

# Consortium for Labelling for the Environment, Animal Welfare and Regenerative Farming (CLEAR)

The logo for CLEAR, consisting of the word "CLEAR" in white, uppercase, sans-serif font, centered within a solid black square.

Parliamentary Briefing on Mandatory Method of Production Labelling  
March 2022

## Background

In January 2021, Minister Victoria Prentis MP committed the Government to “consult on what can be done through labelling to promote high standards and high welfare across the UK market ... This will feed into the Government's wide-ranging review on food labelling to ensure that consumers can have confidence in the food they buy and to facilitate the trade of quality British food at home and abroad.”

During the passage of the Agriculture Act, Lord Gardiner committed to deliver “informative food and drink labelling and marketing standards to protect consumer interests.”

Following the National Food Strategy and a Defra inquiry into animal welfare labelling in Dec 2021, it is anticipated that Spring 2022 will see the release of the Government's Food White Paper and the launch of an inquiry into environmental labelling.

**CLEAR believe that the Government has a unique opportunity to make positive change that will underpin the future food production system for generations to come and we urge them to take this important step and deliver one unified labelling system.**

## About CLEAR

Representing a range of civil society, farming and food organisations, the Consortium for Labelling for the Environment, Animal Welfare and Regenerative Farming (CLEAR) bring together a range of views and expertise. Established in 2020, our objective is to advocate for the need for transparent and verifiable mandatory method of production labelling for food products sold in the UK. We believe that developing clear accessible food labels that identify method of production will deliver greater transparency over how UK food is produced and will help deliver against the 25 Year Environment Plan's promise to “become the first generation to leave that environment in a better state than we found it and pass on to the next generation a natural environment protected and enhanced for the future”. To this end, the Consortium welcomes the Government's commitment to review the food labelling regulations.

**There are a growing number of initiatives that are taking place in this arena that need to be marshalled to bring together the best of innovation, skills, and expertise, to ensure there is only one data system on which a holistic mandatory label is developed. Unless this happens there will be more labels and no common structure leading to more confusion and a continuing lack of trust and clarity. CLEAR proposes the following top line principles against which a food labelling system should develop.**

## The ask

We want the Government to create a mandatory, data-driven, method of production labelling system to allow all citizens to be able to make informed choices about the food that they buy for themselves and their families. This would:

- Cover all foods, processed and unprocessed, domestic, and imported, clearly available at the point of purchase.
- Take a transparent and holistic approach that integrates animal welfare with other social and environmental metrics that go into our food production.
- Provide a common framework that is sufficiently flexible to allow for improvement and change over many years, allowing for new developments and understanding.

## The need

The British public has made their support of high British farm standards clear.

- [75%](#) of UK consumers want supermarkets to supply sustainably and ethically sourced products
- Over [one million](#) citizens signed the NFU's petition to protect UK food standards.
- Consumers trust food producers ([67%](#) trusted producers) but didn't feel that they are able to make informed choices based on sustainability since existing labels are ineffective.
- Overall, [63%](#) make an effort to buy healthy food and [45%](#) said they have switched to more sustainable options.

A mandatory, holistic, robust labelling system, assessing all businesses against the same criteria would

- create a level playing field with all foods being labelled in the same way,
- give clarity and choice for all consumers with one over-arching labelling system at all price points,
- drive development and innovation and support improved methods of production,
- be beneficial to supermarkets as the desire to distinguish themselves on quality and provenance would allow businesses to differentiate their produce from the rest of the market and communicate the premium value of high-quality foods to consumers;
- support the existing voluntary labels as they provide both entry points for farmers onto the labelling metric and also further information to consumers who want it.

In order to achieve this rigorously and in light of the current challenges and fluidity in trade and agricultural policy, the following steps can be taken immediately as a first step on the successful implementation of full mandatory labelling system which will take place over a longer period:

- Mandatory animal welfare labelling for poultry and pork, focused on method of production
- Legislation on a mandatory method of production system for labels for all food
- Extend country of origin labelling requirements to include all raw and processed foods

Furthermore, brand terms and packaging to be regulated to ensure that the consumer is not misinformed or deceived by sustainability marketing. We would want to see;

- Regulatory basis for the use of specific sustainability terms such as "humanely-raised," "nature-friendly" or "grass-fed" on package.
- The strengthening of the existing Advertising Standards Agency regulations (with additional resource for enforcement).

## The labelling framework and process

To be regulated efficiently, a consistent Government-backed framework is required. Such an approach would ensure consistency and allow farmers operating at higher standards to differentiate themselves from others. This framework should be underpinned by data to ensure a balanced and agnostic impact assessment of the method of production. The Government should stipulate the framework and required metrics and then ask farmers to report that self-assessed data. One example of work that is currently taking place on on-farm metrics is that of the Global Farm Metric (GFM) that has established a set of on-farm data points to assess production impacts and monitor change. The GFM could be further developed to provide the framework on which the labelling scheme is based.

The expertise and experience in existing certification bodies (CBs) can be mobilised to audit this new scheme with producers reporting their self-assessed data to CBs, such as the Soil Association Certification, RSPCA, OF&G or Red Tractor. These CBs would take the responsibility for compliance, although additional funding for spot checks and enforcement should be made available. Current certification bodies have indicated a willingness to take on the necessary auditing of such a mandatory framework, effectively negating the need for the Government to set up a new monitoring and enforcement system itself.

**For more information or to discuss our proposals in more depth, please contact;**  
**Fidelity Weston, CLEAR's Chair ([romshed@weald.co.uk](mailto:romshed@weald.co.uk))**  
**Robert Lingard, Clear's Advocacy Lead ([robert@whitestorkconsultancy.co.uk](mailto:robert@whitestorkconsultancy.co.uk))**