

THE FAILURES OF ORGANIC & ANIMAL WELFARE CERTIFICATIONS:

A Case Study of Alexandre Family Farm



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EXECUTIVE SUMMARY

Farm Forward reported the results of its investigation into the welfare abuses of Alexandre Family Farm, a prominent California-based organic dairy operation that holds multiple certifications, including USDA Organic and Certified Humane®—just over a year ago. With extensive documentation, the investigation revealed widespread patterns of animal abuse, neglect, and consumer deception at what was publicly regarded as one of the nation's leading “ethical” dairy producers. These abuses were not isolated incidents but represented systematic failures affecting more than a thousand animals over multiple years.

Farm Forward's investigation's impact was substantial and swift. Following publication, USDA's National Organic Program finally launched an investigation that substantiated numerous allegations of abuse. The company faced multiple lawsuits, law enforcement investigated, and retailers terminated marketing campaigns, reduced product placements, or cancelled orders entirely.

Although Alexandre had publicly maintained that many of Farm Forward's accusations of wrongdoing were “totally false or fabricated half-truths,” we obtained through a Freedom of Information Act request the results of USDA's investigation, in which Alexandre admitted to many of the allegations privately to regulators.

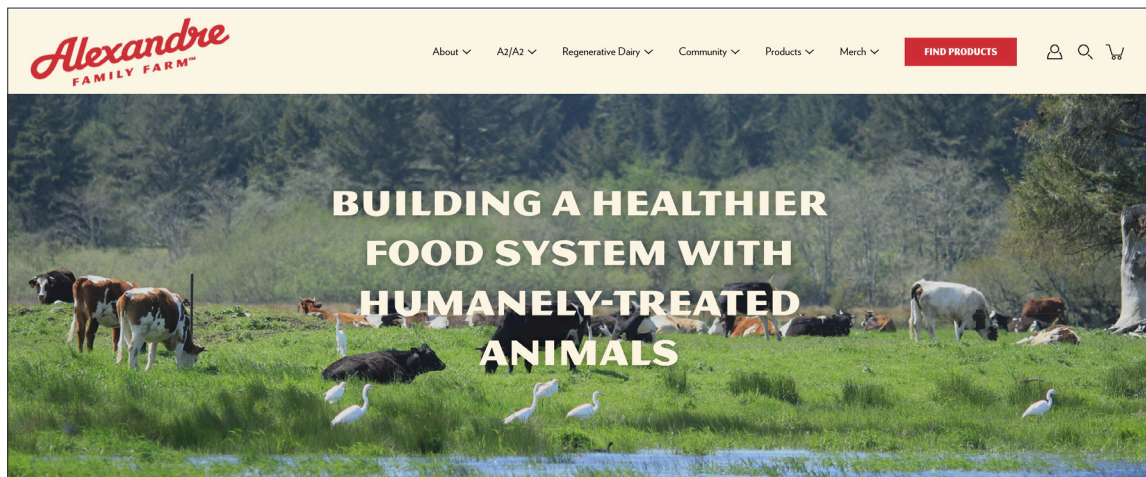
Our work exposing the abuses at Alexandre illuminates the **legal and regulatory exceptionalism at work in animal agriculture**, where actors at every level—federal and state organic agencies, local law enforcement, the state veterinarian, the commercial entities that sourced its products, and nonprofit welfare certifiers—privilege industry interests, fail to protect animals, and disempower the public from making more informed, humane purchasing decisions. The net effect of this exceptionalism is an extraordinary level of unchecked humanewashing, where consumers purchase products thinking they represent far better conditions for animals than they actually do.

Beyond exposing conditions at a single operation, our investigation's aftermath illuminates broader systemic failures across multiple oversight mechanisms designed to protect both animals and consumers. This case study demonstrates that animal agriculture operations can and do operate with an impunity that most consumers would find shocking, and a far cry from the level of accountability they would expect for any producer, let alone a USDA Organic, Certified Humane dairy.

This report documents how government regulators, independent certifiers, and “ethical” retailers all failed to monitor, prevent, or adequately respond to documented abuses. These findings reveal how **current systems that consumers would expect to hold producers accountable to high standards instead function primarily for the marketing benefit of producers**, humanewashing their practices—that is, providing false assurances of ethical treatment to consumers while masking widespread farmed animal suffering.

The report concludes by identifying **critical reforms needed to prevent ongoing failures in animal welfare oversight**, focusing on three key areas: reforms in government (establishing and enforcing clear, science-based standards, and separating regulatory and promotional mandates); independent certifiers (enforcing standards, eliminating conflicts of interest, and developing alternative models of certification); and retailers (increasing their responsibility for the accuracy of their marketing claims about the ethical standards of their suppliers through a combination of legal, regulatory, and consumer pressure). The conclusion also highlights the need to address perverse incentives in current organic standards and to prioritize transparency and consumer education.

These proposed systemic changes are designed to move the industry toward greater accountability and better protection for animals, and to empower consumers with the information they need to make informed choices. While these reforms are actionable and practical, they will also require sustained, cross-sector collaboration.



Above, taken from Alexandre Family Farm website, marketing materials presenting bucolic farming practices.



Photograph of dead cows on Alexandre property. Unknown cause of death.

THE ALEXANDRE INVESTIGATION AND ITS AFTERMATH

Just over a year has passed since Farm Forward, aided by rancher whistleblowers, [exposed](#) widespread animal cruelty and consumer deception at Alexandre Family Farm, a leading organic, regenerative, Certified Humane® dairy. Despite Alexandre's numerous certifications and stellar reputation, our investigation found that the dairy systematically abused cows, and routinely allowed animals with treatable diseases and injuries to suffer without proper care. Extensive evidence—including eyewitness accounts, our own visits to the farm and cattle auction, video and photographic documentation, veterinary evaluations, and expert review—revealed that preventable suffering was rampant, and that diseased and disabled cows were often sold into the food supply.

Key abuses documented included untreated severe lameness, eye diseases, emaciation, and cancer; cows unable to walk dragged by construction equipment across gravel and concrete; widespread, particularly inhumane use of calf hutches; sick and injured animals transported to auction rather than receiving treatment or euthanasia; cows trampled to death; mutilations (e.g. dehorning 800+ adult cows without pain relief, cutting off a cow's teat with a pocketknife); and makeshift, painful treatments for infections, involving wrapping legs in duct tape and pouring salt into eyes. These incidents were not isolated but part of a systemic pattern, with over a thousand cases recorded.

In April 2024, Farm Forward published a report, [Dairy Deception](#), documenting in detail

Alexandre's pattern of abuse. Our report highlighted not only Alexandre's abusive and neglectful practices but also how organic and humane certifications failed to prevent—or apparently even detect—these abuses. We revealed

Humanewashing is tragic not only for the millions of animals impacted, and for any operators who actually do put in the time, effort, and expense to treat farmed animals more humanely, but also because the lack of oversight and transparency prevents consumers from being informed about the persistent failures in animal welfare standards and enforcement. Why would consumers feel any need for industry reform when they believe that organic and humane producers are already basically doing a good job, and have a meaningful level of accountability for their treatment of animals. Humanewashing obscures the way meat, egg, and dairy companies act, and blocks public energy that might otherwise be mobilized to combat widespread animal suffering.

how certifications can mislead consumers by giving false assurances of ethical treatment while masking widespread suffering and neglect (a phenomenon known as “humanewashing”).

Since the Dairy Deception report was released, much has happened in the Alexandre case.

Farm Forward is releasing this new report to provide an update on the latest developments in the case—including a summary of the response to Farm Forward’s investigation and undisclosed findings about United States Department of Agriculture’s (USDA’s) investigation of the company we obtained through a Freedom of Information Act (FOIA) request. **This new information illuminates system-wide failures in setting and enforcing welfare standards.**

The Response to Farm Forward's Investigation

The release of Dairy Deception precipitated a wave of public response to Alexandre’s egregious animal welfare violations. In the year following the report’s release:

- The Atlantic published a longform piece,¹ corroborating many of our findings and contradicting none, that quickly became the top story on its website.
- All Alexandre products were pulled from ASPCA’s Shop With Your Heart list, FindHumane.com, and the Cornucopia Institute scorecard.
- Alexandre, which had been suspended from Regenerative Organic Certified just months before, was temporarily delisted by Certified Humane.
- The Humboldt County Sheriff’s Office opened an investigation into Alexandre’s animal abuse.
- Gus’s Community Market, a California grocery with five locations, pulled its Alexandre promos and reduced Alexandre’s products and shelf space, and Whole Foods Market terminated their marketing campaign that had featured Alexandre as “environmental stewards.”
- Providore Fine Foods and Luke’s Local cancelled all orders of Alexandre products.
- Walt’s Wholesale Meats, which specializes in slaughtering dairy cattle for human consumption, stopped accepting all cows from Alexandre.
- A nonprofit law firm filed a [lawsuit](#) against Alexandre to enforce California criminal animal cruelty statutes. In June of 2025, a judge in Humboldt County ruled the case could proceed.
- A separate [class action lawsuit](#) with potential damages exceeding \$5 million was filed against Alexandre and the owners of the Certified Humane® label in March 2025; the case could set a new precedent if it shows that “humane” farms and third-party certifications that humanewash can be held legally accountable for deceiving consumers.

Despite this public response, rather than admitting any wrongdoing or taking any responsibility, Alexandre tried to call Farm Forward’s motivations into question, undermine the credibility of *The Atlantic* article’s author,² and claim that many photos in our report were doctored, staged, and otherwise misleading.³ (We invited Alexandre to point to any specific image that they believed was doctored, staged, or otherwise misleading, but to date, Alexandre has not indicated even one.)

We invited Alexandre to have a dialogue about the report, under the modest condition

1 Annie Lowrey, “[The Truth about Organic Milk](#),” *The Atlantic*, April 12, 2024, accessed June 11, 2025.

2 Ryan Burns, “[\[UPDATED\] Report From Animal Advocacy Group Finds ‘Deception, Cruelty and Animal Abuse’ at Alexandre Family Farm in Crescent City](#),” *Lost Coast Outpost*, updated April 12, 2024, 3:28 PM.”

3 Annie Lowrey, “[The Truth](#).”

that they acknowledge the challenges in organic dairy production, such as those presented by current organic dairy standards stripping animals of organic status if they have ever been treated with antibiotics when sick. Alexandre did not reply to our offer.

Tellingly, Alexandre did not ask us to take down our public allegations, either by sending us a “cease and desist” letter or suing us for defamation. To win a defamation case,

Alexandre would have had to show that our findings were untrue, and we had amassed irrefutable evidence of their violations.

While Alexandre was denying the veracity of the evidence presented by Farm Forward, USDA opened an investigation of the allegations of abuse and neglect by the company. These results were not made public—until Farm Forward’s release of this report.

Previously Undisclosed: USDA’s Shocking Revelations

In the most recent development on the Alexandre case, Farm Forward obtained new information on USDA’s investigation of Alexandre through a FOIA request. In September 2024, Farm Forward learned that USDA’s National Organic Program (NOP) had substantiated many of the violations of organic standards that we had alleged against Alexandre. However, no information about those NOP-documented violations was publicly available.

In May 2025, Farm Forward received the FOIA response containing the details of these violations. Although heavily redacted, it confirmed many of our specific findings of animal abuse, neglect, and mismanagement at Alexandre. USDA and Alexandre’s organic certifier, CCOF,⁴ verified Alexandre’s inadequate feeding, failure to treat lameness and hoof rot, use of diesel fuel on animals, improper animal handling, cramped and unsanitary calf hutches, trampling deaths due to hunger, and a series of other violations.

See the Appendix for detailed excerpts of USDA’s response to our FOIA.

Publicly, Alexandre had characterized many of Farm Forward’s allegations as “either totally false or fabricated half-truths,”⁵ and claimed, e.g., “We are guided by a deep care for our animals as well as protocols established by experts in the treatment of farm animals.”⁶ But the FOIA response shows **Alexandre admitted**—not to us, or to the public, but to NOP in direct communications between the company and the agency—that many of our allegations were accurate, including:

- improper handling of cows with hip clamps⁷ [presumably, this refers to our photo of a living “down” (non-ambulatory) cow, and a whistleblower account of at least one other, being hung by the hips from a skid steer loader and then pulled across the ground, their faces dragging over concrete and gravel for more than 50 yards]

4 CCOF’s full name is California Certified Organic Farmers Certification Services, LLC.

5 Burns, “[[UPDATED](#)] Report”

6 Burns, “[[UPDATED](#)] Report”

7 NOP [United States Department of Agriculture, Agricultural Marketing Service, National Organic Program, Compliance and Enforcement Division]. “[[NOPI-LS-00240-2024, Alexandre Family Farms: Report of Investigation](#).” Judith Ragonesi, November 5, 2024. Obtained under the Freedom of Information Act; requested on October 23, 2024; received May 7, 2025, 6.

- using diesel fuel on animals for fly control⁸
- cutting off the teat of a cow with mastitis⁹
- inadequate preventative hoof care¹⁰
- a down cow left [in a pasture, unable to walk,] without care for approximately two weeks “likely” on their farm¹¹
- selling cows with “cancer eye” at auction¹² [such as the Alexandre cow with the ruptured eyeball witnessed at auction by this author]
- a mass death event where animals were “trampled due to hunger”¹³

Alexandre also acknowledged the accuracy of additional allegations, including at least four lines of admissions that USDA redacted in the materials sent to Farm Forward.¹⁴ **The non-redacted admissions alone reveal that Alexandre has been aware of its egregious and systemic failures in animal care and farm management all along, in stark contrast to its public disavowal of *Dairy Deception*’s findings.**

Alexandre also denied to NOP certain allegations that Farm Forward could have proven were true, had NOP responded to our offer to speak to them by phone, which NOP did not. For example, as reported in *Dairy Deception*, the veterinarian who reviewed our video evidence found that some Alexandre cows sent to auction had low “body condition scores” and some were even “emaciated.” According to NOP, “Alexandre denied that body condition of animals was a concern.”¹⁵ We would have been happy to provide these videos of cows with low body condition scores and emaciation to NOP, and still would. Similarly, Alexandre stated that “they do not withhold treatment to maintain an animal’s organic status.”¹⁶ We could easily connect NOP to whistleblowers who have witnessed multiple cases of Alexandre withholding treatment to preserve a cow’s organic status.



8 NOP, 7.
9 NOP, 6.
10 NOP, 7.
11 NOP, 6.
12 NOP, 7.
13 NOP, 10.
14 NOP, 7.
15 NOP, 6.
16 NOP, 7.

Despite seeming to take Alexandre’s denials at face value rather than consulting the evidence we could have provided, NOP and CCOF confirmed dozens of animal welfare violations. In addition to the allegations that Alexandre acknowledged, NOP substantiated instances of animal abuse, neglect, and mistreatment by Alexandre including:

- animals had severe lameness and hoof rot and inadequate hoof management¹⁷
- calves did not have adequate space in their hutches, and had both dried manure on their bodies and wet bedding¹⁸
- animals deemed unfit for transport were transported to auction or sale¹⁹
- calf treatment records were not documented,²⁰ and inspectors found several calves with scours [diarrhea] and pink eye²¹
- hoof baths [a standard method to prevent hoof rot and other infections] were not in use²²
- an eye patch was not removed from a cow after treatment was complete²³
- algae was found in water troughs²⁴
- “Alexandre animals were without feed and some animals died from trampling”²⁵ [Presumably, this refers to our finding that Alexandre left approximately 800 animals without feed for several days, and when feed finally arrived, dozens of animals died from trampling and more than a dozen were injured]



A reasonable person might think that confirming these allegations would result in—at the very least—Alexandre’s suspension from the Organic program. So it may not be surprising that, alongside NOP’s characterization of “systemic failures found at Alexandre,”²⁶ CCOF gave Alexandre a “Combined Notice of Noncompliance and Proposed Suspension.”²⁷

17 NOP, 5.
18 NOP, 9.
19 NOP, 5.
20 NOP, 8.
21 NOP, 10.
22 NOP, 10.
23 NOP, 10.
24 NOP, 9.
25 NOP, 5.
26 NOP, 11.
27 NOP, 11.

What may be surprising, though, is that CCOF did not suspend Alexandre’s certification, but instead settled with them. Without even a one-day pause in their full USDA Organic status, Alexandre is receiving “additional oversight and monitoring for two years.”²⁸ This additional oversight and monitoring consists primarily of “one unannounced inspection per year” and quarterly submissions of paperwork based on Alexandre’s self-reporting of its practices.²⁹

This toothless response to years-long, systemic abuse, neglect, mismanagement, and consumer fraud is not even the most blatant instance of the widespread failure to hold Alexandre, or any “ethical dairy,” to

any meaningful standards. Largely hidden from public view, such failure extends beyond NOP and CCOF to county and state officials, additional organic and independent humane certifiers, and retailers (including “ethical” retailers). This report is not only about the animal welfare failures of one industrial dairy, but more significantly, about the egregious failures at every level—federal, state, and county government, independent certifiers, and retailers—that compromise animal welfare and make it impossible for consumers to make conscientious purchasing decisions that align with their commitment to ensuring that farmed animals are raised with basic standards of care. We turn first to government failures.



28 NOP, 11.

29 NOP, 8.

IN DEFERENCE TO INDUSTRY, GOVERNMENT ENTRENCHES POOR ANIMAL WELFARE

The Alexandre case highlights key failures by federal, state, and county governments to uphold animal welfare laws and regulations. USDA's National Organic Program at the federal level, the California Department of Agriculture and state veterinarian at the state level, and law enforcement at the county level all deferred to industry interests over protecting animal wellbeing and health.

Federal Failures in Welfare Standards and Enforcement

The U.S. federal government assigns USDA oversight over agricultural and food production. This includes stated regulatory objectives of assisting farmers, improving health, ensuring food safety, conserving natural resources, marketing agricultural products, and protecting plant and animal health, including enforcing the Animal Welfare Act.³⁰ The Animal Welfare Act, however, excludes farmed animals from its coverage, limiting legal protections for animals in agriculture. **USDA's aim of promoting agricultural products is at odds with its mandate to protect animal welfare,** and the agency often prioritizes economic interests over the well-being of animals whose care it is supposed to regulate. This conflict of interest affects animals in both conventional and organic production settings.

The public relies on the USDA Organic label, one of the most trusted labels in the marketplace, to ensure the products that consumers purchase align with higher standards and practices.³¹ Many consumers assume that USDA Organic certification ensures higher welfare for farmed animals—both in the standards it sets and in its enforcement.³² However, **NOP standards for critical aspects of animal welfare, such as outdoor access, indoor space, genetic engineering, and physical alterations, are significantly lower than consumers expect.**³³ As the case of Alexandre highlights, even when NOP standards should ensure better welfare outcomes than conventional industry practices, NOP fails in its enforcement of standards, and lacks transparency when problems are identified.

30 USDA, "Mission Areas,"

31 A recent report by the Organic Trade Association, "[Consumer Perception of USDA Organic and Competing Label Claims](#)," found that 74 percent of consumers surveyed trusted the USDA Organic label above other product labels. For a non-paywall summary of the report, see: SES, Inc., "[Five Takeaways from the Consumer Perception of USDA Organic and Competing Label Claims Report](#)," March 21, 2025.

32 American Society for the Prevention of Cruelty to Animals (ASPCA), "[Research on Consumer Perceptions of Organic Food Standards for Treatment of Animals](#)," April 2014.

33 ASPCA, "[Research on Consumer Perceptions](#)."

USDA Organic's Low Animal Welfare Standards

USDA Organic certification has always had minimal, low, or poorly defined standards for animal welfare. At a fundamental level, USDA Organic condones much of the cruelty built into raising cows for milk in both organic and non-organic settings. For example, current USDA Organic standards allow for the dairy industry's genetic engineering of breeds maximized for milk production,³⁴ resulting in chronic poor health for cows who routinely suffer from mastitis,³⁵ lameness,³⁶ metabolic disorders,³⁷ and infertility,³⁸ which often lead to culling. Even in organic dairies, calves are immediately separated from their mothers in order to maximize profit by diverting milk that would normally feed their calves into production for human consumption, a practice that causes significant distress for both cow and calf.³⁹ Male calves, who are not of use to the industry, are typically killed at birth or raised for veal. Physical alterations that cause stress and pain to cows, such as disbudding (removing horn buds), are allowed under USDA Organic standards.

USDA standards also disincentivize providing antibiotics to sick animals who need them.

Under USDA Organic rules, any animal treated with antibiotics must be removed from the organic herd, causing farmers to lose the price premium that they would have received for organic milk (and for organic beef, once the cow's milk production declines and she is sold for meat). If cows are treated with antibiotics and therefore downgraded to conventional status, the price differential is sometimes fivefold.⁴⁰ This discourages

NOP standards for critical aspects of animal welfare, such as outdoor access, indoor space, genetic engineering, and physical alterations, are significantly lower than consumers expect.

humane treatment of sick cows who need antibiotics. Milk processors further discourage antibiotic treatment by refusing to buy from organic dairies that use antibiotics on cows they downgrade to conventional, fearing contamination of the organic supply. A further disincentive to treating sick organic cows with antibiotics: milk from treated cows cannot be

34 Compared to her ancestor 75 years ago, each cow in 2022 produced over 4.5 times as much milk. Between 1947 and 2022, the country's cows used for dairy shrunk from 23,329,000 cows to 9,402,000 cows, but as a result of genetic engineering, the volume of milk each cow produced rose from an average of 5,244 lbs annually to an average of 24,087 lbs annually. Figures from USDA, "[Milk Production](#)," February 22, 2023, p. 4, accessed June 9, 2025, and USDA, "[Milk Production and Dairy Products: Annual Statistical Summary, 1961](#)," Table 1.--Milk cows and milk production on farms, United States, 1947-61," February 1962, p. 5, accessed June 9, 2025.

35 Wei Nee Cheng and Sung Gu Han, "[Bovine Mastitis: Risk Factors, Therapeutic Strategies, and Alternative Treatments - A Review](#)," Asian-Australasian Journal of Animal Sciences 33, no. 11 (2020): 1699-1713.

36 L.G. Baird et al., "[Effects of Breed and Production System on Lameness Parameters in Dairy Cattle](#)," Journal of Dairy Science 92, no. 5 (2009): 2174-2182.

37 Mária Kapusniaková, "[Alimentary Metabolic Disorders in High-producing Dairy Cows: A Review](#)," Acta Fytotechnica et Zootechnica 26 (2023): 354-359.

38 M.C. Lucy, "[Reproductive Loss in High-Producing Dairy Cattle: Where Will It End?](#)" Journal of Dairy Science 84, no. 6 (2001): 1277-1293.

39 Kathrin Wagner et al., "[Effects of Mother Versus Artificial Rearing During the First 12 Weeks of Life on Challenge Responses of Dairy Cows](#)," Applied Animal Behaviour Science 164 (2015) 1-11.

40 For example, when sold at auction for beef, a formerly organic 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 had withheld antibiotics and sold her as organic, commanding 5 times the price.

used to feed organic calves,⁴¹ and it cannot be sold, even for conventional milk unless a withdrawal period has been followed,⁴² so it must be discarded as waste. Combined, these factors make the antibiotic treatment of sick cows who need them economically disadvantageous. As a result, producers often allow sick or injured cows who need antibiotics to languish without adequate treatment—continuing to milk them intensively for the human food supply.⁴³

In an effort to address the inadequate welfare standards of USDA Organic certification, the agency passed the Organic Livestock and Poultry Standards (OLPS), effective January 2025. The new rule includes modest improvements in some aspects of animal welfare; however, it still

allows for many practices that cause harm and suffering to farmed animals, such as dehorning, disbudding, cow-calf separation, isolation of calves, genetic modification, and the use of male calves for veal. Even with the passage of the OLPS, USDA Organic cannot be considered a meaningful animal welfare certification.



USDA NOP Hides Welfare Standards Violations from the Public

Compounding its low standards for animal welfare, NOP conceals from the public the results of its investigations of animal welfare violations. As is illustrated in the case of Alexandre, the company's organic certifier found that the operator did not meet USDA Organic standards—for years—but **NOP did not publicly acknowledge the existence of any findings, let alone report any details about Alexandre's welfare violations. None of this information was available to consumers until Farm Forward submitted a FOIA and [broke the news](#).** Without Farm Forward's investigation and subsequent

FOIA, the public could not possibly have known that anything at all was going wrong at Alexandre.

This lack of transparency means that consumers were unable to make informed purchasing decisions to avoid Alexandre products, and indicates that consumers cannot trust that USDA Organic standards are being met or enforced at any farm.

For USDA Organic to be considered meaningful, in the sense that USDA Organic producers can be said to be held accountable to

41 USDA, Agriculture Marketing Service, [National Organic Program; Origin of Livestock](#), Title 7 CFR § 205, April 5, 2022, pp. 19740-19773, accessed June 9, 2025.

42 United States Food & Drug Administration, "[Adequate Records help Prevent Illegal Drug Residues and Ensure Food Safety](#)," March 1, 2023, accessed June 9, 2025.

43 This tremendous economic disincentive to treat animals with antibiotics stands 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 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. 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* 13, no. 9 (2023), 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* 10, no. 10 (2020).

certain standards, NOP needs to make at least some information about standards violations available to the public. Certifiers should, of course, hold some types of information confidential, and complete transparency is likely not possible or beneficial, but **a USDA Organic producer committing dozens of egregious violations of USDA Organic standards surely does not fall into the**

category of information that serves the public to be kept secret.

What other violations, by other dairies, are also known to NOP, and are also being kept from the public? **Without a far greater level of transparency, the public cannot reasonably trust the USDA Organic program.**

State and County Entities Charged with Animal Welfare Fail to Respond to Abuse

Mirroring the role and responsibilities of federal oversight, state and county agencies are tasked with ensuring standards of animal welfare in organic food production. However, the conflicts of interest that drive USDA's standards and enforcement are also reflected at these more local scales of government.

This includes the California Department of Agriculture (CDFA), which sacrifices animal welfare in service to producers' economic interests, and officials of the state (the state veterinarian) and county (law enforcement) who look the other way when it comes to animal abuse.

The California Department of Food and Agriculture Prioritizes Profit

The CDFA oversees both plant-based and animal-based agriculture in California. Like USDA, it is charged with protecting a safe, healthy food supply and enhancing agricultural trade. And like USDA, the CDFA **is rife with loyalty conflicts, as it is charged with both regulating and promoting the state's powerful dairy industry.**

CDFA has used taxpayer funds aggressively to defend dairy interests. In recent years, with the help of California's attorney general, CDFA has spent significant resources trying to protect California dairy from what the dairy industry perceives as competition from other California agricultural products: plant-based dairy alternatives (e.g., oat milk). In one case, CDFA even targeted plant-based dairy companies, including one called

Miyoko's Creamery, which it deemed a threat to the dairy industry. CDFA ordered Miyoko's to stop using terms like "vegan butter," "cruelty free," and even to remove a photo of a woman hugging a cow from its packaging, claiming these violated dairy labeling laws. When Miyoko's sued, a federal judge ruled that CDFA had overstepped its authority and violated Miyoko's First Amendment rights.

This is just one case of how CDFA's multiple mandates present clear conflicts of interest, and how CDFA tends to lean in favor of promoting animal agriculture, rather than regulating it. The relationship between the regulatory body and Alexandre is a further example.

According to a [FOIA response](#), NOP delegated to CDFA some complaints it received that

Alexandre “starved their cows, did not treat their sick cows in order to preserve organic status, and sold sick cows instead of euthanizing the animals.” We learned through an additional FOIA request that CDFA investigated the complaint they received from NOP by inspecting Alexandre on May 31 and June 1, 2023, but issued Alexandre advance notice of which farm locations they would inspect, giving the company time to prepare for the inspection. Because there were serious concerns identified—supported by substantiating evidence—it’s not obvious why CDFA wouldn’t conduct a surprise visit instead.

Whistleblowers have informed us that Alexandre goes to great lengths to clean up or clear out standards violations in advance of announced inspections—for example, sending sick or injured cows to auction whose presence on the farm would result in a citation. So it’s no surprise that following CDFA’s announced inspection, on July 20, 2023, CDFA’s State Organic Program (SOP) sent Alexandre a letter saying they didn’t find any violations of organic rules. We asked CDFA for the details of what their audit reviewed and found, but they did not fulfill our request.

Normally, a complaint made to NOP and passed on to CDFA would be referred to California Certified Organic Farmers (CCOF), Alexandre’s organic certifying body, and then investigated by CCOF. But through our public records request, we obtained [emails](#) indicating that CCOF was not informed of the complaints made to NOP. When CCOF raised its being

cut out of the investigation as an issue, CDFA replied to CCOF and explicitly suggested that CCOF was excluded in order to “maintain a sense of neutrality” and avoid “possible bias.”⁴⁴

Despite CDFA’s suggestion that CCOF’s investigation would have been biased and not neutral, it was actually CCOF, and later NOP, that confirmed many of our allegations, not CDFA.

... [CDFA] issued Alexandre advance notice of which farm locations they would inspect, giving the company time to prepare for the inspection.

The decision to exclude Alexandre’s certifier, CCOF, from the investigation in favor of CDFA is worrying, as **Alexandre has a longstanding close relationship with CDFA**. For example, Blake Alexandre is seated on the CDFA’s California Organic Products Advisory Committee,⁴⁵ a committee established by law to advise the CDFA Secretary on issues including organic standards and enforcement.⁴⁶ Mr. Alexandre also sits on CDFA’s regenerative agriculture advisory committee, created to define the term “regenerative” for the state of California⁴⁷—an important regulatory definition, which will likely result in public grants from CDFA to farms like Alexandre. It is unclear whether Alexandre’s participation on CDFA committees contributes to an increased likelihood of Alexandre receiving

44 Because CCOF’s exclusion was highly unusual, Emily Vasquez of CCOF repeatedly expressed dismay to CDFA that CCOF was not notified of the complaint regarding Alexandre. In an email to CCOF, Supervising Special Investigator Danny Lee of CDFA justified CCOF’s exclusion by stating that CDFA’s State Organic Program may conduct investigations independently to “maintain a sense of neutrality” and avoid “possible bias.”

45 CDFA, “[California Organic Products Advisory Committee](#),” August 1, 2024, accessed June 13, 2025; California Certified Organic Farmers, “[Congratulations to Blake Alexandre for His Re-Appointment to the California Organic Products Advisory Committee \(COPAC\)](#),” April 21, 2020.

46 CDFA, “[What is COPAC?](#),” accessed June 9, 2025.

47 CDFA, “[Defining Regenerative Agriculture for State Policies and Programs](#),” accessed June 13, 2025.

CDFA grants, but CDFA has granted funds to Alexandre totalling at least \$0.8 million to upgrade Alexandre's infrastructure, improve Alexandre's soil, and "keep their

calves healthier."⁴⁸ Perhaps the reason CDFA provided Alexandre with advance notice of the inspection is more obvious than it initially appeared.

The State Veterinarian Overlooks Routine Abuse

State veterinarians are senior officials within California Department of Food and Agriculture (CDFA), and are key actors in identifying animal abuse. At Alexandre's local livestock auction, almost every week, Alexandre cows encountered State Veterinarian Meghan Mott. Mott is not employed by the auction, but is responsible for overseeing animal health at the auction on behalf of the state of California. Although Mott's role focuses on ensuring regulatory compliance and monitoring and controlling certain infectious diseases,⁴⁹ she is also a mandated reporter of suspected animal abuse or cruelty.

So when obviously abused and cruelly treated cows arrive at the auction yard—such as the Alexandre cows we have seen in person or in videos who were transported to auction, despite being unable to stand on four legs due to hoof rot or severe lameness; or despite blindness due to "cancer eye" or eye trauma; or despite emaciation due to malnutrition or inadequately managed diseases; or despite ataxia [poor muscle control resulting in clumsy movements] due to a spinal cord injury—one might expect a state veterinarian, as a mandated reporter of animal abuse and cruelty, to report it.

Multiple veterinarians confirmed that the animals from Alexandre were subject to

abusive and neglectful treatment, with one characterizing the video documentation from the auction yard as demonstrating "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."

However, it appears that Mott did not identify (or report) any of these animal welfare violations, but allowed these animals to be sold at auction; neither did she report any other mistreatment of Alexandre animals who came through the auction over a five-year period.⁵⁰

CDFA Director of Public Affairs Steve Lyle told The Atlantic that the head state veterinarian "tries to convey the idea of 'if you see something, say something' to staff," but went on to explain that "state veterinarians are functionally epidemiologists, checking for conditions like influenza."⁵¹

It may seem extraordinary that as a **mandated reporter, a state veterinarian whose job is to ensure animal welfare instead overlooked routine abuse for years**, but the agricultural exceptionalism that exempts farmed animals from even minimal oversight and allows their ongoing mistreatment extends to all levels of government.

48 California Climate and Agricultural Network, "[Farmer and Rancher Climate Leaders: Alexandre Family Farm](#)," accessed June 13, 2025.

49 California Department of Food and Agriculture, "[List of Reportable Conditions for Animals and Animal Products](#)," September 2024, accessed June 13, 2025.

50 Like the livestock deputy, Mott did regularly volunteer to unload animals from the trucks, and to help auction workers move cattle into the arena.

51 Lowrey, "[The Truth](#)."

Law Enforcement Enables Animal Abuse

Law enforcement is also a key actor in investigating and responding to reports of animal welfare violations, but it consistently fails in this mandate. The case of Alexandre highlights the inadequacies and negligence of law enforcement in investigating evidence of farmed animal abuse.

On April 12, 2024, the day after Farm Forward published *Dairy Deception*, we sent a [letter](#) to the Humboldt County Sheriff's Office to request that it investigate Alexandre Family Farm's pattern of animal abuse, neglect, and indifference to chronic animal suffering over the previous five years." We urged the sheriff to "take all appropriate action to prevent or prosecute Alexandre's violations of California anti-cruelty laws (including CPC\$597a) and water quality laws (including FGC\$5652a)." After we followed up, a special services sergeant asked us to send him "any contact information for any witnesses to these crimes." We replied with full contact information for eyewitnesses and stated that we were reaching out to other eyewitnesses to obtain their permission to share their information as well.

More than seven weeks after our initial complaint, on May 29, we were contacted by the deputy who had been assigned to the case. He stated that he had interviewed employees at the auction yard about Alexandre's activities there "over the past 20 to 30 years," but when we mentioned the *Dairy Deception* report and *The Atlantic* article that we had submitted to the sheriff's office almost two months prior, he stated that he had not seen them. He didn't know they existed.

We forwarded the deputy the report and article, offered to answer his questions about our experiences and findings, and attempted to contact him 9 times between

June 3rd and October 9th. We heard back from him only once, by email, requesting photo and video evidence. We sent him photos, videos, and accounts of abused



and neglected Alexandre cattle, including additional videos recorded after those we'd analyzed for *Dairy Deception*. We offered to connect him to two of the whistleblowers who were willing to be interviewed. Without taking us up on our offer to speak to us or the two other eyewitnesses about conditions at Alexandre, the deputy completed his report and forwarded it to the District Attorney's (DA's) office for their review.

When we requested a copy of the deputy's report, the sheriff's department informed us that the report was "exempt from disclosure" as an ongoing investigation, and might well remain exempt even after the investigation was closed. More than a year has passed since we first

registered our findings with the sheriff. As far as we know, the deputy's report is still sitting on the DA's desk, and there has been no engagement with Alexandre. It seems possible that the DA may have "pocket vetoed" the case as a way of ensuring that it is kept open, in limbo, and immune to any public scrutiny.

Why would this happen? It appears that the sheriff's department has consistently failed in its mandate to protect animals at Alexandre. Prior to our investigation, a whistleblower had reported Alexandre's animal abuse to the sheriff, which led to no consequences for Alexandre.

The sheriff's department is also directly implicated in overlooking Alexandre's abuses for years. The department staffs the local cattle auction with a "livestock officer" whose job includes monitoring for any signs of abused, neglected, or mistreated cattle. If the sheriff's office acknowledged that Alexandre sent cows in wretched condition to the very auction the sheriff was charged with monitoring, it would amount to a confession that the livestock deputy who should have reported abuse had failed to do his job.

One of the most recent livestock deputies acknowledged in court that he had actively

participated in violating welfare practices at an auction by using an electric prod on a "sub par cow," which a whistleblower clarified was a "downed" animal.⁵² This same deputy had a clear conflict of interest in overlooking Alexandre's abuses; he was leveraging Alexandre's assistance to enter the cattle business.⁵³

The case of Alexandre illustrates multiple ways the sheriff's office failed its mandate to respond to Alexandre's animal abuse. Despite having a livestock officer dedicated to monitoring the animals at the auction, the sheriff's office seems to have done nothing about Alexandre until its hand was forced, and even at that point, what it did remains unclear. As one of the key mechanisms of oversight for animal welfare, law enforcement failed in its duty of care to protect animals suffering from abuse and neglect.

These failures at every level of government severely compromise animal welfare and mislead consumers who believe that government provides meaningful oversight of animal agricultural production practices. But it is not just government inadequacies that pose a problem; independent organic and humane certifiers, too, allow violations of basic animal care practices on farms.

52 Superior Court of California, County of Humboldt, *People of the State of California v. Raymond Frank Christie*, No. CR1802751, Reporter's Transcript, November 14, 2019, 62. Although not employed by the auction, while on duty and wearing a sheriff's deputy uniform the livestock officer "sometimes helped with moving cattle" [Rhonda Parker, "[Christie Trial: Defense Attorney Attacks Deputy's Credibility on Cow Carcass Testimony](#)," *Lost Coast Outpost*, November 15, 2019], e.g., unloading cows from trucks or moving them into the chute [People vs. Christie, 60, 62], "using an electric prod to keep them going" [Parker, "[Christie](#)"]. In court, the livestock officer affirmed that he was "just voluntarily assisting using the cattle prod" [People, 63]—in spite of never having received instruction on how to use a cattle prod [People, 62]. In court, the livestock deputy acknowledged using the cattle prod on a "sub par" cow [People, 62]; according to a whistleblower, the deputy repeatedly used an electric cattle prod at the auction on a downed cow who was unable to get up, let alone get away, as well as on injured animals using only three legs who found it painful to move. None of this is compatible with discharging the duty of animal protection.

53 According to a whistleblower, this livestock officer assigned to the cattle auction was trying to enter the cattle business with the Alexandres' help, and now has achieved his ambition. In a court transcript, the deputy described his "purpose being there [at the auction]" as, in part, "a learning opportunity for me to ... learn the market." [People, 64].

INDEPENDENT CERTIFIERS’ *LAX OVERSIGHT ALLOWS FOR WELFARE VIOLATIONS*

Independent certifiers exist to fill the gaps left by inadequate federal and state oversight and the lack of clear definitions of “humane” standards by USDA. In theory, these certifiers should ensure better welfare and verify that producers are meeting high standards of care for animals. In practice, this is not the

case. Two of Alexandre’s most well-known independent, nonprofit certifiers, California Certified Organic Farmers and Certified Humane, failed to identify and report the company’s abuse of animals, and did not effectively verify that organic standards were being met by the producer.

California Certified Organic Farmers

California Certified Organic Farmers (CCOF) is an organic certifier accredited by NOP. CCOF is typically charged with auditing organic producers in California, including Alexandre, to verify their compliance with USDA Organic standards. In the aftermath of our investigation of Alexandre, we found several problems with CCOF.

First, CCOF is a black box. CCOF is even less transparent than government entities like USDA, NOP, or CDFA. Organic certifiers like CCOF are not government entities, but nonprofit organizations. Therefore, they are not subject to FOIA’s or other public records requests; their investigations and their results are hidden and inscrutable. Although CCOF is no different from NOP or CDFA in its refusal to comment on specific investigations of organic producers, CCOF’s immunity to FOIA means its investigations are, typically, entirely opaque to the public.

Second, CCOF fails to enforce NOP standards. CCOF has faced scrutiny from NOP for failing to adequately enforce organic standards. NOP found that CCOF, during a recent audit of a dairy, did not fully verify the integrity of the dairy’s organic status as required by NOP standards. A separate FOIA submitted by Farm Forward led to our discovery that NOP’s 2022 evaluation of CCOF as an organic auditor found multiple violations of National Organic Program Standards by CCOF.

CCOF’s violations led NOP to issue several “non-compliances” to CCOF that required CCOF to take corrective action. While we don’t know whether any of CCOF’s non-compliances specifically involved Alexandre, several of CCOF’s violations would likely have impacted their ability to effectively audit dairy operations like Alexandre.

For example, during the one livestock operation evaluation that NOP auditors

witnessed CCOF conduct as part of NOP's review, NOP determined that the CCOF inspector did not fully verify the integrity of the dairy's organic status as required by NOP standards. CCOF was cited by NOP for the following violations:

- CCOF failed to note any "concern that the dairy operation did not have records of [the] amount of feed fed for milking cows."
- CCOF's inspection checklists "do not ask inspectors to confirm the actual number of days grazed."
- CCOF failed to verify the operation's compliance related to the temporary confinement of cattle prior to calving.
- CCOF "did not conduct any traceback exercises for either the crop or livestock scopes" [meaning: CCOF did not check records, ear tags, etc. to verify that the animals' histories complied with organic standards].



It is sobering that NOP witnessed these violations at the only CCOF livestock inspection that NOP evaluated, especially since the CCOF inspector being observed knew they were being evaluated.

When it comes to Alexandre, Farm Forward is grateful that CCOF found as many of Alexandre's violations as it did. However, in our opinion, CCOF audits likely would be more effective if the results of both the audits CCOF conducts and the results of audits conducted of CCOF were far more accessible to public watchdogs.

Third, CCOF is structured with multiple layers of conflicts of interest. Like many independent certifiers that rely on fees from their audited members as their primary source of income, CCOF receives more money from larger producers like Alexandre than it does from small producers. The annual certification fee that CCOF charges is based on a given operation's Organic Production Value (OPV), the value of organic products it produces or handles. Larger farms with higher OPV pay higher annual fees—ranging up to \$35,000 for the largest operations—while small farms typically pay between \$400 and \$1,000 per year.⁵⁴ Additionally, inspection time is billed at an hourly rate, and larger, more complex operations like Alexandre require more inspection hours, further increasing revenue.

Economists have noted that under this certification fee structure, "leniency could be higher for clients that they [certification bodies] are particularly eager to attract, such as large-scale multisite producers."⁵⁵ Alexandre falls into the category of a large-scale multisite producer, with

54 CCOF does not publish its range certification fees. These figures are current as of 2012; today's fees may be higher. Dominique Navarro, "[Corporate Social Responsibility: California Certified Organic Farmers \(CCOF\)](#)," March 2012, University of California, San Diego.

55 Yuqing Zheng and Talia Bar, "[Certifier Competition and Audit Grades: An Empirical Examination Using Food Safety Certification](#)," *Applied Economic Perspectives and Policy* 45, no. 1 (2023): 182–96, 193.

its four sites and the exceptionally large number of cows. (For example, a survey published in 2022 found that the median organic dairy herd size in California was 310 lactating cows.⁵⁶ Even the largest organic dairies in the state rarely exceed 1,000 lactating cows per farm. Alexandre is most recently reported to have 4,500 lactating cows and 3,700 heifers, with an additional 2,000 calves born each year,⁵⁷ and is likely the largest organic dairy producer in California.) CCOF and other certifications paid variably by their member producers based on OPV are arguably economically incentivized to consider relaxing their standards for larger farms such as Alexandre, given the high economic cost of losing them as clients.

CCOF faces additional challenges with inherent conflicts of interest, given its structure. Like the example of CDFA discussed earlier, CCOF also has a dual mandate: to both certify and promote organic producers in its jurisdiction. In part to manage this and other perceived conflicts of interest, while remaining one nonprofit organization, CCOF includes three legally distinct entities.

The primary entity (CCOF, Inc.) is governed by a Board of Directors elected by CCOF members—that is, elected by



the very operations that CCOF certifies.⁵⁸ This alone creates an intrinsic conflict of interest as CCOF's certification arm (CCOF Certification Services, LLC) goes about certifying members' operations.⁵⁹

Further, it is disturbing that one of Alexandre's two principals, Stephanie Alexandre, sat on CCOF's Board of Directors for 10 years.⁶⁰ Her leadership at CCOF did not end after she completed her five terms

56 Cheong, Sejin et al., "[Survey of Management Practices and Farmers' Perceptions of Diseases on Organic Dairy Cattle Farms in California](#)," *Animals: An Open Access Journal from MDPI* 12, no. 19 (2022): 2526.

57 Tamara Scully, "[Regeneration: Alexandre Family Farm The Blake and Stephanie Alexandre Family, Crescent City, California](#)," Northeast Organic Dairy Producers Alliance (NODPA), April 12, 2021, updated May 17, 2021.

58 "CCOF's Board of Directors consists of 8 directors and 4 officers, elected by certified members for two year terms. Of the four officers, three come from organic farms that are certified by the CCOF. All eight of the directors are from organic farms, orchards, or vineyards certified by the CCOF." CCOF, [Corporate Social Responsibility](#), Dominique Navarro and Peter Gourevitch, March 2012. Specifically, "each CCOF chapter [of CCOF members] elects one representative to participate and vote on the CCOF, Inc. Board of Directors." CCOF, "[CCOF How to Guide: Holding Chapter Elections](#)," Adrian Fischer, updated February 2017.

59 While the member-elected CCOF Board does not directly oversee the day-to-day operations of CCOF Certification Services, LLC, the CCOF Board does directly appoint the Management Committee responsible for oversight of CCOF Certification Services.

60 Peter Nell, "[OTA to Honor CCOF Leaders at Expo East](#)," CCOF's Certified Organic magazine, Fall 2018, 9.

on its ruling board; Ms. Alexandre went on to serve as an advisory committee member of CCOF's Future Organic Farmer Grant Fund. In the aftermath of CCOF confirming multiple egregious animal welfare violations at Alexandre, it is plausible that Stephanie's

more-than-a-decade-of service to CCOF, and Alexandre's esteem among other CCOF members, played a role in CCOF withdrawing Alexandre's proposed suspension in favor of a toothless two-year monitoring arrangement reached via settlement with Alexandre.

Certified Humane

One of the certifications that Alexandre proudly boasts on its products and website is "Certified Humane."⁶¹ Certified Humane allowed Alexandre to use its logo uninterrupted over years while Alexandre's abuses were occurring; a lawsuit now alleges that Certified Humane was aware of the conditions at Alexandre throughout, but took no action to remove Alexandre from the Certified Humane program.



Despite its name, Certified Humane standards are widely viewed by farmed animal welfare experts as only minimally higher than typical industry practices.⁶² Certified Humane distributes its license in 25 countries, "to hundreds of operations caring for 417 million animals."⁶³ Operations pay for the privilege of using the Certified Humane seal,⁶⁴ so if Certified Humane ever records a severe noncompliance and exiles an operation from its program, then it loses the income it would otherwise have received from that operator, creating an innate conflict of interest in the certification's structure. It's a pay-to-play system.

That said, Certified Humane fees are not overly onerous, especially for larger operations like Alexandre. The more modest costs attached to certification schemes with lower standards may play a role in producers' selection of those certifications. Recent research states that:

certification systems are susceptible to opportunistic behaviour ... In a market in which the company to be supervised can choose its own auditor, misleading incentives may occur. From the viewpoint of the certification body, a cheap certification can be a decisive competitive advantage in certification markets. Low-cost strategies might

61 Certified Humane is a program of the independent nonprofit Humane Farm Animal Care, but for simplicity's sake we will refer to both the program and its sponsor as "Certified Humane."

62 For example, like USDA Organic, Certified Humane allows dairy producers to forcibly separate calves from their mothers in a fraction of the time they would naturally wean. ASPCA's Shop With Your Heart program notes several limitations of Certified Humane, including: "Standards do not extend to animals used for breeding, nor do they ensure higher-welfare breeds for animals, including broiler chickens. Compliance is assessed by auditors on-farm, except for producer groups and beef marketing groups, wherein participating brands conduct a percentage of their own audits on farms. 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 June 11, 2025.

63 Annie Lowrey, "[The Truth](#)."

64 Like CCOF, Certified Humane charges vary based on an operation's size (in the case of dairies, based on the volume of licensed milk produced). Certified Humane, "[Fee Schedule](#)," November 5, 2020, accessed June 13, 2025.

significantly affect the quality of inspections. Hence, the underlying institutional structure can considerably influence the effectiveness and reliability of the whole certification system.⁶⁵

Certified Humane gave Alexandre its stamp of approval in 2021. By no later than 2022, Certified Humane had received a whistleblower complaint about Alexandre's cruelty, including photographs of Alexandre cows with eye injuries transported to auction. The Atlantic's reporter writes that Certified Humane's executive director, Mimi Stein, responded to that whistleblower complaint by phoning Blake and Stephanie Alexandre:

When Stein called the Alexandres to ask what had happened, they were "upset" and "passionate," she told me. They said one cow had an eye damaged after sale and the other was "fine, as much as anybody could tell." Stein's sense was that the Alexandres "would have taken care of them and euthanized them on site" had they been severely injured or ill, as Certified Humane requires.

The organization followed up with an in-person audit, which found no problems. Basically, Stein told me, "if animals were that damaged, chances are they wouldn't sell them, because they wouldn't have any value. It just wouldn't make any sense."⁶⁶

This, despite having received photographs and a direct whistleblower report. As for the in-person audit mentioned, Certified Humane's audits generally happen with advance notice to the operation being audited, and as Stein also clarified to the reporter, "the program certifies the farm—not the animal."⁶⁷

Certified Humane's annual announced inspections can perhaps ensure that farms are, on average, minimally better than uncertified operations (for example by verifying that Alexandre is a "grass-fed" operation), but the certifier's auditing system is generally unable to prevent, or apparently even detect, a farm's noncompliance with its minimal standards throughout the year, which is what consumers ultimately care about.

Despite its name, Certified Humane standards are widely viewed by farmed animal welfare experts as only minimally higher than typical industry practices.

Certified Humane first certified Alexandre during the period that Alexandre's abuses were already well underway, and those abuses continued for years under the Certified Humane seal. Weeks after the release of Dairy Deception, when we discovered that Certified Humane had delisted Alexandre, we contacted Stein to ask what she could tell us about the delisting. Stein politely declined to clarify the cause, nature, or implications of the delisting.

Notably, throughout the many months Alexandre was delisted by Certified Humane, the dairy continued to proudly advertise itself as Certified Humane on its product packaging and its website. Consumers had no reason to suspect any deception on the part of Alexandre; although Certified Humane removed Alexandre from a little-visited webpage of certified producers on its website, neither Certified Humane nor the dairy notified Alexandre's customers that the dairy had been delisted,

65 Gabriele Jahn et al., "[The Reliability of Certification: Quality Labels as a Consumer Policy Tool](#)," *Journal of Consumer Policy* 28 (2005): 53–73, 54.

66 Annie Lowrey, "[The Truth](#)."

67 Annie Lowrey, "[The Truth](#)."

and Certified Humane seals remained in place on Alexandre's packaging and internet marketing. Once Alexandre was relisted, Certified Humane provided no public information about why Alexandre had been delisted or relisted.

Following its failure to ensure Alexandre was meeting its requirements for certification, and its noncommunication to the public, Certified Humane is now being sued along with Alexandre in a class action lawsuit. The suit alleges that, based on Certified Humane's own representations, Certified Humane was aware of the conditions at Alexandre in the years leading up to our release of Dairy Deception,

yet took no action to remove Alexandre or prevent Alexandre from using the Certified Humane logo. The suit seeks damages totalling more than five million dollars.⁶⁸

In the absence of meaningful enforcement and transparency by both independent certifiers and government agencies, consumers are left with few avenues for verifying that their purchasing decisions reflect the higher standards they expect. Beyond certifications, consumers trust that retailers where they shop are selling products that live up to the standards reflected on product labels and in-store marketing. But this trust is misplaced.



⁶⁸ Rev. John Millsbaugh, "[BREAKING: Farm Forward's abuse investigation results in class action lawsuit against Alexandre Family Farm, Certified Humane](#)," Farm Forward, March 10, 2025.

RETAILERS FAIL TO MAINTAIN ETHICAL STANDARDS

Retailers often show willful ignorance about—and sometimes outright refusal to acknowledge—evidence proving that products they sell do not meet the labeling and marketing claims made by producers. Although some retailers and companies sourcing Alexandre responded with meaningful actions when we informed them of Alexandre's abuses, most did not. Instead, most prioritized profits over ethics—even retailers who rely on being perceived as “ethical.”

Despite repeatedly contacting the leadership of 19 retailers and companies that source Alexandre dairy products—backing up our individual outreach by providing them

The proof we delivered wasn't enough to make these companies stop sourcing Alexandre.

the Dairy Deception report, The Atlantic's story, videos, and more, as well as offering to speak with them—this had very limited effect. The proof we delivered of Alexandre's abuses wasn't enough to make these companies stop sourcing Alexandre. Many food companies made no changes in their support of Alexandre and continued to sell the company's products despite being informed about their abuse of cows. For example, companies like Once Upon a Farm, Cheddies, Alec's Ice Cream, and United Natural Foods Inc., a large natural food distributor, prioritized profiting from the false marketing of Alexandre's labeling

claims over acting with integrity to protect consumer interests and animal well-being.

Not only did Albertsons and Albertsons-owned Bay Area chain Andronicos make no changes, but even well-known grocery chains that *make their name on ethical sourcing*, like Whole Foods Market and Natural Grocers, either ignored our many communications or actively rebuffed us, as did medium-size regional “ethical” grocers like New Seasons in the Pacific Northwest. While Whole Foods Market terminated their Alexandre marketing campaign, it likely did so because of concerns about legal liability, and it has continued to sell Alexandre products. Only two small independent retailers cancelled all orders of Alexandre products, Providore Fine Foods and Luke's Local.

Why would so-called ethical grocers and food brands not respond to the exposure of Alexandre's abuses by pulling Alexandre products from the shelves to align with the grocers' stated commitments to higher welfare animal products? Two explanations could account for this: **first, these retailers have been successfully humanewashed by Alexandre's PR and certifications, or second, these retailers don't actually care about Alexandre's abuses as long as customers continue to pay a premium for Alexandre's products.**

In either case, the apathetic response from even “ethical” retailers and companies calls to mind the words of Upton Sinclair, who in 1906 published *The Jungle*, a muckraking exposé of the conditions in the U.S. meatpacking industry. Upton wrote, “It is difficult to get

a man to understand something, when his salary depends upon his not understanding it.”⁶⁹ Psychologists now refer to disregarding or distorting evidence that conflicts with one’s pre-existing beliefs as “motivated reasoning.” Since Alexandre’s stellar reputation as a humane dairy is a lucrative source of income for the companies that source Alexandre products, they are highly motivated to ignore or distort any evidence to the contrary.

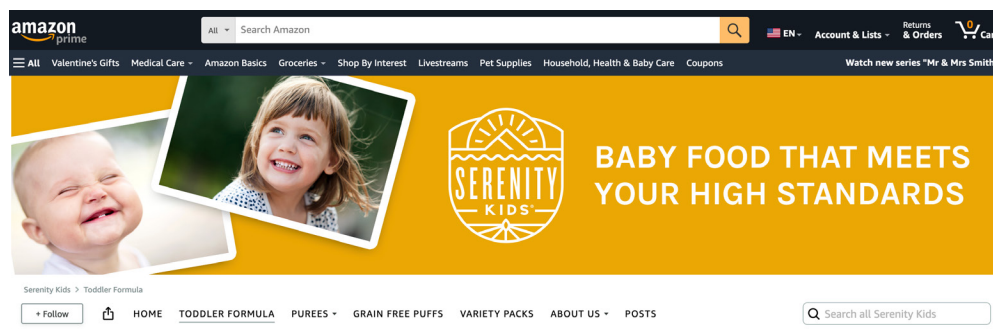
As a consequence, consumers who trust retailers and dairy-based brands positioned as “ethical” need to understand that their claims are unreliable, as they do not necessarily act in ways that consumers would expect—even when provided overwhelming evidence of appalling animal cruelty.

Consumers shop these stores and brands because they believe the companies have done the work of finding ethical products, and only sell to consumers the products

that clear their very high bar, enabling conscientious consumers to buy whatever is on the shelves with minimal concern for how the products were produced. Retailers’ and other companies’ responses to the Alexandre findings demonstrate that this is not the case.

If conscientious consumers who want to buy dairy cannot trust stores like Whole Foods Market, Natural Grocers, or New Seasons to maintain their own advertised ethical standards, even when it comes to a company like Alexandre that demonstrably abuses animals while marketing itself as one of the most ethical companies in the U.S., **what dairy products *can* consumers possibly trust?**

In light of these many failures of government, independent certifiers, and retailers, what can be done to reform this system? What should consumers put their energy behind to ensure that their purchasing decisions align with higher standards of care?



69 Upton Sinclair, “[I, Candidate for Governor and How I Got Licked](#),” Oakland Tribune, Oakland, California, December 11, 1934, pg 19, Column 3.

POLICY SOLUTIONS:

TRANSFORMING ANIMAL WELFARE OVERSIGHT IN THE AGE OF HUMANEWASHING

The failures of government oversight, independent certification, and retailer accountability documented in the Alexandre case are not isolated incidents. They are symptomatic of a system that prioritizes industry interests over animal welfare, consumer trust, and the integrity of ethical claims. Efforts by whistleblowers and animal advocacy groups like Farm Forward expose structural failures that allow systemic animal abuse to continue unchecked in the industry, but even well-placed individuals

and advocacy organizations cannot monitor every producer or the system as a whole.

To more effectively address these structural failures, we propose incremental and structural reforms at each level of animal welfare standards and enforcement (government, independent certifiers, and retailers), informed by the lessons of Alexandre and best practices from other sectors. These reforms are designed to be actionable and practical, despite some requiring implementation well into the 2030s.

Government Reforms: Clear Definitions, Strong Enforcement, and Separation of Powers

As the first line of defense, federal and state government agencies must set and enforce meaningful standards for animal welfare. The current definitions and regulations allow for

unchecked abuse and neglect on farms, and provide leeway for the industry to largely set its own welfare benchmarks.

Defining and Enforcing Animal Welfare Claims

The ambiguity surrounding terms like “humane,” “regenerative,” “sustainable,” etc. has allowed producers to set their own lax standards, often with little to no oversight.

The Food Safety and Inspection Service (FSIS), a part of the USDA, oversees labeling for meat and poultry products. FSIS has the

power to accept or reject label claims and has final say over every word that goes on an animal product label. But FSIS has no set metrics defining what, for example, “humane” means. FSIS asks producers to define such terms for themselves, and submit paperwork supporting their claim that they meet their own benchmark. No one at USDA

conducts on-farm inspections to verify these claims, instead relying on producers' self-reporting. FSIS simply compares what's on the paperwork with the producer's own definition of e.g., "humane."

At least, that's what FSIS claims it does. In many cases, FSIS fails even this modest charge. In 2023, the Animal Welfare Institute (AWI) FOIAed the application files for 97 different meat labels that made sustainability and animal-welfare-related claims. USDA was unable to provide application files for almost half of the labels (48). In addition, 34 application files included no relevant substantiation (6) or inadequate substantiation (28). AWI concluded, "In total, 82 of the 97 claims (85%) lacked sufficient substantiation."⁷⁰ Yet USDA is mandated by congressional regulation to review and approve animal welfare claims on labels; simply put, they are not doing their job.

Farm Forward recommends that federal agencies establish clear, science-based definitions for all animal welfare claims, rather than relying on producers' varying self-definitions. These science-based definitions must be developed with input from animal welfare scientists, veterinarians, and the public—not dictated by industry. A concern with federal agencies setting defined requirements for welfare is that these agencies could create clear definitions that entrench low standards. Thus, the role of scientists, advocacy groups, the public, and lawmakers is critical to ensure that when these definitions are set, they reflect high standards of care.

The newly implemented Organic Livestock and Poultry Standards (OLPS), which require

organic operations' compliance effective January 2, 2025, offer a modest step in setting welfare standards, but fall short of ensuring good animal care. The existence of the OLPS, however, offers some hope that higher welfare standards in organic production can be federally established. Ongoing reform of the OLPS is perhaps the most direct route for USDA Organic to ensure higher standards. The OLPS should be revised to prohibit practices it currently allows that cause unnecessary harm, such as permanently separating dairy calves from their mothers shortly after birth (which causes lasting distress to both cow and calf), isolating calves in individual hutches until they are consistently eating solid foods, and hot-iron branding of cattle.⁷¹

Enforcing welfare standards is just as important as setting them.

Enforcing welfare standards is just as important as setting them. Ideally, federal standards would be enforced through unannounced on-farm inspections, with findings made publicly available. In addition, producers should also be liable for their marketing if it is found to be false. Unfortunately, under the current administration, staff cuts at USDA mean that the capacity for auditing and inspections is even more limited than it had been previously.⁷² Until these staff cuts are reversed, federal enforcement of federal welfare standards will be unattainable unless these staff cuts are reversed by a future administration.

In the absence of meaningful government standards and enforcement for animal welfare,

70 Animal Welfare Institute, "[Deceptive Consumer Labels: How the USDA's Failure to Oversee Its Label Approval Program Allows Meat Industry to Co-opt Humane and Sustainable Claims.](#)"

71 USDA Agricultural Marketing Service, "[National Organic Program \(NOP\); Organic Livestock and Poultry Standards.](#)" Federal Register, November 2, 2023.

72 National Sustainable Agriculture Coalition, "[USDA Staffing Cuts Hurt Farmers and Rural Communities.](#)" March 14, 2025.

it may be that companies should not be permitted to label their products as “humane” unless they are certified by an independent

certifier with proven high standards and meaningful enforcement.

Reforming USDA Organic Antibiotic Standards

Both Farm Forward’s and The Atlantic’s investigations of Alexandre highlighted the perverse incentives created by the current USDA Organic antibiotic standards. As explained earlier in the report, although NOP prohibits withholding treatment from sick cows, **antibiotics are routinely withheld from animals who need them because the use of antibiotics is prohibited in cows supplying the organic market.** Administering antibiotics to sick cows means that producers lose the premium they would earn from animals raised as “organic.” Thus, the very standards of USDA Organic that prohibit withholding treatment from sick cows also incentivize producers to deny animals medical treatment. **Reforming organic standards to allow for the therapeutic use of antibiotics in cases of treating disease and**

injury—under strict veterinary oversight and with mandatory withdrawal periods—would remove the economic incentive to withhold this critical medical care when it is needed.

Although this recommendation may seem like a tall order (given NOP’s strong opposition to allowing antibiotics in animals raised for the organic market), it is not unprecedented. In the European Union, certain antibiotics are allowed in organic production in clearly defined situations (e.g., when non-antibiotic treatments have failed, a veterinarian approves and prescribes antibiotic use, and a withdrawal time period of the antibiotic is met).⁷³ Adopting a similar policy in the United States would align organic standards with both animal welfare and public health objectives.

Separating Regulation from Industry Promotion: The CFPB Model

The USDA, NOP, and CDEA are all charged with both regulating and promoting the industries they oversee. This conflict of interest is at the heart of many of the failures documented in the Alexandre case. Regulators who are also responsible for promoting industry growth are unlikely to take strong action against powerful producers, even in the face of clear evidence of abuse.

As such, a major structural reform to government oversight of agriculture is

needed—namely, regulation should be covered by one agency and industry promotion by another. The Consumer Financial Protection Bureau (CFPB) provides a compelling example. In the aftermath of the 2008 financial crisis—which crashed home values, led to high unemployment, and saw millions of Americans defaulting on their loans—the CFPB was created to ensure that access to personal financial services like mortgages was **“fair, transparent, and competitive.”** Previously, regulatory apparatuses were

73 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* 13, no. 9 (2023), 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* 10, no. 10 (2020).

nested in agencies that also promoted the financial industry, like the Federal Deposit Insurance Corporation, the National Credit Union Administration, and the Department of Housing and Urban Development, leading to lax oversight and widespread consumer harm. Separating regulation from promotion was a common-sense move; agencies and regulators cannot be both the cheerleaders for an industry and protectors against that same industry's worst harms and externalities. The CFPB was designed to be independent of promotional functions and focused solely on protecting consumers and successfully [returned billions of dollars](#) to consumers who had been defrauded.

A similar approach could be taken in agriculture. An independent agency dedicated to animal welfare, consumer

protection, and environmental stewardship—free from the influence of industry promotion—would have the authority to set and enforce meaningful standards, conduct inspections, and impose penalties. **This separation of powers is essential to restoring public trust and ensuring that animal welfare is not sacrificed for industry profits.** Some have [already articulated](#) what such a department that protects consumers, maintains public health, and defends animal welfare might look like.

In the absence of such structural change—and until high-welfare government standards are met and enforced—independent certifiers are a primary mechanism for regulating higher welfare. But the flaws inherent in the current independent certifier model, too, need substantial reform.

Independent Certifier Responsibility: Transparency, Accountability, and Conflict-Free Models

The Alexandre case illustrates how inherent problems in independent certifications (conflicts of interest, market competition, lack of transparency, and compromised standards and enforcement) are difficult to resolve in the current system, where certifiers vie for producer business, and producers choose which certifications they will hold themselves accountable to. In this scenario, independent certifiers are unable to adequately fill the gaps created by the insufficient standards and enforcement of the federal and state governments. If USDA or another federal

agency were to implement and enforce clearly defined, meaningfully high standards for claims like “humane,” “sustainable,” “free range,” etc., then independent certifiers would be unnecessary. In the absence of such federal implementation and enforcement, however, independent certifiers must be held accountable for meeting clearly defined high standards of animal welfare.

Given the current state of welfare certifications, we put forward three incremental and structural areas for reform:

Independent Certifiers Must Enforce Their Welfare Standards

At the very least, independent certification bodies must ensure that farms meet the standards set by the certification. This may

seem too obvious to mention, but the class action lawsuit against Certified Humane is based on the finding that even when

farms like Alexandre fail to meet welfare requirements, certifiers can allow them to maintain their certified designations. Several other high-profile investigations of Certified Humane and “Animal Welfare Certified” farms in recent years have found

similar abuse, neglect, and filthy conditions that seem to violate the certification’s standards.⁷⁴ Certifiers must commit to careful oversight and inspections to ensure that farms meet their minimum standards.

Ending Conflicts of Interest and Ensuring Enforcement

The Alexandre case exposes the inherent conflicts of interest in the current certification system. Both CCOF and Certified Humane are funded by the producers they certify, creating a powerful incentive to overlook violations. In the case of Alexandre, CCOF’s board included a principal of the farm for over a decade, and CCOF’s response to the abuses it documented at Alexandre was a toothless monitoring arrangement rather than meaningful enforcement. Certified Humane, despite receiving whistleblower complaints and photographic evidence of abuse, continued to allow Alexandre to use its logo for years. Incremental changes to mitigate such conflicts would make a meaningful difference.

Better enforcement is also critical. Certifications should be required to conduct regular, unannounced audits. They should take prompt action to delist or reject producers that do not meet their minimum standards. They should also be required to be transparent with at least high-level information about what specific practices were found lacking, and the responsive actions taken by both the certifier and the farm.

But to fully address certifiers’ challenges with conflicts of interest and enforcement, more systemic reform may be necessary.

Developing Conflict-Free Certification Models

The Animal Welfare Approved (AWA) program, operated by A Greener World (AGW), offers a promising certification model for minimizing conflicts of interest. AWA is funded by philanthropy rather than producer fees, rendering it effectively free for producers, with a minimal cost for audits. This eliminates the financial incentive to attract and retain large clients. As a result, AWA has maintained a high degree of integrity in setting and enforcing high standards of welfare.

In the current landscape of certifications, however, AWA has not been widely adopted by

producers, perhaps because its standards are higher than other welfare certifications. This has meant that the availability of AWA products is limited, creating a feedback loop where low awareness, availability, and consumer demand disincentivize producers from seeking out this higher standard certification. However, the model demonstrates that conflict-free certification is possible.

A new generation of certifications could be created, supported by public funding, controlled by welfare advocates without financial conflicts of interest who would

⁷⁴ See, for example, Direct Action Everywhere (DxE), “[A Recipe for Disaster: Unchecked Abuse and Disease at Perdue’s Petaluma Poultry](#),” People for the Ethical Treatment of Animals (PETA), “[They Claim It’s Humane. A Whistleblower Says Farmer Focus Chicken Is Anything But.](#)”

have animals' wellbeing and interests foremost in mind. These certifications would intentionally set standards that appeal to larger-scale industrial producers that are adopting higher welfare practices. They would attract producers by offering a free certification and label, and further incentivize participation through public recognition and access to premium markets.

These new certifications would focus significant energy on compliance and transparency, ensuring producers meet the standards and

giving the public insight when producers fail to do so. The certifications might adopt new automated monitoring technologies—such as continuous air quality monitoring, thermal imaging to measure animal health, CCTV cameras powered by AI that can identify abuse, etc.—to detect and deter welfare violations. Such programs would provide a bridge between current government standards and the higher bar set by AWA,⁷⁵ offering a realistic path for large-scale producers to improve their practices.

Retailer Accountability: Aligning Ethics with Economics

When consumers purchase products with organic or humane labels, they expect that these labels are truthful and accurate, and they trust retailers and manufacturers supplying and marketing these products to uphold their purported standards. However, the Alexandre case highlights not only the lack of accountability of many retailers and food companies, but also their complicity in perpetuating animal abuse and deceptive marketing. Despite being presented with concrete evidence of abuse, most retailers continued to sell Alexandre's products. Even "ethical" retailers like Whole Foods Market, Natural Grocers, and New Seasons failed to take meaningful action, instead prioritizing profits over ethics. But this problem extends far beyond Alexandre.

For example, an ongoing class action lawsuit against Whole Foods Market alleges that the retailer knowingly continued to sell meat containing antibiotics under their No

Antibiotics Ever (NAE) promise. Even when presented with USDA testing that revealed the presence of antibiotics in Whole Foods beef suppliers, the company refused to remove its NAE advertising, instead choosing to continue selling supposedly antibiotic-free beef at a premium through deceptive marketing practices.

Retailers, as direct suppliers of milk, meat, and eggs trusted by consumers, must be held accountable for the ethical claims they extend and profit from, especially when provided evidence that they are perpetuating consumer fraud. Retailer accountability can be gradually achieved through a combination of legal action, regulatory reform, and consumer pressure. Consumer advocacy, boycotts, and class action lawsuits can be powerful tools for driving change, as demonstrated by the legal challenges faced by Whole Foods and Certified Humane.

⁷⁵ The Global Animal Partnership (GAP) certification was set up with this structure in mind, but by early 2020, the certification had been co-opted by industry interests. Farm Forward's founder summed up the situation at the time, "GAP is no longer a tool for change, but is increasingly a marketing scheme functioning to benefit massive corporations." For more information, see Aaron Gross, "[Why We Resigned from the Board of the Nation's Largest Animal Welfare Certification](#)," Farm Forward, October 2, 2020, accessed July 1, 2025.

BUILDING A COALITION FOR CHANGE: *THE PATH FORWARD*

The reforms outlined above will not be achieved by any single actor or stakeholder group. They require the concerted efforts of animal advocacy organizations, farmers dedicated to high welfare, journalists and media outlets, food safety advocates, environmental organizations, and consumers. Together, these stakeholders must:

- Advocate for legislative and regulatory reform, including clear, enforceable animal welfare standards and the separation of regulatory and promotional functions.
- Support developing independent certifications free from conflicts of interest and industry influence, and transparent in their operations.
- Hold producers, manufacturers, and retailers accountable to ethical standards, using a combination of consumer power, legal action, and public pressure.
- Promote transparency and public education about the realities of animal agriculture.

The systemic failures exposed by the Alexandre case demand bold, structural reform. By working together, we can build a food system that truly reflects public values—a food system in which animal welfare is not just a promise on a package, but a lived reality. The future of ethical food production depends on our collective action today.



APPENDIX

Below we excerpt some of the FOIA response from USDA's National Organic Program (NOP) received in May 2025 that confirmed many of our investigation's original findings about Alexandre's abuse and neglect. Despite Alexandre's public repudiation of our findings, including claims that images we included may have been doctored or staged, the FOIA response includes Alexandre admitting to many of our allegations.

It's unsurprising that NOP was not able to confirm all of our allegations. Alexandre's abuse and neglect of cows occurred over at least a four- or five-year period, and almost all of the abused and neglected cows identified in our report have since been slaughtered for beef. We would expect that little evidence would remain for certifiers to uncover through inspections of the Alexandre farm sites. NOP did not examine our extensive archive of photos and videos documenting Alexandre's abuse and neglect of cows, which would have easily substantiated many of the claims that NOP did not substantiate.

Nonetheless, Alexandre explicitly admitted to at least three dozen of the violations alleged in our original report, and together, CCOF and NOP confirmed at least 50.

Findings and Outcome of CCOF and NOP Investigations

Findings of violations quoted from [NOP's FOIA response](#) have been numbered for ease of reference. Because of the way the FOIA response is structured, and because some violations were inflicted on multiple animals, some numbers encompass more, or many more, than one violation.

FOIA Page 5:

"CCOF Investigation and Information"

- 1) "Alexandre acknowledged that an animal had been improperly moved with hip lifters." [This presumably refers to the photo in Dairy Deception of the cow being dragged by the skid steer loader.]
- 2) "CCOF confirmed that Alexandre animals had severe lameness and hoof rot."
- 3) "CCOF confirmed that Alexandre transported unfit for transport animals to auction or sale."
- 4) "CCOF confirmed that Alexandre used diesel fuel for fly control."
- 5) "CCOF confirmed that ... Alexandre is being evaluated by the California Department of Agriculture regarding maintenance of natural resources."
- 6) "CCOF confirmed that Alexandre animals were without feed and some animals died from trampling."

FOIA Page 6:**"Alexandre Submission to NOP - Response specific to allegations"**

7) "Alexandre confirmed that employees were incorrectly moving cows with hip clamps."

8) "Alexandre confirmed that animals were to be horn-tipped in 2019 however some animals were inappropriately horn-tipped..."

9) "Alexandre did not have record of a non-ambulatory cow without care for approximately two weeks however, they did acknowledge that the animal was likely on their property..."

10) "Alexandre did not have a record of a calf stuck in a headlock for approximately three days however they did acknowledge the photo of the animal was from their farm."

11) "Alexandre stated that ... an individual allowed to be on the farm cut the teat off an animal with mastitis." [On page 10, Alexandre confirms that the person who cut off the cow's infected teat worked at Alexandre at the time.]

12) [Apparently responding to the photo on page 15 of Dairy Deception] "Alexandre stated that they were not aware of the animal that died in the feed[cnt'd below]

FOIA Page 7:

trough"

13) "Alexandre stated that ... Due to their certifiers' fall 2023 inspection, they have focused on preventative hoof care management ..."

14) "Alexandre stated that the cancer eye cow that was sold at auction was a healthy cow however she could have gone to auction sooner. Alexandre also stated that there was only one cow in 2023 sold for cancer eye and one cow in 2022 sold for the same reason. [This seems unlikely. What would be the chances that on the one day Farm Forward visited the auction, we would encounter the cow with cancer eye documented on page 23 of Dairy Deception? Regardless of whether Alexandre sent 2 or 102 cows with cancer eye to auction in 2022 and 2023, any cow with cancer eye should have been euthanized on farm.]

15) "Alexandre acknowledged that diesel fuel was used for fly prevention."

16) "Alexandre acknowledged that [4 LINES REDACTED]."

17) "Alexandre acknowledged that 30 head, not 40 head, died or were euthanized when there was an equipment breakdown, staff were unavailable, and animals were held in an area that typically did not hold animals."

FOIA Page 8:**"Settlement Agreement of 2.16.2024 — effective for 2 years, CCOF and Alexandre"**

Farm Forward summary: Alexandre's consequence from CCOF involves only "one unannounced inspection per year during the SA [Settlement Agreement period of two years]," quarterly submission of healthcare and cull records during the SA, the requirement to follow all healthcare practices and protocols for animal living conditions per the OSP [Organic System Plan], and "Animals treated with diesel fuel for fly control would no longer be considered organic."

"CCOF Annual inspection — 11.14.2021"

- 18) "Smith River Dairy herd was standing in water in free stall barn from a flush system backup"
- 19) "... several calves in hutches did not have clean and dry bedding"
- 20) "calf treatment records for natural treatments were not documented..."

FOIA Page 9:**"CCOF Annual inspection — 9.22.2023"**

- 21) "Findings: some larger calves in hutches were cramped and did not have clean dry bedding. [REDACTED] ..."
- 22) "Algae growth in water trough at [REDACTED]..."

"CCOF Unannounced inspection — 11-28-2023 to 11-30-2023"

"Combined Notice of NONC [Notice of Noncompliance] and NOPS [Notice of Proposed Suspension] issued on 12.21.2023 for 205.239 [Code of Federal Regulations (CFR) § 205.239 Mammalian and non-avian livestock living conditions] 205.201 [CFR § 205.201 Organic production and handling system plan], 201 [?], 205.238 [CFR § 205.238 Livestock care and production practices standard]."

23) "Caves in hutches had wet bedding and dried manure on their bodies, Alexandre Acre Dairy and Alexandre Family Farm free stall barns bedding was wet and dirty..."

24) Several animals at Alexandre Acres had severe hoof rot ... One of these animals was set to sale for slaughter."

FOIA Page 10:

"CCOF Unannounced inspection 6-3 and 4-2024." [This unannounced inspection was almost three months after Alexandre was informed that we intended to release Dairy Deception, and almost two months after we did.]

"Condition of Ongoing Certification issued on 6.20.2024 for

25) 205.238(a)(5) not removing an eye patch after the treatment is complete ...

26) 205.238(c)(7) hoof bath not in use at [REDACTED]..."

27) "Calves were healthy with few incidences of scours [diarrhea] and pink eye."...

28) "Only the tip of the horn was meant to be trimmed however some employees trimmed too much"...

29) "The 2018 allegation of animals being trampled due to hunger did occur."

FOIA Page 11:

"Conclusion [of the NOP investigation overall]"

"Some of the allegations were substantiated by the investigation process and some were not substantiated. Due to systemic failures found at Alexandre, they received a Combined Notice of Noncompliance and Proposed Suspension from their certifier, CCOF ... Alexandre entered into a Settlement Agreement with CCOF and is receiving additional oversight and monitoring for two years."

AUTHOR & ACKNOWLEDGEMENTS

Farm Forward was founded in 2007 as the nation's first nonprofit devoted exclusively to end factory farming. We are a team of strategists, campaigners, and thought leaders guiding the movement to change the way our world eats and farms. More information about Farm Forward's work and our other publications can be found at farmforward.com.

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