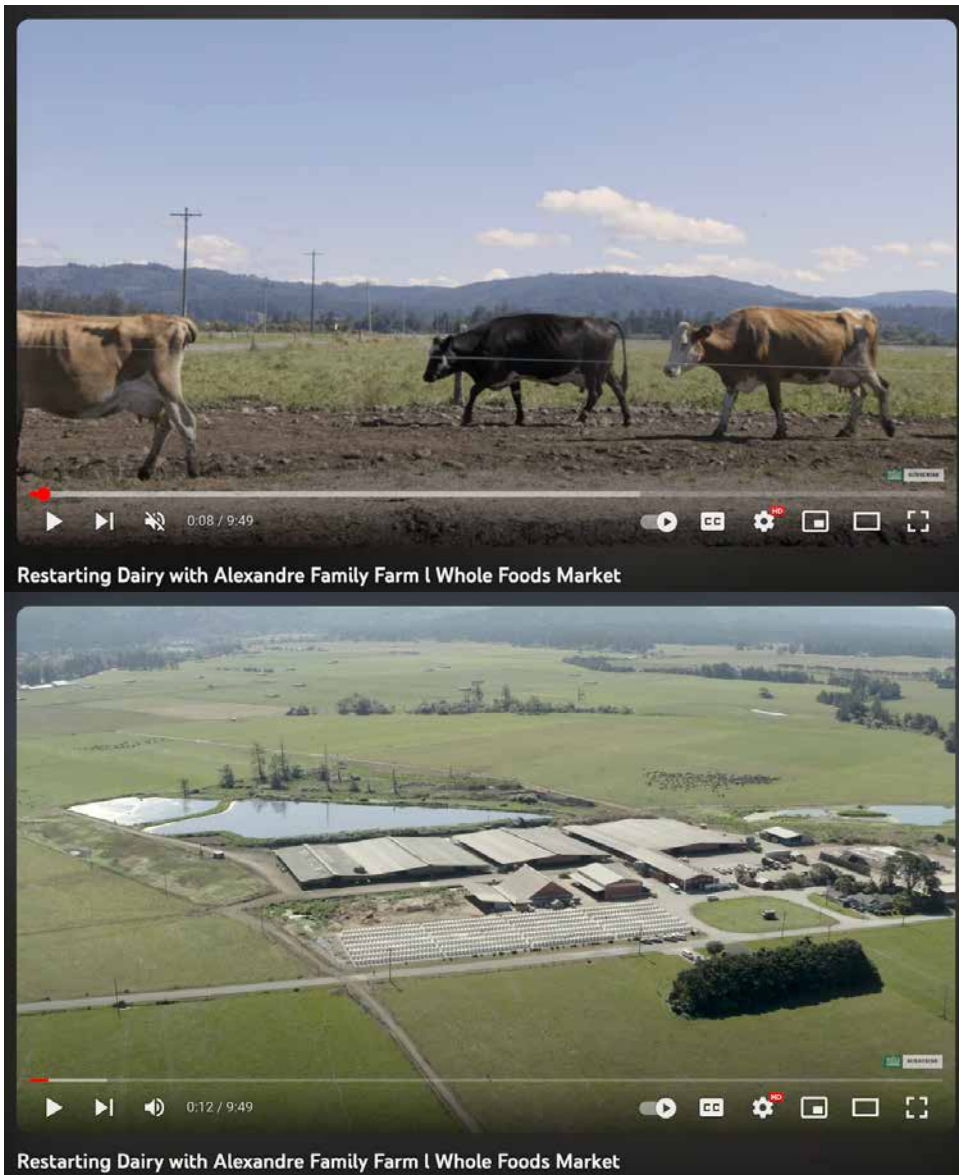
<sup>69</sup> "Restarting Dairy," Whole Foods Market, accessed Feb 7, 2024, available [here](#).

<sup>70</sup> Stephanie Alexandre, in "Restarting Dairy with Alexandre Family Farm," Whole Foods Market video, 5:22–5:44, accessed Feb 7, 2024, available [here](#) and [here](#).

<sup>71</sup> Blake Alexandre, in "Restarting Dairy with Alexandre Family Farm," Whole Foods Market video, 8:05–8:36, accessed Feb 7, 2024, available [here](#) and [here](#).



Despite WFM's high profile investment in Alexandre's products, even their expensive marketing can't hide some of the inhumane practices at Alexandre. **A flashy WFM promotion video documents cows with extremely low body condition scores, suggesting disease and/or malnutrition, as well as rows of hundreds of plastic calf hutches where baby cows are isolated from their mothers and other calves.** Alexandre reports a standardized practice of removing calves from their mothers within their first 24 hours of life and transferring them to the crates, where they are individually isolated for 13 weeks.<sup>73</sup> Even the rosier portrayals of Alexandre reveal systemic and unnecessary suffering.



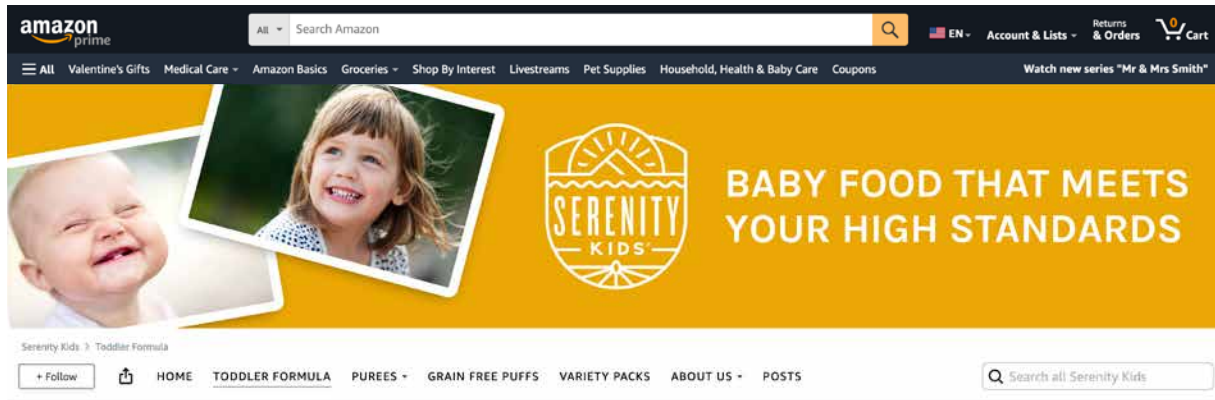
In addition to being a major cows' milk supplier to WFM, Alexandre sells their milk to food manufacturers, including two baby food and kids' snack companies and a leading Organic cheese company.

<sup>73</sup> As reported as recently as May 2021, in Tamara Scully, "Regeneration: Alexandre Family Farm The Blake and Stephanie Alexandre Family, Crescent City, California," NODPA, Apr 12, 2021, updated May 17, 2021, accessed Jan 6, 2024, available [here](#). We also witnessed calves in crates on Alexandre property in Dec 2023. According to the article, Alexandre also weans calves from liquid to solid feed around this 13 week mark, when calves would naturally wean from their mothers around 42 weeks.





Alexandre promotes a partnership with **Serenity Kids**, which sells baby food and “toddler formula” (which according to the Serenity Kids website “meets FDA nutritional requirements for infant formula”).<sup>73</sup> Serenity Kids notes that its milk for its formula comes from Alexandre, “which is known for its quality, **ethical practices**,”<sup>74</sup> and touts Alexandre’s reputation as “America’s first certified regenerative dairy!”<sup>75</sup> where people acting as “caretakers” of the cows source “ingredients you can trust—for little ones you love.”<sup>76</sup>



“At Serenity Kids we support American family farmers that **treat their animals ethically** ... We are just super excited to have now created a product that proves that you can make formula ... created in a way that’s great for the planet and **great for the animals.**”

- Joe Carr, President and Co-Founder, Serenity Kids<sup>77</sup>

<sup>73</sup> “Why Toddler Formula?,” Serenity Kids, accessed Jan 27, 2024, available [here](#). Serenity Kids notes that its “Toddler Formula ... has not yet gone through the FDA evaluation process that is required for infant formula,” and “We are not allowed to recommend this product for infants.”

<sup>74</sup> “Why Toddler Formula?,” available [here](#).

<sup>75</sup> “Our Farmers,” Serenity Kids, accessed Jan 27, 2024, available [here](#).

<sup>76</sup> “A2 Whole Milk Toddler Formula - 12.7oz,” Serenity Kids, accessed Jan 27, 2024, available [here](#).

<sup>77</sup> Joe Carr in “Serenity Kids & Alexandre Farm,” 0:04–0:10, 1:48–2:01, Mar 10, 2022, accessed Jan 6, 2024, available [here](#) and [here](#).



Co-founded by actor Jennifer Garner and recipient of the Clean Label Project’s “Purity Award,” until recently **Once Upon a Farm** only produced completely plant-based foods for infants, toddlers, and children. In January 2024 it announced that it will put products from Alexandre (and no other dairies) in some of its foods marketed to kids 12 months and older;<sup>78</sup> noting (correctly) that Alexandre is “**the leading regenerative organic certified dairy farm in the U.S.**” Once Upon a Farm products are sold at Whole Foods, Target and Costco.



Alexandre is also a supplier of **Rumiano Cheese**, which claims “a deep commitment to ... animal welfare”<sup>79</sup> and sells Organic cheese to thousands of grocery stores nationwide, including grocery giants like Safeway, Vons, Whole Foods, and Costco. Rumiano boasts that their cheese “**benefits the animals** and consumers by helping produce healthy and **humane** dairy products.”<sup>80</sup> In July of 2021, one of the whistleblowers sent information to Rumiano Cheese describing the conditions of cows managed by Alexandre. Rumiano did not respond and, as far as we are aware, Rumiano took no action in response to the whistleblower’s report to ensure their suppliers met the high standards they market.



This image from the Rumiano Cheese website does not necessarily depict Alexandre cows.

<sup>78</sup> “These are ... suitable for 12+ months.” Two (2) Once Upon a Farm comments on Once Upon a Farm’s Instagram post, Jan 9, 2024, accessed Jan 9, 2024, available [here](#).

<sup>79</sup> “About Us: The History of Rumiano Cheese: 2005: Organic and Sustainability Pioneers,” Rumiano Cheese, accessed Jan 6, 2024, available [here](#).

<sup>80</sup> “How It’s Made,” Rumiano Cheese, accessed Jan 27, 2024, available [here](#).





In the past several years Alexandre seems to have expanded their customer list, with prominent relationships with food companies like **Alec's Ice Cream**, which markets “the first-ever regenerative organic ice cream—one that’s improving our world through the way it’s created” and that “improves the lives of animals,”<sup>81</sup> and **Cheddies Crackers**, which differentiates their products in large part by marketing them as Certified Humane and Regenerative Organic Certified. In late 2023, they marketed their crackers as made with dairy from a farm where “cows are treated well,” with “happy cows,” and even went so far as saying that thanks to Alexandre, Cheddies products are “Good for the Cows.”<sup>82</sup>

# alec's™

ICE CREAM

“Our cheese comes from regenerative farms, like the Alexandre Family Farm in California. **These farms are like VIP clubs for cows - they get the royal treatment.**”

- Cheddies Crackers website homepage.<sup>83</sup>



All of these suppliers use Alexandre’s certifications and marketing to differentiate their products, trying to convince a public that is increasingly skeptical of cows’ dairy products because of their health, animal welfare, and environmental impacts that it’s acceptable, even beneficial, to eat their products. In the marketing language of one of Alexandre’s buyers, “Every time you enjoy Alec’s ice cream, you’re making a positive impact.”<sup>84</sup> In other words, **Alexandre’s deception is propagated in the market by the companies that use Alexandre’s products and reputation to hide the ubiquity of the ethically repugnant practices that are virtually unavoidable in dairy given the present structure of the industry.**

While Farm Forward acknowledges that it is possible to produce dairy products without leaving animals languishing for days or months with painful, untreated diseases and injuries, we emphasize that **current welfare certifications amount to humanewashing even when their standards are enforced.** Even at local farmers markets or other venues that cater to conscientious consumers, dairy products are almost certainly from farms that raise animals in conditions that create constant distress and frequent misery. **From the moment of birth when even the basic pleasure of maternal care is denied to both mother and child, to their slaughter when their young but exhausted bodies begin to succumb to disease, dairy has become one of the worst industries for animal welfare.**

<sup>81</sup> Alec Jaffe, “Our Story: Hi, I’m Alec,” Alec’s Ice Cream, accessed Jan 6, 2024, available [here](#), and “Our Impact,” Alec’s Ice Cream, accessed Jan 30, 2024, available [here](#).

<sup>82</sup> Cheddies Crackers website homepage Oct 31, 2023, accessed Jan 6, 2024, archived [here](#).

<sup>83</sup> Cheddies Crackers website homepage Jan 6, 2024, accessed Jan 6, 2024, available [here](#).

<sup>84</sup> Alec’s Ice Cream website homepage Jan 6, 2024, accessed Jan 6, 2024, available [here](#).





DAIRY DECEPTION: CORRUPTION AND CONSUMER FRAUD AT ALEXANDRE FAMILY FARM

# Conclusion







# Conclusion

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Until this investigation, Alexandre was universally lauded as America's best dairy for the animals and best for the Earth. Conscientious consumers were willing to pay the price premium Alexandre commanded to ensure that their glasses of milk were not laced with disease and suffering.

The ill treatment uncovered at Alexandre, until now obscured from public view by corruption and fraud, provides a window into just how profoundly and how long consumers have been misled. The apparent inability of respected animal welfare certifications to detect, let alone prevent, systemic animal abuse and neglect at the leading higher welfare regenerative dairy, is just as troubling.

If this is happening at Alexandre, what is happening elsewhere?

Please see the Appendix, below, for a preliminary exploration of this question.





DAIRY DECEPTION: CORRUPTION AND CONSUMER FRAUD AT ALEXANDRE FAMILY FARM

# Appendix: Structural Suffering





# Appendix: Structural Suffering

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Far from being unique to Alexandre, much of the suffering described above is the result of structural conditions common in the organic dairy industry. Some of these conditions are exacerbated by the economics of the dairy market, which has experienced an ongoing disruption and collapse since the 1980s. The four disease processes highlighted in this report's video documentation are so common that the veterinarian who reviewed the footage writes **"...lameness, poor body condition, spinal trauma/hind end paralysis, and ocular disease/trauma. I see at least one of these conditions on every dairy I routinely visit every day. They are an unavoidable consequence of the management practices that define modern confinement dairy (organic or otherwise)—concrete flooring, high density group housing, intensive reproductive cycles intended to maximize production, genetics, and diet."**

This appendix describes how structural issues and economic forces in the dairy industry contribute to two of the most common, and most painful, abuses experienced by cows used for dairy, as well as the appalling slaughter and death rate of cows used for dairy: on average, one third of the herd per year.



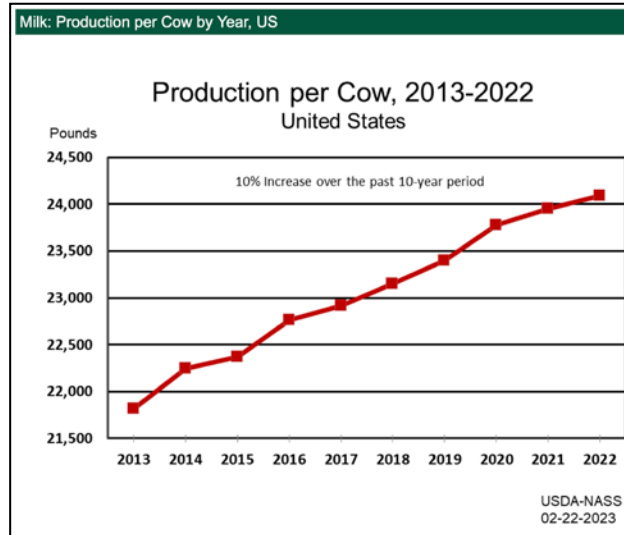


## Genetic abuse

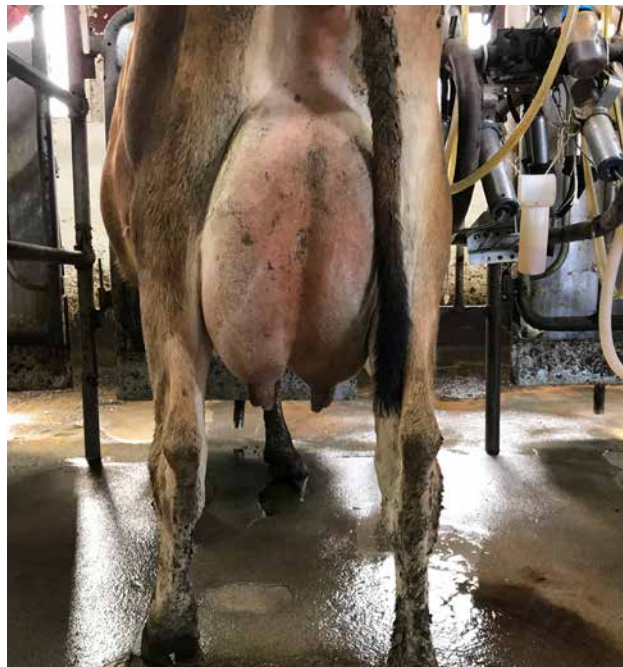
Virtually all cows on organic and conventional dairies have been repeatedly bred over generations to maximize milk production.

Compared to 1972,<sup>85</sup> in 2022<sup>86</sup> the U.S. produced 88 percent more milk from 20 percent fewer cows. This is because each cow produced over 2.3 times as much milk as 50 years prior—and over 4.5 times as much milk as 75 years prior.<sup>87</sup> This staggering increase in milk “output” per cow is a result of intensive breeding, typically through artificial insemination.<sup>88</sup>

While poor body condition in cows used for dairy can be caused by insufficient feed, it is also the predictable result of **genetic abuse: decades of breeding to maximize milk production at the expense of animal welfare**. If a cow lactated just enough to feed her calf, she would lactate just 1–2 gallons of milk per day, the average production of cows used for dairy just 75 years ago.<sup>89</sup> An average dairy cow now lactates 6–7 gallons of milk each day, which takes a tremendous toll on her body. Cows used for dairy produce the most milk between 30–90 days after calving; during that period, a lactating cow’s incredibly high metabolic demand often cannot be sufficiently met by an intake of calories even when provided, and the resulting depletion of her fat stores leads to emaciation like that evidenced in the above videos. Eventually, keeping a cow is



Source: National Agricultural Statistics Service, USDA. Available [here](#).



<sup>85</sup> USDA, “Milk Production,” Sep 12, 1973, p. 2, accessed Jan 6, 2024, available [here](#). In 1972, The U.S. averaged ~11,710,000 cows used for dairy, with average annual pounds of milk per cow totaling 10,271 lbs, and a total U.S. milk production of ~120,278,000,000 lbs.

<sup>86</sup> USDA, “Milk Production,” Feb 22, 2023, p. 4, accessed Jan 6, 2024, available [here](#). In 2022, the US averaged ~9,402,000 cows used for dairy, with average annual pounds of milk per cow totaling 24,087 lbs, and a total U.S. milk production of ~226,462,000,000 lbs.

<sup>87</sup> USDA, “Milk Production and Dairy Products: Annual Statistical Summary, 1961,” “Table 1.—Milk cows and milk production on farms, United States, 1947–61,” Feb 1962, p. 5, accessed Jan 6, 2024, available [here](#). In 1947 the country’s ~23,329,000 cows used for dairy produced an average of 5,244 lbs of milk each annually.

<sup>88</sup> S.G. Moore and J.F. Hasler, “A 100-Year Review: Reproductive technologies in dairy science,” *Journal of Dairy Science*, Nov 16, 2017, accessed Jan 6, 2024, available [here](#).

<sup>89</sup> USDA, “Milk Production and Dairy Products: Annual Statistical Summary, 1961,” “Table 1.—Milk cows and milk production on farms, United States, 1947–61,” Feb 1962, p. 5, accessed Jan 6, 2024, available [here](#).



no longer as profitable as replacing her with a younger, less depleted cow. Although cows' natural lifespan is about 20 years, today cows used for dairy are slaughtered at an average age of 4.5–6 years.<sup>90</sup>

Breeding animals to maximize milk production has led to unintended consequences. For example, on conventional confinement dairies one common result is a condition called “displaced abomasum” (DA). The abomasum is one of a cow’s four stomachs. In DA, the stomach slips from its typical position, fills with gas, and becomes trapped. This can prevent the flow of food through the digestive system, or worse, impede blood flow to the stomach, killing the organ and the cow soon after. DAs used to be virtually nonexistent, but as cows’ metabolisms and genetics have been altered through breeding to maximize milk production, and higher energy diets have been pushed to follow suit, DAs have become increasingly common.<sup>91</sup> The surgery to correct DAs, called abomasopexy, is now a standard part of a dairy veterinarian’s job; a typical veterinary practice serving 100 dairies could expect to perform 3–9 surgeries *every week*. **The fundamental problem in dairy today is not simply that sick animals are more profitable than healthy ones, but that only sick animals raised in inhumane conditions allow a dairy to survive economically.**

One obvious way that dairies could mitigate welfare problems caused by intensive breeding would be to adopt more balanced breeding programs that do not focus on milk production per cow as the most important metric for future selection for breeding. Alternatively, dairies could shift feed composition to include more fibrous materials, but cows would then have difficulty consuming the calories required by their intensive milk production. Since dairies exist to make money, and cows who produce the most milk lead to the greatest profits, there is little if any economic incentive for dairies to address this animal welfare issue. We expect that **as long as there is demand for cows’ milk and the U.S. market is a game of scale (in tons of milk produced), genetic abuse will remain an industry cornerstone.** Milk production per cow will continue to increase until hard biological limits are reached, at the cost of welfare.

<sup>90</sup> Maureen Hanson, “Is it Time to Rethink Dairy Cow Lifespan?” Dairy Herd Management, Sep 29, 2023, accessed Jan 16, 2024, available [here](#). See also A. De Vries and M. I. Marcondes, “Review: Overview of factors affecting productive lifespan of dairy cows,” *Animal* Vol 14:S1, Feb 6, 2020, accessed Jan 16, 2024, available [here](#).

<sup>91</sup> Jennifer L. Reynen et al., “Factors associated with survival in the herd for dairy cows following surgery to correct left displaced abomasum,” *Journal of Dairy Science* 98:6, pp. 3806–3813, Apr 16, 2015, accessed Jan 17, 2024, available [here](#).





# Organic Certification disincentivizes treating sick animals

**In some ways, cows in organic dairies are worse off than cows in conventional dairies, because these dairies have a disincentive to treat sick and injured animals.**

As noted in an article by the Northeast Organic Dairy Producers Alliance that writes admiringly about Alexandre's practices, **"If cows are limping, they'll hoof trim them once, but not a second time. They don't generally treat any other health problems."**<sup>92</sup>

The period of a cow's calving and her subsequent 30 days of highest milk production is her riskiest period from a health and welfare perspective. Many of the cows in organic systems who suffer illness or injury during this period would benefit from treatment with antibiotics, but the USDA Organic and Certified Humane programs stipulate that cows treated with antibiotics for any reason must be removed from the organic or Certified Humane herd. Dairy farmers get a price premium for organic or Certified Humane milk; treating animals with antibiotics would require that they be downgraded from "organic" or "Certified Humane" to "conventional," for both milk and meat, and in both cases farmers would lose the price premium. When sold at auction for beef, a dairy cow treated with antibiotics might be valued at 20¢ a pound when "red tagged" and sold as conventional, but could instead bring as much as \$1 a pound if a producer illegally sells her as organic, commanding 5 times the price. **In order to retain a cow's organic or Certified Humane status, dairies often do not administer antibiotics (sometimes employing alternative, often less effective treatments) and continue to milk a cow for the human food supply while she is suffering from sickness or injury.** It may be helpful to consider that these practices would be equivalent to noticing that your dog is vomiting and, instead of taking them to the vet, taking them on longer walks and letting the symptoms worsen indefinitely. We do not have good scientific vehicles yet to quantify this way of piling suffering upon suffering, but it is easy to see that it is egregious.

Even if organic or Certified Humane producers were willing to give up organic or Certified Humane status for an individual cow in order to treat her injuries or illnesses, many milk processors (the companies that buy milk directly from dairies) do not want to deal with organic or Certified Humane farmers who treat *any* of their animals with antibiotics, because they worry that milk from cows treated with antibiotics could inadvertently contaminate their organic or Certified Humane products.

Cows used for dairy who are treated with antibiotics like penicillin, neomycin, or florfenicol still produce milk, but it is illegal to sell that milk (even on the conventional market) unless a withdrawal period has been followed.<sup>93</sup> Milk from cows treated with antibiotics cannot be fed to organic calves without negating the calves' organic status.<sup>94</sup> So on an organic dairy that is not associated with a conventional herd, milk from treated cows might have to be dumped. Rather than dump their profits, dairy farmers are instead incentivized to not treat their sick and injured cows with antibiotics.

<sup>92</sup> Tamara Scully, "Regeneration: Alexandre Family Farm The Blake and Stephanie Alexandre Family, Crescent City, California," NODPA, Apr 12, 2021, updated May 17, 2021, accessed Jan 6, 2024, available [here](#).

<sup>93</sup> United States Food & Drug Administration, "Adequate Records help Prevent Illegal Drug Residues and Ensure Food Safety," Mar 1, 2023, accessed Jan 19, 2024, available [here](#).

<sup>94</sup> USDA, Agriculture Marketing Service, National Organic Program (NOP); Origin of Livestock, Title 7 CFR § 205, Apr 5, 2022, pp. 19740-19773, accessed Jan 19, 2024, available [here](#).



Although organic producers are required by the USDA Organic program to treat animals with antibiotics when they need them, the same Organic program prohibits selling any animal or animal product that has been treated with antibiotics as organic. This tremendous economic disincentive to treat animals with antibiotics is in stark contrast with the European Union (EU) requirements on antibiotic use. The EU allows use of certain antibiotics and continued use of the label “organic” when defined standards are met, e.g. when when alternative “non-antibiotic” treatments have failed, antibiotic use is approved by a veterinarian, withdrawal is at twice the label indication, and an animal receives three or fewer antibiotic treatments per year.<sup>95</sup>

Organic dairy farmers may decide the question of whether to treat a cow with antibiotics more through weighing the underlying economics than considering best medical practice.

For example, treating a cow with antibiotics may not make economic sense for a farmer who has a lot of replacement cows because of a growing herd. Often farms calculate<sup>96</sup> whether to treat a cow with antibiotics by considering factors such as:

- The price of milk
- The price of feed
- The number of heifers detected to be in estrous
- The number of heifers that will calve soon
- The value of the cow in the beef market
- The cow’s phase of lactation
- Her age
- The number of times that she has been unsuccessfully bred in the current lactation
- The volume of milk she produced this lactation or last lactation
- The cost of treating her medical condition

rather than considering the cow’s basic health or her suffering.

That is, whether to treat an individual cow (or a group of cows who all have a particular condition at once), and the amount and type of treatment that the cow receives, are significantly dictated by the underlying economics of the operation rather than the cow’s need for treatment. **In many, likely most, cases, a sick or injured animal is allowed to linger as long as she is able to produce milk, even if she is suffering, because it is more profitable to let her suffer than to treat her.**

<sup>95</sup> See G. Grodkowski, et al., “Organic Milk Production and Dairy Farming Constraints and Prospects under the Laws of the European Union,” *Animals: An Open Access Journal from MDPI*, Apr 25, 2023, 13(9), accessed Jan 24, 2024, available [here](#), and E. Duval, M.A.G. von Keyserlingk, and B. Lecorps, “Organic Dairy Cattle: Do European Union Regulations Promote Animal Welfare?” *Animals: An Open Access Journal from MDPI*, Oct 1, 2020, 10(10), accessed Jan 24, 2024, available [here](#).

<sup>96</sup> On dairies throughout the country, millions of individual cows’ data are tracked using sophisticated software (e.g. “DairyComp,” “PCDART,” etc.). When Alexandre comes “across a cow we want to learn more about” they use DairyComp to analyze “a ton of information on her.” [Alexandre, Facebook post, Jun 28, 2023, accessed Feb 7, 2024, available [here](#).] Dairies use such software to increase their economic efficiency by supporting data-driven decisions, by (for example) computing for each cow in the herd a farm-specific net present value, or anticipated future value, relative to an average replacement cow. The software provides a way for producers to calculate the expected economic benefit of treating sick and injured animals vs. euthanizing or culling them. Software like DairyComp influences the welfare of cows used for dairy in myriad ways. For example, the software can quantify economic losses (including decreased butterfat production, increased udder infections, and increased cow deaths) due to heat stress, so producers can determine “the profitability of investing in cow cooling measures.” As one example, see Theodore Halbach, Marie Fuenzalida Valenzuela, and Lyssa Seefeldt, “Using DairyCOMP 305 to Assess the Potential Impact of Heat Stress on a Dairy,” University of Wisconsin-Madison Extension, undated, accessed Jan 6, 2024, available [here](#).





## One third of the herd

“Culling” is the act of identifying and removing cows from a herd. Conventional, Organic, and “Certified Humane” dairies constantly replace cows with decreasing milk production, injuries, illnesses, etc. with cows experiencing their first lactation.<sup>97</sup> Culled cows can be euthanized on farm, but more often are sold at a profit to slaughterhouses to be processed as meat (typically hamburger), or to a livestock market or auction en route to the slaughterhouse.<sup>98</sup> Culling typically represents 5 to 15 percent of a dairy’s gross income.

Like all mammals, cows only lactate after giving birth. Through artificial insemination, dairy farmers cause their cows to give birth to new calves about yearly in order to maximize their lactation. Given the constant influx of “replacement cows” who result from these births, farmers have a continual incentive to sell sick and injured cows for a profit.<sup>99</sup>

A 2021 study found that **in the U.S., the annual dairy cow herd culling rate varies from 30 percent to 35 percent.**<sup>100</sup> In addition, an average of 1 in 20 (5 percent) cows used for dairy die “naturally” on farm each year,<sup>101</sup> so in total dairies replace about a third (35-40 percent) of their lactating cows with younger cows every year.

**In 2023, more than 3.1 million cows used for dairy were slaughtered in U.S. slaughterhouses alone, or one dairy cow slaughtered every ten seconds, around the clock.**<sup>102</sup>

<sup>97</sup> Michal Lunak, “Cull Rates: How is Your Farm Doing?” PennState Extension, updated Oct 20, 2020, archived [here](#). See also Cassie Yost, “Have Your Cows Repaid their Debts?” Penn State Extension, updated Dec 13, 2022, accessed Jan 6, 2024, available [here](#).

<sup>98</sup> A very small number of culled cows (less than 5 percent of the total culled, according to Lunak) are sold to other dairy farms. Their total is quite limited because of the surfeit of replacement cows generally available on all but the newest dairies—which are few, as the number of dairies in the U.S. is shrinking, not expanding.

<sup>99</sup> Lauren King and Donna M. Amaral-Phillips, “Dynamics and Strategies for Culling in a Dairy Herd,” University of Kentucky Dept. of Animal & Food Sciences, undated, accessed Jan 6, 2024, available [here](#).

<sup>100</sup> This figure does not include cows who die naturally or from euthanasia. Ligia C. Moreira, Guilherme J.M. Rosa, and Daniel M. Schaefer, “Beef production from cull dairy cows: a review from culling to consumption,” *Journal of Animal Science* 99:7, Jul 2021, accessed Jan 11, 2024, available [here](#). See also Lily N. Edwards-Callaway, Jennifer Walker, & Cassandra B. Tucker, “Culling Decisions and Dairy Cattle Welfare During Transport to Slaughter in the United States,” *Frontiers in Veterinary Science*, Vol. 5, Jan 18, 2019, accessed Jan 6, 2024, available [here](#).

<sup>101</sup> See for example Cassie Yost, “Have Your Cows Repaid their Debts?” Penn State Extension, updated Dec 13, 2022, accessed Jan 6, 2024, available [here](#), which found the annual death rate for the Northeastern U.S. to be 6.2 percent, in addition to an average cull rate of 31.4 percent, for “a total of 37.6 percent of [dairy] cows permanently removed from herds per year.” See also Franklyn Garry, “Adult Dairy Cow Mortality,” DAIReXNET, Aug 16, 2019, accessed Jan 7, 2024, available [here](#), which notes, “In some states, adult cow mortality [in addition to the those who are slaughtered] exceeds 10 percent per year.”

<sup>102</sup> “Livestock and Meat Domestic Data: Meat statistics tables, recent: Slaughter Counts,” USDA Economic Research Service, Jan 29, 2024, accessed Jan 30, 2024, available [here](#) and [here](#).



The incentive to cull cows used for dairy is a structural issue that affects organic, welfare-certified dairies to a similar degree as conventional dairies. All dairy types are constantly replacing milking cows through calving, and all have a financial incentive to sell culled cows to slaughterhouses, sale barns, and auctions.

“Our cows have to fit into our system. We have to sell the right cows and cull our herd appropriately.”

- Blake Alexandre.<sup>103</sup>

Alexandre culls “any cows with breeding issues, udder issues, or foot and leg problems,” as well as cows who are “too tall.”<sup>104</sup>

The suffering of cows en route to auctions, livestock sales, and slaughterhouses is considerable, as cows with difficulty standing and who are otherwise suffering are herded up into stockcars, are jostled over highways, and disembark en masse to enter unfamiliar pens, auction rings, and slaughter chutes. According to the most recent USDA figures available, 15 percent of cows who are lame are sold, as are 19 percent of cows who have been down for at least 24 hours, 20 percent of cows with a displaced stomach (which might otherwise require surgery to repair), 24 percent with clinical mastitis, and 36 percent of cows with eye cancer.<sup>105</sup>

<sup>103</sup> Tamara Scully, “Regeneration: Alexandre Family Farm The Blake and Stephanie Alexandre Family, Crescent City, California,” NODPA, Apr 12, 2021, updated May 17, 2021, accessed Jan 6, 2024, available [here](#).

<sup>104</sup> Tamara Scully, “Regeneration.”

<sup>105</sup> USDA, Animal and Plant Health Inspection Service, Veterinary Services, National Animal Health Monitoring System, “Dairy 2014: Health and Management Practices on U.S. Dairy Operations, 2014,” Feb 2018, accessed Jan 7, 2024, available [here](#).





## Appendix Conclusion

As appalling as Alexandre's abuses are, the structure of the dairy industry renders welfare problems systemic. In this appendix, we have raised questions about systemic suffering in the dairy industry that deserve further research.

Organic, "higher welfare," and conventional dairies all use cows bred to produce 3–6 times as much milk as a calf would naturally drink, which leads to unintended consequences like the explosion of displaced stomachs. In some ways, animals on higher welfare organic dairies are worse off, because farmers have financial incentives to not treat their illnesses or injuries with antibiotics. On average, dairies cull about a third of their cows each year, while another five percent or so die on farm.

The animal welfare certifications that Farm Forward has previously evaluated<sup>106</sup> are not up to the job of ensuring meaningfully higher welfare conditions.

Economic forces will continue to pressure farmers to make milking "parlors" ever more efficient, and to turn cows ever more "productive," so we expect the animal welfare problems intrinsic to dairy milk will only increase in the years ahead.

Perhaps someday, to better align with consumer's values, the American dairy industry will grapple with these systemic welfare issues. Perhaps not.

<sup>106</sup> See Farm Forward, "Label Guide," 2022, accessed Jan 7 2024, available [here](#).



DAIRY DECEPTION: CORRUPTION AND CONSUMER FRAUD AT ALEXANDRE FAMILY FARM

# Authors & Acknowledgements







# Authors

Farm Forward was founded in 2007 as the nation's first nonprofit devoted exclusively to end factory farming and our work improves the lives of 400,000,000 farmed animals annually. More information about Farm Forward's work and our other publications can be found at [farmforward.com](https://farmforward.com).

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Unless otherwise flagged in the text, all images of cattle in this report show cows from Alexandre, which we know based on 1) our personally videoing the cows on Alexandre property from public roads; 2) Alexandre or its clients using images of the cows on their own social media posts, videos, or websites to promote Alexandre products; 3) affidavits and purchase records verifying that the cows belonged to Alexandre; and/or 4) whistleblower interviews, in most cases backed by GPS metadata confirming that the cows were located on Alexandre's property. To our knowledge, none of the images have been altered or enhanced by anyone (using AI, image editing software, or any other method), with the exception of cropping or where necessary blurring faces to protect identities.

*This report has been updated from the original to remove statements indicating that dairy products from cows whose illnesses or injuries were treated therapeutically with antibiotics cannot bear the Certified Humane designation, and to include the mature jersey cow we witnessed with contents of her right eye extruding, on page 23.*