



For Immediate Release

Contact: Abby Hills, Director of Communications, BBB National Programs
703.247.9330 / press@bbbnp.org

National Advertising Division Finds Butterball's Qualified "All Natural" Claims Supported; Recommends Certain Other Claims be Modified or Discontinued

New York, NY – August 10, 2021 – The National Advertising Division (NAD) of BBB National Programs determined that Butterball, LLC provided a reasonable basis for several claims for its turkey products but recommended that others be modified or discontinued. The claims at issue were challenged by Animal Outlook (AO), a not-for-profit animal rights organization.

NAD determined that the advertiser provided a reasonable basis for:

- "All natural" claims on its website that include the clear and conspicuous disclosure "all natural means minimally processed and no artificial ingredients."
- General "humane" claims, when presented in close proximity to claims about or an explanation of its American Humane Association Certification ("AH Certification"), including:
 - "Commitment to animal care and well-being."
 - "It is our responsibility to produce health, high-quality turkeys in a responsible way."
 - "Animal Care and Well-Being is central to who we are as a company, and we are committed to maintaining the health and well-being of our turkeys."
 - "From our family farms to our processing facilities, we commit significant resources to strengthen our already rigorous standards for animal care and well-being."
- The claim that it has a "Zero-tolerance policy against any form of animal mistreatment."
- Its vague, non-specific aspirational claims that it "recognizes" its "responsibility" to "preserve the plant."

However, NAD recommended that Butterball discontinue:

- The claim "Farmers humanely raise our turkeys every day" or modify it so that it appears in close proximity to the reference to Butterball's AH Certification.
- "Humane" claims that were couched in comparative, superlative or absolute terms, including:
 - "The best possible care for our turkeys."
 - "Does Butterball Treat Its Turkeys Humanely? . . . Absolutely!"
 - "Butterball continues to lead the turkey industry in animal care and well-being standards."
 - "Industry-leading results."
- The claim "making good food in the most responsible and sustainable way" or modify it to avoid conveying a broad environmental benefit message about its practices.
- The claim "Embracing Sustainable Practices Defines a Butterball Grower."

During the proceeding, Butterball permanently discontinued the challenged headline claim "Healthy, Natural Turkeys" and permanently modified the challenged "FARM TO FAMILY"

video. In reliance on the advertiser's written representation that it has permanently modified these challenged claims, NAD did not review these claims on their merits. NAD found that the replacement headline claim "Hormone- & Steroid-Free Turkeys" no longer conveys a broad "natural" message, but rather conveys a narrower, unchallenged message about hormones and steroids. NAD agreed with both parties that the modified video properly limits the claims therein.

Further, the advertiser modified its website claim that Butterball Fresh and Frozen Whole Turkeys are "all natural" by adding a clear and conspicuous disclosure that "all natural means minimally processed and no artificial ingredients." NAD noted that this limited claim identifies for consumers that the term refers to what is in the product and the amount of processing involved. NAD determined that the claim is substantiated and that such a claim does not convey a broader message about the way the turkeys were raised or produced.

The challenger took issue with several "humane" claims that make general or non-specific claims about Butterball's animal welfare practice and which appear in close proximity to claims about or an explanation of Butterball's AH Certification. NAD determined that in the context that these claims are presented, consumers will reasonably take away the message that the AH seal defines what Butterball means when it claims its practices are "humane," that is, that it meets standards set by the third-party certifier. Further, NAD determined that Butterball provided evidence demonstrating that AH is an independent third-party certifier with standards based on a scientific understanding of humaneness and appropriate animal welfare practices.

NAD determined that Butterball provided a reasonable basis for "humane" claims made in the context of the AH seal, including:

- "Commitment to animal care and well-being."
- "It is our responsibility to produce health, high-quality turkeys in a responsible way."
- "Animal Care and Well-Being is central to who we are as a company, and we are committed to maintaining the health and well-being of our turkeys."
- "From our family farms to our processing facilities, we commit significant resources to strengthen our already rigorous standards for animal care and well-being."

NAD found, however, that one of Butterball's "humane" claims, appearing on the advertiser's "Stance on Antibiotics" page – "farmers humanely raise [Butterball's] turkeys every day" – was presented in a manner that is distant and removed from its AH Certification seal. Because consumers could reasonably take away a broad, unsupported message about Butterball's animal welfare practices, NAD recommended that the claim be discontinued or modified so that it appears in close proximity to the reference to Butterball's AH Certification.

NAD determined that the advertiser's claim that it has a "zero-tolerance policy against any form of animal mistreatment" was substantiated because Butterball described its "zero tolerance" policy in detail and demonstrated that such a policy is required for AH Certification.

NAD determined that the claims "the best possible care for our turkeys" and "Does Butterball Treat Its Turkeys Humanely? . . . Absolutely!" convey a level of humane treatment that is not limited to a particular certification. NAD recommended that such claims be discontinued because the advertiser did not submit any evidence that its current practices for the care of turkeys is the "best possible" or that its practices are "Absolutely!" humane under all reasonable interpretations of that term.

Further, NAD found that the claims "Butterball continues to lead the turkey industry in animal care and well-being standards" and "industry-leading results" convey the message that both Butterball's procedures and its actual treatment of turkeys is superior to that of

the rest of the industry and that it has the “most rigorous” animal welfare program among its competitors. NAD determined that these claims were not substantiated and should be discontinued.

NAD determined that the advertiser’s animal welfare advertising, when presented in a manner that defines humane as meeting AH standards, did not convey a series of alleged implied claims that Butterball refrains from engaging in certain practices that consumers would find to be inhumane (e.g., grinding up live birds or subjecting them to painful mutilations). In addition, NAD did not find that the challenged advertising implies that Butterball’s turkeys are raised on small, family farms where farmers provide individualized care for the animals.

NAD determined that when “sustainable” is used in connection with the phrase “the most responsible and sustainable way” as an introduction to Butterball’s social responsibility report, it could be understood by customers to mean that Butterball’s practices are optimized in relation to their impact on the environment. Because the evidence in the record did not support that message, NAD recommended that the advertiser discontinue this phrase or modify it to avoid conveying such a general broad environmental benefit message about its practices.

NAD also recommended that the advertiser discontinue the claim “Embracing Sustainable Practices Defines a Butterball Grower” because it conveys the unsupported message that its farmers have widely implemented or “embraced” sustainable practices and made significant efforts to reduce their impact on the environment, such that it “defines” the group.

Regarding the claim that Butterball “recognizes” its “responsibility” to “preserve the planet,” NAD determined that the advertiser’s efforts to improve its impact on the environment were sufficient to show that the vague, non-specific aspirations communicated by these challenged claims were not illusory, and sufficiently supported.

NAD determined that Butterball’s advertising does not convey the challenged implied environmental benefit claims that Butterball:

- Exceeds industry standards for environmental stewardship.
- Protects the environment in all aspects of its business.
- Farmers use environmentally friendly practices.
- Production practices are not harmful to the environment.
- Has not repeatedly violated federal environmental regulations.
- Has not been subject to any EPA enforcement actions.
- Does not presently have any outstanding compliance violations.

In its advertiser statement, while Butterball respectfully disagreed with certain of NAD’s findings regarding its animal welfare and environmental benefit claims, Butterball stated that it “accepts the NAD’s recommendations to discontinue the few claims that the NAD sustained and will comply with the NAD’s guidance.”

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programs, and continues to evolve its work and grow its impact by providing business guidance and fostering best practices in arenas such as advertising, child-directed marketing, and privacy. To learn more, visit bbbprograms.org.

About the National Advertising Division: The National Advertising Division (NAD) of BBB National Programs provides independent self-regulation and dispute resolution services, guiding the truthfulness of advertising across the U.S. NAD reviews national advertising in all media and its decisions set consistent standards for advertising truth and accuracy, delivering meaningful protection to consumers and leveling the playing field for business.