

Meeting of the sub-group on animal welfare labelling

Fifth meeting, 26 September 2022
(Videoconference)

– MINUTES –

Attendance

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

Discussions

1. Presentation by the chair on possible criteria (see attached)

The Chair summarized the outcomes of the previous discussions. The purpose of this meeting was to try to define a common framework for setting up technical species-specific criteria (or standards).

One approach was about defining structural criteria (management, personnel, premises, and monitoring system). In addition, within the monitoring system, specific indicators would be defined with a certain range of acceptability as well as a method to consolidate the results.

The discussion was then open while some slides were not presented due to lack of time.

2. Structural criteria

Some members were afraid that the design presented was particular complex and cumbersome without considering the interest of consumers. Instead, they would favour a much simpler system with very few criteria that would be easy to communicate to consumers.

Other members added that finding common criteria across species was a challenge. A management criterion might be complicated to apply. A criterion on the ratio of personnel/animals was not appropriate since this ratio would depend on the level of technology in the farm. Similar welfare levels could be obtained with different ratios.

Other members considered that a certain level of details was necessary so that the EU label would be meaningful.

Another member argued that the competence of personnel was already a requirement of legislation and was therefore not necessary to add for a label. The same member emphasized the challenge of finding common grounds across species. If the broiler sector was fairly harmonised, pig farming was much heterogenous and cattle farming was extremely variable in the EU. The same member also pointed out that, an approach by animal welfare domains was debatable since animal welfare issues vary between species and it was therefore not necessary to insist equally for all domains for all species.

Another member confirmed that simplicity was important, especially to take into account the size of the farm. This member considered that the EU label should facilitate the access of the label to small farms. When questioned about the concept of “small farms”, the member admitted that this might be challenging to define as farms size varies among Member States. However, he suggested that this definition could be established around the concept of “family economy” without outsourcing for example. The member promised to come back with more specific definitions at the next meeting.

Some other members disagreed in making a distinct approach along the size of the farms. These members considered that there was no evidence of a link between the size of the farm and the level of welfare. In their opinion, the label should strictly focus on welfare.

The Chair said that consideration for small farmers could be relevant if it relates to administrative burden because labels tend to create paperwork, something that is more difficult to cope with for small structures. A member replied that paperwork should be avoided for all farmers and not only for small ones. The Chair accepted this point but stressed that a label will inevitably create some additional administrative tasks and small enterprises are hence more at risks of being excluded.

3. Use of indicators

One member wanted to understand how the system would work in practice and in particular how each criterion would be weighted. Another member referred to the Animal Welfare Quality project, asking how criteria will be chosen.

The Chair replied that the framework legislation for an EU label would not define the weighting or the way it should be weighted but would require species-specific criteria to have a transparent and logical system of consolidating the results. This would not necessarily imply that there would be many criteria. In addition, the Chair added that the indicators would not necessarily be animal based [like in the Animal Welfare Quality project] and this would depend on how practical indicators could be monitored and meaningful.

A member then raised the issue of how farmers would pay and how control costs would be shared especially in the case of small farms. The Chair replied that it would be illusionary to believe that upper standards would not bare additional costs. Studies on labels indicate that there are costs associated with upper standards due to registration, high control rates, etc. However, the Chair suggested to keep the discussion on controls for another meeting.

A member questioned the purpose of the label and its success criteria. This member recalled that, from the previous sub-group discussions, that the EU label should provide for an umbrella including all current labels. This member also insisted on the need for a simple framework that gave the opportunity to reward farmers. This member believed that if the EU label was too detailed it would take the risk of few uptakes by operators and consequently having not much impact.

One member confirmed that controls were important, and it was difficult to find a common ground for a baseline.

Another member declared that the Animal Welfare Quality project was useful, but the EU label would need something more workable.

Another member suggested that while there should be some general standards, there should be national based criteria since practices are so different between Member States.

One member agreed that science was important to consider for criteria, but these criteria should be easy to communicate to consumers and retailers and they should be fully part of the discussion.

Another member supported the idea that the EU label should be an umbrella helping the existing labels to continue allowing a certain system of recognition.

The Chair declared that there is a dilemma between the need for harmonisation and the desire to keep existing labels unchanged. One of the outcomes of the study on animal welfare labelling was that existing animal welfare labels substantially differ in standards and methodology. The Chair hence concluded that, even if an EU label would contain limited criteria, there will be inevitably winners and losers. The purpose of harmonisation was to ensure a certain level of convergence and comparability and it was therefore difficult to believe that the existing labels will remain totally untouched by a new framework.

Another member raised the question of criteria and the costs implied. This member insisted on the fact that standards have cost implications, and they should not only be based on science. The Chair welcomed the idea that criteria should be subject to some costs analysis so that criteria are also based on their economic feasibility.

A member confirmed that there is a need for harmonisation and all existing standards will not meet the criteria of a new EU label. This member also stated that there was a need for a compromise between costs and welfare progress reflected in the criteria proposed.

There was a recurrent discussion among members on how meaningful criteria should be established in the light of the expectations of consumers and the potential for added value to the food supply chain. Some of them would favour to focus on consumers expectations while other members considered that consumers have limited understanding of the production process. Consequently, an EU label should give rather a consolidated results (like a final score) rather than focusing criteria on consumers expectations that are not always a proper reflection of the state of welfare of the animals.

The Chair explained that there was no obligation to set up common principles across species for setting criteria. The framework could simply establish the procedure for setting criteria without details. However, in absence of common frame for establishing criteria, there was a higher risk of substantial divergence between species-specific standards, making the label less credible.

4. Establishment of a baseline

The Chair presented the concept of a baseline before establishing species-specific standards. The baseline could be based only on the legislation but there was risk of important gaps. First, the specific pieces of EU legislation do not cover completely the welfare of animals. Secondly, the EU legislation does not cover all species. A baseline based on legislation would then take the risk of “welfare washing” by providing marginal improvements if the label was not based on an inventory of the most common practices. The Chair hence suggested that, together with species specific standards a certain baseline could be established to ensure that upper standards would be meaningful. The Chair recognised that establishing a baseline would be a challenging task since processes vary substantially within a particular sector.

One member underlined that the baseline should be dynamic since practices evolve in time. The Chair agreed and suggested that baseline should be regularly reviewed.

A member considered that the baseline could be simpler if it was based on the legislation. Having a more comprehensive approach would require huge resources. The Chair agreed but said that this could be mitigated by asking the scientists to focus on the most critical areas of welfare.

5. Next steps

The Chair summarized the discussion by pointing out when establishing criteria, the need to consider:

- a right balance in terms of complexity vs scientific robustness,
- the costs in establishing specific criteria,
- the commercial added value.

The Chair also underlined the importance of a proper baseline that could also be used as a monitoring tool for measuring the success of the label.

The Chair also confirm that the work of the subgroup was extremely valuable and will be used to refine the reflection on the different options for legislation.

Following the demand of the members to discuss further the criteria, the grading and the five domains, the Chair suggested that the next meeting could be first dedicated to the governance and controls and then to the criteria again.

[Note: the next meeting is planned for 20 October pm]