

ANIMAL WELFARE LABELLING

FINAL POSITION PAPER

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Fatma Sahin
Adviser
T: +32 2 737 05 96
sahin@eurocommerce.be

1. Consumer information

As the interface between industry and Europe's 500 million citizens, retailers enjoy a unique relationship with consumers, who are increasingly concerned about receiving clear, understandable, useful and transparent information about their food.

Labelling and consumer information are in fact issues of utmost interest for the commerce sector: consumers will shop with retailers who provide them with the products and services they want, and product information is an important part of a retailer's marketing strategy to attract and retain the loyalty of customers.

Labels should be clear, understandable and useful for consumers as well as flexible enough to be adjusted to different situations or to new demands.

Studies have underlined that consumer demands and expectations can differ essentially between Member States or even from one consumer to another which stresses the need for flexible rules that can adapt to the changing markets and consumers. There is no such a thing as an European consumer.

Furthermore, research has consistently shown that only few consumers regularly read the labels and if they read them, that they do not understand them sufficiently or know how to use them.

Nowadays, foods are more complex and processed and consumers are more urban and educated, as a result the information demand is growing.

The main reasons of overloaded labels are the number of mandatory information requirements – which are not always essential for the consumer and confusing – and the fact that operators have to use multilingual labels to operate on different markets or even sometimes in one Member State.

TOO MUCH INFORMATION KILLS THE INFORMATION!

The main objectives of labelling should be to give consumers the essential information so that they can make an informed choice.

It is proven that the more information is provided on the label, the less consumers actually read the information. The consequence is counter-productive; the consumer does not find the essential information!

When designing a label with the aim of helping the consumer to make a healthy and informed food choice, it is important to reason from the perspective of what consumers want and what they need. Consumers want to be fully informed, but the information provided can also be more generic and provided by other means.

A clear distinction should be made between "nice to know" (voluntary) and "need to know" (mandatory) information.

Criteria for mandatory labelling are 1) that the information is necessary from a food safety point of view, 2) that it should be widely requested by a great majority of consumers across the EU, and 3) that it is seen as essential or necessary for the buying decision.

Information that a small group of consumers would like to know, such as animal welfare issues, should remain voluntary.

2. Animal welfare schemes and labelling

EuroCommerce strongly opposes a mandatory framework for animal welfare labelling. Consumer request varies in every Member State and in those countries where there is a demand, voluntary schemes are already put in place with different stakeholders for different groups of products. Private initiatives are considered to be more effective and flexible than official labeling schemes.

Moreover, animal welfare criteria are different in every Member State. For example castration under anaesthesia in The Netherlands is a major issue, while in other Member States pain killers are decided to be sufficient.

As animal welfare is not a need to know information for European consumers, is there any other reason justifying animal welfare labelling? What kind of problems exist in the field of animal welfare? Is there a need to restore the reputation of EU animal welfare legislation? Are private schemes an obstacle to trade? do they mean a lack of competition or are they misleading?

Any EU new possible initiative on labelling should be based on objective findings. An accurate impact assessment, a broad stakeholders' consultation as well as a thorough justification by the Commission for the need for animal welfare labelling are needed.

EuroCommerce supports the establishment of a European Scientific Animal Welfare Centre

EuroCommerce acknowledges the need for science-based animal welfare indicators. Currently, some animal welfare groups claim, without scientific evidence, that particular farm practices cause pain to the animals. Therefore, EuroCommerce supports the intention of the European Commission to establish a European Scientific Animal Welfare Reference Centre being the knowledge provider in this field. The centre has to provide the latest scientific information and common definitions regarding animal welfare issues.

EuroCommerce opposes mandatory animal welfare labelling

EuroCommerce nevertheless encourages raising animal welfare standards through effective monitoring and enforcement between the EU countries to prevent internal market distortion. Retailers and wholesalers achieve this through extensive use of private certification schemes with independent and competent third-party auditing against transparent requirements.

Since the certification schemes go beyond mandatory legal minimum requirements, the operator should be able to give additional animal welfare information on a voluntary basis.

Animal welfare information is clear and understandable for consumers only in case of simple and non processed products.

Some simple messages, such as free range eggs, have resonated with consumers, but for example animal welfare of cows from which milk ingredients (used in biscuits or pastries for example) or processed products (like yogurts or cheese) are produced is a much more complicated and less understood issue.

When it comes to animal welfare labelling, there is no consumer demand for it. Referring to the general revision of food labelling requirements, traders do not see the necessity for a uniform European label for animal welfare. There are already many private standards defined with stakeholders in which animal welfare standards are included.

3. Existing voluntary private schemes

Animal welfare information is made available on products where it is perceived that there is a real consumer interest in this information and where it would influence purchasing decisions. There are, however, differences between consumer preferences across Europe concerning the interest in animal welfare issues.

Many consumers associate animal welfare products with higher quality foods such as free range eggs, or with organic food and fresh categories such as dairy products and meat. But most of the time, the labelling of it is not requested nor expected by the consumers.



There are already Animal Welfare standards in place on voluntary basis for different product groups. Mostly a logo is used on the product itself and communication takes place through means other than labelling, because of the limited space on the label and since it is a generic information.



In 2008 some EuroCommerce members have won the "Good Egg Award". Good Egg Award is awarded to the leading and well-known food companies in European Union that have started or are planning to launch selling or using free range eggs. Furthermore, there are many standards which are developed in cooperation with all kinds of stakeholders. Not only logos on products are used, but communication to consumers also take place through on shelf ticketing. Some members won animal welfare awards such as the "From Compassion in World Farming".

4. Potential Impacts of Mandatory Labelling

There is already limited space available on the label. Mandatory animal welfare labelling will increase the product costs for the supply chain, create administrative burden, in particular for SMEs and own brand products, and increase inspection costs by the governments involved as well. In the case of complex and/or processed products, mandatory animal welfare labelling would even result in being confusing or misleading for consumers.

The consumers will be the main victim as the commerce sector will have no alternative than to pass on the costs down the supply chain, without any benefits for the consumer.

To conclude, only "need to know" information should be mandatory on the label. EuroCommerce believes that consumer information on animal welfare issues should remain voluntary.

Should obligatory labelling schemes be considered, involving additional costs for the industry, these costs should be duly considered within impact assessments for such measures undertaken, taking into account economic objectives related to market competition, growth and employment. Furthermore, the Commission should justify the need for animal welfare labelling.

EuroCommerce and the commerce sector

EuroCommerce represents the retail, wholesale and international trade sectors in Europe. Its membership includes commerce federations and companies in 31 European countries.

Commerce plays a unique role in the European economy, acting as the link between manufacturers and the nearly 500 million consumers across Europe over a billion times a day. It is a dynamic and labour-intensive sector, generating 11% of the EU's GDP. One company out of three in Europe is active in the commerce sector. Over 95% of the 6 million companies in commerce are small and medium-sized enterprises. It also includes some of Europe's most successful companies. The sector is a major source of employment creation: 31 million Europeans work in commerce, which is one of the few remaining job-creating activities in Europe. It also supports millions of dependent jobs throughout the supply chain from small local suppliers to international businesses.