

BVA response to Defra's fairer food labelling consultation

15 April 2024

Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) We welcome this opportunity to respond to Defra's consultation on fairer food labelling.

Question 16a: How important do you think it is that mandatory country of origin labelling rules be changed so that they apply to the meat used in minimally processed meat products as they do already to unprocessed meat? [Very important / Important / Neutral / Not very important / Not at all important / Don't know]

- 3) Very important.

Question 16b: Please explain your answer.

- 4) We strongly support the principle that consumers have a right to understand the provenance of the food they are purchasing and make an informed choice as to how to direct their spend towards higher animal health and welfare products, based on their own ethical and budgetary priorities. This should apply to all food products, including meat used in minimally processed meat products. Being made aware of the country of origin of a meat product is vital for making informed choices about the animal produce a person buys, especially for products that may have been reared and slaughtered in one country and then processed in another. It must be clear to the consumer where the meat has come from regardless of the final form the meat product takes.
- 5) A new labelling system should be based on animal welfare outcomes, not just inputs or methods of production. These standards should span the whole life of the animal, each stage of the supply chain (eg. breeding, rearing, transport, markets and slaughter) from 'farm to fork' and be centred around the Five Domains model for animal welfare assessment.

Question 17: What five (minimally) processed meat products would be the most important to include?

- 6) All minimally processed meat products should be included.

Question 18: If we did not use a list approach, please describe any alternative approaches you would propose to define which minimally processed meat products are included?

- 7) We think that labelling should be applied to all products that contain meat because allowing consumers an informed choice means the welfare standards of the animals used in the products should be made clear regardless of how the meat has been processed.

Question 19a: Do you think that the use of national flags on food requires more regulation than described above? [Yes / No / Don't know]

- 8) Yes.

Question 19b: If 'yes', how would you further regulate the use of national flags on food?

- 9) In this consultation document, the example of applying a British flag to bacon because it was cured in Britain despite the pork being imported from elsewhere demonstrates the current rules for adding a British flag to food labels is incredibly misleading. Any system of labelling should be simple, accessible and facilitate informed consumer choice. It should be clear to consumers that when they pick up a product that has a flag on it, this informs them of the country where the animal product was reared and slaughtered and reflects the associated animal welfare standards. Concern for animal welfare is reportedly a big driver for British consumers so the labelling system in place needs to ensure people know that when they are buying a product with a national flag on the label that this is indicating the origin of the animal meat ingredients/products rather than the place of

manufacture. Although the current system requires a line explaining this, there is no guarantee that a consumer will read this beyond glancing at the flag and assuming it to be produced in Britain. The national flag must only be used to indicate its country of origin.

Question 20: Should there be further controls on the use of flags on food labels? [Yes [please specify what further controls are needed] / No / Don't know]

10) Please see answer to previous question.

Question 21: Should there be an additional requirement that mandatory origin information should be on the front of the pack? [Yes / No / Don't know]

11) Yes.

Question 22: What should the minimum size font be for mandatory origin labelling? [Stay the same / Make larger than 1.2mm 'x' height / Don't know]

12) Make larger than 1.2mm 'x' height.

13) We think that labelling should be clear and easy to read. When people are making their purchasing decisions, having to read through small lines of text on the back of a product could be a key factor in preventing informed choice and the purchase of higher animal welfare quality produce. Therefore, having a larger size of font on the front of the product clearly indicating the origin of the product and what that means in terms of animal welfare standards is the solution. This could be further improved with a QR code linked to additional information including farm assurance schemes.

Question 23: Should the written origin of food be accompanied by a national flag or other symbol? [Yes, a national flag / Yes, a different symbol (please specify) / Not necessary / Don't know]

14) Yes, a national flag.

15) It is clear there should be greater regulation of the use of national flags on labels to only indicate the country of origin and we think a flag should accompany the written origin of food. We think it should be as quick and simple as possible for a consumer to see a product and be made aware of the origins of the food. This can be done with a flag, with the accompanying text available for further information. We would suggest that the name of the country where the animal product was reared and slaughtered should clearly accompany the national flag.

Question 24: What role should be played by labelling requirements for seafood, farmed or wild-caught, in order to encourage consumers to buy more locally caught or produced seafood?

16) As we mentioned above, the new labelling system should be based on animal welfare outcomes, not just inputs or methods of production. These standards should span the whole life of the animal, each stage of the supply chain (eg. breeding, rearing, transport, markets and slaughter) from 'farm to fork', and be centred around the Five Domains model for animal welfare assessment. This should apply to seafood as well. Informing consumers of the quality of the produce and the conditions it has lived and eventually been slaughtered under can lead to shifts in consumer choice. In this consultation the example is given of the impact of the labelling requirements for eggs leading to the market share of free-range eggs in retail doubling from less than 30% in 2004 to over 60% in 2023. This could have a similar impact if seafood is clearly labelled with country of origin and the conditions of its production and may encourage people to buy more locally caught or produced seafood.

Question 25: Do you think information on the origin of food is sufficiently clear when it is sold via online platforms (either from a mainstream grocery retailer or other general retail platforms)? [Yes, it is sufficiently clear / No, it is not sufficiently clear / It varies / Don't know]

17) No, it is not sufficiently clear.

Question 26: What improvements would you like to see in how origin information is presented online, if any? [Free text box] [None / Don't know]

18) There are a number of improvements that can be made to the labelling of origin information to those products presented online. We have outlined above the improvements that can be made to the labelling on products themselves and these can be mapped to the online product information whilst also utilising the space that is offered in an online format. An obvious one is the online version can include more detail, in a larger font as it is not as limited by space availability. In addition to this,

links to farm assurance schemes like RSCPA and Red Tractor could be included in the online information where appropriate.

- 19) For meaningfully improving the origin information presented online and the labelling on the product itself, it will be paramount that there are appropriate traceability systems in place and sufficient resourcing for enforcement and monitoring to ensure any system of animal welfare labelling is effective, transparent and not open to abuse. We recognise the existing work carried out by APHA, Scottish Government, DAERA, Local Authority and FSA egg marketing inspectors and poultry meat marketing inspectors that is required to ensure that labelling does reflect the reality of production. There is a significant motivation for deception at all stages of production and distribution and there have been very high value fraud cases whereby products have been labelled as a higher value product. Any labelling regime must be backed by a resourced inspectorate and auditors, and the increased resource will need to be supported by defined funding.

Question 27a: Should there be a mandatory requirement to state the origin of meat, seafood and/or dairy products in the out-of-home sector? [Yes / No / Don't know]

- 20) Yes.

Question 27b: If yes, what form should this requirement take?

- 21) A key part of having informed customer choice is that it should apply wherever the consumer can make a choice on the type of food they wish to buy whether in a supermarket, online or a restaurant. We think it should take a similar form to the introduction of calorie information on menus and food labels. The changes make it a legal requirement for large businesses with more than 250 employees, including cafes, restaurants and takeaways, to display calorie information of non-prepacked food and soft drinks. This was done to help improve the nation's health by allowing people to make informed choices about the calorific content of the food they consume in the out-of-home sector.
- 22) We appreciate there are some differences in the type of information that needs to be displayed as the requirement for calorie information is simply one number. However, at the very least we think that even mandating the inclusion of country of origin and perhaps the production system used for meat, seafood and dairy products is an achievable ask. The level of detail here would not be like that included in the product labelling or in the online presentation of the product. An example could look like this: *Beef burger (Beef - British farmed, grass fed, free range)*. Markers for meat slaughtered under halal can be achieved by listing halal on the menu next to the food. This can be applied for origin information of animal products too. Once again QR codes could be utilised to inform consumer choice and work around the limitations of including information on the origins of meat, seafood and dairy products such as physical space on menus and costs of redesigning them.

Question 28: Should the requirements be applied equally to all out-of-home food businesses? [Yes / No – please specify which businesses would require different requirements and/or exemptions / Don't know]

- 23) No. As mentioned above we think it should follow a similar implementation to the calorie information requirements for the out-of-home sector. We must be conscious of the difference in scale and affordability for the costs of making these changes. A larger restaurant chain should be able to easily reprint their menus to make the appropriate changes we have recommended in question 27. However a small café that has a low footfall may take on a disproportionate cost to make these changes for a minimal impact in the wider push to more informed animal welfare conscious consumer decision making. Some smaller businesses will however see such labelling as a marketing opportunity and indeed some already do include this level of food providence.

Question 29: If measures such as mandatory origin for minimally processed meat products, increasing the visibility of origin labelling, controlling the use of national flags and/or mandating origin labelling for the out-of-home sector were introduced, what do you think are realistic timescales for businesses to implement such policies from the point at which they are announced? [1 year / 2 years / 3 years / 4 years / 5 years and over / Don't know]

- 24) Don't know. When deciding on how long businesses should be given it must allow them a reasonable length of time to make the necessary changes and ensure there is a robust traceability system in place with sufficient resourcing for enforcement and monitoring. However there must be a degree of haste with this work. Improved food labelling will be a key tool in offsetting the damaging impacts of the UK signing away tariff free access to animal products produced under systems we

do not accept in this country. Australia, New Zealand and countries in the CPTPP all have animal husbandry systems that differ significantly from the UK and it may be these methods allow for a cheaper price to be applied to these products once they hit the shelves. UK Government must ensure trading partners meet UK standards in all future trade deals but if this is not the case then at the very least having a clear country of origin label and information on what that means in terms of animal welfare will be vital in helping to protect British industry by highlighting and supporting high animal welfare produce.

Question 30: What exemptions should be given, if any?

25) As mentioned in question 28, we think there should be reasonable exemptions applied to businesses of a certain size for the reasons we described.

Question 31: Do you have any suggestions on how to smooth the costs and complexities of implementing these changes?

26) Open and clear communications to stakeholders informing every step of the way. Particularly engaging with the animal welfare sector and veterinary profession to ensure the UK maintains the high standard of animal welfare it is renowned for and this key consideration is not lost in the discussions around cost and complexities of implementing these changes.

Question 32: Do you have any other suggestions for improving country of origin information?

27) Reformed labelling for animal welfare would provide an opportunity to better communicate the value of improved animal health and welfare to farmers, consumers, retailers and others, so that the links between investment, good health and welfare outcomes (for animals and farmers) and economic returns are understood.

28) Any system of labelling should be simple, accessible and facilitate informed consumer choice. Therefore, we strongly support labels indicating tiers as the clearest and most meaningful way of communicating welfare standards with consumers.

29) We strongly support a UK-wide approach to welfare labelling to ensure consistency and unified consumer understanding across each of the devolved administrations. It is important to consider what this will mean for Northern Ireland and the conditions of the Windsor Framework.

30) As a welfare labelling system is developed, it will be important to avoid oversimplification when considering how different production systems address animal health and welfare needs. It is paramount to recognise that welfare outcomes are not solely dependent on the type or size of different production systems, and that consideration should be given to welfare outcomes across the supply chain.

31) Therefore, welfare standards to support a new labelling system should be based on animal welfare outcomes, not just inputs or methods of production. These standards should span the whole life of the animal, each stage of the supply chain (eg. breeding, rearing, transport, markets and slaughter) from 'farm to fork', and be centred around the Five Domains model for animal welfare assessment.

32) Further, the UK government should introduce mandatory method of slaughter labelling regulations, as a standalone label to clearly indicate whether or not a product contains meat from animals that have been stunned before slaughter. This would facilitate informed choice for all consumers.

33) Across all of these proposals, it will be paramount that there are appropriate traceability systems in place and sufficient resourcing for enforcement and monitoring to ensure any system of animal welfare labelling is effective, transparent and not open to abuse. We recognise the existing work carried out by APHA, Scottish Government, DAERA, Local Authority and FSA egg marketing inspectors and poultry meat marketing inspectors that is required to ensure that labelling does reflect the reality of production. There is a significant motivation for deception at all stages of production and distribution and there have been very high value fraud cases whereby products have been labelled as a higher value product. Any labelling regime must be backed by a resourced inspectorate and auditors, and the increased resource will need to be supported by defined funding.