



# Call for evidence response

## Labelling for animal welfare: Call for evidence

### Defra Consultation

Date: 6<sup>th</sup> December 2021

The Country Land and Business Association (CLA) is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners, and those with an economic, social and environmental interest in rural land. Our members own or manage around half the rural land in England and Wales and more than 250 different types of businesses.

### General remarks

Most CLA members are involved in farming and many farm livestock. This call for evidence on animal welfare labelling was circulated for discussion at CLA county-level branch meetings that were held across England and Wales this autumn. The points below reflect these discussions. In addition, members with a specific interest in the call for evidence were encouraged to respond directly.

Maintaining and building on the UK's existing high animal welfare standards is important to CLA members. However, CLA members questioned the value of adopting a labelling system that focused on animal welfare in isolation. Rather, members were eager to promote British produce which is synonymous with high animal welfare, with place of origin labelling helping consumers make choices.

On the specific proposal, there was little wholehearted support. Members repeatedly highlighted the following key points:

- The UK's animal welfare standards, underpinned by strong regulation, are amongst the highest in the world. Labelling based on country of origin is the priority and will help consumers make better purchasing decisions.
- Any new labelling requirements must include information on the origin and welfare standards of food products made in the UK from imported meat;
- The labelling requirements must apply to food service businesses as well as retailers.
- All meat and meat products sold in UK shops, whether from domestic or imported sources, must be subject to the same animal welfare labelling requirements.

On issues related to food labelling more generally, members highlighted the following points, if a food new labelling system were to be introduced:

- There were mixed views on whether animal welfare labelling should be considered alongside other factors of interest to the consumer, such as environmental labelling, as suggested in the National Food Strategy. While some were in favour, many were

concerned that more encompassing labelling would dilute focus and create more bureaucracy for the supply chain without much benefit in terms of customer behaviour.

- Food labelling is a crowded space, with many existing accreditation schemes with their own labelling. A new labelling scheme should not create confusion.
- Additional labelling requirements will generate additional costs throughout the supply chain and may impose additional burdens on producers.

### **UK regulatory baseline and Country of origin labelling**

Some members were concerned that a new animal welfare labelling system would confuse customers, and undermine the key message, which is that by law and under existing assurance schemes, all UK meat is produced to baseline animal welfare standards which are amongst the highest in the world. In England, there are welfare codes of recommendations for the different kinds of farmed animals, which animal keepers must read. There are many different farming systems in the UK, which all operate within these standards, but rear animals in different ways, some of which have enhanced welfare aspects above the regulatory baseline. Enhanced welfare is often recognised through accredited marketing standards such as organic and RSPCA Assured. Other terms such as free range, pasture-fed, and outdoor-bred signify production systems which may include differentiators for animal welfare.

Consumers can therefore rightly assume that any meat born, raised and slaughtered in the UK conforms to high welfare standards. The same is not necessarily true for imported meat, and the welfare standards of meat products or ingredients that have been incorporated into ready meals or used in hospitality is obscured. Therefore it is essential that the country of origin of meat and meat products is clearly labelled, including for ready meals and in food service. At the moment, goods that are imported but are packaged in Britain can be labelled as 'British' which can mislead consumers.

### **Complexity of labelling**

Devising a simple, meaningful and uniform labelling system which does not confuse consumers presents a challenge. A country of origin system is a simpler alternative but lacks detail. Animal welfare is an issue that is of importance to many consumers and will be a deciding factor for some, so consistent and meaningful labelling is key. However, other factors, such as the environmental impact of food are also of interest to the consumer and should also be reflected in a labelling system, as suggested in the *National Food Strategy-The Plan*. This would allow a more comprehensive review of consumer needs and how best to present complex information, which often has trade-offs.

The Sustainable Food Trust is working on an ambitious project, which aims to create a globally available tool for measuring the sustainability of all farms, taking into account 11 different factors such as impact on water, biodiversity and animal husbandry (which includes animal health and welfare). This is a massive project, not without its complications and will not necessarily be used to label food, but it at least represents a more realistic attempt to capture a comprehensive view of how food is produced.

## **The costs of labelling**

CLA members observed that labelling systems will create additional costs throughout the supply chain, with a risk that small producers, those selling direct to consumers and small retailers such as farm shops may be disadvantaged.

## **Existing accreditation schemes**

CLA members expressed the need for a new labelling system to work with existing accreditation schemes. These include schemes such as Red Tractor, RSPCA Assured and LEAF marque.

## **Consumer behaviour**

Defra's [Evidence Compendium](#) from 2019 found that the public think it is important to support British farmers by buying British, but that this desire was not wholly reflected in consumer behaviour. CLA members observed that the majority of consumers make price-driven choices. However, for consumers interested more detail on how their food has been produced, there could be a role for technology with QR codes on each product, providing additional information. This additional information should also be made available for online shopping products.

Government and industry should work towards improving domestic and international understanding of British and international animal welfare standards. As well as ensuring British consumers are better informed on the advantages of buying British, it could serve as a marketing tool to promote British exports of animal products.

## **Trade and imports**

CLA members were very clear that any meat sold in UK shops should be required to have the same animal welfare labelling requirements, whether from domestic or imported sources. To do otherwise could lead to unfair competition between more expensive domestic products raised in accordance with the UK's high animal welfare standards and cheaper, lower welfare imports.

## **Devolved nations**

This call for views focusses on England, Wales and Northern Ireland. As there is a significant proportion of cross border trade of animals throughout the UK, CLA members felt that any labelling system that is introduced should be considered on a UK-wide basis.

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