

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

### **Animal Welfare Labelling Call for Evidence: Guidance for member submissions**

October 2021

#### **Summary of CLEAR priorities of the submission:**

CLEAR want to see the Government grasp the once in a generation opportunity to fix the inadequacies in the confusing labelling system we have at present and deliver one that is fit for purpose and that can lead to a transparent food system. We would like to see one mandatory method of production label created that recognises the integrated reality of our food system and its effects on planetary, animal and human health. A holistic label that clearly conveys to the consumer the way in which their food was created is needed.

We recognise the need to have a focus on animal welfare in any labelling solution and the role of labelling in driving positive change in the ways animals, specifically, are managed. We believe, however, that the transparent food system we are pushing for cannot be arrived at by siloed thinking or solutions. We need a labelling system that integrates animal welfare with other social and environmental concerns to create one transparent and holistic approach.

By creating a mandatory method of production labelling system for all foods (processed and unprocessed, domestic and imported), the Government will allow all citizens to be able to make informed choices about the food that they buy for themselves and their families. Simultaneously, farmers who have high animal welfare *and* strong environmental credentials will be able to distinguish themselves within the market. The result would be a transparent and equitable food system that would meet the Government's ambition of setting a "[global gold standard for animal welfare as we leave the EU](#)".

Ultimately, we would like to see labelling that is based on the method of production and is;

- Mandatory with adequate enforcement mechanisms for all foods, including imports
- Data driven from the farm method of production and up through the processing system, with sufficient flexibility to allow for change and improvement
- Clear accessible presentation (i.e. on package)

That said, in light of the current challenges and fluidity in trade and agricultural policy, we recognise the difficulty in implementing such a significant step-change in the short term. While that longer term ambition is in process, there are opportunities to take initial steps and pilot certain aspects of a future system. We are advocating for the current plans for animal welfare labelling for pork and poultry to be changed from voluntary to mandatory. While the voluntary approach has helped increase transparency within the food system, it remains confusing to the consumer and is not as effective as a mandatory scheme would be.

#### **Questions**

##### **Q1: How to define the welfare standards that underpin a labelling system?**

We recognise the importance and urgency of updating and improving the inadequate provision for animal welfare in our current labelling system. However, any resulting label that is limited to just animal welfare misses the opportunity to acknowledge the interconnectivity of food systems. We would want to see the creation of an integrated label that covers all environmental and welfare impacts of production and that is based on data that is acquired transparently and fairly across the sector. Doing so will help to create a more transparent and equitable food system and is necessary for citizens to be able to make informed choices about the food that they purchase for their families.

We encourage CLEAR members to outline and detail the welfare standards that their organisation would want to see within the labelling scheme while maintaining the need for a more integrated and holistic approach.

- *Tobj, R., Harris, F., Rana, R., Brown, K., Quaife, M. and Green, R., (2019). Sustainable Diet Dimensions. Comparing Consumer Preference for Nutrition, Environmental and Social Responsibility Food Labelling: A Systematic Review. Sustainability, 11(23), p.6575.*

This is a review paper on a number of different food labelling studies – demonstrates across multiple studies that consumers respond very positively to labelling schemes. Importantly that out of environmental, social and nutritional labelling, environmental labels were most important to consumers in many cases, then social (e.g. Fairtrade) and then nutrition.

### **Q2: How could the labelling be regulated?**

It is essential that the label be mandatory, and that a consistent Government-backed framework is used, to ensure consistency and allow farmers operating at higher standards to differentiate themselves from others. 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. The terminology currently used should also be better regulated with a stronger legal basis for the use of on-package terms, such as “humanely-raised”. This could be achieved through the strengthening of the existing Advertising Standards Agency regulations to improve safeguards for misrepresentation to the consumer.

- *Weinrich, R. and Spiller, A., (2016). Developing food labelling strategies: Multi-level labelling. Journal of Cleaner Production, 137, pp.1138-1148.*

This paper studies multiple types of food labelling and found that multi-level labelling schemes derive the greatest overall market share and sustainability benefits – and demonstrates that they can actively improve animal welfare.

### **Q3: What a label might look like, including views on international examples?**

No answer proposed by CLEAR but we encourage members to submit their own preferred options in their own response.

### **Q4: What products could fall in scope of any labelling reform, and the differential impacts of this?**

All products should be included, both in-home and out of home as well as imported goods. Raw foods are a good starting point but given [64.4%](#) of food consumed by adults over 19 in the UK is processed, there must be a commitment to label all products, raw and processed in the long term.

- *Rauber F, Steele EM, Louzada MLdC, Millett C, Monteiro CA, Levy RB (2020) Ultra-processed food consumption and indicators of obesity in the United Kingdom population (2008-2016). PLoS ONE 15(5): e0232676. <https://doi.org/10.1371/journal.pone.0232676>*

This reference documents UK consumption trends and the increase in consumption of processed and ultra-processed food – it highlights the need for processed foods to be regulated.

### **Q5: How to monitor and enforce labelling for animal welfare?**

Government should establish the framework that would underpin the labelling (in consultation with stakeholders) and design the process by which data would be collected and reported. Producers would compile data themselves based on the Government's framework and required metrics and then report that self-assessed data to existing certification bodies (CBs). These CBs would ensure compliance and accurate reporting and could provide spot checks. Current certifications bodies have indicated a willingness to take on this responsibility if provided with additional resources to cover the cost.

- Zapf, R., Schultheiss, U., Knierim, U., Brinkmann, J. and Schrader, L., 2017. *Assessing farm animal welfare – guidelines for on-farm self-assessment*. *Landtechnik*, 72(4), pp.214-221.

This paper is a comprehensive analysis of the benefits of animal welfare self-assessment on farms and the manuals that guided self-assessment – although German, it has been regularly cited by other papers and provides evidence to show that self-assessment can be effective.

#### **Q6: What would be the potential impacts on businesses?**

A robust labelling system would allow businesses to differentiate their produce from the rest of the market and communicate the premium value of high-quality foods to consumers. Assessing all businesses against the same criteria would create a level playing field, driving development and innovation. The desire to distinguish themselves on quality and provenance is core to retail differentiation in the UK and therefore such a scheme would be beneficial to supermarkets too. At an international level, a recognised labelling system would bolster the brand of British products against imported goods, supporting British producers. There would also be an export benefit. Foreign markets would be able to quantify the quality of British produce against other suppliers and it would demonstrate that U.K. standards were equal (if not higher) than their own, allowing market access to continue and grow.

- Eftimia Tsakiridou, Helen Tsakiridou, Konstadinos Mattas & Evdoxia Arvaniti (2010) *Effects of animal welfare standards on consumers' food choices*, *Acta Agriculturae Scandinavica, Section C — Food Economics*, 7:2-4, 234-244, DOI: [10.1080/16507541.2010.531949](https://doi.org/10.1080/16507541.2010.531949)

This research is into the influence of animal welfare standards on consumer and the benefits of a welfare label in Scandinavia. There is perceived product value for high welfare products amongst consumers of which businesses aren't currently taking full advantage.

#### **Q7: How effective would labelling be at influencing farmer, business and consumer behaviour?**

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 and over a million citizens signed the NFU's petition to protect UK food standards. The Government has an obligation to reflect the will of the public in legislation. Farmers who operate at higher standards would be rewarded, with visible labelling differentiating their produce from those derived from lower standards of production.

- EIT Food, 2020, *The EIT Food Trust Report*, available at: [https://www.eitfood.eu/media/news-pdf/EIT\\_Food\\_Trust\\_Report\\_2020.pdf](https://www.eitfood.eu/media/news-pdf/EIT_Food_Trust_Report_2020.pdf)

This report details a Europe-wide survey to measure trust in the food system. Consumers trusted producers (67% trusted producers) but didn't feel that they are able to make informed choices based on sustainability since existing labels and supplementary information sources are ineffective. Overall, 63% make an effort to buy healthy food and 45% said they have switched to more sustainable options.