



October 27, 2023

**Ad Standards**

33 Bloor Street East, Suite 303  
Toronto, Ontario M4W 3H1

*Via Online Submission*

To Whom It May Concern:

**Re: Complaint Concerning Chicken Farmers Canada’s Misleading Social Media Advertisement**

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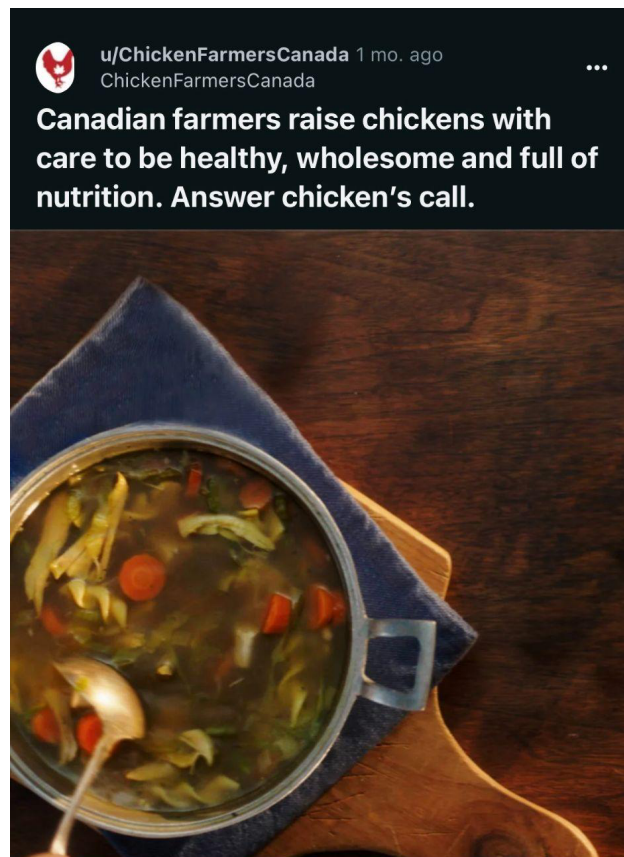
I write to you on behalf of Animal Environmental Legal Advocacy (“**AEL Advocacy**”), a public interest law practice and not-for-profit organization based in Ontario. Our lawyers understand the important interconnection between humans, animals, and the environment. We combine our in-depth knowledge of the legal and political landscape with a commitment to supporting individuals and organizations working to protect animals and the environments where they live.

Please accept this letter as a formal complaint regarding a misleading Chicken Farmers Canada (“**CFC**”) advertisement that has been appearing on social media platforms in violation of the Canadian Code of Advertising Standards (the “**Code**”).

AEL Advocacy requests that Ad Standards take action to enforce the Code and ensure the CFC withdraw the advertisement.

**A. The Advertisement**

A photo of the problematic advertisement (the “**CFC Ad**”) is depicted below. The CFC Ad appeared on Reddit as a “sponsored” post on October 20th, 2023. In other words, CFC is paying so that this advertisement will appear to Reddit users, whether or not they follow the CFC on the platform.



As shown in the above photo, the CFC Ad states the following, in large prominent text:

Canadian farmers raise chickens with care to be healthy, wholesome and full of nutrition. Answer chicken's call.

The CFC Ad is clearly aimed at presenting chicken as a humane and ethical choice, a claim that is not only deceptive and misleading but fundamentally inaccurate when confronted with the grim reality of how Canadian chickens are raised and slaughtered. The CFC Ad further communicates that chicken is “full of nutrition”, a deceptive and misleading claim given the abundance of scientific evidence on the health risks associated with chicken meat.

## **B. Deceptive and Misleading Information**

CFC's claim that “Canadian farmers raise chickens with care to be healthy, wholesome and full of nutrition” is deceptive and misleading for two main reasons. Firstly, the CFC Ad falsely claims that chicken is nutritious. Secondly, the CFC Ad falsely represents the health of the chickens on chicken farms.

**Animal Environmental Legal Advocacy**

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## 1. The CFC Ad Falsely Represents that Chicken is Nutritious

The CFC's claim that chicken is "full of nutrition" implies that chicken provides health benefits, contradicting substantial scientific evidence that clearly demonstrates **chicken is not a healthy choice**.

A study funded by the National Institutes of Health (NIH), the primary medical research agency of the US government, found that both red and white meat increase cholesterol.<sup>1</sup> The research was published in the peer-reviewed *American Journal of Clinical Nutrition*. Comparing beef, pork, chicken, and turkey with plant-based protein sources, researchers found that all animal meat varieties raised LDL ("bad") cholesterol to the same degree.<sup>2</sup>

In addition to dietary cholesterol, typical chicken servings are about 50 percent fat, and 30 percent of that is saturated or "unhealthy" fat, which stimulates the body's production of cholesterol.<sup>3</sup>

Research has also linked poultry consumption with a higher risk of cancer, with one study revealing the presence of PhIP, a known carcinogen, in grilled chicken samples from popular restaurant chains.<sup>4</sup> Other studies have connected poultry consumption with an increased risk of prostate cancer and non-Hodgkin lymphoma, underscoring the potential health hazards associated with chicken consumption.<sup>5</sup>

Equally concerning is the prevalence of foodborne illnesses related to chicken meat. Pathogens such as E. coli, salmonella, campylobacter, and clostridium bacteria, often originating from fecal matter, can lead to severe and sometimes fatal human illnesses, including diarrhea, stomach pain, nausea, vomiting, urinary tract infections, and even death.<sup>6</sup> The presence of these harmful bacteria, along with cholesterol, carcinogens, and feces in chicken products, significantly heightens the risk of heart disease, breast and prostate cancers, urinary tract infections, and foodborne illnesses.<sup>7</sup>

In light of these compelling facts, it is crucial to scrutinize and challenge the claims made by the CFC. Misleading statements not only misinform consumers but also jeopardize their health and well-being. It is imperative that consumers make informed choices based on accurate information, and that Ad Standards

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<sup>1</sup> <https://pubmed.ncbi.nlm.nih.gov/31161217/>

<sup>2</sup> <https://www.pcrm.org/news/health-nutrition/white-and-red-meat-are-both-bad-your-heart>

<sup>3</sup> <https://www.pcrm.org/good-nutrition/nutrition-information/chicken>

<sup>4</sup> <https://pubmed.ncbi.nlm.nih.gov/18791922/>

<sup>5</sup> <https://academic.oup.com/ije/article/49/5/1540/5894731>

<sup>6</sup> <https://animaljustice.ca/blog/5-reasons-chicken-is-a-health-risk>

<sup>7</sup> <https://www.pcrm.org/good-nutrition/nutrition-information/chicken>

ensure transparency and truthfulness in food-related claims. The public deserves nothing less than complete honesty regarding the products they consume, and the potential health risks associated with them.

## 2. The CFC Ad Falsely Represents the Conditions on Chicken Farms

The CFC's claim that "Canadian farmers raise chickens with care to be healthy, wholesome [...]" is deceptive and misleading, as **it does not align with the reality of the harsh conditions in which Canadian chickens are raised and slaughtered.**

Chickens comprise the majority of farmed animals in Canada, with nearly 750 million raised for meat killed each year.<sup>8</sup> Sadly, industry norms subject these chickens to overcrowding, rampant disease, extreme stress, and inhumane slaughter methods.<sup>9</sup> According to the 2022 Mercy for Animals' Canada Animal Welfare Scorecard, modern chickens are genetically engineered for rapid growth, reaching slaughter age at a mere 35 days.<sup>10</sup> This accelerated growth leads to severe health issues, including immobility, organ stress, heart disease, and excruciating leg deformities, causing unbearable pain.<sup>11</sup>

During their lifetimes, the vast majority of Canadian chickens endure cramped, filthy conditions in sheds filled with waste-soaked litter, resulting in ammonia burns, respiratory problems, and painful foot ailments.<sup>12</sup> The consequences of these deplorable conditions are birds so diseased and weakened that millions die or are euthanized before reaching the desired slaughter weight.<sup>13</sup> Overcrowding in vast barns also robs chickens of their natural behaviours like scratching and foraging.<sup>14</sup> Stress-induced behaviours like feather pecking and cannibalism further intensify their suffering.<sup>15</sup>

During transportation to slaughterhouses, many birds succumb to heat exhaustion or freezing temperatures.<sup>16</sup> If subjected to live-shackle slaughter, birds are hung upside down, conscious and shocked,

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<sup>8</sup> <https://mercyforanimals.org/blog/canadian-restaurant-chains/>

<sup>9</sup> <https://faunalytics.org/canadas-farmed-animal-welfare-progress-in-2022/#>

<sup>10</sup> [https://file-cdn.mercyforanimals.org/mercy4animals.wpengine.com/sites/517/2022/10/Canada\\_Animal\\_Welfare\\_Scorecard\\_2022.pdf?\\_ga=2.157296762.1506016597.1698197083-585676528.1698197082](https://file-cdn.mercyforanimals.org/mercy4animals.wpengine.com/sites/517/2022/10/Canada_Animal_Welfare_Scorecard_2022.pdf?_ga=2.157296762.1506016597.1698197083-585676528.1698197082)

<sup>11</sup> <https://spca.bc.ca/programs-services/farm-animal-programs/farm-animal-production/broiler-chickens/>

<sup>12</sup> [https://file-cdn.mercyforanimals.org/mercy4animals.wpengine.com/sites/517/2022/10/Canada\\_Animal\\_Welfare\\_Scorecard\\_2022.pdf?\\_ga=2.157296762.1506016597.1698197083-585676528.1698197082](https://file-cdn.mercyforanimals.org/mercy4animals.wpengine.com/sites/517/2022/10/Canada_Animal_Welfare_Scorecard_2022.pdf?_ga=2.157296762.1506016597.1698197083-585676528.1698197082)

<sup>13</sup> *Ibid.*

<sup>14</sup> <https://spca.bc.ca/programs-services/farm-animal-programs/farm-animal-production/broiler-chickens/>

<sup>15</sup> *Ibid.*

<sup>16</sup> *Ibid.*

before being slashed at the throat and scalded for feather removal.<sup>17</sup> Often, these birds remain conscious through the entire process, including throat-cutting and scalding.<sup>18</sup>

Recent undercover investigations have exposed shocking cruelty at Canadian chicken farms, revealing the routine abuse and neglect prevalent in the industry. In 2015, for example, CTV's W5 aired disturbing undercover footage capturing the abuse of chickens at one of Canada's largest slaughterhouses owned by Maple Lodge Farms.<sup>19</sup> The conduct captured in this footage included workers throwing and dropping crates of live chickens, shackling sick and injured birds for slaughter, negligently sending live animals through industrial washing machines, and allowing animals to dangle by one leg through the slaughter process.<sup>20</sup> At the time, Maple Lodge Farms was already on probation following convictions in 2013 for 20 counts of animal cruelty offences under the federal *Health of Animals Act*. Moreover, in the first three quarters of 2014—the year following its conviction—it was fined for 14 separate animal welfare violations, significantly more than any other company in Canada.

In 2017, the BC SPCA investigated a similarly disturbing case of abuse in the chicken industry.<sup>21</sup> A witness observed workers at a chicken facility brutally handling chickens, including clutching multiple birds upside down, throwing them into crates, and closing the crates while the animals' legs and wings were still protruding.<sup>22</sup> These actions can lead to broken bones, dislocated joints, bruising, and bleeding, emphasizing that such treatment should not be tolerated.<sup>23</sup>

In the same year, an undercover investigation exposed a Lilydale chicken catching contractor engaged in brutal treatment of live chickens.<sup>24</sup> The footage revealed workers ripping off heads and legs of live birds, forcing them into overcrowded transport crates, running over them with forklifts, and subjecting them to physical violence.<sup>25</sup>

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<sup>17</sup> [https://file-cdn.mercyforanimals.org/mercy4animals.wpengine.com/sites/517/2022/10/Canada\\_Animal\\_Welfare\\_Scorecard\\_2022.pdf?\\_ga=2.157296762.1506016597.1698197083-585676528.1698197082](https://file-cdn.mercyforanimals.org/mercy4animals.wpengine.com/sites/517/2022/10/Canada_Animal_Welfare_Scorecard_2022.pdf?_ga=2.157296762.1506016597.1698197083-585676528.1698197082)

<sup>18</sup> *Ibid.*

<sup>19</sup> <https://animaljustice.ca/media-releases/animal-justice-statement-on-chicken-cruelty-exposed-on-national-tv>

<sup>20</sup> <https://animaljustice.ca/media-releases/animal-justice-statement-on-chicken-cruelty-exposed-on-national-tv>

<sup>21</sup> <https://animaljustice.ca/media-releases/bc-sPCA-investigating-new-case-of-chicken-cruelty-caught-on-tape>

<sup>22</sup> *Ibid.*

<sup>23</sup> *Ibid.*

<sup>24</sup> <https://chickentorture.ca/>

<sup>25</sup> *Ibid.*

These practices demonstrate a clear disparity between the CFC's claims and the actual treatment of chickens. It is essential to hold CFC accountable for these deceptive practices, ensuring consumers know the truth about the welfare of these animals and upholding ethical standards in the poultry industry.

### **C. The Canadian Code of Advertising Standards**

The purpose of the Code is to set standards of honesty, truth, accuracy, fairness and propriety in advertising. Clause 1 of the Code makes it clear that, in assessing the truthfulness and accuracy of an advertising claim, the focus of analysis should be on “**the general impression conveyed by the advertisement**”. The CFC Ad falsely conveys an image of chicken as a healthy, humane and ethical dietary choice, while omitting crucial information about the many health risks associated with chicken consumption and the actual industry practices related to animal welfare.

Clause 1(a) of the Code provides that “advertisements must not contain, or directly or by implication make, inaccurate, deceptive or otherwise misleading claims, statements, illustrations or representations”.

The CFC Ad violates Clause 1(a) of the Code by containing inaccurate, deceptive, and misleading claims. First, the CFC's assertion that they raise chickens to be “full of nutrition” implies that consuming their chicken products offers health benefits, which contradicts substantial scientific evidence indicating the health risks associated with chicken consumption. By suggesting that chicken is inherently healthy without acknowledging these risks, the CFC is providing a misleading impression to consumers. Second, despite the overwhelming evidence of the harsh conditions faced by Canadian chickens, the advertisement presents a false image of humane and ethical treatment, which contradicts the reality of the industry's practices. The claims made in the ad mislead consumers, creating a deceptive impression of the conditions in which Canadian chickens are raised and slaughtered.

The CFC Ad also violates Clause 1(b) of the Code, which provides that “advertisements must not omit relevant information if the omission results in an advertisement that is deceptive or misleading.” The CFC's omission of crucial information regarding the health risks associated with chicken consumption constitutes a violation of this clause. Failing to inform consumers about the elevated levels of cholesterol, the presence of carcinogens, and the potential for foodborne illnesses in chicken products creates a deceptive representation of their products, leading consumers to make uninformed and potentially harmful choices.

The CFC Ad further violates Clause 1(e) of the Code, which states that “all advertising claims and representations must be supported by competent and reliable evidence.” The CFC's claim that their chicken products are “healthy, wholesome, and full of nutrition” lacks substantiation when viewed in light of scientific research highlighting the health risks associated with chicken consumption and the evidence related to standardized poor animal welfare practices in the industry. Without credible evidence supporting their claims, the CFC's advertisements are in violation of this clause.

The Code defines an “advertisement” as “any message [...] the content of which message is controlled directly or indirectly by the advertiser expressed in any language and communicated in any medium [...] to Canadians with the **intent to influence their choice, opinion or behaviour.**”

Chicken meat labeling plays a pivotal role in shaping consumer purchasing behaviour. A substantial number of Canadians are concerned about the ethical treatment of animals and are willing to pay extra for humanely raised meat.<sup>26</sup> Additionally, 45 percent of consumers indicate that a symbol indicating whether a food is healthy would make them more likely to purchase a product.<sup>27</sup> This underscores the clear economic incentive of the CFC to depict their practices as healthy and humane, aligning with consumer preferences and ethical concerns.

The CFC, through its use of inaccurate, deceptive, and misleading claims, is capitalizing on the rising trend of health and ethics conscious consumers. By encouraging viewers to purchase products under the false pretense of health benefits and humane treatment, the CFC is exploiting consumer sentiments, leading them to buy products that are inherently harmful to their health and to animals.

Allowing the CFC to persist in providing consumers with inaccurate, deceptive, and misleading information about Canadian chicken not only violates the principles of the Code but also infringes upon the rights of consumers to make informed purchasing choices. It is imperative to hold the CFC accountable for their misleading advertising practices, ensuring that consumers receive accurate, transparent, and truthful information about the products they purchase.

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<sup>26</sup>

<https://www.corporateknights.com/food-beverage/empty-promises-improve-animal-welfare-bad-look/#:~:text=Polling%20shows%20Canadians%20are%20increasingly,it%20means%20reducing%20animal%20suffering>

<sup>27</sup> <https://foodinsight.org/wp-content/uploads/2019/01/IFIC-FDN-AHA-Report.pdf>;

## D. Conclusion

We ask that you take immediate action to ensure that the CFC Ad is withdrawn from circulation on social media and anywhere else such misleading claims are made available to the public.

Please do not hesitate to contact me at [krystal@aeladvocacy.ca](mailto:krystal@aeladvocacy.ca) if you have any questions. Thank you for your consideration.

Sincerely,



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