

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.

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- 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.¹
- 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-rearedq free-range.qThis approach is insufficient -

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~~ ~~ranged~~ 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.

- 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

- 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 d

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**
- 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

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 ca()102()102()10(e)27(x)-28(i)-12(s)-28(t)-15(i)-12(n)27(g)-31()102(w)16(o)27

Aligning with wider food labelling reform

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