

## Labelling; A Means, Not an End

*Statement of Eurogroup for Animals to the German Presidency Conference; "Animal Welfare – Improving by Labelling?"*

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### Labelling or Communicating?

Labelling is a means to allow consumers to make informed choices. As there is overwhelming evidence that consumers' inability to identify high welfare on the shelf is damaging the market for high welfare products, it is clearly important that consumers are better informed.

Labelling is but one means of informing the consumer, however. If we wish to communicate with consumers about animal welfare, we will need to look at labelling, but we will also need to look beyond labelling.

Eurogroup therefore calls for an effective communication strategy to assist consumers as they make their choices.

Labelling may, or may not, prove to be an effective part of that strategy. Well thought through and well implemented, it has the potential to be very useful.

Poorly conceived and managed, labelling will be ineffective or damaging.

Eurogroup is concerned that in our eagerness to find an easy solution to complex problems, we may hastily seize on labelling as the only answer.

We therefore need to be very clear about the role of labelling, the sort of labelling that we want and the sort of labelling we should avoid.

In this statement, Eurogroup for Animals lays out some of the factors that should be considered when looking at welfare labelling.

### Labelling should be understandable

This is more likely to be achieved if coupled to a strong communication strategy.

Only consumers can tell us whether or not it is understandable. Labelling schemes should be trialled, evaluated and adapted before they are rolled out. If it cannot be shown to be an effective communication tool, a label should be amended or rejected.

### A welfare label should be about welfare.

The label should be designed in order to inform the consumer about the welfare implications of their purchases. Its purpose should not be to promote European agriculture in the face of foreign imports, or reassure consumers about the welfare standards of highly intensive agriculture.

### Clarity of purpose in labelling requires clarity of responsibility.

Communicating animal welfare to the consumer has to date fallen between DGs SANCO and Agriculture. The Commission's record of joined up working on animal welfare is not strong. Furthermore, successful implementation will require the Commission to be able to learn and adapt the scheme. To take this forward, the Commission should centralise responsibility for labelling and communication on animal welfare within one unit.

### More labelling cannot mean less legal protection

If effective, labelling would support the market for products raised to higher standards of welfare. No matter how successful however, not all animals will be raised to these higher standards. Without legal standards, some animals will therefore not be protected by any standards at all. There will always remain the need to provide legal protection for those animals which are not raised to the standards demanded by label. Eurogroup therefore does not see measures to inform consumers as being a substitute for legal protection. Rather it considers laws, (providing minimum protection for all), and labelling, (providing for higher levels of protection where there is a market), as having distinct and separate roles.

### High-Welfare labels for high welfare.

The role of labelling would be to support the market for products produced under better conditions than those produced under minimum legal standards. Furthermore, consumers have the right to expect their products to be produced legally. There can therefore be no justification for granting any form of high-welfare label to products that merely conform to minimum legal standards. It should not be forgotten that even when enforced, European legislation still fails to protect animals from many major welfare problems.

This is of particular concern if symbolic labels, (e.g. traffic lights or bronze/silver/gold medals) are used. Even awarding the lowest classification of welfare under such a scheme carries an implication of quality. When applied to products raised to minimum legal standards that implication could only mislead the consumer.

It should be noted that European table eggs, which are labelled according to their production method, do not use symbols. Battery eggs carry the unambiguous term "*eggs from caged hens*" to differentiate them from other, higher welfare systems. Supported by this welfare labelling, we have seen the consumption of eggs from non-cage systems rise to 275% of its 1997 level.

Eurogroup believes that the success of the scheme has been largely due to the fact that it has been compulsory for all methods of production, including the lower welfare systems, to identify themselves to the consumer. Compulsory labelling by production method would therefore be preferable to voluntary schemes for all animal products, but it is difficult to see how this could be accommodated within a system based on symbols.

### Welfare indicators are still in the pipeline.

The proposed use of symbols presents a further challenge, in that they assume it will be possible to measure the welfare of one system in comparison to another. Doing so would be very useful, and the Commission is to be commended for its forward thinking in the Welfare Quality® Project which is developing welfare indicators. Welfare Quality® does not present its findings until 2009. Until that date the usefulness of those indicators, in terms of their accuracy, their comprehensiveness and their ability to respond to consumers' true concerns about welfare remains uncertain. Eurogroup believes that it is premature to commit to a labelling system which relies on such welfare measurements before we have the means of implementing it and before we have trialled any proposed system.

### Transparency

Labelling can be an effective tool of trust, allowing consumers to be confident of the quality of their purchases. It must therefore not only be honest, it must be seen to be honest. The standards underpinning it must be transparent and agreed through due consultation with stakeholders.