



Department  
for Environment  
Food & Rural Affairs

# Labelling for animal welfare: Call for evidence

September 2021

Date: 13 September 2021

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, and supporting our world-class food, farming, and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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## Contents

Foreword.....	4
Executive summary .....	5
Confidentiality and data protection information .....	6
Definitions .....	7
About you or your organisation .....	8
Labelling for animal welfare .....	10
Defining welfare standards .....	12
Method of slaughter .....	13
Approaches to labelling.....	15
Label format.....	17
Scope and impact of labelling .....	19
Unprocessed meat, eggs, and milk .....	20
Prepacked processed products .....	21
Prepared food sold through mass catering.....	24
Monitoring and enforcement .....	26
Aligning with wider food labelling reform.....	27
How to respond.....	29
Sources .....	29

# Foreword

One of the first things I did as a minister was to take the Agriculture Bill through Parliament. Now the Agriculture Act 2020, it has given us the legislative framework to set the basis for future farming policy. We will support farmers to improve the environment, increase animal health and welfare, and reduce carbon emissions – while of course producing high-quality, delicious food.

As a nation we care enormously about animal welfare and increasingly about environmental standards. Consumer information and labelling are part of the toolbox that we have when it comes to creating a better food system for people and the planet. It is something that we will be considering in detail with industry and stakeholders in the weeks and months ahead.

It is an exciting time for our agri-food sector. Our new agricultural schemes will soon begin to reward farmers for improving both the environment and animal health and welfare. Reforms to labelling and consumer information could enable us better to connect farmers in our schemes through the supply chain to consumers, recognising the whole farm picture and stimulating demand for environmentally friendly and high welfare products and improving profitability.

I also want to make sure that our labelling reforms support our trade policy by promoting the interests of our farmers and food producers. Our manifesto was very explicit that in all of our trade negotiations, we will not compromise on our high environmental protection, animal welfare and food standards. I want us to ensure that consumers are able to differentiate between products that meet or exceed the UK's high welfare standards and those that do not.

We know that the public is largely in favour of the Government setting further standards to ensure greater consistency and understanding of welfare information at the point of purchase. This will also be a key consideration in our Food Strategy White Paper, which we have committed to publish within six months of the publication of Henry Dimbleby's recent review. We will also be exploring other complementary market interventions, including mandatory disclosure of welfare standards.

Any changes that we make must be user-friendly for our agri-food businesses, and I am very mindful of the importance of ensuring that any changes are simple, considered in the round, and do not place additional cost burdens on business. It is a moment of great opportunity for our food system, and the wider agri-food industry. This call for evidence is an important step alongside our wide review of food labelling for the Food Strategy White Paper. We hope we can use this evidence to work with you to identify any improvements to food labelling and consumer information that deliver the high welfare and environmental outcomes we all support.

**The Rt Hon Victoria Prentis MP**

**Minister of State, Department for Environment, Food, and Rural Affairs**

# Executive summary

The [‘Health and Harmony’ consultation](#) in 2018 found that 72% of respondents were in favour of the government setting further standards to ensure greater consistency and understanding of welfare information at the point of purchase.

As part of the UK Government’s commitment to further improving standards of farm animal welfare, we are seeking evidence on the impacts of different forms of labelling. This will be used to inform any future policy proposals on labelling for animal welfare.

Evidence would be particularly welcome on potential impacts on businesses, and also on the effectiveness of labelling at influencing farmer, business, and consumer behaviour. It can be in the form of statistical data, case studies, literature reviews, personal experiences, reports, and documents, whether new or historic. Wherever possible, please provide full references.

Anyone may respond to the call for evidence. Those who have an interest include:

- Food industry, including retail, processing, and catering sectors
- Livestock farmers, farm assurance and industry bodies
- The veterinary profession and welfare scientists
- Animal welfare organisations
- Academics or think tanks focused on food policy, economics, or consumer behaviour
- Organisations representing food consumers
- Government bodies, particularly those involved in enforcement

We are looking for information on labelling for animal welfare in the following key areas:

- How to define the welfare standards that underpin a labelling system
- How labelling could be regulated
- What a label might look like, including views on international examples
- What products could fall in scope of any labelling reform, and the differential impacts of this
- How to monitor and enforce labelling for animal welfare

There will be a wider review of food labelling as part of the UK Government’s Food Strategy White Paper where there may be a need for future public consultation. For now, we are looking for some preliminary evidence with regards to how labelling for animal welfare may align with wider labelling reform, including nutrition and eco-labelling.

This is a call for evidence relating to England, Wales, and Northern Ireland only. Animal welfare and food labelling are devolved and we will discuss the responses to this with the Scottish government.

# Confidentiality and data protection information

A summary of responses to this call for evidence will be published on the Government website at: [www.gov.uk/defra](http://www.gov.uk/defra). An annex to the call for evidence summary will list all organisations that responded but will not include personal names, addresses or other contact details.

Defra may publish the content of your response to this call for evidence to make it available to the public without your personal name and private contact details (e.g. home address, email address, etc).

If you select 'Yes' in response to Question 3 asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this call for evidence may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this call for evidence, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

If you select 'No' in response to Question 3 asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.

There may be occasions when Defra will share the information you provide in response to the call for evidence, including any personal data with external analysts. This is for the purposes of call for evidence response analysis and provision of a report of the summary of responses only.

This call for evidence is being conducted in line with the Cabinet Office "Consultation Principles", which can be found at: <https://www.gov.uk/government/publications/consultation-principles-guidance>.

Please find our latest privacy notice uploaded as a related document alongside our call for evidence document.

If you have any comments or complaints about the call for evidence process, please address them to:

Labelling for Animal Welfare  
Consultation Co-ordinator, Defra  
2nd Floor, Foss House,  
Kings Pool,  
1-2 Peasholme Green,  
York, YO1 7PX.

Or email: [consultation.coordinator@defra.gov.uk](mailto:consultation.coordinator@defra.gov.uk)

## Definitions

Below are a set of definitions that are used throughout the call for evidence. Legal definitions have been used where possible, including a link to the relevant legal text.

In some cases, we have defined terms solely for this call for evidence to provide clarity and to minimise differing interpretations of the questions as much as possible. These definitions are indicated by an asterisk '\*'. If any labelling reforms were introduced, we would need to define such terms in law and would expect to engage further on this.

- **\*Baseline UK welfare regulations:** The high standards for animal welfare set out in UK legislation, which relate to animal welfare on-farm, during transport and slaughter, or elsewhere. This includes, but is not limited to:
  - the [Animal Welfare Act 2006](#) and [Welfare of Animals Act Northern Ireland \(2011\)](#)
  - the Welfare of Farmed Animals Regulations for [England \(2007\)](#), [Wales \(2007\)](#) and [Northern Ireland \(2012\)](#)
  - the Mutilations (Permitted Procedures) Regulations for [England \(2007\)](#) and [Wales \(2007\)](#), and the [Welfare of Animals \(Permitted Procedures by Lay Persons\) Regulations \(Northern Ireland\) \(2012\)](#).
  - the Welfare at the Time of Killing Regulations for [England \(2015\)](#), [Wales \(2014\)](#) and [Northern Ireland \(2014\)](#).
- **\*Higher welfare:** exceeding baseline UK welfare regulations
- **\*UK baseline products:** those, either domestically produced or imported, that meet our baseline UK welfare regulations
- **\*Higher welfare products:** those, either domestically produced or imported, that exceed our baseline UK welfare regulations
- **\*Imports of lower welfare:** the subset of imports that do not meet our baseline UK welfare regulations
- **\*Meat, eggs, and milk:** any substance derived from an animal and intended for human consumption (full definitions can be found in [The Specific Food Hygiene Regulation 853/2004](#))

- **Unprocessed products:** those not substantially altered from an initial state; this category includes products that have been frozen, minced, or otherwise altered without the addition of another ingredient (definition: [Hygiene Regulation 852/2004](#))
- **Processed products:** those substantially altered from an initial state through the addition of another ingredient or ingredients, for example cured meats or ready meals (definition: [Hygiene Regulation 852/2004](#))
- **\*Minimally processed products:** those processed products which have a major ingredient that is characteristic of the food, with limited additional ingredients that make up the minority of the food, for example butter
- **Primary ingredient:** an ingredient or ingredients of a food that represent more than 50% of that food or which are usually associated with the name of the food by the consumer and for which in most cases a quantitative indication is required, for example lamb in a shepherd's pie (definition: [Food Information to Consumers Regulation 1169/2011](#))
- **\*Major ingredient:** the primary ingredient which makes up the largest share of that food, for example milk in butter, and typically represents more than 50% of that food
- **\*Secondary ingredient:** any ingredient or ingredients of a food which are not primary ingredients and for which a quantitative indication is not required, for example egg in a cake
- **Mass caterer:** any establishment (including a vehicle or a fixed or mobile stall), such as restaurants, canteens, schools, hospitals and catering enterprises in which, in the course of a business, food is prepared to be ready for consumption by the final consumer (definition: [Food Information to Consumers Regulation 1169/2011](#))
- **Food information:** information concerning a food and made available to the final consumer by means of a label, other accompanying material, or any other means including modern technology tools or verbal communication (definition: [Food Information to Consumers Regulation 1169/2011](#))
- **Labelling:** any food information, written or pictorial, including that displayed on packaging, a shelf, online or on a menu, or otherwise accompanying a product (definition: [Food Information to Consumers Regulation 1169/2011](#))
- **Marketing standards:** the set of legally defined requirements governing the production, promotion and sale of certain products, including eggs and beef (definition: [Agriculture Act 2020 and EU regulation 1308/2013](#))
- **\*Marketing terms:** words or phrases used to promote a product, and which are not legally defined or otherwise certified, for example 'grass-fed'

## About you or your organisation

Question 1: What is your name?

Question 2: What is your email address?

Question 3: Would you like your response to be treated as confidential (required)?



*Please select:* Yes -- No

**If yes, please give your reason.**

*Free text*

**Question 4: Are you responding as an organisation or an individual?**

*Please select:* Organisation -- Individual

**Question 5: Which of the below options best describes you?**

*Please select:* A farmer – part of the food industry – a vet -- an academic – an interested member of the public -- other

**Question 6: Please provide a summary of why you chose to respond to this call for evidence, and any relevant expertise you have.**

*Free text*

**Question 7: Where are you based in the UK?**

*Please select:* England – Scotland -- Wales -- Northern Ireland -- Not UK Based (please specify)

**Question 8: Please provide the name of your organisation (optional).**

*Free text*

**Question 9: Please provide a summary of what your organisation does and where relevant who you have consulted to formulate your response.**

*Free text*

**Question 10: Where does your organisation operate?** Please select all that apply.

*Please select:* England – Scotland -- Wales -- Northern Ireland – Outside the UK (please specify)

**Question 11: Where are your organisation's headquarters?**

*Please select:* England – Scotland -- Wales -- Northern Ireland – Outside the UK (please specify)

**Question 12: What type of organisation are you responding for?**

*Please select:* A government body -- Non-governmental organisation (NGO) -- Local authority – Charity – Consultancy -- Small or micro business (fewer than 50 employees) -- Medium business (50 – 249 employees) -- Large business (250 or more employees) -- Industry association -- Academic Institution -- Other

If you answered Other, please state your organisation type.

**Question 13: Does your business source / sell agricultural or food products?**

*Please select:* Yes, as its primary activity – Yes, but only as a secondary activity -- No

**Question 14: What is the primary purpose of your business?**

*Please select:* Primary production – Manufacturing – Wholesale -- Retail -- Mass catering: B2C (for example restaurants, hotels, takeaways) – Mass catering: B2B (for example contract caterers) -- Other (please specify)

**Question 15: Please provide your 5-digit [Standard Industrial Classification \(SIC\) code](#).**

## Labelling for animal welfare

### The current situation

Currently, labelling regulations for animal welfare apply to only a handful of food products. There are two marketing standards defining the method of production for [shell eggs](#) (mandatory) – with a ‘non-UK/EU standard’ label for imports that don’t meet these – and [unprocessed poultry meat](#) (voluntary). Beef, lamb, pork, and dairy are not covered. Nor are processed products or those sold through mass catering which may be more likely to contain imported ingredients that do not meet baseline UK welfare regulations.

A range of industry-led voluntary labelling initiatives – such as assurance schemes, supermarket-specific standards, and unregulated marketing terms – have filled some of these gaps. UK farm assurance schemes, such as Red Tractor and RSPCA Assured, are well-known. They play a significant role in domestic production of meat, eggs, and milk, allowing consumers to identify UK produce which meets or exceeds our baseline welfare regulations. However, they place variable importance on welfare and do not cover imports or all products. In many cases, no animal welfare information is provided.

### Why are we considering reform?

**Consumers:** The majority of UK consumers (98%) value animal welfare but this does not always translate into purchasing decisions [1].<sup>1</sup> This is known as the value-action gap and is driven by a range of factors that influence food choices. We have identified a number of factors that may not make it easy for consumers to choose products aligning with their welfare values; we would like more evidence to understand this.

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<sup>1</sup> References are denoted in square brackets; sources can be found at the end of this document.

- **Accessibility:** Without a simple standardised way of labelling for animal welfare, it is not easy for consumers to choose food that aligns with their welfare values. There are numerous industry-led voluntary labelling initiatives which may use inconsistent language or imagery and so these may be confusing or poorly understood by consumers. Many products are without labels that indicate animal welfare. Together, these limit consumer transparency.
- **Availability:** Supermarkets tend to only offer higher welfare alternatives for unprocessed meat, dairy, and eggs with limited availability for processed products, such as ready meals, and within the catering sector. Additionally, higher welfare products often may not be stocked in all stores, particularly convenience stores.
- **Affordability:** 72% [1] of consumers say they are willing to pay more for higher welfare products. However, the amount extra that consumers are willing to pay is generally between 20-30% [2], whereas higher welfare products can be significantly more expensive. For example, free-range chicken is, on average, priced at 115% [3] more per kg, which cannot solely be explained by higher production costs.

**Food industry & farmers:** There is currently no clear, consistent way to differentiate between products that meet or exceed the UK's baseline welfare regulations – whether domestically produced or imported – and those that do not. Therefore, UK farmers may be undercut by imports of lower welfare and may not be able to capture the value of their products that meet baseline UK welfare regulations. Farmers opting for higher welfare systems may not receive a premium for such products. This is dependent on whether a food processor, retailer, or caterer chooses to set certain welfare standards for food they purchase and how or whether they choose to include this on a label. A lack of consistent terms means it is not easy to differentiate products based on animal welfare and so industry may rely on alternative ways to differentiate their product such as taste, quality, premium packaging, and branding. Consequently, there isn't always a clear incentive for businesses to promote these products or for farmers to produce to them.

Therefore, we are looking at how market interventions, including labelling, can:

- Support farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market
- Improve animal welfare by unlocking untapped market demand for higher welfare products
- Ensure 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

**Question 16: What barriers are there for consumers wishing to buy food produced to UK baseline welfare or higher?** Please provide supporting evidence on the drivers of the value-action gap.

*Free text*

**Question 17: Should the UK government reform labelling to ensure greater consistency and understanding of animal welfare information at the point of purchase?**

*Please select:* Yes -- Yes, as long as it does not present an unreasonable burden to farmers and food industry -- Perhaps in some areas -- No, it should be up to retailers and consumers -- Other (please specify)

**Why?**

*Free text*

## Defining welfare standards

The UK has some of the highest welfare standards in the world. Existing regulations set out baseline UK welfare standards for farm animal welfare, such as the Welfare of Farmed Animals Regulations for [England](#), [Wales](#), and [Northern Ireland](#) (a fuller list of relevant regulation can be found under 'Definitions'). Any label requirements would need to be underpinned by a set of agreed welfare standards that differentiate different levels of welfare for each species, referring to how these meet, exceed or fall below baseline UK welfare regulations as well as international standards such as those developed by the [OIE](#). There are a range of possible ways to set animal welfare standards which could be used for labelling. The welfare standards could be set based on:

- Inputs, indicating the method of production, such as access to outdoors and environmental enrichment. An example is existing egg regulation which sets out standards, for example, for a 'free range' system
- Outcomes: that is, measures of health and welfare on the farm such as prevalence of disease or expression of natural behaviour
- A combination of the two, with welfare standards reflecting both differing welfare outcomes and production systems

We know welfare can vary within each method of production, owing to factors such as stockmanship. Therefore, we are interested in how outcomes could be incorporated into welfare standards, overcoming barriers such as lack of welfare data collected by farmers, limited consensus on defining 'high welfare', and difficulty in measuring certain welfare outcomes. One potential option could be to first define welfare tiers (for example Grade A to E) based on method of production and then incorporate outcomes as some of the barriers are overcome. We would also like to understand any supply chain implications as the welfare outcomes of a given farm could change each production cycle.

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

**considerations?** You may wish to refer to specific species you have a particular interest in.

*Free text*

**Question 19: How could welfare outcomes be incorporated into a set of welfare standards that can then be used for a label?** You may wish to refer to specific species you have a particular interest in.

*Free text*

If new labelling regulations for animal welfare were introduced, the welfare standards would need to specify the period of time that they apply for. For example, Red Tractor provides assurance for beef cattle (which are typically slaughtered at 12-24 months) if they have spent a minimum of 90 days on an assured farm, whilst Quality Meat Scotland provides lifetime assurance. Some livestock sectors separate out breeding, rearing, and producing. Therefore, welfare standards could also be applied to breeding flocks or herds to give transparency on the welfare of an animal's parents.

**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?** You may wish to refer to specific species you have a particular interest in.

*Free text*

Existing labelling regulations for [unprocessed poultrymeat](#) and [shell eggs](#), which are retained EU law, lay out a set of welfare standards based on the method of production.

**Question 21: Should the UK government update the welfare standards set out in the existing marketing standards for unprocessed poultrymeat and shell eggs? If so, how?**

*Free text*

## Method of slaughter

Legislation requires that when animals are slaughtered, they are killed humanely and are spared avoidable pain, distress, or suffering. In general, animals must be stunned so that they are unconscious and unable to feel pain during the slaughter process.

Stunning methods for the slaughter of various species are set out in Annex I of retained EC Regulation 1099/2009 on the protection of animals at the time of killing. Stunning methods for slaughter include captive bolt devices, firearm with free projectile, electrical stunning, electrical waterbath stunning for poultry, and gas stunning.

The only exception to the rule that animals must be stunned before slaughter is where slaughter is carried out for Jews and Muslims in accordance with religious rites. All Kosher meat and some, but not all, Halal meat comes from animals that are not stunned prior to slaughter. The Government would prefer all animals to be stunned before slaughter but respects the rights of Jews and Muslims to eat meat prepared in accordance with their beliefs; this is a fundamental issue of religious freedom and belief. The derogation for religious slaughter is set out in the Welfare of Animals at the Time of Killing (England) Regulations 2015 and equivalent legislation in Wales and Northern Ireland. This legislation also sets out strict limitations on how, where, and by whom religious slaughter must be carried out.

Beyond the requirement not to mislead consumers, there are no legal requirements governing the sale and labelling of meat as regards method of slaughter. Currently some meat produced in accordance with religious beliefs is voluntarily labelled as Halal or Kosher, but not all meat produced by non-stun methods is labelled as such. Questions have been raised by animal welfare, veterinary and secular societies about meat from animals slaughtered without stunning being sold to consumers who do not wish their meat to come from animals killed in this way. For example, some religious groups, such as Sikhs, are not permitted to eat meat from religiously slaughtered animals. To improve consumer transparency and enable consumers to make an informed choice there have been calls for meat from animals not stunned before slaughter to be labelled and also for all potential methods of slaughter to be labelled.

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

*Please select:* Yes, as a mandatory label – Yes, through voluntary labelling, with terminology defined in law – Perhaps, but this should be at discretion of the business – No

**Why?** Please provide supporting evidence

*Free text*

Consumer information on the way in which an animal was killed could be provided as part of wider welfare labelling reforms, for example as part of a defined standard covering both the animal's life and death, or as a standalone label describing only the method of slaughter. Factors to consider include whether consumers would like the method of slaughter explicitly referenced on a label, the number of labels, and whether there is demand for higher welfare meat which has not been stunned.

**Question 23: If the UK government introduced mandatory or voluntary method of slaughter labelling regulations, should this be:**

- a) As part of a wider set of animal welfare standards where the label indicates the welfare of the whole life of the animal
- b) As a standalone label relating only to the method of slaughter

**Why?** Please provide supporting evidence

*Free text*

## Approaches to labelling

Labelling for animal welfare could be:

1. **Mandatory** – where food products in scope, both domestically produced and imports, would have to be labelled to indicate the welfare standard to which an animal was produced. This would be based on a set of animal welfare standards that define different levels of animal welfare in law.
2. **Voluntary, but defined in law** – where a set of animal welfare standards would define different levels of animal welfare in law. While these would not be mandatory to use on a label, if they were used on food products, they would have to conform to the standardised legal definition. Businesses would not have to label imported products that do not meet baseline UK welfare regulations.
3. **Industry-led** – where industry develop, expand, and refine their own voluntary labelling initiatives, such as UK farm assurance schemes or supermarket-specific standards. Existing UK farm assurances schemes do not cover imports or provide a standardised, comparable welfare label.

**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?

*Please select:* Mandatory – Voluntary, but defined in law – Industry-led

**Why?** Please use supporting evidence.

*Free text*

98% [1] of UK consumers value animal welfare and 94% [4] want our standards to be upheld in trade deals. Therefore, we are looking at the role labelling could play in supporting this, including by allowing consumers to identify the animal welfare standards of imported food. Evidence [5] shows that consumers sometimes use country of origin as a proxy for animal welfare standards. However, this is often weighed up against multiple

dimensions in terms of quality, environmental credentials, and political views of a specific country, rather than the product itself.

A label could differentiate imported meat, eggs, and milk that meet or exceed our baseline UK welfare regulations from those that do not. This would need to be mandatory to ensure imports of lower welfare are labelled. For example, existing mandatory egg labelling regulations require that any imported shell eggs produced using battery cages are marked as non-UK/EU standard. Any such label could also support the trade of UK baseline or higher welfare imports and would need to comply with international trade law and regulations. While this does not prevent imports that do not meet our baseline UK welfare regulations from entering the country and being sold, this could encourage industry to alter their product range.

As well as applying to future imports under new trade deals, labelling could help consumers clarify the welfare standards of food already on our market. For example, 65% [6] of pork consumed in the UK is imported from the EU. Whilst sow stalls are banned in the UK, they are only partially restricted under EU law. The EU has recently committed to introduce standardised labelling for animal welfare across all member states.

**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?**

*Please select:* Strongly support -- Partially support -- Neutral -- Partially oppose -- Strongly oppose

**Why?**

*Free text*

**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?**

For example, in terms of what they grow, how they source ingredients, their product range, pricing and how they market to customers.

*Free text*

**Question 27: How would these business decisions affect the accessibility, availability, and affordability of UK baseline and higher welfare products?**

*Free text*

**Question 28: How would these business decisions differ if regulations introduced were only voluntary but with welfare standards defined in law?**

*Free text*



# Label format

There are a variety of ways that welfare information can be presented on a label, which may be accompanied by links/QR codes for further information.

We would like to get your views on which could be most suitable if we were to introduce new labelling regulations: from a consumer perspective, in terms of making it easy for consumers to compare different welfare standards and providing an appropriate level of transparency; and from a farmer perspective, in terms of the ability to set welfare standards that are flexible and adaptable to fit with a variety of production systems.

A label could present welfare information in different formats, including:

- **Tiered:** A rating system which indicates relative animal welfare levels on livestock products for each sector against a set of criteria, for example grade A-E rating, which has the flexibility to be updated without needing to change the label
- **Descriptive:** A short description that refers to how the animal was raised, produced, or prepared, for example 'free range', underpinned by more detailed specifications
- **Certification logo:** A label carrying a branded logo which indicates that a product meets a specific set of welfare standards set by a certification scheme (usually one rather than different levels)

Below are some example labels from international assurance schemes:

	A – Etiquette Bien-Être Animal	B – American Humane Certified	C – Beter Leven	D – Haltungsform	E – CIWF Italia/Legambiente <sup>2</sup>
Label feature					

<sup>2</sup> Please note that this is not a label, but rather a proposal for a labelling matrix.

<b>Label format – tiered or descriptive</b>	Both	Neither (a certification logo for meeting one specific welfare standard)	Tiered	Both	Both
<b>Detail for tiered format</b>	Colours, grade A-E, comparative descriptions 'good, quite good, standard'	n/a	3 stars	Numbers with different colours	Numbers with different colours
<b>Detail for descriptive (method of production) format</b>	Written and pictorial description, for example 'Parcours arboré' = 'Woodland'	n/a	n/a	Written description, for example 'Stallhaltung plus' = 'Indoor housing plus (enriched indoor housing)'	Written and pictorial description, for example 'Pascolo 4 mesi' = '4-months access to pasture'
<b>Required for products with the lowest welfare standards (normally the legal baseline)?</b>	Yes (E = minimal)	No	No (no label if not awarded at least 1 star)	Yes (assigned 1 if it is certified for food safety, <sup>3</sup> but does not significantly exceed baseline welfare standards)	Yes (proposes a label to indicate 'intensive' method of production )

**Question 29: Which of the following label formats do you think is most effective?**

1. Labels indicating tiers only (Beter Leven)?

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<sup>3</sup> More information available here: [QS - QS Certification Mark \(q-s.de\)](https://www.qs.de)

2. Labels indicating both tiers and descriptions of the method of production (Etiquette Bien-Être Animal, Haltungsform, CIWF Italia/Legambiente labelling proposal)?
3. Labels describing the method of production only?
4. Labels with only a certification logo (American Humane Certified)?

**Question 30: For those labels with tiering, which of the following do you think is most effective?**

1. Etiquette Bien-Être (graded colours, grade A-E, comparative descriptions – for example ‘good’, ‘quite good’, ‘standard’)
2. Beter Leven (3-stars)
3. Haltungsform, CIWF Italia/Legambiente labelling proposal (numbers with different colours)

**Question 31: For those labels with descriptions of the method of production, which of the following do you think are most effective?**

1. Labels with both a written and pictorial description (Etiquette Bien-Être, CIWF Italia/Legambiente proposal)?
2. Labels with only a written description only (Haltungsform)?

**Question 32: Overall, which of the five labels do you think is most effective?**

*Please select:* Etiquette Bien-Être – American Humane Certified – Beter Leven – Haltungsform -- CIWF Italia/Legambiente labelling proposal

**Why?**

*Free text*

**Question 33: Please can you tell us your views on any domestic or international labels that indicates animal welfare.** You may wish to include specific examples to highlight particular features that you like, or dislike.

*Free text*

**Please provide any evidence you have on the impact and effectiveness of existing assurance schemes or labelling regulations (domestic and international).**

## Scope and impact of labelling

We would like to better understand the **primary production volume (kg or %)** of meat (beef, poultry, lamb, pork), eggs and dairy that ends up being sold **via:**

- Retail (for example supermarkets, convenience stores) as:

- An unprocessed product (for example raw chicken breast, milk)
- An ingredient of a processed product, if possible, split into:
  - Primary ingredients (for example pork in a sausage)
  - Secondary ingredients (for example egg in a sponge cake)
- Catering, if possible, split into:
  - Private catering (for example restaurants, hotels)
  - Public catering (for example schools, hospitals)

We would also like to understand the relative proportion of domestic production compared to imports for each of these categories.

**Questions 34: Please could you provide us with any relevant data that you have available, including sources.** We appreciate your data may not match up perfectly with the above categories but would appreciate the closest available. Business-level data will be anonymised and not shared outside of the UK Government.

*Free text*

## Categorisation of food products

There are various ways that food products can be differentiated: for example, by the level of processing, ingredients, type of packaging, preparation method, who they are sold by/to, or where they are sold. For the purpose of this call for evidence, we have divided food products containing meat, eggs, and milk into three broad categories:

1. **Unprocessed meat, eggs and milk** sold through retail, as well as business-to-business.
2. **Prepacked processed products** containing meat, eggs, and milk and sold through retail or mass catering.
3. **Prepared food sold through mass catering:** this covers food containing meat, eggs, and milk which is prepared by mass caterers either as loose food or packaged food for direct sale.

## Unprocessed meat, eggs, and milk

The current labelling regulations for animal welfare only cover unprocessed poultry meat (voluntary) and eggs (mandatory). These could be expanded to cover some, or all, types of meat, eggs, and milk to improve the accessibility, availability, and affordability of higher welfare products.

**Question 35: What would the impact be if current mandatory labelling was expanded to indicate the welfare of all unprocessed meat, eggs, and milk, whether imported or domestically produced?** Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who would be impacted, providing supporting evidence where available. We would like to understand how the impacts vary for different

groups. If you represent or operate within a particular sector or group, please tailor your response. It may be helpful to define and lay out any assumptions on which your answer is based, such as what a set of welfare standards may look like for a given animal.

Impacts on consumers: *Free text*

Impacts on food industry: *Free text*

Impacts on farmers: *Free text*

Impacts on animals: *Free text*

**Question 36: How would the impacts differ between types of unprocessed meat, eggs, and milk?** (For example: lamb, beef, chicken, pork, eggs, milk, other poultry meat)

Impacts on consumers: *Free text*

Impacts on food industry: *Free text*

Impacts on farmers: *Free text*

Impacts on animals: *Free text*

We understand that labelling changes can be costly and are interested in how costs can be reduced; for example, by allowing enough lead-in time so that labelling changes can be made as part of the normal product cycle.

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

*Free text*

## Prepacked processed products

The latest Family Food Survey indicates that around 44% of expenditure on meat-based products goes on processed items [7]. Labelling such products could improve the accessibility, availability, and affordability of higher welfare products. However, labelling these products adds complexity as they may contain multiple ingredients, or an ingredient which is from multiple sources.

There are some examples of this being done today. For example, some ham in UK supermarkets carries the Red Tractor logo, and the [Beter Leven logo](#), a Dutch assurance scheme, can be found on ready meals. In 2017, France introduced mandatory country of origin labelling for processed products containing at least 8% meat and 50% milk. Existing

traceability regulations already require that, during processing, all ingredients used within a batch are recorded and traceable.

For this call for evidence, we distinguish between three broad categories of prepacked processed products, those which:

1. are minimally processed with meat, egg, or milk as the major ingredient, for example, yoghurt, cheese, bacon, or cooked chicken breast
2. contain meat, eggs and/or milk as [primary ingredients](#), for example, beef in a steak pie
3. contain meat, eggs and/or milk as secondary ingredients, for example, egg in a cake.

**Question 38: In Q35 we asked what the impacts would be of introducing mandatory labelling to indicate the welfare of all imported and domestically produced *unprocessed* meat, eggs, and milk.**

**How would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which are minimally processed with meat, egg, or milk as the major ingredient?** Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who would be impacted, providing supporting evidence where available. We would like to understand how the impact could vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

Impacts on consumers: *Free text*

Impacts on food industry: *Free text*

Impacts on farmers: *Free text*

Impacts on animals: *Free text*

**Question 39: Compared to Q38, how would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which contain meat, milk and/or eggs as [primary ingredients](#)?** Please detail each type of impact (positive or negative), the size of impact, related cost/benefits and who is impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

Impacts on consumers: *Free text*

Impacts on food industry: *Free text*

Impacts on farmers: *Free text*

Impacts on animals: *Free text*

**Question 40: Compared to Q38, how would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which contain meat, milk and/or eggs as secondary ingredients?** Please detail each type of impact (positive or negative), the size of impact, related cost/benefits and who is impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

Impacts on consumers: *Free text*

Impacts on food Industry: *Free text*

Impacts on farmers: *Free text*

Impacts on animals: *Free text*

We understand that labelling requirements for processed products could impact the supply chain, particularly if these are poorly designed. For example, due to varying demand for different cuts of meat, manufacturers may use chicken from both indoor and free-range systems within a chicken pie. This helps to optimise carcass balance.

Segregating chicken for processing by its method of production could be extremely costly and wasteful. To avoid this, labelling regulations could, for example, require the label to be based on the lowest standard of welfare within a batch.

We would like to understand more about the impacts labelling could have on the supply chain and how these could be reduced through good policy design without compromising the information given to consumers.

**Question 41: To what extent could these supply chain impacts be reduced if:**

- a) Labelling regulations for processed products were introduced a few years after those for unprocessed products, to allow time for higher welfare markets to develop
- b) Welfare standards for a given ingredient were assigned based on the lowest standard of animal welfare in a batch, preventing the need for segregation
- c) The label only displayed the welfare standard of one ingredient where a processed product included more than one type of meat, egg, and milk.

*Please select:* Significantly reduced -- Partially reduced -- No impact

**Why?** *Free text*

**Question 42: Are there other ways that these supply chain impacts could be reduced? How?**

*Free text*

## Prepared food sold through mass catering

The eating out market accounted for £66bn (39% [8]) of food spend, and 11% [9] of energy intake in 2015. However, there may be less transparency available to consumers on the animal welfare standards of food bought in this context [10], so we are looking at how this information could be provided to consumers.

Given that it is less straightforward to 'label' prepared food than packaged food, we are also considering alternative market interventions, such as mandatory disclosure, that may improve the accessibility, availability, and affordability of higher welfare products.

Mass caterers such as restaurants sell food direct to consumers, whilst others are contracted to provide food by another organisation, such as hospital meals or for corporate events. We would like to understand how the impact of any reforms may affect the different settings in which consumers eat out, for example dinner at a restaurant, eating lunch at school, or a buffet at a wedding.

To ensure consistent answers for this call for evidence, please assume that this would apply to food where meat, eggs and milk are a [primary ingredient](#), for example chicken in a roast dinner, pork in a sausage roll, egg in an egg mayonnaise sandwich.

Changes to the Government Buying Standards for Food and Catering Services will be consulted upon early next year. These standards are mandatory for central government and their executive agencies, including the NHS, armed forces, and prisons in England. As part of this consultation we will propose that all food must meet, or in some places exceed, baseline UK welfare regulations.

**Question 43: When eating out, what barriers do consumers face choosing food that aligns with their values on animal welfare? How can these be overcome?** Please provide supporting evidence. We are particularly interested in evidence that quantifies the availability of welfare information or higher welfare options.

*Free text*

**Question 44: What barriers do mass caterers face in providing welfare information and higher welfare options to consumers? How can these be overcome?**



*Free text*

**Question 45: Which of the following options do you think could be suitable for indicating welfare standards within the catering sector? Please select up to 3 that you would be in favour of.**

1. Mandatory labelling of the welfare standard at the point of sale, for example: on the menu
2. Mandatory disclosure of welfare standards available per product, for example: welfare information must be available on request
3. Mandatory disclosure of welfare standards on aggregate, for example: website states percentage of chicken sourced from free-range systems
4. Voluntary labelling of the welfare standard, using marketing terms defined in law
5. Rating for each mass caterer based on their welfare standards
6. No further action and use existing voluntary disclosures.

**Why?** Please provide supporting evidence.

*Free text*

**Question 46: In Question 35, we asked what the impacts would be of introducing mandatory labelling to indicate the welfare standards of all imported and domestically produced *unprocessed* meat, eggs, and milk.**

**How would the impacts differ if the catering sector were required to disclose the welfare standards of meat, milk and eggs purchased?** Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who could be impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response.

Impacts on consumers: *Free text*

Impacts on food Industry: *Free text*

Impacts on farmers: *Free text*

Impacts on animals: *Free text*

**Question 47: Compared to mandatory disclosure, how would the impact differ if the catering sector were required to label food containing meat, milk, and eggs as primary ingredients, for example on menus?** Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who is impacted, providing supporting evidence where available. We would like to understand how the impacts vary

for different groups. If you represent or operate within a particular sector or group, please tailor your response.

Impacts on consumers: *Free text*

Impacts on food industry: *Free text*

Impacts on farmers: *Free text*

Impacts on animals: *Free text*

## Monitoring and enforcement

If new labelling regulations for animal welfare were introduced, there would need to be a fair and proportionate means of verifying that a product carried the right label and that the animals had been produced to the expected welfare standard. This is critical for ensuring consumer trust and fairness for producers.

We are looking to understand the different ways we could do this, including how to verify both imports and domestic production and at what point in the food chain. This includes considering who has a role in monitoring and enforcement, which may include local authorities, government bodies, port authorities, farm assurance schemes, and food businesses; and how we can work with new and existing trading partners, for example the EU, who are planning to introduce a standardised animal welfare label.

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

*Free text*

**Question 49: What existing monitoring and enforcement regimes could set a precedent for, or be adapted to incorporate, any new requirements?** Please consider multiple points in the food value chain.

*Free text*

We recognise the significant role UK farm assurance schemes already play in domestic production of meat, eggs, and milk, and we would like to understand how we could best harness this if any labelling reforms were introduced.

We are also interested in exploring how accreditation could assure the welfare standards of imported meat, eggs, and milk. For example, we could mutually recognise international assurance schemes that meet, or exceed, our baseline UK welfare regulations.

**Question 50: What role could UK farm assurance schemes play in verifying a label indicating welfare standards?**

*Free text*

**Question 51: What role could accreditation play in assuring the welfare standards of imports?**

*Free text*

## **Aligning with wider food labelling reform**

As well as considering how labelling could indicate animal welfare standards, we are also looking at other aspects of a label (marketing terms or imagery) related to the provenance and quality of meat, eggs, and milk. Some of these may be used by consumers as proxies for animal welfare.

Consumers are protected by existing regulation that states that food information should not be misleading, including in relation to the method of production. While this can be inferred from guidance, case law or research, it is ultimately a case-by-case judgement. For example, marketing terms on labels, such as 'grass-fed', can have varying definitions between retailers. Farm assurance schemes, such as Quality Meat Scotland and Pasture for Life, are industry-led initiatives aiming to address some of these issues.

The UK Government could introduce new marketing standards relating to the provenance or quality of meat, eggs, and milk to ensure consistency and transparency. It would be voluntary to label in this way but if these terms are used, they would have to conform to the standardised legal definition.

**Question 52: Are there non-welfare marketing terms, relating to the provenance or quality of meat, eggs, and milk, that you would like to see defined in law but voluntary to use?**

*Please select: Yes – No*

**If yes, which terms and why?**

*Free text*

Consumers also use product branding or imagery on packaging when assessing the provenance and quality of meat, eggs and milk, or products containing them. For example, a hypothetical brand such as 'Chalk Down Farm' may imply to consumers that the product is from the UK and/or locally produced.

**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?**  
Please provide examples and attach photos or web links if available.

*Free text*

## Other food system outcomes

Responses to this call for evidence will feed into a wider review of food labelling that will inform the UK Government's Food Strategy White Paper.

We are considering how any labelling reforms for animal welfare could be developed to best work alongside and inform potential reforms to, for example, nutrition and eco-labelling.

From a consumer perspective, a similar label format could make it *easier* for consumers to read food labels, for example, using a graded scale. From a business perspective, common traceability requirements and enforcement mechanisms could minimise the burden on industry, for example.

**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?** Please consider this from a consumer and business perspective and outline the challenges and opportunities that you see for each.

Consumer perspective: *Free text*

Business perspective: *Free text*

Food production has an environmental impact throughout the supply chain, including both arable and livestock production on-farm, processing, and transportation.

We are looking at whether eco-labelling has a role in delivering UK Government goals including those in the 25 Year Environment Plan and Net Zero by 2050, and whether this could be aligned with our new domestic agriculture policy. Our new future farming schemes will reward farmers who deliver environmental and animal health and welfare outcomes.

We would like to get your initial views on how animal welfare and environmental standards could be brought together, if we were to introduce labelling reforms covering both of these.

**Question 55: What are your views on:**

- a) A label based on a set of production standards on-farm which include both welfare and sustainability criteria for livestock production.
- b) Separate labels with one based on a set of welfare standards, and the other based on environmental impact throughout the supply chain, including on-farm
- c) An assurance scheme which sets standards based on the extent to which a farm is participating in our new future farming schemes and is delivering environmental and animal health and welfare outcomes

Free text

## How to respond

Please submit your response by **06-Dec 2021** using the online portal at <https://consult.defra.gov.uk/animal-welfare-market-interventions-and-labelling/labelling-for-animal-welfare/>.

Alternatively, you can post your response to:

Labelling for Animal Welfare  
Consultation Co-ordinator, Defra  
2nd Floor, Foss House,  
Kings Pool,  
1-2 Peasholme Green,  
York, YO1 7PX.

Or email us your response at: [welfare.label@defra.gov.uk](mailto:welfare.label@defra.gov.uk)

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