

Defra Consultation

Labelling for animal welfare: Call for evidence. September 2021

Consultation response from the Agriculture and Horticulture Development Board (AHDB)

Response sent to:

welfare.label@defra.gov.uk

6th December 2021

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About you or your organisation

Question 1: What is your name?

Susie Stannard

Question 2: What is your email address?

Susie.Stannard@ahdb.org.uk

Question 3: Would you like your response to be treated as confidential (required)?

No.

If yes, please give your reason.

N/A.

Question 4: Are you responding as an organisation or an individual?

Organisation.

Question 5: Which of the below options best describes you?

Other.

Question 6: Please provide a summary of why you chose to respond to this call for evidence, and any relevant expertise you have.

The Agriculture and Horticulture Development Board (AHDB) is a statutory levy board, funded by farmers, growers and others in the food supply chain. It exists to make British agriculture and horticulture industries more competitive and sustainable through factual, evidence-based advice, information and activity. Levy payers are considered as the primary customers although AHDB also benefits the wider industry.

AHDB staff have technical expertise in a wide variety of fields including: animal health and welfare, retail and consumer insights, market intelligence, and exports.

Question 7: Where are you based in the UK?

England.

Question 8: Please provide the name of your organisation (optional).

Agriculture and Horticulture Development Board (AHDB).

Question 9: Please provide a summary of what your organisation does and where relevant who you have consulted to formulate your response.

The Agriculture and Horticulture Development Board (AHDB) is a statutory levy board, funded by farmers, growers and others in the food supply chain. It exists to make British agriculture and horticulture industries more competitive and sustainable through factual, evidence-based advice, information and activity. Levy payers are considered as the primary customers although AHDB also benefits the wider industry. The delivery of services to levy payers and industry stakeholders is currently channelled through six sectors, which account for about 72% of total agricultural output in the United Kingdom (UK), including pork, beef and lamb, dairy, cereals, vegetables and potatoes.

Staff with technical expertise across multiple teams within the organisation have been approached to formulate this response and we have also taken sounding from other industry organisations.

Question 10: Where does your organisation operate? Please select all that apply.

AHDB operates across six sectors with the following geographical remit for each:

1. England for the Beef and Lamb sector
2. England for the Pork sector
3. England, Wales and Scotland for the Dairy Cattle sector
4. England, Wales and Scotland for the Potato sector
5. England, Wales and Scotland for the Horticulture sector
6. England, Wales and Scotland and Northern Ireland for the Cereals and Oilseeds sector

The evidence-based resources AHDB produce are widely accessible and used both within and outside the UK.

Question 11: Where are your organisation's headquarters?

England.

Question 12: What type of organisation are you responding for?

Other. Statutory Levy Board.

Question 13: Does your business source / sell agricultural or food products?

No.

Question 14: What is the primary purpose of your business?

Other. AHDB is a statutory levy board, funded by farmers, growers and others in the food supply chain. It exists to make British agriculture and horticulture industries more competitive and sustainable through factual, evidence-based advice, information and activity.

Question 15: Please provide your 5-digit Standard Industrial Classification (SIC) code.

AHDB has a wide remit across six sectors therefore multiple codes are applicable, listed below:

- 01610 Support activities for crop production
- 01629 Support activities for animal production (other than farm animal boarding and care) n.e.c
- 58190 Other publishing activities
- 74909 Other professional, scientific, and technical activities n.e.c

Labelling for animal welfare

Question 16: What barriers are there for consumers wishing to buy food produced to UK baseline welfare or higher? Please provide supporting evidence on the drivers of the value-action gap.

- a) Currently 'higher' welfare products tend to be recognised by Farm Assurance Scheme labels. E.g. RSPCA Assured
- b) These products tend to command a higher price – as an example, the premium paid for pork products with an outdoor claim is £9.27 per kg versus £5.67 per kg for standard (Source: Kantar). Premium private label (PL) tier products, where higher welfare tends to be found, command a significant price premium of 48% (Kantar, Total meat, fish and poultry, 52 w/e 03 Oct 21). Price is the main driver for products with welfare low down on the list of items consumers consider when making a purchase decision.
- c) Price becomes higher up the agenda the more financial uncertainty shoppers have, which is particularly true in the current climate, with financial confidence in the year ahead dropping significantly in Sep 21 (IGD ShopperVista, Sep 21). Therefore products labelled as higher welfare have low uptake and represent a small segment of the market. This is likely one of the reasons why premium PL products have such a low share of meat, fish and poultry (MFP) volumes, at just 6% (Kantar, Total MFP, 52 w/e 03 Oct 21). This figure is even lower in primary meat products, at just 3%.

- d) In order for meat and dairy produce to receive recognition for production to baseline or higher welfare there is first a need to have a system in place that independently and robustly assesses livestock welfare. This needs to be independent of production system type.
- e) The system needs to be based on welfare outcome measures that are meaningful to animals (e.g. lower levels of lameness / injury) and not based on perceived welfare benefit (e.g. system type) which does not equate to welfare.
- f) There is frequently a mis-alignment between consumer's perception of welfare and welfare outcomes for livestock (e.g. Free-range/outdoor systems – where animals may be subject to adverse weather and predation).
- g) There is no single industry recognised assessment of welfare for the ruminant sectors to enable an independent evidence-based assessment of welfare. The Real Welfare scheme provides such a tool for the pork sector.
- h) There is little uptake of the AssureWel protocol's of welfare outcome assessments in the ruminant sectors, which may indicate either practical difficulties in implementation or a lack of perceived benefit. Requires further investigation.
- i) Defra's Code of Recommendations for the Welfare of Livestock: Sheep was last reviewed and updated in August 2003, more than 18 years ago and needs reviewing and ~~an update~~ updating to reflect current legislative changes and guidelines.
- j) Defra's Code of Recommendations for the Welfare of Livestock: Cattle was last reviewed and updated in March 2003, more than 18 years ago and needs ~~an update~~ ~~an update~~ reviewing and updating to reflect current legislative changes and guidelines.
- k) .The Code of practice for the welfare of pigs was updated in 2020 to reflect the legislative changes and revised guidelines since 2003..
- l) Animals move across UK borders, particularly in the sheep sector. However, animal health and welfare are devolved matters within government policy making. Whole life welfare labelling may be difficult to achieve without devolved administration inclusion, debate, and agreement.
- m) We suggest any food labelling system for welfare, if introduced, needs to be simple, consistent across sectors to avoid consumer confusion and importantly be based on meaningful welfare improvements for animals.

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

Other. No.

Why?

Robust, independent evidence of higher welfare for farmed livestock is required first to support such a labelling system. This would be required before any labelling system could be designed or introduced.

There is a complex system of movement of animals between farms and across UK borders, particularly in the sheep sector. Suitable traceability is required to support an animal welfare labelling system for 'whole life assurance.' However, animal health and welfare are devolved matters within government policy making. Whole life welfare labelling may be difficult to achieve without devolved administration inclusion, debate, and agreement.

Existing welfare labelling uses animal production method as a proxy for animal welfare. This is both misleading to consumers and does not ensure higher welfare for animals. Only welfare outcome measures can be used to evidence animal welfare. Using production method as a proxy for animal welfare is highly likely to lead to unintended consequences of poorer welfare, as seen in data from egg production. For example, higher mortality (an indicator of welfare) in free range systems (considered by consumers to be higher welfare) compared to conventional systems (Weeks, et al., 2016)

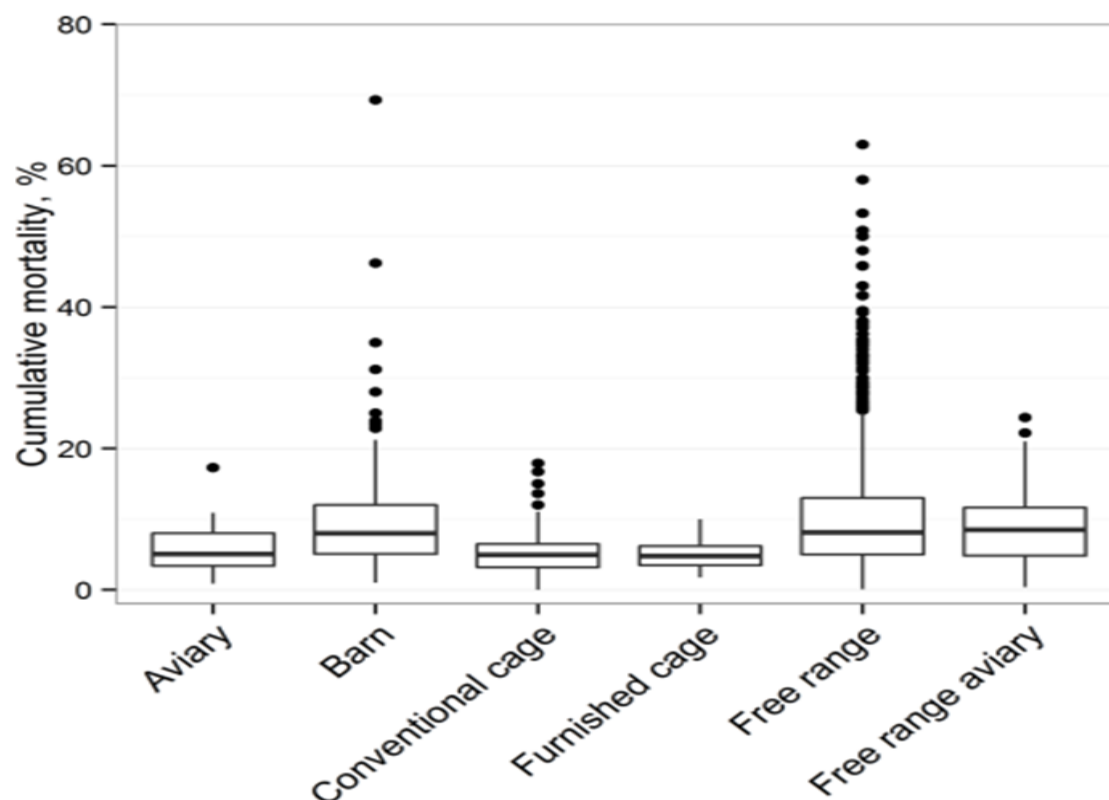


Figure 1. Box plots for mortality in each laying hen housing system using data from 10 studies (3,851 flocks) Source: Weeks *et al*, 2016 <https://doi.org/10.5061/dryad.60q44>

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? You may wish to refer to specific species you have a particular interest in.

It is no longer appropriate to make assumptions about the state of animals' welfare based simply on the resources provided to them. Measuring levels and types of inputs can become a tick box exercise, and do not necessarily indicate good or bad welfare. Anthropomorphic analogies make input-based assessments inherently biased. **AHDB recommend that any welfare standards must not be defined on the basis of inputs or production systems, but instead on welfare outcomes.**

AHDB, along with others, have been working to develop practical, reliable methods for assessing the health, physical condition and behaviour of farm animals, particularly pigs, to give us a more accurate and direct picture of their welfare. This approach is known as 'welfare outcome assessment'. Welfare outcomes are taken from the animals themselves, regardless of inputs and production systems. This enables appropriate comparisons across farms in how welfare is managed and can be used to evidence improvements over time in welfare of the animals.

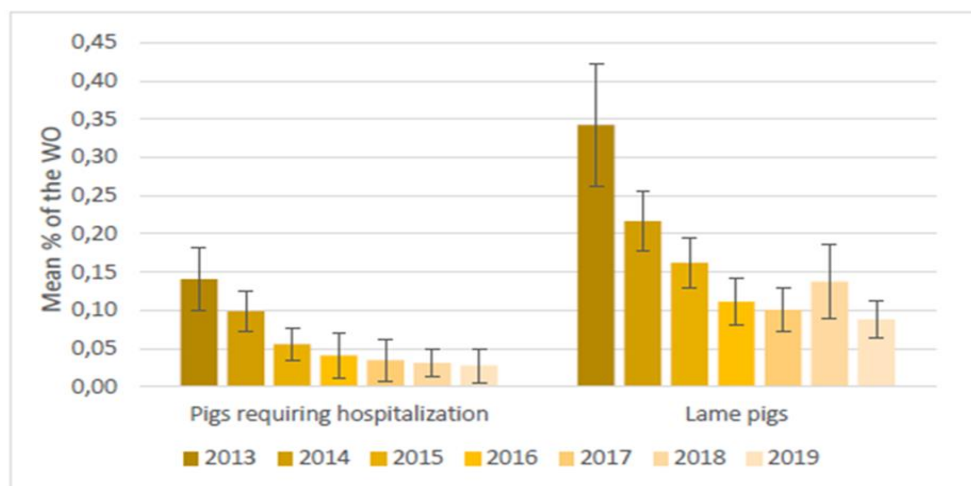
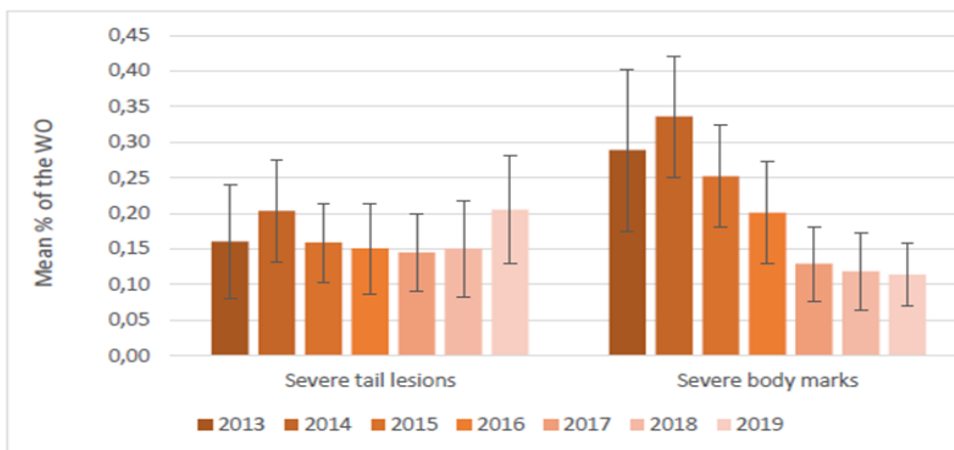
As stated above, animals move across UK borders, particularly in the sheep sector. However, animal health and welfare are devolved matters within government policy making. Whole life welfare labelling may be difficult to achieve without devolved administration inclusion, debate, and agreement.

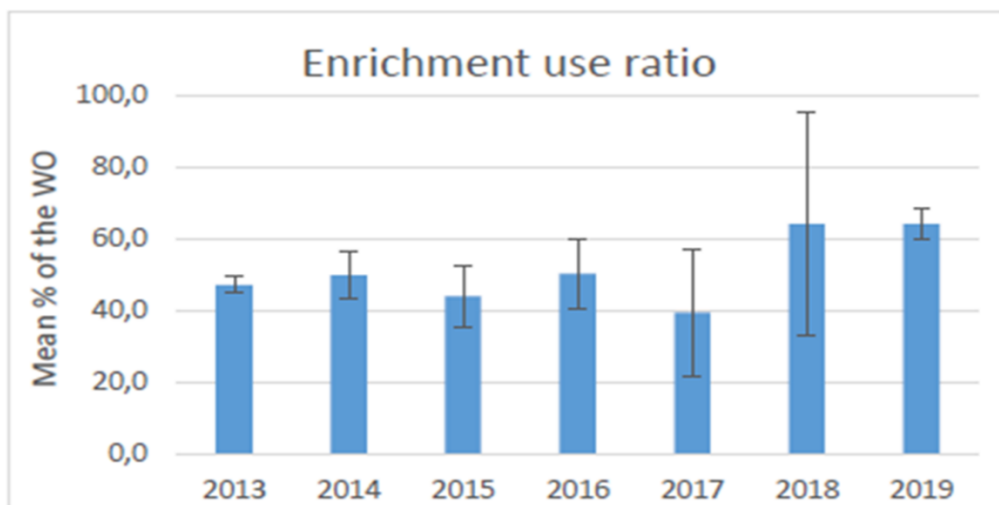
Question 19: How could welfare outcomes be incorporated into a set of welfare standards that can then be used for a label? You may wish to refer to specific species you have a particular interest in.

Outcomes are evidence based and this is the approach that has been taken in the development of the AHDB run Real Welfare scheme. The scheme involves on-farm assessment of finisher pig welfare using a set of five objective and repeatable 'welfare outcomes', which are animal-based, and thus obtained from the animals themselves, rather than from their environment. This underlines that good welfare should be achieved in any system. Real Welfare outcome assessment for pigs is a requirement of Red Tractor and Quality Meat Scotland farm assurance, covering 95% of all pigs slaughtered in the UK. The RSPCA use a similar welfare outcome scheme, Assurewel (<http://www.assurewel.org/index.html>) as part of their RSPCA Assured farm assurance scheme but cover a much smaller number of pigs (approx. 30%). Real Welfare was developed in response to the pig industry's need for strong, science-based evidence to demonstrate its husbandry standards to retailers, animal welfare lobby groups, policymakers and consumers. Whilst Real Welfare outcome assessment is in progress for finisher pigs, other species do not have such schemes. Other species/industries should consider whether similar schemes, based on welfare outcomes, should be developed, as they can support reputation, export trade and evidence trends in welfare over time. This additionally allows resource to be focused where needed in terms of R&D and on-farm support/advice. An outcome-based assessment provides a measure of welfare, independent of the production system an animal is reared in. Such data could be used to support a welfare scheme in the

future or remove such a need, since the industry could confidently provide data to reassure consumers of high animal welfare achieved for farmed livestock.

The data collected by the Real Welfare Scheme belongs to producers. AHDB manages the anonymised data set amalgamated across all units, which enables us to monitor welfare outcomes across the whole industry and trends over time (see Figures 2-4). If producers gave permission their data could be used to evidence welfare of finisher pigs on their farms, as assessed by Pig Veterinary Society (PVS) vets.





*Explanation of enrichment use ratio, 100 = all pigs using enrichment; 0 = none

Figures 2.4. Annual means for all Real Welfare outcomes (pen level)

Source: AHDB Pork Real Welfare Scheme Statistical analysis of data 2013-19 (2020)

More details and published reports and papers on the Real Welfare scheme for pigs can be viewed at: <https://ahdb.org.uk/knowledge-library/real-welfare>

Real Welfare Reports:

<https://ahdb.org.uk/knowledge-library/real-welfare-baseline-report-2013-2016>

<https://ahdb.org.uk/knowledge-library/real-welfare-update-report-2013-2017>

<https://ahdb.org.uk/knowledge-library/real-welfare-update-report-2018-2020>

Scientific papers:

Pandolfi, F., Stoddart, K., Wainwright, N., Kyriazakis, I. and Edwards, S.A., 2017. The 'real welfare'scheme: benchmarking welfare outcomes for commercially farmed pigs. *animal*, 11(10), pp.1816-1824.

<https://www.sciencedirect.com/science/article/pii/S1751731117000246>

Pandolfi, F., Kyriazakis, I., Stoddart, K., Wainwright, N. and Edwards, S.A., 2017. The "Real Welfare" scheme: Identification of risk and protective factors for welfare outcomes in commercial pig farms in the UK. *Preventive veterinary medicine*, 146, pp.34-43.

<https://www.sciencedirect.com/science/article/pii/S0167587717302581>

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.

If new labelling regulations for animal welfare were introduced, the welfare standards would need to specify the period of time that they applied for. For example, Red Tractor provides assurance for beef cattle (which are typically slaughtered at 12-24 months) if they have spent a minimum of 90 days on an assured farm, whilst Quality Meat Scotland provides lifetime assurance. Some livestock sectors separate out breeding, rearing, and producing. Therefore, welfare standards need to be considered in the context of possible application to breeding flocks or herds to give transparency on the welfare of an animal's parents.

- a) The traceability for each species throughout their life
- b) Period of time the assurance label is applicable
- c) Not all species have individual identification in place
- d) Farms may not always keep dam and sire records for commercial flocks. In addition, in commercial flocks, the sire may not be identifiable individually as multiple males will be put out in the field with females.
- e) Transport / haulier records would need to be available
- f) Welfare assessment at slaughter may be difficult where abattoir line speeds are fast paced.
- g) Animals move across UK borders, particularly in the sheep sector. However, animal health and welfare are devolved matters within government policy making. Whole life welfare labelling may be difficult to achieve without devolved administration inclusion, debate, and agreement.
- h) There may be changes in ownership and responsibility for the welfare of animals at different stages of the animal's life e.g., breeding, rearing, transport and slaughter. If a whole life assurance label is developed, consideration would need to be given for assessment and assurances for each stage and how differences in welfare achieved are reconciled within a single label.
- i) A range of legal slaughter methods exist, which have different impacts on animal welfare at the point of slaughter (FAWC, 2003). A farmer may have limited control over slaughter methods used.

Refs:

Red Tractor (Nov 2021) Beef and Lamb Standards. https://assurance.redtractor.org.uk/wp-content/uploads/2021/08/RTStandardsV5_BeefLamb_SINGLES.pdf

Quality Meat Scotland (2020) Cattle and Sheep Standards

https://www.qmscotland.co.uk/sites/default/files/qms_cattle_and_sheep_standards_2020_final_20200110.pdf

FAWC (2003) Report on the Welfare of Farmed Animals at Slaughter or Killing Part 1: red Meat Animals. Defra.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/325241/FAWC_report_on_the_welfare_of_farmed_animals_at_slaughter_or_killing_part_one_red_meat_animals.pdf

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

AHDB does not work with the poultry sector and so is unable to respond to this question.

Method of slaughter

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

No.

Why? Please provide supporting evidence

Consumers may disassociate meat products from its animal origins. It would be advisable to review evidence via robust consumer market research on the implications of including slaughter method on pack before considering labelling. Slaughter method labelling on pack may have negative unintended consequences, including reduction of meat consumption leading to substitution of products with alternatives that have higher environmental impacts making it harder to reach global targets and that are more likely to be produced overseas (soya-based burgers for example). It may also increase human health issues related to nutritionally imbalanced diets.

There is already a wide variety of labels on pack which consumers struggle to understand. Additional labels may obscure the view of the product which may disadvantage consumers whose principal concerns are price and look of product.

There are concerns based on evidence that if meat is labelled according to its method of slaughter, that within certain communities it could drive increased purchase of meat from un-stunned animals. This would have unintended consequences leading to an increase in demand for un-stunned meat and hence the number of animals required to be un-stunned at the point of slaughter. For example, there is a lack of unified national or global Halal standards and this has resulted in consumer confusion as to what is authentic Halal. In a recent survey of Halal Certification Bodies (HCBs), the majority of certifiers indicated that they accepted pre-slaughter stunning if the stunning did not result in the death of animals prior to exsanguination (Fuseini, et al., 2020). However, in another study of 250 Halal meat consumers in England, the majority of respondents (approximately 70 per cent) indicated a preference for meat from animals slaughtered without stunning over those stunned before slaughter, despite it being certified as Halal (Fuseini, et al, 2020b), as this they felt assured compliance with Halal standards and beliefs. Further assurances are required within the UK to demonstrate recovery after stunning to provide reassurances for Halal standards and consumers for those who are willing to consider stunned meat as compliant with their religious beliefs. Defra recently launched a scheme called 'demonstration of life' which is now available to abattoirs wishing to demonstrate reversibility of stunning. This evidence has the potential to improve animal welfare at slaughter and may reduce the requirement for non-stun production.

It may be implausible to achieve for example a top tier of high welfare labelling where non-stun slaughter methods are used within whole life labelling assurance. Conversely, faith based Halal or Kosher consumers may require that non-stunned products represent the pinnacle of high welfare and only seek to purchase products that meet this requirement.

Fuseini, A., Hadley, P. and Knowles, T., 2020. Halal food marketing: an evaluation of UK halal standards. *Journal of Islamic Marketing*.

<https://www.emerald.com/insight/content/doi/10.1108/JIMA-02-2020-0037/full/html>

Fuseini, A. and Knowles, T.G., 2020b. The ethics of Halal meat consumption: preferences of consumers in England according to the method of slaughter. *Veterinary Record*, 186(19), pp.644-644.

<https://bvajournals.onlinelibrary.wiley.com/doi/abs/10.1136/vr.105287>

Question 23: If the UK government introduced mandatory or voluntary method of slaughter labelling regulations, should this be:

- As part of a wider set of animal welfare standards where the label indicates the welfare of the whole life of the animal
- As a standalone label relating only to the method of slaughter

Why? Please provide supporting evidence

Neither. Labelling for animal welfare is a complex issue and is only possible after the development of a system that captures robust independent evidence of animal welfare which must be based on animal outcome measures. Whole life assurance would require breeders, farmers, hauliers and abattoirs to agree to a standardised welfare assessment and assurance system, such as that used within some Farm Assurance schemes. It will also require devolved administration discussion and agreement at government level to facilitate any proposed labelling regulations because animals move across UK borders.

If the aim is to improve animal welfare and demonstrate high welfare standards, labelling alone does not do this. A wider set of developments is needed to enable potential for labelling in the future.

Approaches to labelling

Question 24: Which type of labelling could be most effective at:

- Supporting farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market?
- Improving animal welfare by unlocking untapped market demand for higher welfare products?
- 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?

Industry led

Why? Please use supporting evidence.

- It must be recognised that consumers tend to believe that British food is already of a high standard, with 17% agreeing that the “UK has very high animal welfare standards on farms”, and 61% agreeing that the “UK generally has high animal welfare standards on farms but there are still some bad cases” (YouGov, Sep 2020). The perception is therefore that UK baseline is usually of a higher standard than imported products, which is particularly true when compared to the USA, where 48% of consumers believe that US meat is worse than UK when it comes to animal welfare, with just 13% thinking it’s better (AHDB/Blue Marble, Sep 21). This then leads one to the conclusion that welfare labelling is not answering an unmet consumer need
- It is unclear by what mechanism labelling would ensure that farmers meeting baseline mechanisms are rewarded by the market. Meat and dairy produced to some assurance schemes receive a premium already. We need standardised measures of animal welfare before we can have non voluntary labelling.

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?

Strongly support -

Why?

The UK has a long-established animal welfare basis. UK farmers invest and ensure that these standards, often higher than global competitors, are achieved to give assurance to UK consumers that the products they buy are produced to the high welfare standards that they demand. Adhering to such standards comes at a financial cost to UK producers and so imported products that fall short of these standards, and in principle would compete on the domestic market at a lower price point, should be clearly labelled. This would give shoppers choice and make clear that such products while cheaper, may be due to lower welfare standards allowing consumers to make informed purchase choices.

Question 26: What business decisions would farmers and food businesses be likely to take in response to the introduction of mandatory labelling for animal welfare?

For example, in terms of what they grow, how they source ingredients, their product range, pricing and how they market to customers.

AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Question 27: How would these business decisions affect the accessibility, availability, and affordability of UK baseline and higher welfare products?

AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Question 28: How would these business decisions differ if regulations introduced were only voluntary but with welfare standards defined in law?

AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

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)?

A

A seems to be the system that could be adapted by including welfare metrics that go beyond system of production towards welfare outcomes. This would offer more simplicity for the consumer yet would have scope to be more sophisticated underneath.

B and C are attractive for the consumer in that consumers do value outdoor systems but they also value welfare outcomes such as lameness, mastitis etc which would not be covered.

In general more complexity is problematic as consumers tend to disengage and defer responsibility for welfare outcomes to the retailers.

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)

All could have merit but grading them would be highly subjective. We would recommend conducting consumer research to assess how clear and easy to understand and how appealing these are.

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)?

Both could have merit but grading them would be highly subjective. We would recommend conducting consumer research to assess how clear and easy to understand and how appealing these are

Question 32: Overall, which of the five labels do you think is most effective?

Please select: Etiquette Bien-Être – American Humane Certified – Beter Leven – Haltungsform -- CIWF Italia/Legambiente labelling proposal

Cannot answer without evidence

Why?

Any could have merit but grading them would be highly subjective. We would recommend conducting consumer research to assess how clear and easy to understand and how appealing these are.

Research shows that 54% of consumers think that a simplified system of production labelling would be very helpful in improving trust in the food system in the UK (AHDB/Blue Marble, 2019). Qualitative research shows that there is existing familiarity with simple (star) systems, which is why shoppers will better comprehend a tier system. However, there isn't enough evidence to suggest that showing all tiers on pack is favourable over a single icon or logo that forms part of a wider labelling system, such as Lidl's welfare labelling. Assurance

scheme standards could potentially be used as a basis for a broader welfare system. There is however the general consensus that such labelling should reflect the price spectrum, which again is likely to provide a barrier to shoppers.

Question 33: Please can you tell us your views on any domestic or international labels that indicates animal welfare. You may wish to include specific examples to highlight particular features that you like, or dislike.

Existing UK welfare labelling uses animal production methods as a proxy for animal welfare. This is both misleading to consumers and does not ensure higher welfare for animals. Only welfare outcome measures can be used to evidence animal welfare. Using production method as a proxy for animal welfare is highly likely to lead to unintended consequences of poorer welfare, as seen in data from egg production. For example, higher mortality (an indicator of welfare) in free range systems (considered by consumers to be higher welfare) compared to conventional systems (Weeks, et al., 2016)

Research shows that 54% of consumers think that a simplified system of production labelling would be very helpful in improving trust in the food system in the UK (AHDB/Blue Marble, 2019). Qualitative research shows that there is existing familiarity with simple (star) systems, which is why shoppers will better comprehend a tier system. However, there isn't enough evidence to suggest that showing all tiers on pack is favourable over a single icon or logo that forms part of a wider labelling system, such as Lidl's welfare labelling. Assurance scheme standards could potentially be used as a basis for a broader welfare system. There is however the general consensus that such labelling should reflect the price spectrum, which again is likely to provide a barrier to shoppers.

Please provide any evidence you have on the impact and effectiveness of existing assurance schemes or labelling regulations (domestic and international).

AHDB recommends that a proposal to collate robust independent evidence is tendered by Defra as a R&D call prior to any decision on labelling regulations.

Scope and impact of labelling

We would like to better understand the **primary production volume (kg or %)** of meat (beef, poultry, lamb, pork), eggs and dairy that ends up being sold **via**:

1. Retail (for example supermarkets, convenience stores) as:
 1. An unprocessed product (for example raw chicken breast, milk)
 2. An ingredient of a processed product, if possible, split into:
 1. Primary ingredients (for example pork in a sausage)
 2. Secondary ingredients (for example egg in a sponge cake)
2. Catering, if possible, split into:
 1. Private catering (for example restaurants, hotels)
 2. Public catering (for example schools, hospitals)

We would also like to understand the relative proportion of domestic production compared to imports for each of these categories.

Questions 34: Please could you provide us with any relevant data that you have available, including sources. We appreciate your data may not match up perfectly with the above categories but would appreciate the closest available. Business-level data will be anonymised and not shared outside of the UK Government.

As we import and export so much meat, identifying accurately where UK production goes by channel isn't possible. We have some analysis here: <https://ahdb.org.uk/news/how-do-uk-red-meat-markets-balance>, which is based on this document:

<https://ahdb.org.uk/knowledge-library/foodservice-insights-eating-out-review-2019>.

However, the above is based on all meat sold in the UK, regardless of country of origin.

We do some calculations too on a cwe basis, based on production and trade, which give an estimation of demand overall. However, this does not split out demand for British by channel..These are laid out below.

SUMMARY STATISTICS (EUROSTAT DEFINITION)												
	PRODUCTION						IMPORTS					
	Beef	Lamb	Pig meat	Red meat	Poultry	Total	Beef	Lamb	Pig meat	Red meat	Poultry	Total
	000 tonnes						000 tonnes					
2018	898.4	289.0	928.4	2115.7	1937.0	4052.8	453.7	92.1	1063.4	1609.2	991.5	2600.8
2019	914.5	307.5	957.4	2179.3	1910.3	4089.7	381.7	76.0	982.4	1440.1	990.0	2430.1
2020	932.1	296.1	984.3	2212.5	1974.9	4187.4	376.9	69.5	891.9	1338.3	901.7	2240.0
	EXPORTS						CONSUMPTION					
	Beef	Lamb	Pig meat	Red meat	Poultry	Total	Beef	Lamb	Pig meat	Red meat	Poultry	Total
	000 tonnes						000 tonnes					
2018	147.1	87.4	268.2	502.7	404.9	907.5	1205.0	293.7	1723.6	3222.3	2523.7	5746.0
2019	174.3	98.6	291.3	564.2	402.5	966.7	1121.9	284.8	1648.6	3055.2	2497.8	5553.0
2020	152.7	91.9	300.3	544.9	439.7	984.7	1156.2	273.7	1575.9	3005.8	2436.9	5442.7
	PRODUCTION MINUS EXPORTS						CONSUMPTION OF UK MEAT					
	Beef	Lamb	Pig meat	Red meat	Poultry	Total	Beef	Lamb	Pig meat	Red meat	Poultry	Total
	000 tonnes						000 tonnes					
2018	751.3	201.6	660.2	1613.1	1532.1	3145.2	751.3	201.6	660.2	1613.1	1532.1	3145.2
2019	740.2	208.8	666.1	1615.1	1507.8	3123.0	740.2	208.8	666.1	1615.1	1507.8	3123.0
2020	779.3	204.2	684.0	1667.5	1535.1	3202.7	779.3	204.2	684.0	1667.5	1535.1	3202.7
	UK MARKET SHARE						IMPORT MARKET SHARE					
	Beef	Lamb	Pig meat	Red meat	Poultry	Total	Beef	Lamb	Pig meat	Red meat	Poultry	Total
	per cent						per cent					
2018	62.3	68.6	38.3	50.1	60.7	54.7	37.7	31.4	61.7	49.9	39.3	45.3
2019	66.0	73.3	40.4	52.9	60.4	56.2	34.0	26.7	59.6	47.1	39.6	43.8
2020	67.4	74.6	43.4	55.5	63.0	58.8	32.6	25.4	56.6	44.5	37.0	41.2
	SELF-SUFFICIENCY											
	Beef	Lamb	Pig meat	Red meat	Poultry	Total						
	per cent											
2018	74.6	98.4	53.9	65.7	76.8	70.5						
2019	81.5	108.0	58.1	71.3	76.5	73.6						
2020	80.6	108.2	62.5	73.6	81.0	76.9						

If we consider beef, the UK is 75%ish self-sufficient in beef and according to the 2019 report, 21% of demand was out of the home. We produce 900kt, and export 150kt in carcase weight equivalent. That leaves 750kt of UK beef in the home market. We import 450kt. If foodservice/out of home is 21% of 1200kt (750+450 = national demand) then it's 250kt, and retail must be the other 950kt. So, if we already assume that imported beef does well in foodservice anyway, and retail is dominated by British, that leaves very little room for UK beef out of the home as it is. (450kt imports into a market of 250kt, and 750kt of British serving a retail market of 950kt). We still wouldn't say that British beef 100% goes into retail, as plenty of restaurants claim to serve it.

Due to these considerations it is impossible to estimate with accuracy the true split, for any meat.

Categorisation of food products

Question 35: What would the impact be if current mandatory labelling was expanded to indicate the welfare of all unprocessed meat, eggs, and milk, whether imported or domestically produced? Please detail each type of impact (positive or negative), the size

of impact, related cost/benefits, and who would be impacted, providing supporting evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. It may be helpful to define and lay out any assumptions on which your answer is based, such as what a set of welfare standards may look like for a given animal.

Impacts on consumers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on food industry: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on farmers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on animals: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Question 36: How would the impacts differ between types of unprocessed meat, eggs, and milk? (For example: lamb, beef, chicken, pork, eggs, milk, other poultry meat)

Impacts on consumers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on food industry: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on farmers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on animals: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

We understand that labelling changes can be costly and are interested in how costs can be reduced; for example, by allowing enough lead-in time so that labelling changes can be made as part of the normal product cycle.

Question 37: To what extent might any negative impacts of labelling changes be reduced, and how?

Production systems take time to change and in some cases could include significant capital expenditure. Some animal production cycles are over several years. In order to make investment in changes then there would need to be confidence and trust in the labels, and the likely consumer demand. To reduce the negative impact longer lead in times allow for consumer research, development of markets and production system changes.

Prepacked processed products

Question 38: In Q35 we asked what the impacts would be of introducing mandatory labelling to indicate the welfare of all imported and domestically produced *unprocessed* meat, eggs, and milk.

How would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which are minimally processed with meat, egg, or milk as the major ingredient? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who would be impacted, providing supporting evidence where available. We would like to understand how the impact could vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

Impacts on consumers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on food industry: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on farmers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on animals: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Question 39: Compared to Q38, how would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which contain meat, milk and/or eggs as primary ingredients? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits and who is impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

Impacts on consumers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on food industry: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on farmers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on animals: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Question 40: Compared to Q38, how would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which contain meat, milk and/or eggs as secondary ingredients? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits and who is impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

Impacts on consumers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on food Industry: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on farmers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on animals: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Question 41: To what extent could these supply chain impacts be reduced if:

- Labelling regulations for processed products were introduced a few years after those for unprocessed products, to allow time for higher welfare markets to develop
- Welfare standards for a given ingredient were assigned based on the lowest standard of animal welfare in a batch, preventing the need for segregation
- The label only displayed the welfare standard of one ingredient where a processed product included more than one type of meat, egg, and milk.

Please select: Significantly reduced -- Partially reduced -- No impact

Why? Not for AHDB

Question 42: Are there other ways that these supply chain impacts could be reduced? How?

Not for AHDB

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? Please provide supporting evidence. We are particularly interested in evidence that quantifies the availability of welfare information or higher welfare options.

- At present consumers can choose (if labelled) organic / higher welfare like RSPCA assured (as these logos are used on some menus). However, many menus are not explicit in these claims
- When eating out of home, we know consumer priorities change. For example, 27% of in-home meals are influenced by health as a need state, whereas this drops right back to just 6% when out of home. Enjoyment becomes the greater priority.
- It is likely that welfare becomes even less of a priority out of home

Question 44: What barriers do mass caterers face in providing welfare information and higher welfare options to consumers? How can these be overcome?

- Lack of information provided by suppliers
- Inconsistent supply chains to ensure what is labelled is correct
- The reprinting of menus every time a delivery changes or let down by a particular supply route

Question 45: Which of the following options do you think could be suitable for indicating welfare standards within the catering sector? Please select up to 3 that you would be in favour of.

- Mandatory labelling of the welfare standard at the point of sale, for example: on the menu
- Mandatory disclosure of welfare standards available per product, for example: welfare information must be available on request
- Mandatory disclosure of welfare standards on aggregate, for example: website states percentage of chicken sourced from free-range systems
- Voluntary labelling of the welfare standard, using marketing terms defined in law
- Rating for each mass caterer based on their welfare standards
- **No further action and use existing voluntary disclosures.**

Why? Please provide supporting evidence.

It is too early to make this decision. We would need to have the evidence on welfare, a labelling system designed and then we could answer this question.

Question 46: In Question 35, we asked what the impacts would be of introducing mandatory labelling to indicate the welfare standards of all imported and domestically produced *unprocessed* meat, eggs, and milk.

How would the impacts differ if the catering sector were required to disclose the welfare standards of meat, milk and eggs purchased? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who could be

impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response.

Impacts on consumers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on food industry:

- The whole labelling system would need to be linked to a central database, ensuring full traceability, ensuring all primals are traceable back to each individual carcass.
- Batching carcasses according to welfare criteria would be an additional issue to overcome with added pressure on the speed of the line running and chiller space to ensure adequate “gapping” between the classifications (rather than carcass classifications)
- (Bearing in mind speed is vital to cut costs and chiller space is of a premium)
- It will also be an additional barrier to pricing – e.g.
 - non-farm assured
 - farm assured followed
 - non-farm assured with welfare status
 - Farm assured with Welfare status
 - followed by whatever sub classifications for each level of main classification
- Creating batches of steaks within a welfare status could be tricky for small to medium sized enterprises due to stock levels being sent to retail and bigger processing plants (would impact on job viability if couldn't supply through no cause of their own)
- Lack of continuity of supply, only on an ad hoc basis would be sustainable.

Impacts on farmers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on animals: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Question 47: Compared to mandatory disclosure, how would the impact differ if the catering sector were required to label food containing meat, milk, and eggs as primary ingredients, for example on menus? Please detail each type of impact (positive

or negative), the size of impact, related cost/benefits, and who is impacted, providing supporting evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response.

Impacts on consumers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on food industry:

- Making menus fit a price point
- The constant change of menus structure due to the demand through retail
- The reprinting of menus with correct information logos when supply chain is not consistent
- The extra space needed to put ingredient decks on menus for main ingredient and proteins
- Who is affected in this - chefs / restaurant owners / pub groups / cafes / independents sectors eateries?

Impacts on farmers: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Impacts on animals: AHDB is unable to answer this question. We would need to understand what labelling system was being introduced before being able to assess impact and likely response.

Monitoring and enforcement

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

Not for AHDB

Question 49: What existing monitoring and enforcement regimes could set a precedent for, or be adapted to incorporate, any new requirements? Please consider multiple points in the food value chain.

Not for AHDB

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

Not for AHDB

Question 51: What role could accreditation play in assuring the welfare standards of imports?

Not for AHDB

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?

Please select: Yes – No

Possibly

If yes, which terms and why?

There is some consumer demand for products based on what the animal ate – corn-fed, grass fed etc. Potentially soya-free could become a claim consumers may start to look for. We have little evidence here however

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? Please provide examples and attach photos or web links if available.

No evidence

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? Please consider this from a consumer and business perspective and outline the challenges and opportunities that you see for each.

Consumer perspective:

Our evidence suggests that consumers value clarity and simplicity and are already confused by the plethora of different labels and schemes on pack. This can be evidenced by the fact that many existing labelling schemes have low recognition. Only 27% of

consumers recognised RSPCA assured (Source: AHDB/YouGov Aug-20). Only 43% were very or quite clear on what assurance schemes mean. There is demand from consumers for labelling indicating sustainability (here defined as food miles, carbon footprint or water use for example) with 81% believing that that could help improve trust in the food system (source: AHDB/Blue Marble Aug-21). And such system much be holistic and consider multiple elements of sustainability so incorporating carbon as well as biodiversity, soil health, water usage and so on as well as the welfare components. It would be necessary to decide whether welfare outcomes or sustainability outcomes would be privileged in the assessment and what weighting various elements would be given.

Business perspective: *As above*

Question 55: What are your views on:

- A label based on a set of production standards on-farm which include both welfare and sustainability criteria for livestock production.
- 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
- 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

Our evidence suggests that consumers value clarity and simplicity and are already confused by the plethora of different labels and schemes on pack. This can be evidenced by the fact that many existing labelling schemes have low recognition. Only 27% of consumers recognised RSPCA assured (Source: AHDB/YouGov Aug-20). Only 43% were very or quite clear on what assurance schemes mean.

How to respond

Please submit your response by **06-Dec 2021** using the online portal at <https://consult.defra.gov.uk/animal-welfare-market-interventions-and-labelling/labelling-for-animal-welfare/>.

Alternatively, you can post your response to:

Labelling for Animal Welfare
Consultation Co-ordinator, Defra
2nd Floor, Foss House,
Kings Pool,
1-2 Peasholme Green,
York, YO1 7PX.

Or email us your response at: welfare.label@defra.gov.uk