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FVE's position on Animal Welfare Labelling

Adopted at the GA London, June 2022

Introduction and aims of Animal Welfare Labelling

In 2009, FVE made a position statement on Animal Welfare Labelling. In 2021, it was felt that this position needs updating also given that the European Commission (EC) aims to examine setting up of a European Union (EU) animal welfare label as referred to in the Farm to Fork strategy¹. As a prerequisite, FVE recognises that veterinarians as knowledgeable and accountable professionals have a special duty to take advantage of multiple opportunities to advocate for animal welfare². For an Animal Welfare Label to be credible and valuable, veterinary expertise and supervision are imperative to advise on health and welfare as well as to verify the welfare claims. Furthermore, FVE emphasises that animal health and welfare, as well as public health including food safety, are all important and should be seen from a 'One Health – One Welfare' perspective.

FVE proposes that an EU-wide Animal Welfare Label should aim for the following:

- Inform consumers in both retail and catering environments on the welfare standards of husbandry conditions under which a farmed animal has been bred, raised, transported, held, and slaughtered if applicable, allowing them to make an informed choice while being assured that specific animal welfare standards are being achieved;
- Drive the market towards more animal welfare-friendly products and allow farmers to better market these animal welfare-friendly products;
- Work towards continuously improving animal welfare in European livestock farming, and indirectly worldwide;
- Create a single, consistent EU label to harmonise animal welfare standards across EU countries as a reliable, sound source for an informed choice of EU consumers, and simultaneously reduce confusion due to the plethora of labels currently on the market (see Annexe).

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¹ https://ec.europa.eu/food/farm2fork_en

² OIE Terrestrial Animal Health Code (2021). Glossary, definition of Animal Welfare; <https://www.oie.int/index.php?id=169&L=0&htmfile=glossaire.htm> [Accessed February 22, 2022].

Main FVE recommendations for an EU Animal Welfare label

- Animal welfare measures should be based on the latest scientific evidence. Scientific research in animal welfare must continuously be promoted to identify the most valid indicators for all species, breeds, ages etc.
- Animal welfare indicators used must be reliable and feasible to assess and communicate. These indicators should be focused on fundamental aspects of animal welfare and be animal-based.
- The label itself as well as the certification and control mechanism must be transparent and give factual and accurate information as well as supportive for the farmer to improve animal welfare in their herd. Furthermore, it should be easy to comprehend for the consumer to enhance trust and confidence, and it must never be misleading.
- Ideally, the label should cover the welfare of the animal from birth to death and ensure traceability along the whole food chain.
- The use of the logo and visual entity must be protected for accredited farms and products only. The use of e.g., QR codes as links to detailed info on products should be considered.
- A label can only be given if the criteria met are higher than minimum EU animal welfare legislation. It is recognised that some national legislations of Member States are stricter than EU law.
- The housing-, management-, transport- and slaughter-conditions must be regularly controlled by independent, well-educated, and therefore competent experts, by and under the supervision of veterinarians. This control is essential for the credibility of the label and for the confidence of the consumers.
- The controlling findings should be linked whenever possible to the activities of the official controls of the competent authority, including the feedback from the Food Chain Information declaration, as well as results of ante-mortem and post-mortem meat inspections, and other relevant information. Persistent non-compliance to rules, fairly applied, must be penalised in order to ensure good animal welfare as well as continuous confidence in the labelling system.
- Consumer demands should be considered, and priority should be put on communication of animal welfare measures prioritised and those which are the most important from the animals' perspective. Retail may be enticed to run with such a scheme as occurs at present with other schemes due to financial added purchase value of the sold products. The increased selling price of the labelled products and competition for sales may attract retailers to adopt the scheme.
- Regular revisions should be performed, e.g., every 5th year.

General principles to use when measuring Animal Welfare

As much as possible, **animal-based indicators** should be used, as these measure welfare from the perspective of the animal. **The indicators should cover the life of an animal from birth to death.**

Indicators will have to be developed per species and type of production, taking into account different husbandry methods across Europe. Useful indicators to consider are among others the [Welfare Quality](#)[®] protocol³ and the [2018 FVE welfare indicators](#)⁴. Ideally, they should be iceberg indicators, i.e., indicators that provide an overall assessment of welfare through their ability to reliably summarise many different measures of welfare. Indicators will need to be continuously monitored and feasible to assess in practice by and under the supervision of a veterinarian to remain valid and trustworthy.

Scope and design of the Animal Welfare labelling

FVE recommends that an animal welfare label should:

- Focus solely on animal welfare, as a more holistic labelling including other aspects of sustainability would be less comprehensive for consumers and too complex to implement.
- The label should be multi-tiered with the number of tiers limited to three or four. Traffic light systems should be avoided, instead a more neutral system of stars or letters is more appropriate. It is acknowledged that the highest tier will contain the least farms and the majority of farms will be allocated to the lower tiers.
- Whether the system should be voluntary or mandatory, must be further investigated, as both approaches have their benefits and challenges. Practical consideration should be given to choose a set of preliminary iceberg indicators being eligible for achieving the animal welfare label, with an incremental increase in achieving more criteria over a period of 2-3 years, to make the scheme attractive on a voluntary basis in the beginning.
- For meat, the label should start by focusing on the most commonly farmed animals for meat production in Europe which are bred and reared in robust traceable systems to allow to track the animals through various farms during the lifetime of the animal, i.e. broiler chicken, pigs, and beef cattle, including veal calves. It would be advisable to start with the meat of one pilot species, e.g., pigs being one of the commonly farmed animals and having specific EU rules. It is acknowledged that the traceability mechanism from birth to death will be dependent on existing rules (as for cattle) and whether the animals stay on the farm of origin until slaughter (as is usual in most integrated pig and poultry production systems) or are bought and sold during the rearing cycle by intermediaries.

³ <http://www.welfarequality.net/en-us/home/>

⁴ <https://fve.org/publications/monitoring-of-farm-animal-welfare-using-animal-indicators/>

- For fresh milk and for single-ingredient dairy products (cheese, yoghurt) the label should be focusing on dairy cattle, and set up depending on space allowances, outdoor and pasture access. It is acknowledged that dairy plants will have to record the milk from different levels of the animal welfare label separately, which will increase the organisational effort.
- For table eggs, special attention to developing the animal welfare label system is needed. Laying hens have already an existing labelling system based on the housing requirements. It would be sensible to have method of transposition to a new scheme rather than reinventing the mechanism.
- Some animal species do not have specific EU minimum legislation yet e.g., poultry breeding stock, dairy cows, small ruminants, rabbits, turkeys, fish. Nevertheless, for these species minimum EU legislation would also be valuable, and a label could be beneficial for consumers. It is acknowledged that several national labels have already implemented animal welfare labelling for dairy cows and rabbits (see Annexe).

FVE proposes that the following aspects should be considered in the process of establishing an EU animal welfare label:

- Most of the products of animal origin produced in the EU are further processed. FVE would welcome qualitative or quantitative information on the animal welfare label at point of consumer exposure as well for processed products of animal origin but recognised the challenges for an animal welfare label in respect of processed products at retail, but as well for prepared food at community catering, restaurants and for ready-to-eat food.
- As a general principle, the EU must ensure that imported products meet minimum EU legislation. The animal welfare label should also be applicable to imported products for which a similar whole chain assessment needs to be performed in the third countries. Consideration should be given to ensuring that checks in third countries would be subject to audit by DG SANTE to assure EU Member States of the integrity of the schemes. EFTA countries, which already apply various EU legislation, may warrant special consideration.
- Ideally, the label covers the whole life of the animal, but breeding, raising, transport, fattening and slaughter are often done and controlled by different actors. It is important that the animal welfare assessment is consistent over the whole food chain and each actor is competently certified. Initial and continuous training for all actors, including auditors is key to ensure this. There would be benefits to having an extensive communication programme with those involved in the animal chain, to let them all know the bar is being raised to meet societal expectations.
- From an animal welfare point of view, and out of respect for an animal as a sentient being, the practise of slaughtering animals without prior stunning is unacceptable. FVE believes that any meat or meat products from these sources

should be clearly excluded from any animal welfare label to enable consumers to make an informed choice based on welfare, ethics or personal belief when purchasing such products⁵.

- Veterinarians are ideal to advise farmers towards higher animal welfare and to ensure a reliable and trustworthy validation of the label. Some veterinarians are already specially trained and active for years in animal welfare assessments e.g. for private labels or farm accreditation systems. In addition, FVE recognises that regular visits of veterinarians on the farm are essential⁶ as laid down in the new Animal Health Law and may be a prerequisite for the animal welfare label and serve directly for its implementation and control.
- Though organic and other assurance programmes are primarily overseen by non-veterinarians, supervision by veterinarians is an important principle to include the necessary liaisons between third-party assurance organisations and official veterinarians, for example, taking a layered approach to verification of the labelling criteria. Regularly collected harmonised quantitative and qualitative data based on latest scientific research could also be used for benchmarking to allow for performance comparison of individual farms.
- When investing in new buildings or equipment, it would be beneficial to evaluate in advance their animal welfare potential. Therefore, farmers should be offered science-based building advice from an independent actor (e.g., in Sweden all farm building plans need to be checked for compliance with minimal legal Animal Welfare requirements in order to receive a building permit).
- There should be a special investigation on how the organic farming label requirements can be linked to the EU animal welfare labelling scheme. It should be considered that no strong evidence for neither inferior nor distinctly higher animal welfare in organic farming compared with conventional production may be supported; therefore, auditable animal welfare criteria should be applied equally to all farming production systems resulting in one single labelling standard.
- The EU must create incentive schemes to reward farmers for improvements to their farms in order to ensure animal welfare labelling practices are equitable for all stakeholders. Support should be given to farmers who want to promote higher welfare e.g. through the Common Agricultural Policy or via the market. Attention should be paid to issues surrounding labelling systems:
 - The financing of the system needs to be investigated and so the costs split in a fair way
 - Infrastructure required to implement e.g. a label requiring cows to be on grass will not be possible for a farmer not having fields.

⁵ <https://fve.org/cms/wp-content/uploads/030-fve-position-labeling-meat-from-animals-slaughtered-without-stunning-final.pdf> [Accessed February 23, 2022]

⁶ https://fve.org/cms/wp-content/uploads/061-AHL-visits_adopted.pdf [Accessed February 22, 2022]

Annexe to the document

1. Examples of various existing labelling schemes in the agri-food business

- EU Labels:
 - The [EU legislation for laying hens](#) defines the labelling of different production methods (cages, free range, barn, etc.).
 - [EU voluntary marketing standards for poultry meat](#), which include reference to types of farming.
 - The [EU organic farming rules](#) encourage a high standard of animal welfare.
- Private: [GlobalGap 5-step animal welfare label](#)
- National: Hygiene ratings for restaurants and other food processing shops with respect to hygiene (FSA score in the UK, Danish Smiley system)

2. Examples of national animal welfare labels

| POLAND | FRANCE | UK – BVA choose assured farm products | IRELAND | The Netherlands | Demark | Germany |
|--|---|--|---|-----------------------------|---|--|
| The GLOBAL G.A.P. Aquaculture Standard Quality and Tradition QAFP Quality Assurance for Food Products QMP System Pork Quality System | Label Rouge Etiquette bien-être animal | <p>UK-wide</p> <ul style="list-style-type: none"> • Red Tractor • RSPCA Assured • Soil Association (organic) • Lion Eggs Code of Practice <p>Wales Farm Assured Welsh Livestock</p> <p>Scotland QMS (Quality Meat Scotland)</p> <p>Northern Ireland NIFQAS (NI Beef & Lamb Farm Quality Assurance Scheme)</p> | Irish Food Board (Bord Bia) Sustainability & Quality Assurance Standards Irish Organic Association | Beter Leven | Bedre Dyrevelfærd Anbefalet af Dyrenes Beskyttelse | Für Mehr Tierschutz Initiative Tierwohl Tierschutz Kontrolliert Haltungsform (Retail) |

3. Scope of the AWL: AW only label or embedded with other components e.g. sustainability.

| | AW label only | Label combining different components |
|-----------------|---|---|
| Pro's | <ul style="list-style-type: none"> • Can help consumers to decide based on AW grounds • Easy to communicate | <ul style="list-style-type: none"> • AW could add into the sustainability/life cycle analysis score • Help consumers in taking a decision based on several components |
| Contra's | <ul style="list-style-type: none"> • You can get a plenitude of labels e.g. one on nutritional aspects, one on sustainability, one on AW, etc. • Cannot help consumer in taking a holistic decision | <ul style="list-style-type: none"> • Difficult to combine indicators for all these different components. • AW will get a bit lost in the whole sustainability aspect. • How to handle the goal conflicts that could occur between different sustainability measures and AW |
| Notes | <ul style="list-style-type: none"> • AW & environmental sustainability may go hand in hands (e.g. decreased mortality, less transport) but sometimes they conflict (e.g. outdoor ranging and nutrient leakages). | |
| Examples | <ul style="list-style-type: none"> • Many e.g. RSPCA, Assured, Better Welfare (DK) | <ul style="list-style-type: none"> • National organic labels, e.g. KRAV (SE) |

4. Animal welfare labelling as Voluntary versus Compulsory system

| | Voluntary | Compulsory |
|---------------------------|--|--|
| Pro's | <ul style="list-style-type: none"> • Provide opportunities for more ambitious farmers • Less disagreement on limits • Allows farmers freedom to choose, avoiding impositions • Cheaper to implement (total cost of the system) | <ul style="list-style-type: none"> • Increase transparency for consumers as all products would be rated • All farmers/producers are in the system • Easier to have information on composite products • Cheaper for farmers as the system will be public financed |
| Contra's | <ul style="list-style-type: none"> • Not all products will have a label, so consumers will have no welfare info on many products. • Only high-level farmers will be interested to join • Who is going to finance the system? | <ul style="list-style-type: none"> • Farmers feel it is yet another burden • More expensive to implement, as all farms need to be scored and labelled • More expensive for the taxpayers |
| Existing examples: | <ul style="list-style-type: none"> • Organic label, as it is voluntary to choose to enter the organic scheme. However, when in the system it is obligatory to follow the rules. | <ul style="list-style-type: none"> • Laying hen production system numbers • Energy labels on household appliances |
| Notes: | <ul style="list-style-type: none"> • For eggs, label about production system already exist so industry may not be interested in another label. • If obligatory, need to see how we label products just meeting legal requirements or just to label those over a certain threshold. • Impact on imported products should be evaluated. | |

5. Design of the AW labelling system

| | Single level | Multiple levels |
|-----------------|--|--|
| Pro's | <ul style="list-style-type: none"> • Simple to use for categorisation • Easy to understand for farmers and consumers as condition compliance is Yes or No | <ul style="list-style-type: none"> • More choice for farmer and consumer • Easier to decide on thresholds among various levels • Easier to differentiate between farms • Can provide opportunities for more diverse farming systems (e.g. intensive/extensive) • The system may allow farmers, who cannot move to a high level, to join e.g. in spite lack of pastures for cows • Better potential to drive AW improvements in the EU, as more farmers can join from the beginning |
| Contra's | <ul style="list-style-type: none"> • May be a too blunt tool for classifying farms • Not enhancing a continuous improvement, as there may be low differentiations among farms within score • Only one level is controlled, as the zero level will be unrated. Threshold will be critical, i.e. basic level or very high level | <ul style="list-style-type: none"> • How to categorise if several steps? • More difficult to understand for consumers • Possible passage from one level to the other so a swift revision needs. |
| Notes | <ul style="list-style-type: none"> • Can the levels be communicated through the whole chain? • How is the AW levels kept when producing complex processed food? Experience from organic labelling may be used to handle this. | |