



## BVA, AGV, BVPA SVS response to Defra call for evidence on labelling for animal welfare

6 December 2021

### Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 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 have developed our response in consultation with our species and sector-specific divisions, including:
  - The **Association of Government Veterinarians (AGV)** is a specialist division of BVA representing the views of veterinarians working in UK Government Departments and Executive, Agencies or principally engaged in the delivery of services for any UK Government Department or their Executive Agencies.
  - The **British Veterinary Poultry Association (BVPA)** is an active non-territorial division of the British Veterinary Association. The objective of the BVPA is to further the knowledge of its members, who are drawn from academia, research, government, commerce and practice, by holding educational and technical meetings. The Association also offers objective science-based advice and comment on issues affecting its members and the poultry industry in general.
  - The **Sheep Veterinary Society (SVS)** promotes sheep health and welfare as a specialist division of the BVA. While most of its 700 members are vets, many are drawn from all sectors of the sheep industry.
- 3) We welcome the opportunity to respond to Defra's call for evidence on labelling for animal welfare. 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.
- 4) 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.
- 5) 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.
- 6) We would strongly support a UK-wide approach to welfare labelling to ensure consistency and unified consumer understanding across each of the devolved administrations.
- 7) 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

- 8) 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.
- 9) 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), and be centred around the Five Domains model for animal welfare assessment.<sup>1</sup>
- 10) However, we are seriously concerned by proposals to label products that fall below UK baseline standards. All products in the UK are legally required to meet these base line standards, and we are clear that in all future trade deals the UK Government must ensure that trading partners are required to meet these.
- 11) 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.
- 12) 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 and Scottish Government 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.

## Labelling for animal welfare

### Question 16: What barriers are there for consumers wishing to buy food produced to UK baseline welfare or higher?

- 13) At present, there are several barriers for consumers wishing to buy food that aligns with their ethical and budgetary priorities for animal welfare.
- 14) There is no consistent approach to labelling for animal welfare, which can be confusing for consumers. Current approaches to welfare labelling tend to emphasise production systems which do not, by themselves, have a clear relationship to welfare status eg. 'outdoor-reared', 'free-range.' This approach is insufficient - focussing on inputs alone (eg. through method of production on-farm) oversimplifies animal health and welfare outcomes on-farm and does not provide an objective measure of health and welfare across the animal's life from farm to fork.
- 15) Examples of this include:
  - **Free range** - 'free-range' is widely recognised by consumers and understood to represent higher welfare. Free range production systems can offer stimulating living environments to allow for the performance of highly motivated behaviours and can provide opportunities for positive welfare outcomes and a good life. These are attributes of livestock husbandry systems that we call for in the [BVA position on UK Sustainable animal agriculture](#). However, it is important to recognise that simply being free range does not guarantee these positive welfare outcomes; rather, it offers the potential. T o

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<sup>1</sup> Mellor, David J.; Beausoleil, Ngaio J.; Littlewood, Katherine E.; McLean, Andrew N.; McGreevy, Paul D.; Jones, Bidda; Wilkins, Cristina. 2020. "The 2020 Five Domains Model: Including Human–Animal Interactions in Assessments of Animal Welfare" *Animals* 10, no. 10: 1870. <https://doi.org/10.3390/ani1010187>

realise that potential, welfare risks such as feather-pecking and bone fractures (which can be present in both free range and non-free range systems<sup>2,3,4,5</sup>) need to be managed. A welfare labelling scheme, therefore, should not only give information on the method of production (e.g. free range) but also provide assurance that positive welfare outcomes (such as expression of highly motivated behaviours and low levels of feather-pecking) were achieved on-farm. In addition, 'free-range' only considers the on-farm production system, rather than providing an indication of welfare outcomes across the supply chain.

- **Outdoor vs indoor lambing** - In addition, the terms 'outdoor lambing' and 'indoor lambing' do not have a clear relationship to welfare outcomes. Welfare could be equally compromised in either setting for sheep farms, though due to different reasons. For example, indoor lambing can present higher risk of infectious disease, but outdoor lambing presents greater risk of predation and hypothermia. For that reason, again, it would be important to couple such terms with an assurance that good welfare outcomes were achieved on-farm.
- **Outdoor reared/bred**- These terms may currently be used by those who want to ensure that sows have not been confined in farrowing crates, which is important to some informed consumers. However, these terms do not provide information on the welfare of pigs during their rearing period – which may be in a production system perceived as having poorer welfare - and, like 'free range', these terms do not provide information on the welfare outcomes for breeding sows and piglets, beyond the important potential for them to express normal behaviour. It would be important to couple such terms with an assurance that good welfare outcomes were achieved on-farm and in other parts of the supply chain.
- **Organic** - the term 'organic' is perceived as having positive connotations in terms of production system. Some aspects of organic production do not directly relate to animal welfare or animal welfare outcomes; rather, they pertain to rules about e.g. feed, fertilisers, medicine use etc. Other aspects of organic production offer the potential for positive welfare outcomes and for animals to experience a good life – such as lower stocking densities, the use of slower-growing breeds and the ability to perform highly motivated behaviours. However, welfare outcome assessment should be used on-farm to ascertain that this potential is being realised, then conveyed through any labelling system. The simple term 'organic' can only, at best, express the potential for positive welfare – not whether that potential has been realised.
- **PDO/PGI** – labels indicating protected designation of origin (PDO) and protected geographical indication (PGI) may also appeal to consumers who perceive these labels to indicate that animals spend their lives in a more 'natural' setting e.g. Gower Saltmarsh Lamb, Lakeland Herdwick. However, very few of these labels require specific welfare standards to be met eg. through membership of farm assurance schemes.

**16)** We recognise that the UK's farm assurance schemes and their certification logos empower shoppers to make sustainable and ethically informed choices about the food they buy, including the impact of food production on animal health and welfare. However, more could be done to

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2 J. Coton, M. Guinebrière, V. Guesdon, G. Chiron, C. Mindus, A. Laravoire, G. Pauthier, L. Balaine, M. Descamps, L. Bignon, A. Huneau-Salaün & V. Michel, 2019. Feather pecking in laying hens housed in free-range or furnished-cage systems on French farms, *British Poultry Science*, 60:6, 617-627, DOI: 10.1080/00071668.2019.1639137

3 D.C. Lay, R.M. Fulton, P.Y. Hester, D.M. Karcher, J.B. Kjaer, J.A. Mench, B.A. Mullens, R.C. Newberry, C.J. Nicol, N.P. O'Sullivan, R.E. Porter, Hen welfare in different housing systems<sup>1</sup>, *Poultry Science*, Volume 90, Issue 1, 2011, Pages 278-294, <https://doi.org/10.3382/ps.2010-00962>

4 Sónia Saraiva, Alexandra Esteves & George Stilwell, 2019. Influence of different housing systems on prevalence of keel bone lesions in laying hens, *Avian Pathology*, 48:5, 454-459, DOI: 10.1080/03079457.2019.1620914

5 C.M. Sherwin, G.J. Richards & C.J. Nicol, 2010. Comparison of the welfare of layer hens in 4 housing systems in the UK, *British Poultry Science*, 51:4, 488-499, DOI: 10.1080/00071668.2010.502518

communicate the value of farm assurance schemes, and what these certification logos mean in terms of animal health and welfare. We have therefore produced a [position on the value of UK farm assurance schemes](#) and a [supporting #ChooseAssured: UK Farm Assurance schemes infographic](#), which sets out BVA priorities for farm animal welfare and shows if these are addressed in different UK farm assurance scheme standards to assist consumers when navigating different certification labels. Alongside the regulated use of terms such as ‘free range’ or ‘outdoor reared’, the UK farm assurance schemes can provide the additional necessary assurance regarding on-farm welfare outcomes – i.e. whether the welfare potential of these production systems is being realised.

- 17) There is also a lack of publicly displayed, readily available information about the provenance of animal derived products used in public services and mass catering, unless caterers voluntarily display that ingredients are certified by farm assurance schemes or meet Government Buying Standards on menus and marketing materials.

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

- 18) Yes. 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.
- 19) As part of this, communication to consumers as to proposed changes and how they align or differ with current labelling terms is paramount, and will ensure that they can make an informed choice to direct their spend towards animal products which align with their own ethical and budgetary priorities.
- 20) In addition, consideration should be given as to how online mail order food services will be included in any reformed welfare labelling proposals.

### **Defining welfare standards**

#### **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?**

- 21) We would not support the development of welfare standards based on inputs or methods of production alone – they should always be alongside welfare outcome indicators. Any specified resource requirements (inputs) should be evidence-based, with evidence of their potential for improving animal welfare. Resource requirements, when used, should include elements of positive welfare opportunities as described by the [2009 FAWC Past, Present and Future report](#). The [Global Animal Welfare Assurance](#) alliance has published a series of frameworks for the major livestock species, defining the principles of higher welfare standards.
- 22) It is not sufficient to carry out a tick-box exercise in terms of inputs alone, which oversimplify health and welfare outcomes. We consider that this approach would be misleading for consumers wanting to direct their spend to higher health and welfare products.

#### **Question 19: How could welfare outcomes be incorporated into a set of welfare standards that can then be used for a label?**

- 23) We support welfare outcome assessment as a tool to drive continuous improvement of animal management and husbandry practices, in turn promoting high animal health and welfare. The standardised assessment of welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct picture of animal welfare.

- 24) To develop a set of welfare standards based on outcomes that could be used for a label it will first be necessary to identify the relevant welfare indicators to be assessed by species. These standards should span the whole life of the animal, each stage of the supply chain (eg. breeding, rearing, transport, markets and slaughter), and be centred around the Five Domains model for animal welfare assessment.<sup>6</sup> The Five Domains model outlines the key elements that should be considered when assessing welfare, the importance of positive welfare states and mental wellbeing, and how the actions of humans directly impact animal welfare.
- 25) The identified welfare measures would need to be given individual weighting and scores based on welfare outcomes. Such a matrix would, and should, be complex but would allow for a simple overall level of welfare to be generated for the purposes of labelling. These differing levels of welfare could be further interpreted for the consumer by using a tiered labelling format. In addition, it is paramount that any outcomes-based system is dynamic enough to allow for new outcomes to be integrated and standards to be changed based on emerging evidence.
- 26) Any weighting of welfare standards should take into account the length of time animals spend within each stage of the supply chain and the severity of poor welfare outcomes that may occur.
- 27) The relevant welfare measures for each species should be developed in consultation with animal welfare scientists, the veterinary profession (including BVA and our species and sector specialist divisions) and industry. It would be useful for Government to liaise with those who led on the [AssureWel project](#) (RSPCA Assured, Soil Association and University of Bristol); the project's aim was to develop a practical system of welfare outcome assessment for the major farm animal species, which could be used in farm assurance schemes.
- 28) We recognise that the resulting welfare level or tier which appears on the final label will not be precise or detailed for the consumer. Therefore, any consumer wishing to look for more detail could be directed via a QR code to more information about the welfare measures considered for the species and product, and how the overall welfare tier/score/level has been calculated. An associated QR code should help support and complement clear labelling, and could represent a real opportunity for improving consumer understanding and choice, and ultimately ethical sustainability.
- 29) However, QR codes should only be used to provide supplementary information to a welfare label, otherwise it could represent an additional barrier for consumers with limited access to the internet (WiFi or data).
- 30) Products containing meat from animals that have not been stunned before slaughter should also be clearly labelled as such. This should be a standalone label, in addition to labelling based on a welfare measures matrix. See response to Question 22 and 23.

**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.**

- 31) As outlined above, standards should span the whole life of the animal (including parents) and each stage of the supply chain (eg. breeding, rearing, transport, markets and slaughter).
- 32) Identified welfare measures would need to be given individual weighting and scores based on welfare outcomes. Such a matrix would, and should, be complex but would allow for a simple overall level of welfare to be generated for the purposes of labelling. Consideration should also be given as to how welfare outcomes data collected as part of the Animal Health and Welfare Pathway (and future farming schemes in Scotland, Wales and Northern Ireland), could usefully feed into a future welfare labelling system.

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<sup>6</sup> Mellor, David J.; Beausoleil, Ngaio J.; Littlewood, Katherine E.; McLean, Andrew N.; McGreevy, Paul D.; Jones, Bidia; Wilkins, Cristina. 2020. "The 2020 Five Domains Model: Including Human–Animal Interactions in Assessments of Animal Welfare" *Animals* 10, no. 10: 1870. <https://doi.org/10.3390/ani1010187>

- 33)** Any weighting of welfare standards should take into account the length of time animals spend within each stage of the supply chain and the severity of poor welfare outcomes that may occur. It would also be necessary for those carrying out welfare outcomes assessments to be trained.
- 34)** The use of confinement systems (eg. cages for laying hens and farrowing crates for sows) should be weighted negatively due to the fact they restrict behavioural opportunity, which negatively impacts welfare of individual animals.
- 35)** It would be useful for Government to liaise with those who led on the [AssureWel project](#) (RSPCA Assured, Soil Association and University of Bristol); the project's aim was to develop a practical system of welfare outcome assessment for the major farm animal species, which could be used in farm assurance schemes.

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

- 36)** Yes. Method of production, especially where this provides information about close confinement systems such as cages or crates, is important to many informed consumers. But, considered in isolation, method of production only relates to the potential for good welfare (particularly, ability to express highly motivated behaviour) rather than the realisation of that welfare potential. For example, to realise the welfare potential of non-cage systems for laying hens, welfare risks such as feather-pecking and bone fractures (which can be present in both free range and non-free range systems<sup>7,8,9,10</sup>) need to be managed. A welfare labelling scheme, therefore, should not only give information on the method of production (e.g. free range) but also provide assurance that positive welfare outcomes (such as expression of highly motivated behaviours and low levels of feather-pecking) were achieved on-farm.
- 37)** In reality, the regulated marketing standards for shell eggs (relating to input/method of production) are supplemented, in many cases, by welfare outcome assurances provided by assurance schemes (e.g. RSPCA Assured, Organic). A potentially valuable development of the laying hen method of production requirement would be to also insist on an independently certified (ISO 17065) assurance programme for, at least, non-caged systems. In addition, 'free-range' only considers on-farm welfare, rather than providing an indication of welfare outcomes across the supply chain.
- 38)** Transparency on aspects of livestock farming known to be of high concern to consumers – particularly, the use of behaviourally restrictive systems – is essential for ethical and economic sustainability. Our key point is that this information should be supplemented with welfare outcome assurances.

## Method of slaughter

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

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7 J. Coton, M. Guinebretière, V. Guesdon, G. Chiron, C. Mindus, A. Laravoire, G. Pauthier, L. Balaine, M. Descamps, L. Bignon, A. Huneau-Salaün & V. Michel, 2019. Feather pecking in laying hens housed in free-range or furnished-cage systems on French farms, *British Poultry Science*, 60:6, 617-627, DOI: 10.1080/00071668.2019.1639137

8 D.C. Lay, R.M. Fulton, P.Y. Hester, D.M. Karcher, J.B. Kjaer, J.A. Mench, B.A. Mullens, R.C. Newberry, C.J. Nicol, N.P. O'Sullivan, R.E. Porter, Hen welfare in different housing systems<sup>1</sup>, *Poultry Science*, Volume 90, Issue 1, 2011, Pages 278-294, <https://doi.org/10.3382/ps.2010-00962>

9 Sónia Saraiva, Alexandra Esteves & George Stilwell, 2019. Influence of different housing systems on prevalence of keel bone lesions in laying hens, *Avian Pathology*, 48:5, 454-459, DOI: 10.1080/03079457.2019.1620914

10 C.M. Sherwin, G.J. Richards & C.J. Nicol, 2010. Comparison of the welfare of layer hens in 4 housing systems in the UK, *British Poultry Science*, 51:4, 488-499, DOI: 10.1080/00071668.2010.502518

- 39) Yes - as a mandatory label that clearly indicates whether or not the animal has been stunned before slaughter. We are concerned that meat from animals that have not been stunned before slaughter is being supplied without specific, transparent labelling. For example, in the [Results of the 2018 FSA Survey into Slaughter Methods in England and Wales commissioned by Defra and the Welsh Government](#), the survey asked for the destination of the hind quarters (a prime part of the carcass) of Shechita slaughtered animals. However, this question was not mandatory and very few slaughterhouses responded. The end destination of hindquarters from the majority of Shechita-slaughtered animals is therefore unknown, meaning that the meat from some animals that have not been stunned before slaughter can enter the market for wider consumption.
- 40) Supplying non-stun meat for wider consumption is not in the spirit of the derogation that permits non-stun slaughter, which is only intended to serve the UK's religious communities.
- 41) As part of encouraging consumers to exercise informed choice over the animal-derived products they purchase, we therefore support the principle of clearly labelling meat and meat products from animals that have not been stunned before slaughter, with the information readily available to those who want it. Any proposed system of slaughter labelling would need wider consultation with industry, key stakeholders, and consumers before it is implemented. This should also include meat used in mass catering and public services.
- 42) At present, consumers are able to identify whether animal-derived products have met certain animal health and welfare standards across the supply chain (including whether animals have been stunned before slaughter) by looking for farm quality assurance marks such as Red Tractor, Quality Meat Scotland (QMS), Soil Association, or RSPCA Assured. While these farm quality assurance marks enable consumers for whom pre-slaughter stunning is a priority to identify pre-stunned products, to further simplify the decision-making process for all, consumers should be confident the meat they are purchasing has been stunned before slaughter unless stated otherwise. Any meat or meat products from animals that have not been stunned before slaughter must therefore be clearly labelled to enable all customers to make informed purchasing choices.
- 43) Decapods and cephalopods  
We would also support extending mandatory slaughter labelling to indicate whether decapods and cephalopods have been stunned before slaughter. Evidence indicates that decapods (eg lobsters, crabs) and cephalopods (eg octopus, squid) are sentient, and experience pain and distress.<sup>11, 12, 13, 14, 15, 16, 17, 18, 19</sup> We therefore support the principle that commercially caught decapods and cephalopods should be stunned before slaughter.

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<sup>11</sup>European Food Safety Authority, 2005. [EFSA "Opinion on the "Aspects of the biology and welfare of animals used for experimental and other scientific purposes"](#) Available at:

[https://ec.europa.eu/environment/chemicals/lab\\_animals/pdf/efsa\\_opinion.pdf](https://ec.europa.eu/environment/chemicals/lab_animals/pdf/efsa_opinion.pdf)

<sup>12</sup> Barr, S., Laming, P. R., Dick, J. T. A., & Elwood, R. W., 2008. Nociception or pain in a decapod crustacean? *Animal Behaviour*, 75(3), 745–751.

<sup>13</sup> Elwood, R. W., 2012. Evidence for pain in decapod crustaceans. *Animal Welfare*, 21(1), 23–27.

<sup>14</sup> Elwood, R. W., & Appel, M., 2009. Pain experience in hermit crabs? *Animal Behaviour*, 77(5), 1243–12

<sup>15</sup> Magee, B., & Elwood, R. W., 2013. Shock avoidance by discrimination learning in the shore crab (*Carcinus maenas*) is consistent with a key criterion for pain. *Journal of Experimental Biology*, 216 (3), 353-358.

<sup>16</sup> Magee, B., & Elwood, R. W., 2016. Trade-offs between predator avoidance and electric shock avoidance in hermit crabs demonstrate a non-reflexive response to noxious stimuli consistent with prediction of pain. *Behavioural Processes*, 130, 31-35.

<sup>17</sup> Sneddon, L. U., 2004. Evolution of nociception in vertebrates: Comparative analysis of lower vertebrates. *Brain Research Reviews*, 46 (2), 123–130

<sup>18</sup> Sneddon, L. U., 2015. Pain in aquatic animals. *The Journal of experimental biology*, 218 (7), 967-976.

<sup>19</sup> J. Birch et al, 2021. Review of the Evidence of Sentience in Cephalopod Molluscs and Decapod Crustaceans.

Available at: <https://www.lse.ac.uk/News/News-Assets/PDFs/2021/Sentience-in-Cephalopod-Molluscs-and-Decapod-Crustaceans-Final-Report-November-2021.pdf>

44) At present, EC Regulation 1099/2009 and UK Welfare of Animals at the Time of Killing regulations do not cover decapods or cephalopods. It is therefore legal to slaughter these animals (particularly decapods) without first rendering them insensible to pain and with methods that are likely to cause pain and suffering<sup>2021</sup>. Such methods include:

- Placing live decapods in cold water and heating the water to boiling point.
- Placing live decapods into hot or boiling water.
- Placing live marine decapods in fresh water and drowning
- Live carving and dismemberment

45) Electrical stunning of decapods may represent an effective, humane and commercially viable option for stunning decapods in restaurants or commercial slaughter processing plants. Scientific evidence suggests that electrical stunning is an effective stunning method<sup>22,23,24, 25</sup>; however, we note that further research on electrical methods is needed to indicate the minimum effective parameters for different types and sizes of decapods.

**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**

46) 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. Any proposed system of slaughter labelling would need wider consultation with industry, key stakeholders, and consumers before it is implemented.

47) It will also be paramount for there to be appropriate traceability systems and monitoring in place at cutting plants to ensure the effective separation of products from animals that have been stunned before slaughter, and products from animals that have not. We recognise the existing work carried out by APHA and Scottish Government 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. As part of this, consideration could be given to the use of the technology (eg blockchain/ distributed ledger technology) to support traceability and the monitoring and enforcement of systems of production.

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<sup>20</sup> In 2005 the [EFSA "Opinion on the "Aspects of the biology and welfare of animals used for experimental and other scientific purposes"](#) identified these methods as 'likely to cause pain and distress' to decapods and cephalopods.

<sup>21</sup> Roth, B., & Øines, S., 2010. Stunning and killing of edible crabs (*Cancer pagurus*). *Animal Welfare*, 19(3), 287-294.

<sup>22</sup> Albalat, A., Gornik, S., Theethakaew, C., & Neil, D., 2008. Evaluation of the quality of Langoustines after being killed by the Crustastun. *University of Glasgow*. Available at: <http://eprints.gla.ac.uk/81427/>

<sup>23</sup> Fregin, T., & Bickmeyer, U., 2016. Electrophysiological investigation of different methods of anesthesia in lobster and crayfish. *PLoS one*, 11(9), e0162894.

<sup>24</sup> Neil, D., 2010. The effect of the Crustastun on nerve activity in crabs and lobsters. Available at: <http://eprints.gla.ac.uk/81428/>

<sup>25</sup> Roth, B., & Grimsbø, E., 2013. Electrical Stunning of Edible Crabs. Available at: <https://www.nofima.no/filearchive/Rapport%2018-2013.pdf>,



## Approaches to labelling

**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?

48) It is essential that any labelling system that is introduced is mandatory in order for it to be effective, drive improvements in welfare standards across the supply chain, and provide consumers with a meaningful way to differentiate between all products.

**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?**

49) We strongly support the principle of mandatory labelling to identify when animal-derived products do not meet baseline UK welfare regulations. However, we are seriously concerned that this option is being explored; it is paramount that in all future trade deals the UK Government ensures that trading partners are required to meet UK's minimum welfare standards.

50) Consideration should also be given as to how imported produce which meets UK baseline welfare standards will be labelled. We would strongly support alignment of welfare labelling used across UK-derived and imported products.

## Label format

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

1. Labels indicating tiers only (Beter Leven)?
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)?

51) 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.

52) We consider that labels only describing method of production, without additional information and assurances about welfare outcomes, are ineffective and oversimplify animal health and welfare. In addition, they focus on one stage of the farm to fork process, as opposed to welfare outcomes across the supply chain.

53) The use of a graded colour system eg. a traffic light system is recognisable and well understood already by consumers, with red generally understood as indicating stop and think. However, there is a risk that it could be confused with existing nutritional labelling. Further, a graded colour system may be problematic for anyone suffering from colour blindness, or for neuro-diverse individuals. This should be considered further by those with expertise in communications.

- 54) Farm assurance scheme certification is valuable, providing assurances for a breadth of standards beyond just animal welfare. Farm assurance schemes should continue to be supported alongside mandatory welfare labelling.

**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)

- 55) We consider that, of the examples presented, the Beter Leven (stars) and Haltungsform (numbers with different colours) labels are the most effective labels with tiering. These examples are simple and easy to understand.
- 56) While graded colours, graded letters and comparative descriptions (good, quite good, standard) could be effective for indicating tiers if used on their own, when used together on the Etiquette Bien-Être example this creates a complex label, which may be off putting and hard to understand for consumers.

**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)?

- 57) We consider that labels only describing method of production (both in written and pictorial form), without additional information and assurances about welfare outcomes, are ineffective and oversimplify animal health and welfare. In addition, they focus on one stage of the farm to fork process, as opposed to welfare outcomes across the supply chain.

**Question 32: Overall, which of the five labels do you think is most effective?  
Please select: Etiquette Bien-Être – SPCA Certified – Beter Leven – Haltungsform --  
CIWF Italia/Legambiente labelling proposal**

- 58) We consider that, of the examples presented, the Beter Leven (stars) and Haltungsform (numbers with different colours) labels are the most effective labels. We strongly support labels indicating tiers as the clearest and most meaningful way of communicating welfare standards with consumers.

## **Prepared food sold through mass catering**

**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?**

- 59) There is a lack of publicly displayed, readily available information about animal-derived products used in public services and mass catering, unless caterers voluntarily display that products used are certified by farm assurance schemes or meet Government Buying Standards on menus and marketing materials.
- 60) Alternatively, consumers are required to proactively ask catering staff as to the welfare credentials of their food, which is an additional barrier to accessing this information, and staff may not be aware of the food’s provenance.

**61) Government Buying Standards**

We recognise that Government Buying Standards for Food and Catering Services will be consulted upon early next year. It is important to highlight the minimum mandatory standards currently state “All food served must be produced in a way that meets UK legislative standards for animal welfare, or equivalent standards”, however the standards do not specify that all meat must come from animals that have been stunned before slaughter, unless slaughtered under the derogation for slaughter in accordance with religious rites. Consequently, it is possible for public services to procure meat from animals that have not been stunned before slaughter for wider consumption, which is not in the spirit of the derogation which permits non-stun slaughter for the consumption of the UK’s religious communities.

**62)** Therefore, there is an opportunity to specify that all meat must be from animals that have been stunned before slaughter within these minimum mandatory standards. The only exception to this should be if there is a specific request to meet the needs of the UK’s religious communities (as per the spirit of the derogation) and there should be a mechanism to permit this.

**63)** Any meat from animals that have not been stunned before slaughter must be clearly designated as such, on the menu and in accompanying literature, in the spirit of GBS standards on specifying the origin of meat and meat products.

**Question 45: Which of the following options do you think could be suitable for indicating welfare standards within the catering sector?**

**64)** In principle, we would strongly support the introduction of mandatory disclosure of welfare standards at point of sale, for example on the menu. This could be aligned with a tiered welfare labelling system used by retailers, so that categorisation and indication of welfare standards are consistent across food sectors, and consumers become familiar with the method of labelling. However, we recognise the complexities of assessing and assuring this for the catering sector.

**65)** Our views on the other options presented are indicated below:

- **Mandatory disclosure of welfare standards available per product, for example: welfare information must be available on request** – We consider that this approach would rely too heavily on the consumer proactively requesting welfare information and would be a missed opportunity to promote consideration of animal welfare at point of sale for those who would not usually prioritise welfare as part of their decision-making when eating out.
- **Mandatory disclosure of welfare standards on aggregate** – We are concerned that this approach could be misleading for consumers, and would not facilitate transparent, informed choice at an individual level.
- **Voluntary labelling of the welfare standard, using marketing terms defined in law** - Mass caterers are able to adopt a similar approach at the moment by indicating welfare standards through placing farm certification logos on their menus at point of sale. However, we note that very few mass caterers adopt this approach, therefore we question how effective voluntary labelling of welfare standards based on terms defined in law would be. In addition, we are concerned that this would lead to an inputs-based approach, focussing solely on methods of production, rather than incorporating welfare outcomes at each stage of the supply chain.
- **Rating for each mass caterer based on their welfare standards** - We are concerned that this approach could be misleading for consumers, and would not facilitate transparent, informed choice at an individual level.

**66)** In addition, consideration could be given to requiring disclosure of procurement policies. However, we recognise that, as with mandatory disclosure of welfare information on request, this would rely heavily on the consumer proactively seeking out procurement policies and would be a missed opportunity to promote consideration of animal welfare at point of sale for those

who would not usually prioritise welfare as part of their decision-making when eating out.

## Monitoring and enforcement

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

- 67) When designing a monitoring and enforcement regime to verify labels for animal welfare, consideration should be given to:
- Implementing appropriate traceability systems and resourcing for enforcement to ensure any system of animal welfare labelling is effective, transparent and not open to abuse. Any labelling regime must be backed by a resourced inspectorate and auditors, and the increased resource will need to be supported by defined funding. As part of this, consideration could be given to the use of the technology (eg blockchain/ distributed ledger technology) to support traceability and the monitoring and enforcement of systems of production.
  - How data will be collected from each stage of the supply chain, and which body should have overall responsibility for collecting and interpreting this data.
  - Existing sources of animal welfare outcomes data that could be used, and which agencies would need to be engaged to feed in this data eg. local authorities, FSA, farm assurance schemes
  - How outcomes from the Animal Health and Welfare Pathway and future farming schemes in Scotland, Wales and Northern Ireland will feed into data collection.
  - Establishing review periods to assess the suitability of welfare standards that inform the labelling system, and consider whether standards should be added, removed or amended based on the available evidence

### Question 49: What existing monitoring and enforcement regimes could set a precedent for, or be adapted to incorporate, any new requirements?

- 68) We recognise the existing work carried out by APHA and Scottish Government egg marketing inspectors and poultry meat marketing inspectors that is required to ensure that labelling does reflect the reality of production.
- 69) Consideration should be given to existing baseline welfare indicators used across the supply chain in different settings eg. local authorities, FSA, farm assurance schemes. For example, a range of welfare outcome measures relating to on-farm welfare are monitored in UK slaughterhouses by FSA to check compliance with the European Broiler Directive<sup>26</sup>, and there are mechanisms to address and improve welfare issues. In addition, auditing frameworks used by UK farm assurance schemes may provide a useful basis for the monitoring and enforcement of new labelling requirements.

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

- 70) This would largely depend on the final approach government takes to labelling, and if the farm assurance schemes already have processes in place to assess similar standards and welfare outcomes.

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<sup>26</sup> Council Directive 2007/43/EC. COUNCIL DIRECTIVE 2007/43/EC of 28 June 2007 Laying Down Minimum Rules for the Protection of Chickens Kept for Meat production. European Commission. (2007).

## Aligning with wider food labelling reform

**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?**

- 71) It would be useful to define terms such as 'grass-fed' in law to clearly define how long an animal must have been fed these diets to be labelled as such.
- 72) Further, while we recognise that terms such as 'corn-fed' are already defined in law, more could be done to communicate to consumers how long an animal must have been fed this diet to be labelled as such, and what this means in terms of animal health and welfare.

**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?**

- 73) Branding that falsely implies animal-derived products are locally sourced from a specific UK producer (eg. through the use of fictional farm names) is misleading for consumers and creates a false sense of security as to the provenance of products and compliance with high animal health and welfare standards. This would become less of an issue if there was a system of tiered welfare labelling based on outcomes across the animal's life for consumers to objectively refer to.
- 74) The use of non-protected geographical indications may be misleading. For example, Scotch Lamb has protected welfare standards associated with it, however Scottish Lamb does not.
- 75) The use of imagery depicting pasture and outdoor scenery is misleading when used for products from animals that have spent their lives indoors. This should not be permitted.
- 76) There should be tightened rules around the use of non-specific terms such as 'Farm fresh', when these could be used to imply high welfare standards in the absence of welfare outcome-based assurances.

## Other food system outcomes

**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?**

- 77) It is important that important food safety labelling requirements eg allergen labelling, do not become lost in the ambition to have a common labelling approach.

**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.**
- 78) We recognise that a label based on both welfare and other sustainability criteria for livestock production would support consumers to make holistic decisions across both animal welfare and environmental sustainability at farm level. Sustainable animal agriculture should be undertaken in a way that is environmentally, ethically and economically acceptable for consumers,

producers and wider society. As part of this, animal health and welfare should not be unnecessarily compromised to address human need and in order to be considered sustainable, agricultural systems must work towards the positive health and welfare of all farmed animals raised within them.

- 79)** Improved animal health and welfare outcomes and improved environmental outcomes can go hand in hand (for example, in the pig sector, healthy pigs require less feed and water to get to slaughter weight as they grow faster, resulting in reduced use of resources). Therefore a single label could provide an opportunity to recognise that animal health and welfare is an integral part of sustainable animal agriculture, and that to be considered sustainable, agricultural systems must work towards the positive health and welfare of all farmed animals raised within them
- 80)** However, we would not support a label based on welfare and sustainability criteria for livestock production. We are concerned that this label would solely focus on welfare outcomes on-farm, and would be missed opportunity to reflect welfare outcomes across the life of the animal, at each stage of the supply chain.
- 81)** Further, it is important to recognise there may be conflicts that could occur between different sustainability and animal welfare goals, making it difficult to combine criteria.

**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**

- 82)** While we recognise that this may result in several labels on food packaging, this would be our preferred approach. Separate labels based on welfare and environmental standards across the supply chain would be easier to communicate and enable consumers to make an informed choice about the food they are buying based on their own ethical and budgetary priorities for animal welfare and environmental sustainability.

**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**

- 83)** Consideration would need to be given as to who would own and operate the scheme, as well as how this would fit alongside and interact with existing farm assurance schemes. Further, a clear communications strategy would be required to communicate what the assurance scheme means in terms of animal health and welfare to consumers. There may be opportunities to integrate the outcomes of future farming schemes with existing farm assurance scheme standards, whose logos are already familiar to consumers.
- 84)** If the assurance scheme were to only cover outcomes on-farm this would be a missed opportunity to provide assurance across the whole supply chain, which some of the UK's assurance schemes already do or are working towards. Therefore, it is paramount that any new assurance scheme covers welfare standards and outcomes across each stage of the supply chain (eg. breeding, rearing, transport, markets and slaughter) and provides lifetime assurance for the whole life of the animal (including parents).