

# Meeting of the sub-group on animal welfare labelling

Seventh meeting, 12 December 2022  
(Videoconference)

– MINUTES –

## Attendance

<b>Independent expert</b>	Jarkko Niemi
<b>Civil society organisations</b>	Eurogroup for animals FOUR PAWS
<b>Business and professional organisations</b>	COPA EMN ERPA FVE
<b>Member States</b>	Denmark Germany Spain
<b>European Commission</b>	SANTE G5 (Chair)
<b>Guests</b>	ICF (absent)

## Discussions

### 1. Animal welfare domains (see slide 3)

The Chair presented the four animal welfare domains and explained that they could be used as a common framework for labelling across species. The Chair stated that it was a way to make sure that no key elements of animal welfare would be forgotten when drafting criteria.

One member declared that it was not possible to guarantee the absence of disease or pain as mentioned in the slide.

Another member considered that all domains should be subject to minimum acceptable threshold even if this member believed that the behavioural aspect was difficult to monitor.

A member explained that the domains were proposed for a common framework across species but agreed that the idea was not to require the absence of disease or pain. This point of view was supported by two other members. They, however, thought that preventive measures could be implemented to limit the emergence of diseases or the use of mutilations.

The Chair agreed with these views, adding that diseases prevention was not limited to contagious diseases since many non-contagious disorders have serious animal welfare consequences.

## **2. Criteria among upgraded levels (slide 4)**

The Chair presented the possible connection between the animal welfare domains covered and upgraded standards [i.e. standards in the label that goes beyond the minimum requirements or the baseline - see later point]. Under this hypothesis, the number of welfare domains covered will increase with the level of the label. The highest level would have to cover all domains.

One member considered that two different approaches could be adopted. A first approach would be to consider level based on a general score, independently from the domains covered. A second approach would be to require a minimum acceptability level for each domain. This approach was used in one scheme in Spain, where there was a minimum score for each level for all domains.

Another member supported the second approach, saying that requirements for each level should increase for each domain. Upgraded levels should not be limited to the scope of domains covered. This view was also supported by several other members.

On the other hand, a member defended that this second approach was not very transparent for consumers as it does not clearly identify the ground for moving from one level to another one.

One member mentioned that in Denmark they tried to cover all domains with increasing requirements but it was difficult to communicate to consumers. This member considered that all domains might be potentially important even for a first upgraded level. The system has to be flexible enough to allow this possibility.

One member believed that this system by domains was too complicated and difficult to explain to consumers. This member considered that the label should focus on few indicators related to consumers expectations.

This point of view was supported by another member that gave the example of foot pad dermatitis which was relevant for welfare but not understood by consumers. The framework should be simple. A system with too precise defined domains or criteria is not going to work.

Another member disagreed stating that a scoring system was not necessarily complicated, and we should distinguish the part applicable to producers which could be complex but technically relevant and the part for consumers that need to be simple.

A member stressed that indeed the question of how the label would be communicated to consumers will be discussed later in the meeting.

Another member agreed that the two parts are indeed different and should be dealt separately. This member reiterated that the scoring should cover all domains independently from the level considered.

A member concluded that there will be a need for compromise to achieve between the complexity of the criteria and the degree of details to provide to consumers.

## **3. What is a meaningful step (slide 5)?**

The Chair explained that it was important to define the level of improvements for each level. The Chair hence asked the group if they had any suggestion to define how we can distinguish the progression among the different levels from the baseline to the highest one. The Chair admitted that the question was not easy to solve.

One member suggested to grant the highest level to the organic production and the baseline the EU minimum requirements. However, this member admitted that it might be more complicated.

Another member supported this view (ranging from legislation to organic production) but the results may vary among species, organic farming being sometimes not always the best standards

for animal welfare. One of the considerations to establish steps in Denmark was also the affordability of the products so that the first grade could become accessible economically.

One member considered that the step between levels should be first meaningful for animals but should also take into account the scientific literature as well as the current practices used by labels on the market. This member was not sure if we need to define this issue of meaningful step into the framework legislation.

Another member believed that difference between levels should be based on what consumers think as good for the animals and the best solution was still to stick to the description of housing systems.

#### **4. Do we need a baseline (slide 6)?**

The Chair explained that to distinguish upgraded levels (or superior levels) you need a benchmark. In case EU legislation exists for a species, the legislation could be used as a baseline, provided that it addresses all key animal welfare concerns. However, many species do not have specific EU legislation and specific pieces of legislation do not always cover meaningful aspects of the welfare of the animals. The Chair concluded that, even if the work might be challenging, the first task for establishing specific standards was to identify the most common practices that will guide possible improvements.

One member agreed that organic could not be considered as a reference for the highest level since it was missing sometimes important animal welfare aspects. However, one member thought that organic standards should be considered when preparing draft standards on welfare because they were implemented and could give a good indication of the feasibility of a particular criterion.

Many members agreed that organic production was not always representing the best welfare standards, even if consumers often believe the opposite. In the Danish label organic production does not always get the best score.

One member wanted to know what we understand by the baseline. What is the purpose? Would it be an average in the EU or at national level? Do we have enough data to establish such baseline? The Chair said that the establishment of baseline was needed to define what is the basic or common practices level against upgraded or superior levels in the label. The Chair accepted that data are not always available, but it was essential to know what the situation for the key animal welfare concerns was.

At the end, most members accepted that a baseline was needed, especially in absence of specific legislation. They also agreed that organic farming standards could be useful to consider but should not be systematically considered as the highest level.

One member wanted to know how the baseline should be positioned with regard to the forthcoming legislation and the related transition periods. In the opinion of this member the label should be designed to help the front runners, including during the transition periods.

Another member consider that the baseline and the different levels should be based first on the identification of the key welfare criteria. This member considered that existing labels can provide a lot of information of what is technical feasible without the need of reinventing the wheel. A good mapping of current labels could serve as useful information for what is to be improved and the feasibility of improved standards.

#### **5. Which levels (slide 7)?**

The Chair asked the group, in case of voluntary label, which option they would prefer among two possibilities: either a label limited to upgraded levels (Danish type) or a “whole scope” label covering the basic standards and the non-EU products (not adhering to the label).

Two members was in favour of a label limited to upgraded levels, arguing that a scoring system was too complicated for consumers to understand.

One member disagreed, because this member argued that an EU label should encompass all existing schemes and therefore have a broad scope of products on the market.

Another member also supported a “whole scope” label adding that it will also allow a distinction against imported products with lower or unknown standards. The same member also evoked that it might be also more compatible with a sustainable label in the future.

A member supported this view and added that scoring was easier to read. This was confirmed by another member who declared that scoring was the most efficient way for changing consumers behaviour.

## 6. What type of level (slide 8)?

The Chair presented here different possible format to present the different labels based on existing examples. One approach was to use of scale based on words, letters, colours, symbols). Another approach as to use a description without explicit judgment like the one used for eggs. Mixed approach was also possible like the French “Etiquette bien-être animal”.

Two members were in favour of a descriptive label, even if they admitted that it was difficult to transposed to different species.

However, most members were in favour of a scoring system, even if there were no strong views on the best way to communicate it (words, letters, etc).

However, two members underlined that, whatever format used, it was important that compliant operators should not get a negative communication but rather a neutral one.

One member wanted to know how the “unknown” level could work for non-EU countries since it could be misleading for consumers if some products have a good welfare level. The Chair replied that operators from non-EU countries would not be excluded from an EU label as far as they can demonstrate that they meet equivalent criteria. However, in absence of information, it was necessary to envisage such category, the absence of information on welfare standards, not being a sufficient reason for banning such products from the market.

## 7. Next steps

The Chair asked the group if they were interested to have a final meeting and in this case what topics they would like to discuss. In addition, the Chair wanted to have the opinion of the group concerning the demand of EUROCOMMERCE to present its views to the group.

There was an agreement that a short final meeting would be useful to take stock of the work of the subgroup and identify the possible gaps of information.

It was decided to hold the next meeting on **25 January 2023 from 10.00 to 12.30.**

On this occasion, the group also agreed to receive EUROCOMMERCE for the last meeting, underlining that it would be useful if they could provide factual data notably on the transmission of prices along the food chain.