

**FARMED ANIMAL  
ADVOCACY CLINIC  
YEAR IN REVIEW**

**2023-2024**

Dear Advocates,

As we reflect on another year of impactful advocacy and education at the Farmed Animal Advocacy Clinic (FAAC), I am filled with immense pride and gratitude for the work that has been accomplished and the strides made in advancing the protection of farmed animals and the environment.

### **Major Highlights from the Year**

This year, FAAC played a crucial role in significant legal and policy initiatives. The collaboration with leading animal and environmental protection organizations led to a major complaint filed with the U.S. Securities and Exchange Commission against the largest meat and poultry producers in the world, challenging misleading sustainability claims. This initiative provided student clinicians with a deep dive into corporate accountability, investor protection, administrative law, and regulatory practice.

In a landmark case, Animal Partisan, with the support of FAAC, secured a significant victory against the FBI, ensuring greater government transparency under the Freedom of Information Act and uncovering a surprising plan to use weapons of mass destruction laws against animal advocates. This victory is a testament to the tireless efforts of the FAAC and the real-world impact of our clinic.

The clinic also assisted clients in urging the United States Department of Agriculture to close loopholes that allow slaughterhouse operations to evade critical environmental reviews and to issue guidance on enforcing animal cruelty laws at slaughterhouses, reflecting a commitment to environmental justice, animal welfare, and regulatory compliance. In doing so, students were exposed to the intersectional issues of animal cruelty, environmental harm, climate impacts, public health, and worker safety from industrial animal production.

### **Looking Ahead**

The fall semester marks a bittersweet transition. After two years of dedicated service and having had the honor of building FAAC, I have stepped down as director to pursue new opportunities. I am immensely proud of the foundation we have built and the incredible team that has stood alongside me on this journey. I am confident in the continued success of the clinic under new directorship and look forward to witnessing the ongoing achievements of VLGS students and faculty.

### **Farewell Note**

To all the students, staff, and clinic partners, thank you for your passion, your dedication, and your belief in the power of legal advocacy to effect change. My heart is full of hope and gratitude as I pass the baton to the next generation of leaders at FAAC. Keep fighting the good fight—I will always be cheering you on.

Warm regards,

**Laura J. Fox JD/MELP'13**  
Former Director, Farmed Animal Advocacy Clinic



As I step in to oversee farmed animal matters for the Animal Law and Policy Institute, I am humbled and energized by the incredible legacy left by the outgoing FAAC director. This past year's achievements are a testament to the dedication, passion, and expertise that have been the hallmark of the FAAC since its inception.

### **Continuing the Legacy**

The past year at FAAC has been nothing short of remarkable. From challenging the misleading sustainability claims of significant meat and poultry producers to securing a landmark victory for government transparency under the Freedom of Information Act, the clinic has made significant strides in advancing the protection of farmed animals and the environment. These victories have set important legal precedents and provided our student clinicians with invaluable experience in navigating the complex landscape of corporate accountability, environmental justice, and regulatory practice.



As we move forward, I commit to building upon this strong foundation, ensuring that the Animal Law and Policy Institute's work for farmed animal advocacy remains a leader and a powerful force for change. I am excited to be working alongside our talented students, faculty, and partners to tackle the pressing challenges for farmed animals.

### **Looking Forward**

In the coming year, we will continue to engage in impactful litigation, policy advocacy, and public education to advance the rights and protections of farmed animals. We will seek new opportunities to hold powerful industries accountable, close regulatory loopholes that endanger animals and the environment, and advocate for more vigorous enforcement of animal welfare laws. Our work will remain interdimensional, addressing the interconnected issues of environmental harm, public health, and worker safety in industrial animal production.

I am particularly looking forward to expanding our outreach efforts, forging new partnerships, and providing our students with even more opportunities to develop the skills and knowledge they need to become effective advocates. Together, we will continue pushing the boundaries of what is possible in farmed animal advocacy to create a more just and compassionate world.

### **Gratitude and Commitment**

I would like to extend my deepest gratitude to our outgoing director for her visionary leadership and unwavering commitment to the mission of the Animal Law and Policy Institute. To our students, staff, clients, partners, and supporters: thank you for your ongoing dedication and belief in the power of legal advocacy to make a difference. I am excited to embark on this journey with you, and I look forward to all that we will accomplish together.

With determination and hope,

**Taylor Waters**  
Farmed Animal Advocacy Staff Attorney

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*Vanessa Kranz JD'25 with Rumi*



# MEET OUR STUDENTS

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FAAC Fall 2023: Dilara Erhan JD'25, Jenna Kemmer JD'24, Andrea McMillan JD/MELP'24, Kristi Fox JD'24, and Daria Bednarczyk JD'25

**“I came to VLGS to learn how to advocate for animals through law and policy. FAAC helped me to achieve this dream of mine!”**

**- Devin Brennan JD/MAPP'25**

**“Clinic was absolutely the highlight of my past three years of law school!”**

**- Andrea McMillan JD/MELP'24**



FAAC Spring 2024 Students: Devin Brennan JD/MAPP'25, Sophia Clevenger MAPP'24, Vanessa Kranz JD'25, Ema Makas JD/MERL'24, and Hanna Walker JD/MELP'25



FAAC Students at VLGS's 2024 Commencement: Ema Makas JD/MERL'24, Jenna Kemmer JD'24, Bella O'Connor JD'24, Amanda Reyes JD'24, Sophia Clevenger MAPP'24, and Andrea McMillan JD/MELP'24



FAAC Summer 2024 Students: Avery Zasada JD/MAPP'25 and Elizabeth Hack MFALP'24

# MEET OUR INTERNS

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**Kate Collins-Palmer JD'26**  
American University  
Washington College of  
Law



**Eliana Goldstein '26**  
Wesleyan University

**“The FAAC exposed me to the varied ways we can work with the law to advocate for animals.”**

**- Kate Collins-Palmer**



**Ariana Kaputsos JD'26**  
American University  
Washington College of Law



**Jamie Lacanilao '26**  
Wesleyan University

**“I learned more from working for the FAAC this summer than I ever thought I would as an aspiring law school student.”**

**- Jamie Lacanilao**



**Sage Saada Saar '26**  
Wesleyan University



**Jinhua Zhang JD'25**  
The University of Texas  
School of Law



# CLINIC HIGHLIGHTS

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**Challenging Humane-Washing**

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**Winning Lawsuit for Government Transparency**

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**Addressing Slaughterhouse Environmental Impacts**

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**Confronting Slaughterhouse Animal Cruelty**

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**Aerial Tour of North Carolina CAFOs**

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**Visited with Farmed Animals at Sanctuary**



*Kermit at Merrymac Farm Sanctuary*

**Learn more about FAAC's work on VLGS's Hothouse Earth Podcast**



In the milestone 20th episode of the VLGS Hothouse Earth Podcast, Professor Fox sat down with Laura Ireland, associate director of the Animal Law and Policy Institute, to talk about the FAAC and the incredible working being done.

Tune in to catch up on what the clinic has been doing since its creation in 2022:  
[vermontlaw.edu/podcast](http://vermontlaw.edu/podcast)



# Holding World's Largest Meat and Poultry Producers Accountable

With FAAC's assistance, the Humane Society of the United States (HSUS) and the Center for Biological Diversity (Center) filed a complaint with the U.S. Securities and Exchange Commission (SEC) against JBS SA and Pilgrim's Pride. These corporations, among the largest meat and poultry producers globally, are accused of making false and misleading sustainability claims regarding animal welfare practices, deforestation, and net zero emissions commitments. The complaint alleges that JBS and Pilgrim's Pride have violated federal securities laws by presenting deceptive statements in their Offering Documents, which are crucial for facilitating an initial public offering (IPO) in the U.S.

For FAAC student clinicians, working on this complaint has been an invaluable educational experience, providing real-world insights into the intersection of animal advocacy, environmental justice, investor protection, and corporate accountability. This complaint underscores FAAC's commitment to transparency and accountability in the animal agriculture industry and empowering the next generation of legal advocates.

Kristi Fox JD'24, reflects on her experience: "Working on the SEC complaint against JBS and Pilgrim's Pride was deeply eye-opening. These companies' apparent misrepresentations on environmental, social, and governance (ESG) issues reveal a troubling level of potential deception. The skills I've honed here in persuasive writing and legal strategy are tools I will carry forward in my career, dedicated to making a meaningful difference in the world."

Listen to Professor Fox's interview with Mariann Sullivan and HSUS' Stijn van Osch about this complaint on The Animal Law Podcast: [ourhenhouse.org/alp110/](https://ourhenhouse.org/alp110/)

**Will JBS Investors Get the Truth about Animals and Climate?**

**110**

"If there are investigations or scandals about animal mistreatment, you lose consumer confidence, you lose sales."  
**STIJN VAN OSCH**

"Investor groups and individual investors see animal welfare and a company's treatment of animals as material to the financial solvency of that company."  
**LAURA FOX**

# Animal Partisan v. FBI

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This year, we are thrilled to announce a landmark victory for Animal Partisan (AP) in its lawsuit against the Federal Bureau of Investigation (FBI). This case, which was previously reported in last year's end of the year report and featured on Our Hen House Animal Law Podcast, marks a significant win in the fight for transparency and accountability in government operations concerning animal protection.

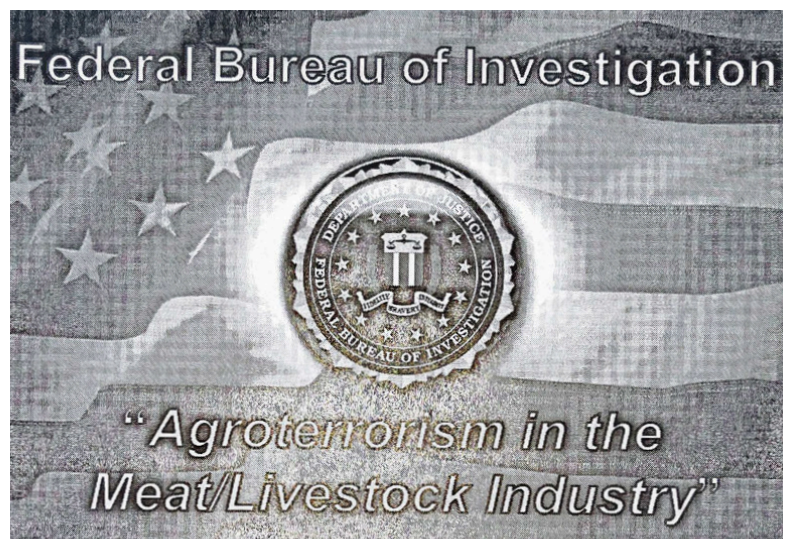
AP, with the support of FAAC and Sorenson Law LC, sued the FBI over its refusal to release records responsive to a Freedom of Information Act (FOIA) request. AP sought to uncover documents concerning the FBI's involvement at two significant trade industry conferences put on by the North American Meat Institute (NAMI). The FBI claimed that the records were exempt from disclosure under FOIA Exemption 7A, which is typically used to protect law enforcement records.

**“Animal Partisan’s victory represents a win for animal advocates nationwide and the animals who rely on them.”**

**- Andrea McMillan JD/MELP’24**

In a surprising turn of events, the FBI has reversed its stand and announced that it no longer considers FOIA Exemption 7A applicable to the request for records. A pivotal moment in this legal challenge came from a meticulously crafted letter by Andrea McMillan JD/MELP’24, a dedicated student attorney that was with FAAC for several semesters. Reflecting on this result, McMillan stated, “Animal Partisan’s victory represents a win for animal advocates nationwide and the animals who rely on them. We are thrilled that Animal Partisan will have the opportunity to review these government records and use their insight to promote a more humane food system.”

*Title slide from the FBI’s presentation at a NAMI conference*



# Animal Partisan v. FBI

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We commend the resilience and advocacy of Animal Partisan, Andrea McMillan, Sorenson Law LLC, and everyone involved in this legal battle. Their work not only exemplifies the impact of skillful legal advocacy but also highlights the critical role that clinical legal education plays in shaping future attorneys capable of making substantial contributions to public interest law. Stay tuned for more exciting updates as we continue our journey toward greater transparency and justice in animal protection.

## A FARMED ANIMAL ADVOCACY CLINIC CASE FEATURED ON THE ANIMAL LAW PODCAST



*"We are deeply grateful to the Animal Law Podcast for shining a light on our client, Animal Partisan, and the crucial work we are doing in the Animal Partisan v. FBI lawsuit."*

*- Andrea McMillan JD/MELP'24*

**LEARN MORE**

[https://www.vermontlaw.edu/  
blog/animal-law/FAAC-FBI-FOIA](https://www.vermontlaw.edu/blog/animal-law/FAAC-FBI-FOIA)



Listen to The Animal Law Podcast Episode #101:  
The Case of the FBI at the Meat Conference:  
[ourhenhouse.org/alp101/](https://ourhenhouse.org/alp101/)



# USDA Urged to Close Loophole on Environmental Review of Slaughterhouse Activities

The Farmed Animal Advocacy Clinic, on behalf of the Center for Biological Diversity, the Humane Society of the United States, and the Humane Society Legislative Fund, filed a petition demanding that the United States Department of Agriculture rescind its unlawful categorical exclusion of the entire Food Safety and Inspection Service (FSIS)—an agency charged with enforcing the Humane Methods of Slaughter Act among other slaughterhouse regulations—from National Environmental Policy Act (NEPA) requirements. This petition aims to ensure that FSIS conducts thorough environmental reviews of its actions, particularly those involving slaughterhouse operations, in line with NEPA’s mandates.

Since 1983, FSIS has been categorically excluded from NEPA’s environmental impact statement and environmental assessment provisions, allowing it to bypass essential environmental review. This exclusion has led to a lack of oversight and accountability, despite the significant environmental impacts of FSIS’s activities, such as diminished air and water quality, increased noise pollution, and the heightened risk of zoonotic diseases. The petition, drafted by FAAC student clinicians Robert “Drew” McCormick JD’24 and Jenna Kemmer JD’24 calls for FSIS to align with NEPA’s obligations and prioritize environmental transparency and public involvement.



The screenshot shows the top navigation bar of The Hill website with categories like News, Policy, Business, Health, Opinion, Events, and Jobs. Below the navigation, the article is categorized under 'OPINION > CONGRESS BLOG'. A disclaimer states 'THE VIEWS EXPRESSED BY CONTRIBUTORS ARE THEIR OWN AND NOT THE VIEW OF THE HILL'. The main headline reads 'No, Congress should not expand the use of categorical exclusions' by Laura Fox, dated 11/02/23 3:00 PM ET. A call-to-action at the bottom of the screenshot encourages reading the article and provides the link [bit.ly/faac-news-the-hill](https://bit.ly/faac-news-the-hill).

# FAAC's Efforts to Enhance Environmental Regulations

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This year, the Farmed Animal Advocacy Clinic made a significant impact by submitting comments on behalf of the Center for Biological Diversity addressing the Council for Environmental Quality's proposed Phase 2 rule changes to the National Environmental Policy Act (NEPA). These comments tackled the problematic use of categorical exclusions (CEs) by government agencies, which often bypass meaningful NEPA review.

NEPA, enacted in 1970, is a cornerstone of environmental protection, requiring federal agencies to assess the environmental impacts of their actions. However, over the years, agencies have stretched CEs far beyond their original intent, allowing significant activities to escape thorough environmental review. One glaring example is the Food Safety Inspection Service (FSIS), which oversees slaughterhouses. Despite the substantial environmental impacts of slaughterhouse operations, FSIS has largely avoided NEPA assessments due to categorical exclusions.

FAAC student clinician Jenna Kemmer JD'24, with the help of pro bono counsel Jon Krois, played a key role in drafting and reviewing these comments. Reflecting on the experience, Jenna said, "Working with the Center for Biological Diversity on NEPA comments enriched my understanding of environmental law and highlighted the deep connection between animal protection and ecological justice. This hands-on experience has been instrumental in shaping my perspective, allowing me to advocate for the voiceless and contribute to meaningful change. It's a vivid reminder that the law is about fostering a more compassionate and sustainable world for all."



*Jenna Kemmer JD'24*

**"This hands-on experience has been instrumental in shaping my perspective, allowing me to advocate for the voiceless and contribute to meaningful change. It's a vivid reminder that the law is about fostering a more compassionate and sustainable world for all."**

**- Jenna Kemmer JD'24**

# Addressing Animal Cruelty at Slaughterhouse

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Ema Makas JD/MERL'24 and Andrea McMillan JD/MELP'24 made significant contributions in drafting comments in support of Animal Partisan's petition to the USDA's Food Safety and Inspection Service (FSIS). The comments draw attention to the staggering scale of animal slaughter in the United States, with over 10 billion animals slaughtered annually, and the countless instances of animal cruelty at slaughter facilities. Animal cruelty at slaughterhouses is underenforced due, in part, to confusion over which laws apply.

The petition calls for formal clarification that federal laws do not preempt state anti-cruelty laws at slaughterhouses, addressing the confusion that often leads state and local authorities to hesitate in taking action against cruelty in federally inspected facilities. Empowering state and local authorities to enforce anti-cruelty laws would bring numerous benefits, including enhanced animal welfare, reduced environmental impact, increased consumer confidence, improved worker safety, and better public health outcomes.



**“I was especially motivated to work on this letter because from the very beginning, I recognized the importance of Animal Partisan’s petition and the potential that the comments in support would have in creating a meaningful difference toward minimizing instances of cruelty in these facilities.”**

**- Ema Makas JD/MERL'24**



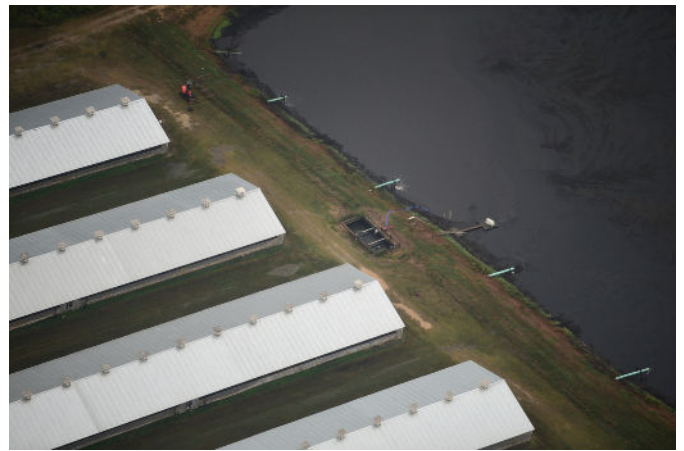
# CAFO Flyover in North Carolina

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The Farmed Animal Advocacy Clinic participated in an aerial survey of concentrated animal feeding operations (CAFOs) in the Duplin County, North Carolina, area. The flight was organized by SouthWings, an organization that connects conservation partners with a network of volunteer pilots to advocate for the restoration and protection of the ecosystems of the Southeast through flight. The tour provided attorneys, including Professor Fox, who are actively engaged in addressing CAFO pollution, with a firsthand observation of the extensive impact these operations have on the environment. This unique perspective enhances their understanding and informs the legal strategies they develop in their ongoing work.



*CAFOs located in close proximity and seemingly as far as the eye could see in this landscape*



*CAFO dumping animal waste into an open air manure lagoon with toxic sludge layered on top*



*Nearby wetland area experiencing heavy algae bloom from CAFO pollution*



*Pigs piled in a dumpster, often referred to as a "dead pen," with blood pooling out*

# FAAC Visits Merrymac Farm Sanctuary

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Merrymac Farm Sanctuary (MMFS) sits in the lush, green hills of northern Vermont. This year our law and policy students were fortunate to visit the sanctuary. Founded by Era MacDonald, MMFS is a testament to her lifelong commitment to animals. During their visit, students experienced firsthand the power of advocacy work as they interacted with animals living safely and happily. Seeing these animals thriving underscored the importance of the students' efforts throughout the semester, and offering a healing reminder of the joy and peace their work can bring to the lives of animals big and small.

Among the residents, a pair of turkeys named Tom and Emory captivated students with their intelligence and playful nature. Huey and Louie, two pigs rescued from a hoarding case, became the fan favorites with their social and curious personalities. MMFS is home to many different species, all enjoying their peaceful days grazing and socializing with visitors.



*Laura Fox JD/MELP'13, Devin Brennan JD/MAPP'25, Ema Makaz JD/MERL'24, Hanna Walker JD/MELP'25, Andrea McMillan JD/MELP'25, Vanessa Kranz JD'25, and Sophia Clevenger MAPP'24*



# Merrymac Farm Sanctuary Visit



*Luca, a rescued sheep, with  
Vanessa Kranz JD'25*



*Hanna Walker JD/MELP'25  
with Huey and Louie*



*Andrea McMillan JD/MELP'24  
with Iceman*



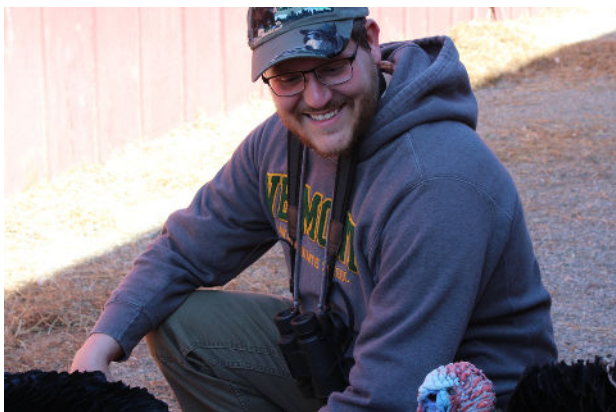
*Eugene*



*A rescued rooster*



*Ally*



*Devin Brennan JD/MAPP'25 with Tom and Emory*



*Emma Makas JD/MERL'25 with Kermit*



# PUBLICATIONS



In their article for the ABA Animal Law Winter 2024 Newsletter, Professor Laura Fox JD/MELP'13 and FAAC Litigation Paralegal Logan Volpe illuminate the dangers of factory farming and its role in fueling novel diseases and infections. They describe how intensive livestock operations create a perfect storm for pathogens like avian flu and swine flu, raising the risk of global pandemics. Discussing how excessive antibiotic use in these environments accelerates antibiotic resistance, making infections more difficult to treat in both humans and animals. Additionally, Fox and Volpe draw attention to the impact of industrialized agriculture on climate change, environmental degradation, and global health inequities, while also identifying opportunities for change and risk mitigation.

**Access the full article here:**  
**[liebertpub.com/doi/10.1089/env.2021.0125](https://liebertpub.com/doi/10.1089/env.2021.0125)**

# AWARDS AND HONORS



*FAAC Fall 2023  
Challenge Cup Winner  
Andrea McMillan JD/MELP'24*



*FAAC Spring 2024  
Challenge Cup Winner  
Devin Brennan JD/MAPP'25*



*Robert "Drew" McCormick  
JD'24 and Taylor Rush JD'24,  
National Animal Law  
Competition Winners, coached  
by Prof. Laura Fox  
JD/MELP'13*



*Andrea McMillan JD/MELP'24,  
received the Clinical Legal  
Education Association (CLEA)  
Outstanding Clinic Student Award  
at VLGS's Commencement  
Awards Ceremony*



*Isabella O'Conner JD'24 received  
VLGS's Marc Mihaly  
Environmental Leadership  
Award in part for her clinic work  
during FAAC's Fall 2022 term*





**Animal Law &  
Policy Institute**

**VERMONT LAW & GRADUATE SCHOOL**

**Farmed Animal Advocacy Clinic**

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