

Labelling for animal welfare: Call for evidence

Wildlife & Countryside Link response

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[Wildlife and Countryside Link](#) (Link) is the largest environment coalition in England, bringing together 62 organisations to use their strong joint voice for the protection of nature and animals.

Introduction

- We welcome this [call for evidence](#) from the Department of the Environment, Food and Rural Affairs on the potential impacts of animal welfare food labelling.
- We have provided responses to the questions where the expertise of our members can add relevant evidence. Our responses to the call for evidence questions, drawn from members of our Animal Welfare and Agriculture Groups, include preferences for:
 - An initial method of production system of welfare labelling, to present consumers with clear information about the system used to rear an animal.
 - The presentation of method of slaughter information as an additional simple label.
 - Making welfare labelling mandatory, to prevent only the highest quality products being labelled.
- A mandatory, method of production welfare labelling system will clarify the labelling landscape. Such a clarified landscape will allow consumer preference for high welfare products to fully manifest, rewarding high-welfare UK farmers and driving further welfare improvements.

Response to consultation questions

Question 18: How could a set of welfare standards, defining different levels of welfare for an animal, be developed based on inputs?

- Method of production represents a key input farmers can make to the welfare of their animals. By choosing methods of production that provide ample space and access to the outdoors, farmers can improve farmed animal welfare. This is recognised in the current model used for egg labelling in the UK, which categorises methods of production as either caged, barn, free range or organic. This system could be adapted to create a four-tier system of input-based standards for all farmed animals, measured by the amount of space and access to outdoors animals are provided with.

Question 19: How could welfare outcomes be incorporated into a set of welfare standards that can then be used for a label?

- It is important to acknowledge that method of production labelling and welfare outcome-based labelling represent two distinct approaches. The former, whilst clearly having inherent animal welfare implications, refers to production methods that can be objectively and precisely described. The latter refers to the level of animal welfare, a comparatively less precise and more contentious entity and one which it is still challenging to assess in practice.

- The development of welfare assessment is still at a relatively early stage and there are many challenges associated with the assessment and use of welfare outcomes. For example, quality control at auditing is much more difficult to achieve than when assessing 'inputs', and often very large numbers of animals need to be assessed collectively and individually to obtain statistically robust, reliable farm-level data. There is still work to be done on defining and validating the exact measures that provide the best information about the welfare state of animals in each species, particularly in the area of behavioural assessment. Whether and how acceptable outcome 'thresholds' should be set is another challenge, which could – if not overcome – result in consumers being faced with confusing welfare information. As such whilst incorporation of welfare outcomes into a labelling system should undoubtedly be an aspiration, the way in which this could be done and the development of the assessment system itself both require further work.
- This further work should consider the full range of farm management actions that can result in bad welfare outputs. Poor sanitation and limited veterinary attention are amongst a range of husbandry factors that can cancel out the welfare benefits of generous space provision and outdoor access.¹ As poor husbandry can negate welfare-positive production methods, standards should consider the accrued outcomes of all aspects of farm management.
- The five freedoms incorporated in the Welfare of Farmed Animals (England) Regulations 2007 Welfare Act 2006 (freedom from hunger, freedom from discomfort, freedom from pain, injury and disease, freedom to express normal behaviour and freedom from fear and distress²) could provide a foundational metric to judge outcomes. Hunger, discomfort, pain, abnormal behaviour and fear are all observable features in farmed animals and, when present, are the outcomes of farm management in the round. Alternatively, the Five Domains Model³, which develops the five freedoms approach to give greater consideration to the mental state of animals, could be used as a basis for welfare assessments.
- A method of production plus simple welfare indicators approach to welfare standards is recommended by Eurogroup for Animals⁴, and forms the foundation of labelling systems such as the French *Etiquette Bien-Être Animal*.
- Link recommends the initial introduction of a simple method of production labelling system, to ensure the provision of clear information to consumers. Further work should then be undertaken to consider how best method of production labelling could be expanded to include welfare outcomes in the future.

Question 20: What would we need to consider if we developed a set of welfare standards that covered the whole life of the animal, including slaughter and transport, and of its parents?

¹ See for an example: <https://www.bbc.co.uk/news/uk-england-sussex-51269967>

² <https://education.rspca.org.uk/documents/1494931/0/FS+The+five+freedoms.pdf/e1e3f7f9-fcce-fdd3-65a8-f29aa4905e2e?t=1555162618511>

³ <https://kb.rspca.org.au/knowledge-base/what-are-the-five-domains-and-how-do-they-differ-from-the-five-freedoms/>

⁴ https://www.eurogroupforanimals.org/files/eurogroupforanimals/2020-10/E4A-AW-Food_Labeling-2020-web-version.pdf

- It would clearly be nonsensical for meat to be presented as being entirely high welfare when that could only apply to one part of that animal's life. The conditions experienced by animals throughout their lives, including breeding, fattening, transport and slaughter should where possible be taken into account when considering their overall welfare.
- However, there are complexities involved with this, as different elements of an animal's life could be provided by different entities (e.g. one farm for breeding, one for fattening, one company for transport and one for slaughter). Presenting the different standards achieved by each location on packaging could cause confusion for the consumer. This would run counter to the goal of providing clear, accessible, easily understandable information to consumers, to allow high welfare preferences to manifest. Transport is particularly challenging, as it is not linked to the system of production, so represents a separate process which is variable depending on non-system factors.
- As such, we recommend that time the on-farm conditions should be the main consideration in welfare labelling, expressed through simple method of production information. Slaughter details should also presented, through a simple statement on the method of slaughter used. As part of further work into expanding labelling to include welfare outcomes, options for clearly presenting breeding and transport options should be explored. The RSPCA's proposals for use of the labelling term 'Not Farm Assured' should be considered in this context. The RSPCA have suggested that it should be mandatory for non-farm assured products to be labelled as such, making a clear distinction between animals raised from birth-to-slaughter under a farm assurance scheme and those not.

Question 22: Do you think that products containing meat should be labelled to indicate the method of slaughter to consumers?

- Yes. Different methods of slaughter can have starkly differing impacts on animal welfare. Non stunned slaughter inflicts very significant pain and distress on an animal before it becomes unconscious; in cattle this period of conscious pain following a cut to the throat can last for up to two minutes.⁵ Consumers wishing to buy high-welfare meat product need to know if the animal was killed in such a way as to inflict a prolonged period of suffering.

Question 23: If the UK government introduced mandatory or voluntary method of slaughter labelling regulations, should this be? (Option A or B)

- We support option B – slaughter method labelling should be a standalone label relating only to the method of slaughter.
- This is because incorporating one element of the slaughter method into a label primarily aimed at imparting on-farm production method information would add complication to the terms themselves (and confusion for consumers) and to the underpinning criteria used to define each labelling term. A clear, standalone simple method of production term alongside a simple slaughter method label would help ensure simple and straightforward information provision.

⁵ <https://www.rspca.org.uk/documents/1494939/7712578/Non+Stun+Slaughter+Briefing.pdf/dec09ee6-9766-bc17-bbd3-6b637472110d?t=1577097683819>

- This dual track approach would clearly present information about the majority of the animal's life (method of production) and the point of potential greatest stress (slaughter). YouGov polling from September 2020 shows a majority (53%) of meat eaters supporting labelling meat products to indicate how the animal had been both raised and slaughtered (only 14% of meat eaters were opposed).⁶

Question 24: Which type of labelling could be most effective at:

a. Supporting farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market?

b. Improving animal welfare by unlocking untapped market demand for higher welfare products?

c. Ensuring UK baseline and higher welfare products are accessible, available, and affordable so that it is easy for consumers to choose food products that align with their values?

(Mandatory, voluntary but defined in law, industry-led)

- Mandatory labelling is essential to meet each criterion. Voluntary or industry led labelling will lead to only the highest quality products being labelled, as only providers who score highly on animal welfare will be incentivised to display welfare scores on their products. In these circumstances, consumers are unlikely to be clear as to why some products have animal welfare labelling, and some do not. This confusion would be even worse in an industry-led system, where a lack of legal definition could lead to a proliferation of different labelling schemes.
- In a confused labelling system, the rewards for farmers exceeding baseline UK welfare regulations are less clear cut, the demand for high welfare products is less developed and the ability of consumers to make honest and comparable choices is limited. This is the current situation and a voluntary or industry led approach to labelling will simply perpetuate it.
- Speaking to the European Union Committee in 2017 about the current labelling landscape, Lynn Frewer, Professor of Food and Society at Newcastle University, reported on how *"consumers are totally overwhelmed by the variety of the labels that appear to be promulgated across a range of products. An enormous and increasing amount of information is associated with different labels."* Sustainable farming think tank Farmwel agreed, saying *"Confusing labels have a significant adverse economic impact on those producers operating to higher welfare standards because they undermine natural consumer preferences."*⁷
- In addition to perpetuating the current confusion, the proliferation of different labelling systems that could follow from an industry-led approach could see a 'halo effect' develop. In the words of US sustainable farming think tank 'Farm Forward': *"The halo effect occurs when producers utilize certifications (or other means) to give the impression that the most rigorous levels of certification are representative of all certified products or even totally uncertified products. For example, a brand-name company may sell 30 different chicken products, only some of which are welfare-certified; but will boast of the few anomalous products and present them as the norm for the brand."*⁸

⁶ <https://yougov.co.uk/topics/food/articles-reports/2020/09/29/what-do-brits-think-uk-farming-practices>

⁷ <https://publications.parliament.uk/pa/ld201719/ldselect/lddeucom/15/1507.htm>

⁸ <https://res.cloudinary.com/hyivcxzjt/image/upload/v1609362305/resource/undefined-the-dirt-on-humanewashing-farm-forward-1609362294.pdf>

- A mandatory method of production label required on all products by law (along with an additional, simple method of slaughter label) is the only way to reduce confusion, and to provide the clarity required to allow consumer choice to reward high welfare producers. It is worth noting that the egg labelling scheme which forms the main UK precedent for welfare labelling was originally voluntary when introduced across the European Union in 1995. After five years the EU acknowledged that the voluntary approach wasn't working and decided that *"unambiguous compulsory labelling is the only way of ensuring that the consumer is able to make an informed choice between the various classes of egg on the basis of the farming method."*⁹ Welfare labelling on eggs became mandatory in January 2004. The failure of voluntary welfare labelling on eggs, and the subsequent success of the replacement mandatory labelling, is a key lesson to apply when considering this round of welfare labelling proposals.

Question 25: To what extent do you support the principle of mandatory labelling to identify when imported meat, eggs and milk do not meet baseline UK welfare regulations?

- We strongly support mandatory labelling on imported meat, eggs and milk that do not meet baseline UK welfare regulations. It is important that consumers are informed of imported goods that fall short of UK standards. Such imported goods should compete on a level playing field with UK goods, which would under our proposals all have to display welfare labelling.

Question 26: What business decisions would farmers and food businesses be likely to take in response to the introduction of mandatory labelling for animal welfare?

- The economic case for producing high-welfare products will grow under a mandatory welfare labelling system.
- Large scale surveys in the USA suggest that 74% of people are willing to pay more for high-welfare products, with more than a third of shoppers willing to pay premiums of up to 20 percent for high welfare products.¹⁰ This willingness to pay a premium for high welfare products means that improved welfare can in the words of a 2009 cross-Europe study, *"pay for itself"*¹¹, especially when supported by a clear and comparable labelling system.
- UK farmers will have the opportunity to benefit from these trends, as they did when egg labelling became mandatory. Consumer demand for eggs in the UK produced in cage-free production systems rose markedly in the years after mandatory labelling was introduced. This increase has driven the egg industry to invest more and more in barn and free-range laying hen systems, with around 52 percent of all eggs sold in the UK now coming from cage-free systems.¹²

Question 29 to 33: Which labelling formats do you think is most effective?

⁹ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2001:002:0001:0003:EN:PDF>

¹⁰ <https://res.cloudinary.com/hyjvcxztj/image/upload/v1609362305/resource/undefined-the-dirt-on-humanewashing-farm-forward-1609362294.pdf>

¹¹ https://www.researchgate.net/publication/233680902_Stakeholder_citizen_and_consumer_interests_in_farm_animal_welfare

¹² https://www.rspca.org.uk/-/2018_08_06_production_labelling_animal_products

- Simple method of production labelling is the preferred option.
- There may be pros and cons to using a tiered system, with regard to the impact it might have on consumer, farmer and food business behaviour. Whilst offering a low tier provides the opportunity for more producers with more widely varying standards to 'qualify' for a label, it might also lead consumer and retailers to feel they are 'ticking the welfare box' by buying/sourcing products in the lowest tier and fail to provide incentive to trade up. Similarly, farmers achieving the lowest tier may not feel the need to progress.
- If the objective is to drive consumer behaviour by giving consumers information they require, a traffic light system may also offer an intuitive and impactful system, though this would result in with less specific method of production information.
- The is Etiquette Bien-Être Animal label combines a clear welfare tiering system with short comparative descriptions (e.g. 'good', 'standard'), along with a description of method of production. This combination of clear method of production information, along with some wider welfare information, may appeal to consumers.

Question 37: To what extent might any negative impacts of labelling changes be reduced, and how?

- Providing a suitable phase-in period for a mandatory labelling system will help producers to adapt. Similarly, advice services should be provided for farmers looking to understand the new system and to upgrade their welfare standards in response to it.
- The clarity provided by a mandatory labelling system will in itself help avoid negative effects, providing clear information on what and when will be required, and from whom. The uncertainties created by a voluntary or industry-led labelling system will create unhelpful confusion for businesses.

Question 45: Which of the following options do you think could be suitable for indicating welfare standards within the catering sector?

- Mandatory disclosure of welfare standards available would appear to strike the right initial balance between informing the consumer and avoiding unreasonable burdens for the catering sector. The maintenance of a written record of the welfare labelling on meat used by caterers, which consumers can easily access at their own request, would not be onerous for catering providers.
- As more consumers become used to a mandatory welfare labelling system in retail, we can expect requests for this information to increase.

Question 48: What are the key considerations when designing a monitoring and enforcement regime to verify labels for animal welfare?

- In 2009 the Federation of Veterinarians of Europe (then including UK veterinarians) published a paper on welfare labelling, stressing that expert inspection must underpin any labelling system. The paper stated that "*the housing, management, transport-and slaughter-conditions must be regularly controlled by independent, well-educated and therefore competent experts. This control*

is essential for the credibility of the labels and for the confidence of the consumers. Non-compliance of the requirements of labelling by the producers shall be avoided by adequate instruments such as a strict time limit for improvements and as the withdrawal of the label".¹³ The paper also argued that the costs of inspections "*must be covered by the market itself*".

- We would agree with that inspections should be undertaken by experts, capable of considering welfare as well as recording methods of production. The Government should establish the inspection regime to ensure it meets the need of mandatory welfare labelling system set in law, with funding to sustain inspections being drawn from producers. Producers will derive a benefit from a clear and trusted welfare labelling system rewarding UK farmers for high welfare production, and it is reasonable for some of these profits to be invested back into the system through inspections support.
- Lessons should also be drawn from the success of method of production labelling enforcement on eggs. Labelling on eggs have been self-policed by retailers, facilitated by the very high coverage of the egg sector by assurance schemes such as RSPCA Assured¹⁴ which applies strict and exacting traceability processes. As the Animal and Plant Health Agency already visits egg producers and is involved in verifying free range status, data from these inspections could also be used to verify and enforce claims made under a wider method of production labelling system.
- A welfare labelling inspection system must form part of a wider overhaul of farm inspections. The latest figures suggest an average farm inspection rate of once in every 50 years¹⁵, a figure so low as to undermine trust in farm standards across the board.

Question 53: Are there any examples of product branding or imagery regarding the provenance and quality of meat, eggs, and milk that you think could be misleading?

- It is important that labels should not imply that the product comes from an idyllic but actually non-existent farm, as some labels currently suggest. Examples of such misleading labels include 'Plumtree Farms' products¹⁶ sold by Iceland and Woodside Farm products¹⁷ sold by Tesco. These products use bucolic imagery to give the impression of high environmental and welfare standards, in place of verifiable proof that meat has been produced according to these standards.
- Only the introduction of a clear, mandatory welfare labelling system will clarify the market to the extent required to dispel the confusion generated by bucolic labelling. Recent evidence from the USA shows how clear welfare certification limits the ability of firms to obfuscate through bucolic labelling - from 2016 to 2018, sales of eggs accompanied by unregulated and

¹³ https://fve.org/cms/wp-content/uploads/fve_08_036_concept_paper_aw_labeling_jan09.pdf

¹⁴ <https://www.rspcaassured.org.uk/>

¹⁵ https://www.wcl.org.uk/docs/WCL_Digging_Deeper_Report_14_Oct_Final.pdf

¹⁶ <https://www.iceland.co.uk/p/plumtree-farms-32-value-sausages-1.44kg/64792.html>

¹⁷ <https://www.tesco.com/groceries/en-GB/products/292311836> Also see press coverage here:

<https://www.theguardian.com/environment/2017/dec/13/tesco-faces-legal-threat-over-marketing-its-food-with-fake-farm-names>

weakly-defined claims like “all natural” decreased by 20 percent, while sales of welfare-certified eggs grew by 57 percent.¹⁸

Question 54: How could a clear and consistent, common labelling approach be best designed to consider animal welfare alongside other labels such as nutrition and eco-labelling?

- As set out above, animal welfare labelling is a complicated area - particularly alongside nutrition and eco-labelling. It will therefore be important to work with retailers to present labels clearly and to engage in public-facing campaigns to help consumers to understand. Retailers are already engaging with animal welfare, nutritional and environmental issues, and so this will not be a new or unexpected challenge.
- The extension of method of production labelling to fisheries products in 2014 is also welcome and shows how method of production schemes can operate in other sectors. Fisheries product labelling could be widened to include bycatch issues (the entanglement of threatened marine species in fishing nets). Public concern about bycatch is growing. A recent survey conducted by OnePoll revealed that the majority of consumers want UK supermarkets to act on the bycatch harms the fish and shellfish products they sell cause to dolphins, seabirds and turtles.¹⁹
- Increases in transparency in fishing, including with the use of electronic monitoring, would be required to put labelling in place. Such labelling could benefit fishers and lead to focused efforts to reduce bycatch and entanglements and improve marine species welfare.

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Wildlife & Countryside Link is a charity based in England. This response is not confidential.

This response is supported by the following organisations who are members of Wildlife & Countryside Link:

FOUR PAWS UK

Whale & Dolphin Conservation

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RSPCA

A Rocha

¹⁸ Nielsen Product Insider 2016-2018

<https://res.cloudinary.com/hyivcxzjt/image/upload/v1609362305/resource/undefined-the-dirt-on-humanewashing-farm-forward-1609362294.pdf>

¹⁹ <https://sustainablefish.org/press-release/survey-reveals-consumers-want-uk-supermarkets-to-tackle-dolphin-deaths/>

