

Conclusions of the animal welfare labelling subgroup of the EU Animal Welfare Platform

Animal welfare labels: demands and offers

1. In the context of these conclusions, a label or a labelling scheme, mandatory or voluntary, is a set of rules, which ensures that specific criteria regarding governance, technical standards and verification of compliance are met and communicated to consumers.
2. In recent years, there has been an increasing interest in the welfare of farmed animals among EU citizens. The interest has been reflected to some degree in an increased consumer awareness of animal welfare in the purchase situation. The level of consumers' interests in animal welfare varies between individuals, genders, age categories, levels of education, purchasing powers and regions of the European Union.

Discrepancies are seen between citizens' stated interest and their action in the purchase situation as consumers. This can be explained by lack of transparency, lack of knowledge, purchasing power and different priorities among consumers in the purchase situation.
3. Animal welfare labels are unevenly developed in the Member States and market shares for animal welfare friendly products are still limited in many countries. However, the number of brands or labels using animal welfare claims has increased. Various methodologies and standards are used. Some focus on animal welfare while others include animal welfare amongst other subjects.
4. Different motivations and organisational backgrounds for welfare labels exist. Some labels are managed by non-profit organisations or public authorities, others by business operators at different levels of the food chain (such as producers' organisations, slaughterhouses, retailers, and food services).
5. At EU-level, organic farming and marketing standards for eggs and poultry meat offer products with animal welfare attributes regulated by EU-rules. EU quality schemes (such as Protected Designation of Origin, Protected Geographical Indication) may also contain animal welfare attributes.
6. The variety of labels and their differences in standards increases the risk of consumers being confused or misled. It also increases the risk to benefit to labels using weak methodologies and low standards. Producers applying high standards are at disadvantage due to the lack of transparency of the market.
7. Many consumers in the EU cannot express their preferences for animal welfare because of the absence of animal welfare labels and/or products with such labels in their location.
8. Animal welfare labels are often defined along national lines. This tends to hamper the functioning of the internal market.
9. Animal welfare labels are more widespread for species such as chickens and pigs. The availability of information to consumers on animal welfare and standards for other species remains limited or is absent.

- 10. The subgroup considers that the establishment of an EU animal welfare label could ensure an equivalent information level for consumers across the EU. It could also increase transparency in the market and provide better protection to EU producers who apply high standards.**
- 11. The subgroup recommends to develop an EU animal welfare label in order to full fill the following objectives:**
- a. Respond to the consumers' demand for clear and reliable information on the way farmed animals are treated.**
 - b. Offer consumers the possibility to choose their food on the base of the level of animal welfare that they are willing to pay.**
 - c. Offer business operators, including farmers, the opportunity and incentives to improve their animal welfare standards at their own pace.**
 - d. Offer business operators, including farmers, a level playing field across welfare label initiatives.**
 - e. Provide a framework for continuous improvement on animal welfare for as many animals as possible.**
- 12. The subgroup recommends that an EU animal welfare label should also protect the use of terms and claims indicating a better welfare for animals.**

The EU legislative framework

13. The EU legislation on the protection of farmed animals has been progressively developed over more than 40 years. It is today one of the most advanced in the world and it applies to the world largest trading zone.
14. The EU legislation on the protection of farmed animals provides a common baseline with requirements in particular for some of the species that are subject to the most intensive farming systems (poultry and pigs). It also covers transport and slaughter of the majority of the farmed species.
15. The EU legislation on the protection of farmed animals ensures a certain level playing field among producers and common guarantees for all citizens. However, it does not allow consumers to favour food from farming practices with higher welfare standards. The increasing number of brands and labels using animal welfare claims may indicate that the today's legislation does not fully reply to the expectations of many citizens.
16. There are today at EU level, certain labels that provide information related to farming methods that could be a good proxy for the welfare conditions of the animals.
17. For table eggs, there are mandatory marketing standards defining farming methods that include the type of housing, space allowances and some enrichment materials for laying hens.
18. For poultry meat, there are voluntary marketing standards defining categories of farming based on similar elements. Marketing standards also set the minimum slaughter age of poultry.
19. The EU legislation on organic farming includes improved animal welfare requirements. The requirements of the organic farming legislation focus on the type of housing, outdoor access, space allowances and enrichment materials. It also

includes other elements such as managing of mutilations, natural light and feeding. However, they do not address all welfare issues and allow for a couple of exceptions (e.g., tethering and mutilations, such as tail docking for sheep, beak trimming in the first three days of life are allowed under certain circumstances).

Which scope?

20. Many existing animal welfare labels limit their guarantees to the farming of the animals directly involved in the food concerned, or even for some, to a part of their life. Other labels cover the whole life of the animals (including transport and slaughter), and some include the treatment of other animals associated with the entire production process.
21. A labelling system that covers the whole life of an animal (including transport and slaughter) is more transparent than a system that limits its guarantees to a part of the life of the animal. It is also more complex to implement and requires a reliable traceability system at each step of the production chain.
22. The whole life cycle of an animal would be complete if other animals that are participating to the production process (breeding sows, culling of economically non-viable animals, etc.) are additionally addressed. Yet, this is possible but would complicate the matter, especially in production systems with a strong separation in production steps (e.g., parent animals of poultry).
23. A label that covers also processed products will have more impact on the welfare of animals but will increase the complexity of the system. The inclusion of processed products in the label will however give more economic opportunities for the business operators participating to the label.

24. The subgroup recommends that:

- a. The scope of an EU animal welfare label should include the whole cycle of production, including transport and slaughter for farmed animals for food production.**
- b. The scope should ideally include also the welfare of other animals that are participating to the production process.**
- c. The scope should also cover processed products or products used in food services.**

Mandatory or voluntary?

25. An EU animal welfare label could be mandatory or voluntary. Mandatory label applies for all products on the market. Voluntary label implies that not all products on the market may have the label. However, all labelled products must comply with the label standards.
26. A mandatory label would inform consumers on the animal welfare status of all products on the market. It will make a distinction between EU products and non-EU products if the latter comply with lower than EU minimum, or unknown, standards. Nevertheless, if non-EU products do meet the standard of the mandatory label, they could also be labelled as such. The administrative burden would apply to all business operators (traceability in particular).

27. A voluntary label would inform consumers on products of mostly higher standards than the minimum legal requirements. There would be no distinction between EU products and non-EU products obtained under low standards. Compliance costs to higher standards and administrative burden would apply to business operators willing to join the label. A voluntary label would allow for a certain degree of market-driven development, where all stakeholders in the food chain play an important role. A market-driven development may allow for a certain degree of progression in animal welfare and for the farmers participating in labelling receiving a premium.
- 28. The subgroup considers that an EU regulatory framework for a voluntary label would represent an achievable progress at this stage, knowing that currently there is limited acceptance for a mandatory label among Member States. However, there is a risk that the impact on animal welfare will be limited due to a reduced coverage and uptake of a voluntary label. In order to mitigate this risk, it would be important to raise consumers' awareness through substantial communication.**
- 29. The subgroup recommends that development and evolution of a regulatory framework for a voluntary label should be evaluated on a regular basis, on which it should be taken into consideration if a mandatory labelling is relevant in the future.**

Single or multi-tier?

30. An EU animal welfare label could be single-tier or multi-tier, i.e. with different levels of welfare standards.
31. A single-tier label is implicitly voluntary because it would be an add-on to the minimum legislation (as for organic farming). It is easy to understand for consumers. It is also easier to manage by retailers, food processors and food services because few products' references are available. It does not provide nuances to the same extent as a multi-tier label. Standards could be slightly higher than the minimum requirements, accessible to many producers and affordable for many consumers. Standards could also be much higher than the minimum EU requirements, which would limit their access for both producers and consumers. In both cases, the consumers' choice is limited, as well as for producers, not reflecting the diversity of farming in Europe.
32. In addition, a single-tier label contains the risk of limited impact to improve the welfare of animals due to the lack of progressivity. It will cover either few animals under high welfare standards or many animals with only slightly higher standards than the legal minimum.
33. A multi-tier label can be voluntary or mandatory. It is more challenging to communicate to the consumers in an understandable way because differences between the tiers must be elaborated. However, it can allow more producers to join and a wider range of consumers to buy animal-friendly products according to their willingness to pay. It can reflect the different types of farming already existing in Europe.
34. In addition, a multi-tier label is more likely to have a greater impact to improve the welfare of animals due to the progressivity.
35. A multi-tier label increases the number of references for retailers, food processors and food services. This can result in retailers tending to choose for a limited number of levels that they buy and sell.

36. The subgroup recommends a multi-tier label because:

- a. it gives more choice to consumers and makes it more affordable for the different types of consumers.**
- b. it provides an incentive for the food supply chain to improve and progress animal welfare step by step.**
- c. it contributes to adopt higher animal welfare practices for as many animals as possible.**
- d. it would better allow accommodating existing labels and standards into the EU label.**

Key features and relationship with other labels

- 37. Labels differ in governance, technical standards, methods for checking compliance and sanctioning in case of non-compliance.
- 38. From a technical point of view, animal welfare labels differ by the criteria chosen, the methods to assess them, the range of acceptable values, the system to consolidate the results and visually present them.
- 39. It is essential that an animal welfare label is able to ensure validity of animal welfare claims in a robust manner so that it delivers a credible value to the consumers. It is also essential that the label makes a real and proven progress in animal welfare.
- 40. The technical specification, which defines the level of animal welfare provided by a label, can use different types of parameters. It can specify requirements concerning the animal's living environment (resource-based indicators such as space allowance or outdoor access) and management, it can define the state of welfare by measuring the animal itself (animal-based indicators such as requirements for health or behaviour), or combinations of these. When ensuring standardised animal welfare, the specification should be able to account for the diversity of farming in the EU.
- 41. Labels under a regulatory framework are often limited to key features for production methods like the space allowances or outdoor access. This limitation to key features is due to the need to compromise among many stakeholders compared to private standards. Key features are sometimes complemented by management features and animal-based indicators.
- 42. As shown in the case of organic labels, an EU label can coexist with national labels by providing a common playing field for producers while keeping the necessary flexibility for each existing scheme to adapt to their specific context and objectives.
- 43. The subgroup recommends that an EU animal welfare label should define minimum requirements for the governance of the label, the technical standards for the welfare state of animals in different farming conditions and the methods to check compliance and the sanctioning in a transparent manner. Such a regulatory framework for an EU animal welfare label should be flexible enough to consider the diversity of:**
 - a. farming across the EU,**
 - b. existing brands and labels using animal welfare claims.**

Promotion and communication to consumers

44. Animal welfare issues could be included among other sustainability issues in an EU sustainable food labelling framework. As a result, the animal welfare aspects may be less visible.
45. An EU animal welfare label could protect certain terms to capture the attention of consumers. Both texts and visual entities play an important role for consumers to identify the products they are looking for. Other supports, like QR code, bar code, internet links might be useful to provide additional information to consumers.
46. Whatever support is used on the product, it is essential that the development and the implementation of an EU animal welfare label is associated with regular promotion campaigns to raise awareness on the label, especially in countries where there is no labelling scheme. It is essential that such communication is understandable and trustworthy.
- 47. The subgroup considers that a specific EU animal welfare logo or visual entity may be useful for both consumers and producers.**
- 48. If the EU animal welfare label were to be part of an EU sustainable labelling framework, the subgroup recommends that it should not dilute the information on animal welfare. Key information should remain visible through reserved terms and/or specific logo and visual entities.**

International trade

49. To be compatible with EU international obligations, an EU animal welfare label should be accessible to business operators from third countries provided that they can comply with equivalent systems of governance, technical standards, methods to check compliance and sanctioning.
50. In case of mandatory label, products obtained from third countries without information on their animal welfare standards should be clearly distinct from EU products that comply with the EU requirements.

Evolution and governance

51. An EU animal welfare label needs to allow regular review to take into account technical and scientific developments.
52. An EU animal welfare label needs to be based on reliable qualitative and quantitative harmonised data over time.
53. The development of standards is a complex process that involve various stakeholders, mainly the actors of the food supply chain (including farmers, food processors and retailers), representatives of the civil society, scientists, and governmental organisations.
- 54. The subgroup recommends that an EU animal welfare label should be able to collect regularly qualitative and quantitative harmonised data to monitor the development of the label and assess to which extent it has achieved its initial objectives.**

55. The subgroup recommends that any regulatory framework of an EU animal welfare label is developed with the active participation of all stakeholders (mainly the actors of the food supply chain, representatives of the civil society, scientists, and governmental organisations) and with the aim to find a right balance between the different objectives of the label previously recommended.