

Fairer food labelling for animal welfare*

Author: Prof Rick D'Eath†

October 2024

Overview

The law (UK, EU, Switzerland) requires shelled eggs sold in retail to have 'method of production' labels (caged, barn, free-range etc), and over years market share has increased for higher welfare systems. Voluntary farm assurance schemes also provide animal welfare information to consumers. Country of origin labels are required for some foods but can be misleading because imported and 'minimally processed' foods can have UK labelling.

Defra and the devolved authorities consulted (March - May 2024) on introducing stricter rules around country of origin and expanding method of production labelling (5-tiers) to chicken and pork.

Main Findings

A policy analysis and literature review were conducted to consider the pros and cons of Defra's proposals for improving animal welfare.

- Animal welfare labels would be competing for space with existing legally required food labels (e.g. for weight, ingredients and best before date). Nutritional and eco-labels are under discussion.
- EU has not extended method of production labels beyond eggs, Germany have introduced a 5-tier scheme for retail pork, with plans to broaden it.
- Main advantages of Defra's proposal for method of production labelling with 5 'tiers':
 - Higher tier systems likely to have better average welfare
 - Shelled eggs have been a success story
 - Consistency across retailers and species; understandable for consumers
 - 'Method of production' includes housing system but also breeds, and management rules
- Main disadvantages:
 - System is 'potential' not 'actual' welfare
 - Animal welfare is best assessed by animal-based measures which are only used in the top 3 tiers
 - 'All or nothing' tiers reduce incentives for incremental or specific improvements in welfare.



Image credit: SRUC Image Library

* This policy brief was produced as part of the Scottish Government Rural Affairs and the Environment Portfolio Strategic Research Programme 2022-2027, Theme A, Project SRUC-A3-2 EU exit and animal welfare. For more information please see: <https://sefari.scot/research/projects/eu-exit-challenges-and-opportunities-for-animal-welfare>.

†Animal Behaviour & Welfare Team, Animal & Veterinary Sciences, SRUC. T: 07973 776850, E: rick.death@sruc.ac.uk

Introduction – food packaging labels are already a busy place to add animal welfare information

Labels on retail food packaging are already quite busy. UK law¹ requires them to include: 1) Total weight or volume; 2) Ingredients (including allergens, caffeine, sweeteners); 3) Sometimes percentage inclusion of main ingredients (e.g. 80% pork) or to support claims like ‘high fibre’, percentage of alcohol; 4) Best before or use by dates and storage conditions e.g. ‘keep refrigerated’. 5) Country of origin for most raw foods (meat, fruit, vegetables, honey etc).

Nutritional labelling front of pack for healthy eating (e.g. energy, fat, saturated fat, sugar, salt) with % inclusion and ‘traffic light’ colours are required in Northern Ireland² (regulated by the Food Standards Agency). In the rest of the UK they are voluntary and usage varies between retailers and manufacturers.

Eco-labelling: pressure group CLEAR (representing 50+ businesses and NGOs) is lobbying government for a food eco-label for sustainability/regenerative agriculture/carbon footprint. A food industry organisation (IGD) has produced detailed proposals on eco-labelling which have been criticised by CLEAR³. Animal welfare is not included in these.

Also, the UK government have set up a **Food Data Transparency Partnership** to improve data quality in relation to food healthiness, and greenhouse gas emissions in the food supply chain (including a methodology for eco-labels).

Proposed changes to food labelling to improve farm animal welfare

Defra (with the devolved governments) consulted on this topic in 2022 and again in more detail in March 2024⁴. Two changes are proposed:

- 1) Country of Origin Labelling should be more visible, expanded beyond food retail to include the food service sector and restaurant chains and cover ‘minimally processed’ meat products. Currently, imported bacon cured in the UK can be labelled UK.
- 2) Method of Production Labelling should be expanded to cover UK produced and imported pork, chicken meat as well as eggs. Certain minimally processed products would also be covered. A five-tier labelling system is proposed: 5 Below UK standard, 4 UK standard (indoor), 3 Improved (enhanced indoor), 2 High (partially outdoor) and 1 Highest (enhanced outdoor).

What is the expected benefit of changing food labelling?

Country of origin labels provide information to consumers who want to buy local to reduce food miles and support British farmers. UK welfare standards must be met as for current ‘Red Tractor’ and ‘British Lion eggs’.

Method of production labels provide a mechanism for different prices to be paid in shops and at the farm gate in support of higher welfare systems. As evidence that labelling can work, Defra reports the increase in market share for higher welfare tiers of eggs (barn, free range) over the years. However, a review by the FSA found that information on food labels had only a minor impact on consumer choices⁵. Retailers and other food companies may use tiers to set their own policies. Following early movers Waitrose, McDonalds and M&S, caged eggs are being phased out by remaining major UK retailers by 2025.



Image Credit: Molly Condit / Sinergia Animal / We Animals

¹ <https://www.gov.uk/guidance/food-labelling-giving-food-information-to-consumers>

² <https://www.food.gov.uk/safety-hygiene/check-the-label>

³ <https://www.clearfoodlabeluk.org/> and <https://www.foodmanufacture.co.uk/Article/2023/12/12/jgd-eco-labelling-recommendations>

⁴ <https://consult.defra.gov.uk/transforming-farm-animal-health-and-welfare-team/consultation-on-fairer-food-labelling/>

⁵ <https://www.food.gov.uk/research/consumer-responses-to-food-labelling-a-rapid-evidence-review>

Table summarising arguments in favour or against method of production labelling

Context	Arguments in Favour	Arguments Against
Consumer understanding	Recognisable system descriptors like 'cage free' or 'outdoor'.	Consumer-driven tiers lead to 'naturalness' rather than welfare emphasis. e.g. outdoor, fresh air. 100% outdoor in harsh climates can mean poor welfare.
	Every retailer has the same system reducing consumer confusion.	Reduces innovation and competition.
	Tiers are defined in law, reducing consumer uncertainty and avoiding 'welfare-washing' marketing terms.	Further labelling confusion if combined with existing brands (e.g. Red Lion, RSPCA Assured, Retailers).
Animal welfare effects	Higher tier housing systems allow for higher 'potential welfare' and likely also higher 'achieved welfare' than lower tier systems do.	System is 'potential welfare' not 'achieved welfare'. In any system, poor management, health and hygiene or lack of sufficient provision (nutrition, enrichment, bedding) can result in poor welfare outcomes.
	Animal-based welfare measures are more difficult to collect and to explain to consumers than method of production. There is no consensus on which measures to use, how to integrate them with each other or with method of production. Animal-based measures of health and welfare taken at the abattoir might be best for scale and standardisation.	Animal-based welfare measures (welfare outcomes) are better for measuring the animals' experience of welfare. It is proposed that these are used in combination with method of production labelling, but only in the three highest tiers.
	Higher tier housing systems have features which are likely to benefit animal welfare, particularly through providing for behavioural needs.	Tiers are 'all or nothing' with no incentive for incremental improvements within a tier such as 1) Changing one aspect (such as stocking density) to reach the next tier's requirements, 2) Improved housing that doesn't reach the next level (e.g. adding semi-outdoor verandas to laying hen barn systems is not 'free range'). 3) Tackling farm-specific problems (e.g. reducing lameness).
Scope	Tier requirements cover the most important aspects of welfare, and often many welfare improvements at each tier.	Some welfare issues may be neglected if they are not specified as a requirement to reach a tier.
	Method of production' can be more than housing system- can include stocking density, breed (e.g. slow growing), and husbandry (e.g. no mutilations, weaning age)	Some elements of this (e.g. provision of enrichment) may be harder to enforce in a short farm inspection visit. Assessing positive welfare could be made more explicit as a goal in higher tiers.
	Farm system criteria affect most of an animal's life. High standards should cover all end-of-life welfare rather than making this subject to a tiered system.	Farm-only criteria do not assess welfare at end of life catching of poultry, transport and slaughter elements.
Policy / implementation	System inspections are easier to carry out and enforce. Three highest tiers require welfare outcome assessment: no detailed system yet.	Inspection of animals themselves (animal- based measures of welfare) would be more accurate.
	Mutual recognition of tiered systems across countries could enable export opportunities.	Diversity of systems in different countries, and of existing schemes makes this challenging.

Stakeholder responses to the proposals in the consultation

Farmers: NFU support Country of origin labelling and its extension to minimally processed foods and to the food service sector. They claim method of production labelling is unnecessary as UK is already a ‘welfare brand’⁶.

NGOs: Eurogroup for animals⁷ and CIWF are broadly supportive of method of production labelling, with CIWF outlining their own ideas for tiers⁸. Vegan group Animal Aid point to the recent RSPCA Assured exposé to argue that all animal agriculture impacts welfare. RSPCA are campaigning for ‘method of production’ and ‘method of slaughter’ labelling⁹.

Vets: BVA are supportive, with provisos- they would add ‘method of slaughter’, and emphasise the need for animal-based welfare assessment to ensure standards, and traceability to stop fraud¹⁰.



Image Credit: Jo-Anne McArthur / Animal Equality / We Animals

International comparisons on ‘method of production’ labelling

Under the EU’s ‘Farm to fork’ strategy (2020) the Commission is looking at harmonising dietary, eco and animal welfare labelling, and set up an animal welfare labelling subgroup¹¹. As yet there is no proposal for mandatory animal welfare labels at the EU level. Germany introduced mandatory labelling for unprocessed retail pork in August 2023¹². It is a five-tier system which builds on a voluntary cross-species scheme. They propose to extend the law to other species, to processed foods and to the food-service sector.

Voluntary labelling schemes in the UK (Red tractor, RSPCA Assured, Organic) are ‘in or out’, without tiers. They combine system and management requirements with animal-based welfare measures. Some European countries and the US have voluntary tiered systems, typically run by NGOs or companies¹³. One exception is the Danish ‘Better Animal Welfare’ label covering pigs, poultry and cattle (3 tiers) where Government agency ‘Veterinary and Food Administration’ inspect farms to enforce standards behind this voluntary labelling scheme¹⁴.

Policy Implications

- Giving consumers better country of origin, and system of production labelling has potential to benefit animal welfare.
- Grant/loan/subsidy payments could be aligned with tiers to support farmers changing their system
- Animal-based welfare assessment is included for the top 3 tiers, although more detail is needed.
- Abattoir measures (feather cover, skin lesions) which are easier to collect, standardise (and even automate), could be combined with farm inspections.
- ‘Payment by results’ could encourage innovation and improvement within a tier.

For more information on this work please contact:

E: rick.death@sruc.ac.uk

T: 07973 776850

W: <https://sefari.scot/research/projects/eu-exit-challenges-and-opportunities-for-animal-welfare>

@SEFARIScot

info@sefari.scot



Scottish Government
Riaghaltas na h-Alba
gov.scot

⁶ <https://www.nfuonline.com/updates-and-information/consultation-on-fairer-food-labelling/>.

⁷ <https://www.eurogroupforanimals.org/what-we-do/areas-of-concern/method-production-labelling>

⁸ <https://www.ciwf.org.uk/our-campaigns/honest-labelling/our-solution/>

⁹ <https://www.rspca.org.uk/getinvolved/campaign/labelling>

¹⁰ <https://www.bva.co.uk/media/5720/bva-response-to-defra-food-labelling.pdf>

¹¹ https://food.ec.europa.eu/animals/animal-welfare/other-aspects-animal-welfare/animal-welfare-labelling_en

¹² <https://www.bmel.de/EN/topics/animals/animal-welfare/state-run-animal-welfare-label-pigs.html>

¹³ <https://globalanimalpartnership.org/> <https://www.etiquettebienetreanimal.fr/> <https://beterleven.dierenbescherming.nl/english/>

¹⁴ <https://en.foedevarestyrelsen.dk/animals/animal-welfare/the-governmental-animal-welfare-label>