



Department  
for Environment  
Food & Rural Affairs

# Consultation on fairer food labelling

Date: 12<sup>th</sup> March 2024



Scottish Government  
Riaghaltas na h-Alba  
gov.scot



Northern Ireland  
Executive



Llywodraeth Cymru  
Welsh Government

We are the Department for Environment, Food and Rural Affairs. We are responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



© Crown copyright 2024

This information is licensed under the Open Government Licence v3.0. To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence/](http://www.nationalarchives.gov.uk/doc/open-government-licence/)

This publication is available at [www.gov.uk/government/publications](http://www.gov.uk/government/publications)

Any enquiries regarding this publication should be sent to us at [welfare.label@defra.gov.uk](mailto:welfare.label@defra.gov.uk)

[www.gov.uk/defra](http://www.gov.uk/defra)

## Contents

Overview.....	4
Introduction.....	9
Part A: Country of Origin Labelling .....	16
Scope of consultation .....	16
Consultation questions .....	16
Part B: Method of Production Labelling.....	21
Summary of labelling proposals.....	21
Labelling approach .....	21
Scope of labelling .....	23
Defining production standards.....	31
Label format and terminology .....	37
Monitoring and enforcement.....	42
Business impacts.....	47
Small and medium businesses .....	48
Impact assessment.....	49
Wider labelling reforms.....	54
Annex A - Glossary of terms .....	55
Annex B - Draft production standards.....	58

## Overview

We are seeking your views on the UK government, the Scottish Government, Welsh Government and the Northern Ireland Executive's proposals for clearer food labelling through improved method of production and country of origin labelling in England, Wales, Scotland and Northern Ireland.

This consultation forms part of the government's wider work to make food labelling informative, consistent and accessible. We will ensure that these proposals align with ongoing work to bring about a standardised approach to eco-labelling through the Food Data Transparency Partnership. We recognise there may be other areas where labelling could provide additional transparency, for example highlighting when foods have been produced using pesticides which are not permitted in the UK. We have included a question at the end of the consultation which seeks your views on other labelling areas for government to consider in future.

## How to respond

Please respond to this consultation using the [Citizen Space consultation hub](#).

If you are unable to use Citizen Space, you can download the consultation documents and return your response via email to [welfare.label@defra.gov.uk](mailto:welfare.label@defra.gov.uk) or via post to:

Animal Welfare Market Interventions and Labelling Team, Department for Environment, Food and Rural Affairs, Seacole Building 2<sup>nd</sup> Floor, 2 Marsham Street, London, SW1P 4DF.

We recognise that respondents may choose to use some standardised text to inform their response. Campaigns are when organisations (or individuals) coordinate responses across their membership or support base, often by suggesting a set of wording for respondents to use. Campaign responses are usually very similar or identical to each other. For this consultation, campaign responses may be analysed separately to other responses to ensure the breadth of views received can be summarised effectively and efficiently. All campaign responses will be taken into account in the final analysis of public views and campaigns help provide an indication of the strength of feeling on an issue. The preferred route for all respondents to provide their views (including where a response is based on a campaign) is via the Citizen Space consultation hub.

## Duration

This consultation will run for 8 weeks. The consultation opened on 12<sup>th</sup> March 2024 and closes on 7<sup>th</sup> May 2024. Any responses received after this date will not be analysed.

## Confidentiality and data protection

Information provided in response to this consultation document, including personal information, will be shared with relevant policy officials in the Scottish Government, Welsh Government and the Northern Ireland Executive.

A summary of responses to this consultation will be published on the [government website](#). An annex to the consultation summary will list all organisations that responded but will not include personal names, addresses or other contact details.

Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (e.g. home address, email address, etc).

If you choose 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

If you choose 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.

There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

This consultation is being conducted in line with the Cabinet Office "Consultation Principles" and can be found at the [government consultation principles webpage](#).

Please find our latest privacy notice uploaded as a related document alongside our consultation document.

If you have any comments or complaints about the consultation process, please email: [consultation.coordinator@defra.gov.uk](mailto:consultation.coordinator@defra.gov.uk).

## About you or your organisation

**Question 1 a) Would you like your response to be treated as confidential (required)?**

Please select: [Yes – **No**]

**Question 1 b) If yes, please give your reason.**

[Free text]

**Question 2. What is your name?**

Jessica Merryfield (Head of Policy and Campaigns) responding on behalf of the Chartered Trading Standards Institute

**Question 3. What is your email address?**

policy@tsi.org.uk

**Question 4. Which of the following best describes you (required)? (Select one option only)**

- Individual – You are responding with your personal views, rather than as an official representative of a business or, business association or, other organisation
- Public sector body – You are responding in an official capacity as a representative of a local government organisation or, public service provider or, other public sector body in the UK or elsewhere
- Industry (single business) – You are responding in an official capacity representing the views of a single business
- Industry (multiple businesses) – You are responding in an official capacity representing the views of multiple businesses or, the views of a trade association or, a business association
- Non-governmental organisation – You are responding in an official capacity as the representative of a non-governmental organisation or, non-profit organisation or, other organisation
- Academia – You are responding in an expert capacity as a faculty member or researcher at an academic institution
- Other: please specify

**Question 5. If you are responding as an individual in Question 4, where are you based in the UK (required)? (Select one option only)**

Please select: England – Scotland – Wales – Northern Ireland – Not UK Based (please specify)

**Question 6. If you are responding as an individual in Question 4, which of the below options best describes you?**

Please select: A farmer – part of the food industry – a vet – an interested member of the public – other [please specify]

**Question 7. If responding as 'Industry (multiple businesses) in Question 4, how many businesses are you representing? (Select one option only)**

Between 0 and 9 / Between 10 and 49 / Between 50 and 499 / 500 or more / Prefer not to say

**Question 8. If responding as 'Industry (multiple businesses) in Question 4, please provide a summary of who you have consulted to formulate your response.**

[Free-text]

**Question 9. If you are not responding as an individual in Question 4, please provide the name of your business/organisation.**

Chartered Trading Standards Institute

**Question 10. If you are not responding as an individual in Question 4, where does your business or organisation operate (required)? Please select all that apply.**

Please select: **England – Scotland – Wales – Northern Ireland** – EU (please specify which countries you operate in) – Rest of the world (please specify which countries you operate in)

CTSI represent Trading Standards professionals and respective businesses from across the 4 nations.

**Question 11. If you are not responding as an individual in Question 4, where is your business or organisation's headquarters (required)?**

Please select: **England** – Scotland – Wales -- Northern Ireland – Outside the UK (please specify)

**Question 12. If you are not responding as an individual in Question 4, is your business or organisation one of the following? (Select one option only)**

Please select: Micro business: 1 to 9 employees -- **Small or Medium-sized business: 10 to 249 employees** – Large business: 250 employees or more

**Question 13. If you are not responding as an individual in Question 4, does your business source / sell agricultural or food products?**

Please select: Yes, as its primary activity – Yes, but only as a secondary activity – No – **Not applicable**

**Question 14. If you are not responding as an individual in Question 4, what is the primary purpose of your business? (required)**

Please select: Primary production – Primary processing/manufacturing – Wholesale -- Retail -- Mass catering: business-to-consumer (for example restaurants, hotels, takeaways) – Mass catering: business-to-business (for example contract caterers) -- Trade body – Consumer group -- **Other (Not for Profit)** – Not applicable

**Question 15. If you are not responding as an individual in Question 4, please provide your 5-digit [Standard Industrial Classification \(SIC\) code](#).**

[Free Text]

**Not applicable**

# Introduction

Farming and food security is at the heart of UK government policy. Farmers have a critical role in feeding the nation and managing our rural environment. [UK farmers already produce about 60% of the food we eat, with the UK agri-food and seafood sectors creating over £120 billion of value for the economy every year and employing over 4 million people.](#)

Well managed livestock provide environmental benefits such as supporting biodiversity and protecting the character of the countryside, as well as generating important income for rural communities. British farmers are rightly proud of producing food that meets and often exceeds our world leading animal welfare and environmental standards. We want UK farmers to receive a fair reward from the market for producing high-quality, high-standard British food. Seafood is also a key part of the UK supply chain, and we are rightly proud of the high-quality, sustainable, and easily traceable seafood to be found in, or farmed in the ocean around the UK. Our wild-caught and farmed produce contributes to a balanced and nutritious diet, as well as our coastal communities. We want to support increased domestic consumption of locally sourced seafood. We will champion UK producers and support them in sustainably producing our great British seafood, and we recognise the important role sustainably produced seafood plays in promoting consumer health, and in contributing to our food security.

The UK government, the Scottish Government, Welsh Government and the Northern Ireland (NI) Executive are committed to a transparent food system so that people have better information about the food they eat and can make choices that reflect their values. Food labelling and animal welfare are devolved policy responsibilities.

Evidence shows that British consumers want to buy high-quality food and we have been consistently clear that we will not compromise on food safety. However, it can be difficult to clearly identify where food comes from and how it is produced. The UK government, the Scottish Government, Welsh Government and the NI Executive are therefore jointly publishing this consultation to explore how we can give people better information about the origin and production standards of certain products of animal origin. This will make it easier for consumers to make informed decisions when purchasing food and allow them to choose products that align with their values.

Products produced to different environmental and animal welfare standards can be placed on the UK market as long as they comply with our stringent food safety requirements. Meat imported into the UK is already required to have been produced to our sanitary and phytosanitary standards (rules on food safety and human and animal and plant health standards).

Food information regulations set out how specific information should be described or displayed and require certain mandatory information on some products. It also requires that all information should not mislead consumers. However, some information used by businesses to brand and market products is not prescribed in terms of how it is displayed.

This has led to an array of different voluntary terms which are inconsistently applied. This risks consumers being unable to clearly compare products and make informed purchasing decisions. This lack of clarity, consistency and transparency could lead to unfairness for both consumers, who may unknowingly be purchasing products that don't align with their values, and for farmers who are disadvantaged if their higher production standards are not clear to consumers.

In this consultation we are seeking views on options to improve transparency and consistency around food labelling. This focuses on measures which would provide clearer information on the origins of food, where it was produced, and inform consumers about the production system in which the animals were reared. Many of the issues relating to labelling in the seafood sector are similar to those in the land-based food sector. However, there are differences too because of differing supply chains, areas of harvest, divergent consumer habits, or seafood products with mixed species from both wild and farmed sources.

This is a joint consultation on behalf of all UK administrations and will help inform the UK government's, the Scottish Government's, Welsh Government's and the NI Executive's policy in this devolved area.

## Country of Origin Labelling

### Current situation

Country of origin information is required for all prepacked food, where its omission would be misleading to consumers. It is also required for fresh and frozen meat of beef cattle, sheep, goat, pigs and poultry, as well as uncut fresh fruit and vegetables, honey, olive oil, wine and some fish products. For processed food, where the origin of the primary ingredient is different to that of the food itself and the origin of the food is given, an indication that the origin of the primary ingredient is different, or the specific origin, must also be provided. In any case, where an indication of origin or provenance is given, either in words or pictures, this must be accurate.

Despite these rules, there is a perception that some foods are labelled in a way that is not fully transparent about the origins of the food. For example, if pig meat is imported into the UK and cured here in order to produce bacon, then the bacon is a British product and so can legitimately be labelled as British. The labelling rules state that if the bacon in this example is voluntarily declared as British, there must be an additional visible statement that the pork which comprises the primary ingredient of the bacon is of a different origin. However, this may not always be very obvious from the label and some people may prefer an emphasis on the origin of the ingredients rather than the place of manufacture.

Even where origin information is mandatory, the rules on its presentation and placement are the same as for other information; it can be anywhere on the pack including the back, and the text size can be such that a lower-case 'x' is just 1.2mm high.

# Method of Production Labelling

## Current situation

Existing regulations related to providing information on how animals are reared are limited.

There are two marketing standards in assimilated law that define methods of production. For shell eggs, such as those sold in egg boxes, they are [mandatory](#) and for unprocessed poultry meat they are [voluntary](#). Beef, lamb, pork and dairy are not covered, nor are processed products or those sold through the food service sector for example, restaurants or catering services.

The introduction of mandatory marketing standards for shell eggs has successfully demonstrated that where better information is available to consumers on how animals are reared, consumer demand patterns become clear, and the food industry responds. In this instance, increased volumes of higher welfare products were made available in response to this demand. In 2004 it became a requirement for eggs to be marked as either: caged hens, barn, free-range or organic. Many retailers promoted free-range eggs and amended their sourcing policies following increased consumer awareness of hen welfare. Since then, the market share of free-range eggs in retail has [doubled from less than 30% in 2004 to over 60% in 2023](#).

Apart from eggs, there is no mandatory requirement to provide information on how animals have been reared. A range of industry-led voluntary labelling initiatives provide some information for consumers - such as farm assurance schemes, supermarket-specific commitments or standards and non-standardised marketing terms. Assurance schemes in place in the UK, such as Red Tractor, Quality Meat Scotland and RSPCA Assured, are well-known and play a significant role in domestic livestock production. However, they place variable emphasis on animal welfare and do not cover imported products. This is important because UK farmers adhere to higher welfare standards than many other countries (including those preventing the use of sow stalls for pork production or battery cages for egg production), and if consumers were able to identify this more clearly they may choose to buy the products that align with their values.

Some countries have already introduced labelling to deliver better transparency and animal welfare. Germany have brought in mandatory labelling for pork, and Switzerland for eggs and rabbit meat.

## Why we are proposing reform

In 2021, we held a joint call for evidence relating to England, Wales and Northern Ireland on labelling for animal welfare to understand how/whether it could address existing market failures. We received 1,633 responses, which are summarised in our [summary of responses](#) and included responses from across the UK. These have helped shape the

proposals presented in this consultation and provided evidence on how labelling could bring the biggest benefits to consumers, farmers and animals, the potential impacts of these on food businesses and farmers, and how these impacts could be mitigated through careful policy design.

The [majority of UK consumers \(98%\) value animal welfare and most \(72 to 84%\)](#) state they are willing to pay more ([around 20 to 30% more](#)) for food from higher welfare production systems. However, this does not always translate into action at the point of purchase – this is known as the value-action gap. To make it easier for consumers to choose products that align with their values, information on these issues needs to be readily available and easily understandable. In addition, higher welfare products must be accessible, available and affordable.

Existing market failures mean that this is not the case: for example, there is strong evidence that consumers find welfare information inaccessible and cite a lack of transparency. The voluntary nature of existing labelling approaches means labels use inconsistent, complex language or imagery which may be confusing to or poorly understood by, consumers, or there is no information at all. Higher welfare products are often not available at all points of purchase, for example, in convenience stores, and can be significantly more expensive. For example, free-range chicken costs on average 115%<sup>1</sup> more per kg, which cannot solely be explained by higher production costs.

In addition, there is currently no clear, consistent way to differentiate between products based on their animal welfare considerations, including those that meet or exceed the UK's baseline animal welfare regulations. This means some consumers may be unknowingly purchasing products which do not align with their values.

Increased transparency for consumers can enable UK farmers who are already meeting, and often exceeding our high baseline welfare standards, to be recognised and rewarded for the high-quality food they produce to high welfare standards.

Clear, standardised, mandatory method of production labelling can create market incentives to rear animals to higher standards, and support farmers who meet or exceed baseline UK welfare regulations to receive a premium to reflect the costs of higher welfare products. Labelling can also support farmers to transition to higher welfare practices which are in-line with consumer demand and public values without the need for further regulation by government.

---

<sup>1</sup> Based on prices from Sainsburys, Asda and Morrisons, July 2021.

## Our proposals

To address existing market failures and deliver on government commitments, our proposed method of production labelling reforms aim to:

- make it easy for consumers to choose food products that align with their values by ensuring that UK baseline and higher welfare products are accessible, available and affordable
- support farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market
- improve animal welfare by unlocking untapped market demand for higher welfare products

Based on responses to the call for evidence, we have created a set of guiding principles for potential labelling reform which we have used to formulate the proposals set out in this consultation. These are that reforms should:

- be based on robust evidence and consumer research
- build on existing measures and align with existing accreditation and assurance schemes where possible
- be co-developed with stakeholders across the whole supply chain, including the metrics and standards underpinning any reform
- minimise burden on industry by putting in place appropriate mitigation measures (such as sufficient transition and compliance periods) and aligning with labelling reforms in other areas wherever possible
- prioritise sectors with: existing measures and relatively broad agreement on product definitions (such as the voluntary marketing terms in the poultry meat marketing regulations); the greatest differentiation in welfare standards; and the greatest level of consumer interest
- simplify information for the consumer, for example, through standardised terminology used across retailers, food services, product categories, and different parts of the supply chain
- not overcrowd food packaging, and streamline on-pack labelling where possible

In the second half of 2022 and early 2023, we engaged closely with a wide range of relevant stakeholders throughout the supply chain and worked with a group from the Animal Welfare Committee (AWC) to identify priority inputs for each sector and develop provisional sector-specific standards. If these proposals are taken forward and prove successful, we may consider extending labelling reforms incrementally to other sectors and products, subject to future consultation.

In developing these proposals, we have considered World Trade Organization (WTO) principles on non-tariff barriers. In order to meet our international obligations, we will ensure that our proposed mandatory method of production labelling reforms avoid

discrimination against non-domestic products and are not more trade restrictive than necessary.

These proposals have been developed to work alongside and inform other potential food labelling reforms, feeding into broader work on improving the resilience of domestic food and farming systems. Where possible, we would align the implementation of labelling reforms to reduce the number of label changes needed and minimise burden on industry.

## Purpose of this consultation

Building on the call for evidence, the purpose of this consultation is to seek views on the proposals set out in detail below from a wide range of stakeholders across the food industry, farmers, vets, academics, trading partners, consumer and animal welfare organisations, civil society, consumers, and the general public.

The accompanying consultation-stage Impact Assessment (Annex C) has been prepared to assess the potential costs and benefits of this proposal.

We are seeking your input on the impact of these proposals so that we can:

- test whether the proposals will deliver the intended benefits for consumers, farmers and animals
- fully understand the impacts of the proposals
- maximise the benefits and minimise burdens on industry if taken forward

Any information that you can provide to help make a more detailed assessment of impacts, for example, to specific sectors would be appreciated.

This consultation supports delivery of two commitments made in the [UK government's Food Strategy](#):

- to consult on proposals to improve and expand current mandatory method of production labelling requirements for animal welfare, and to introduce equivalent measures in the foodservice sector
- to explore whether existing country of origin rules can be strengthened by mandating how and where origin information is displayed, for example, on the front of packs.

## Geographic scope of this consultation

We are proposing that these reforms would be implemented on a UK-wide basis so that a consistent approach is taken across all UK administrations, noting the market access principles in the UK Internal Market (UKIM) Act 2020 of mutual recognition and non-discrimination. These principles mean that goods lawfully sold in the part of UK they were

‘produced in’ or ‘imported into’ can be sold in any other parts of the UK and cannot have any requirements imposed upon them that put them at a disadvantage compared to locally produced goods.

EU and UK legislation are currently largely similar for method of production marketing standards and country of origin labelling with only minor differences. We are considering how existing UK marketing standards can be improved to reflect current production systems, simplify legislation and maintain smooth trade with the EU, along with potential improvements to country of origin labelling. If taken forward UK-wide, we would ensure final reforms work alongside any relevant EU food labelling requirements. Questions throughout this consultation should be answered under the assumption that any reforms will be UK-wide. We also seek views in a later section on how the impact of these proposals would differ, should legislation be brought in on a GB-wide basis only.

## Glossary

A glossary of relevant terms and definitions is included for reference in Annex A and should be read alongside this document.

# Part A: Country of Origin Labelling

## Scope of consultation

We are seeking views and evidence on possible interventions that may improve consumer understanding of the origin of certain foods, including how and where origin information is displayed, and on which products origin information should be mandatory.

Some options we are seeking additional evidence on are.

- mandatory origin labelling for the meat ingredient of minimally processed meat products
- increased visibility of origin labelling
- mandatory origin labelling for certain foods in the out of home sector
- greater control of the use of national flags

We are also seeking views more generally on how seafood is labelled.

## Consultation questions

While certain foods (fresh and frozen, unprocessed prepacked meat or fish) have mandatory origin information, other foods for which the origin may also be of interest to the consumer, (minimally processed meats, such as bacon and ham, fish slices with a coating or raw seasoned chicken portions) do not.

Processed products constitute [almost two-thirds of all calories consumed by adults in the UK. Over three quarters of UK household pork expenditure goes to processed products. Minimally processed products - sausages, bacon and sliced cooked meats \(for example, ham\) - account for over 90% of all processed pork.](#)

**Question 16 a) How important do you think it is that mandatory country of origin labelling rules be changed so that they apply to the meat used in minimally processed meat products as they do already to unprocessed meat?**

[Very important / Important / **Neutral** / Not very important / Not at all important / Don't know]

**Question 16 b) Please explain your answer.**

*CTSI are concerned that any definition of “minimally processed meat” will lead to increased issues involving interpretation. The food industry is very innovative and as new products are developed this will undoubtedly lead to a need to decide if these new products are caught by the legislation. CTSI would suggest a more pragmatic approach*

would be to require origin indications on all meat products as defined in the *Products Containing Meat Regulations 2014*.

We would like your views on which products to include, if country of origin labelling were expanded to include the meat used in minimally processed meat products.

We could define which minimally processed meat products would be covered by country of origin labelling reforms, based on a defined list of products.

**Question 17. What five (minimally) processed meat products would be the most important to include?**

*CTSI opinion is this will lead to issues around interpretation (see answer to Q16).*

**Question 18. If we did not use a list approach, please describe any alternative approaches you would propose to define which minimally processed meat products are included?**

*See answer to Q16*

**Question 19 a) Do you think that the use of national flags on food requires more regulation than described above?**

[Yes / **No** / Don't know]

**Question 19 b) If 'yes', how would you further regulate the use of national flags on food?**

The use of national flags on food is often taken by consumers to be an indication of origin. The existing food labelling rules mean that if a flag is attached to or displayed on a food, it must be made clear to a consumer if that food does not originate in the country of the flag, or if the primary ingredient of the food is from a different country or provenance.

Free text box]

**Question 20. Should there be further controls on the use of flags on food labels?**

[Yes [please specify what further controls are needed] / **No** / Don't know]

The underlying requirement for mandatory information on food is for the height of a lower-case 'x' to be 1.2mm or greater. There is no placement requirement for information, and it is often placed amongst other information on the back of the pack. Where origin information is required for the primary ingredient of food, being different to that of the food itself, it must be presented in text at least 75% of the size of the information on the food origin and in the same field of view, or as above, whichever is larger.

**Question 21. Should there be an additional requirement that mandatory origin information should be on the front of the pack?**

[Yes / No / Don't know]

**Question 22. What should the minimum size font be for mandatory origin labelling?**

[Stay the same / Make larger than 1.2mm 'x' height / Don't know]

*CTSI opinion is that any changes to food labelling need to run in parallel with EU requirements. Where there are too many changes are made this can be costly and confusing for those businesses in the UK who are exporting who are needing to label goods for different markets.*

**Question 23. Should the written origin of food be accompanied by a national flag or other symbol?**

[Yes, a national flag / Yes, a different symbol (please specify) / Not necessary / Don't know]

Given our desire to inspire UK consumers to buy and eat more locally caught seafood, we want to work more closely with stakeholders to better understand consumer behaviour in the seafood sector as part of helping us identify which labelling interventions will be most successful.

While we are not putting forward specific proposals on seafood at this stage, we are seeking views to help us develop further policymaking on the issue of labelling in the wild-caught and farmed seafood sectors.

**Question 24. What role should be played by labelling requirements for seafood, farmed or wild-caught, in order to encourage consumers to buy more locally caught or produced seafood?**

Food information provided when food is sold by means of distance communication, including through an online shop, has many of the same information requirements as that for food sold in a shop. However, it is not always clear at the time an online order is made what the origin of some foods are, even where this is mandatory.

*The Fish Labelling Regulations 2013 already require packaged and loose fish to be labelled with the production method (caught at sea, caught in fresh water, farmed or cultivated), and the area where the fish was caught. This requires sufficient information for consumers to make informed choices already. If the fish is caught near the locality it is sold in this can be conveyed to consumers on the label or other advertising*

*Food information provided when food is sold by means of distance communication, including through an online shop, has many of the same information requirements as that for food sold in a shop. However, it is not always clear at the time an online order is made what the origin of some foods are, even where this is mandatory.*

**Question 25. Do you think information on the origin of food is sufficiently clear when it is sold via online platforms (either from a mainstream grocery retailer or other general retail platforms)?**

[Yes, it is sufficiently clear / No, it is not sufficiently clear / **It varies** / Don't know]

**Question 26. What improvements would you like to see in how origin information is presented online, if any?**

*More consistent indications whilst accepting that sometimes the supply chain can be disrupted and changes of product will occur.*

Origin information, including when it is given in a café or restaurant, has to be accurate and not mislead consumers. However, it is not mandatory to provide it in these out-of-home settings.

**Question 27 a) Should there be a mandatory requirement to state the origin of meat, seafood and/or dairy products in the out-of-home sector?**

[Yes / **No** / Don't know]

*This would bring additional enforcement issues in that if origin indications increase Trading Standards are likely to receive more complaints about origin claims and officers will also need to check them out on routine visits. CTSI is unclear what the consumer demand is for this; at the moment origin tends to be attached to certain foods or perhaps more expensive food.*

**Question 27 b) If yes, what form should this requirement take?**

*Unsure this is needed.*

**Question 28. Should the requirements be applied equally to all out-of-home food businesses?**

[Yes / No – please specify which businesses would require different requirements and/or exemptions / Don't know]

*If it is then perhaps the Out of Home Calorie Labelling Regulations exemption could be applied to remove the need for smaller businesses to be affected unless they made voluntary declarations*

We know that all labelling and information changes take time and impose some cost on businesses. For this reason, they will usually be introduced with an expected timescale for implementation, together with some exemptions or additional implementation time for smaller businesses.

**Question 29. If measures such as mandatory origin for minimally processed meat products, increasing the visibility of origin labelling, controlling the use of national flags and/or mandating origin labelling for the out-of-home sector were introduced,**

**what do you think are realistic timescales for businesses to implement such policies from the point at which they are announced?**

[1 year / 2 years / 3 years / 4 years / 5 years and over / Don't know]

**Question 30. What exemptions should be given, if any?**

*CTSI are not best placed to comment on this as it is a government policy issue, however any exemptions should be clear and easy for businesses to understand.*

**Question 31. Do you have any suggestions on how to smooth the costs and complexities of implementing these changes?**

No.

**Question 32. Do you have any other suggestions for improving country of origin information?**

*A clearer definition of what is meant by origin would be helpful. This could be done by using consumer research to understand better what the average consumers' perception is. For instance, is it that all parts of the product are sourced from one origin or is it where the product is subject to final substantive change?. A ready meal would be a good example of a product which could fall into either category. It will also probably need to be accepted that as the food supply chain is subject to more disruption, sources of product will change quickly, so a process to effectively and pragmatically deal with provision of origin information issues will be needed to support businesses and regulatory officers. This will need to reduce costs to businesses but also continue to offer high levels of consumer protection.*

# Part B: Method of Production Labelling

## Summary of labelling proposals

In this section we are seeking views on proposals to provide clearer information to consumers about the production system in which animals were reared. The responses to the consultation will help us finalise the future shape of policy in this area.

Our core policy proposal is summarised as:

- a mandatory label covering pork, chicken and eggs applying to both domestic and imported products
- a label with five tiers and underpinning standards that are primarily based on method of production, differentiating between products that fall below, meet and exceed relevant baseline UK welfare regulations
- this would apply to all unprocessed pork, chicken and eggs and certain prepacked and loose minimally processed products with pork, chicken or egg.

We are asking for views on each element. We would also welcome feedback on more detailed elements of the policy where we present a range of options. If taken forward, the proposed reforms would be introduced in a way that minimises burden on industry, for example, through aligning with typical business cycles for labelling refreshes, and we would engage further with key stakeholders to ensure this.

## Labelling approach

In our call for evidence, we sought views on which of the following approaches would be most effective in achieving our policy objectives:

- requirements that method of production claims made **voluntarily** on a label conform to a standardised legal definition, or
- requirements for the **mandatory** inclusion of information on method of production

Responses pointed towards a mandatory approach, particularly noting the success of mandatory egg labelling.

**Based on this, we are seeking views on proposals to improve and extend mandatory method of production labelling** to cover pork, chicken and egg products. In practice this means:

- improving existing mandatory labelling requirements for eggs
- moving from voluntary to mandatory labelling requirements for chicken

- introducing mandatory labelling requirements for pork, building on the voluntary industry-led [Pork Provenance code](#).

Some respondents to our call for evidence expressed a preference for voluntary labelling, citing the lower burden on industry. Voluntary labelling can have limited effectiveness as not all products are labelled, meaning a lack of transparency for consumers. It can also be very difficult to understand information that is sometimes absent or presented differently across products. Only a mandatory label can ensure consistent information and deliver the associated benefits. In particular, mandatory labelling is necessary to allow consumers to identify those products which do not meet baseline UK welfare regulations, as such a label would not be voluntarily applied. Respondents across all types of organisations and individuals stressed this as a potential benefit of labelling which a mandatory approach can deliver.

**Question 33 a) Do you agree that method of production labelling should be mandatory?**

[Yes / No / Don't know]

*This will need to be based on consumer expectations for different foods.*

**Question 33 b) Please explain your answer. If you answered no, please detail any alternative approaches that you feel would be effective in delivering informative, consistent and accessible information on method of production to consumers.**

*There does not appear to be sufficient information provided in the consultation as to what the method of production labelling will be, in order for CTSI to be able to form a judgement on this.*

**Question 34 a) Do you agree that any new mandatory method of production labelling should apply to both domestic and imported products?**

[Yes / No / Don't know]

**Question 34 b) Please explain your answer.**

*CTSI believe that this will create and maintain a (needed) level playing field for domestic and imported products. If part of the reasoning is to support UK farming, farmers need to be competing on the same terms.*

**Question 35. What changes would your business have to make in order to adopt a mandatory method of production labelling scheme?**

*Not applicable*

## Implementation period

In the call for evidence, we asked about the costs which businesses may incur as a result of labelling changes, and how these costs could be reduced.

Based on these responses, **we propose an 18-month implementation period following introduction of any legislation**, so that labelling changes could be incorporated into existing business cycles, helping to largely mitigate labelling costs. If taken forward, we would also align implementation with other relevant labelling reforms as far as possible to remove the need for multiple labelling changes. Our impact assessment demonstrates, on a partial assessment of impacts at this stage, that, although mandatory labelling creates additional costs compared to a voluntary approach, the estimated increase in costs is outweighed by the benefits to domestic businesses. Please refer to the accompanying Impact Assessment for further information.

**Question 36 a) Do you think the proposed 18-month implementation period, intended to reduce the cost associated with applying new mandatory labelling is appropriate?**

[It is too long / **It is about right** / It is too short / Don't know]

**Question 36 b) If you do not agree with the length of the proposed implementation period, what length of implementation period do you think should be allowed to help reduce the costs associated with applying new mandatory labelling?**

[Numeric field 0-60 months]

**Question 36 c) Please explain your answer.**

[Free text box]

**Question 37. Are there any other ways in which cost to business associated with applying new mandatory labelling could be reduced?**

*CTSI would call for clearly written legislation, which support businesses to more easily comply.*

## Scope of labelling

Our proposals relate to food intended for human consumption. Food products can be differentiated by the ingredients they contain (for example, the species of animal they come from), how much they have been processed (for example, unprocessed fresh meat, minimally processed products such as bacon, or meat within a ready-meal), how they are packaged (for example, pre-packed or loose foods) and where they are sold (for example,

supermarkets, butchers, market stalls or food service venues such as hospitals, schools or restaurants).

Following the assimilated regulation on the provision of food information to consumers, we define labelling as “any words, particulars, trademarks, brand name, pictorial matter or symbol relating to a food and placed on any packaging, document, notice, label, ring or collar accompanying or referring to such food”. This means that “labelling” could refer to several kinds of food information, depending on the context. For example, it might refer to a physical label attached to a packet of ham, or to a sign accompanying a cut of pork in a butcher’s shop.

The following sections outline the potential scope of our labelling proposals across these different areas.

### **Scope: species**

To establish which products of animal origin are in scope of initial labelling proposals, we have considered which livestock species our proposals would cover. **We propose that mandatory labelling initially covers pork, chicken and eggs (produced by laying hens) only, and certain products containing them**, because these products:

- have the greatest difference in systems of production (for example, hens housed in enriched cages compared to hens in free-range systems), and therefore where there is the greatest demand from consumers for information on how animals were reared
- are consumed in the greatest volume in the UK, therefore providing information on the greatest number of animals
- have the simplest supply chains meaning that traceability, monitoring, and enforcement of labelling would be simpler to implement (though recognising that there would still be significant complexities)
- have the greatest level of consensus on what constitutes good welfare, with existing definitions of production standards that can be built on

If these proposals are implemented and prove successful, we would consider introducing mandatory method of production labelling for dairy, beef, and sheep meat. Any subsequent reforms for additional species would be subject to further consultation.

**Question 38 a) Do you agree that labelling reforms should initially focus on pigs, meat chickens and laying hens?**

[Yes, I agree labelling should focus only on these three species initially / Yes, but I think labelling should cover more livestock species from the start / No, I think labelling should focus on fewer or different livestock species / Other (please expand below) / Don’t know]

**Question 38 b) Please explain your answer.**

*CTSI agree that labelling should focus only on these three species initially, for the reasons given in the consultation of ‘these products having the greatest difference in systems of production; are consumed in the greatest volume in the UK; have the simplest supply chains; and have the greatest level of consensus on what constitutes good welfare’. Also, this should be led by consumer expectations. It will be an opportunity to assess how effective the legislation is in regulating the market.*

**Scope: level of processing**

As outlined in Part A, processed products make up a significant proportion of total food consumption within the UK. Responses to the call for evidence highlighted the importance of extending labelling reforms to processed products as well as unprocessed products – particularly as lower welfare standards are more common in more processed foods. However, responses also highlighted the complexity and potential cost of labelling processed products, noting that challenges increase with the level of processing. For example, prepared meals that may contain more than one animal product would be more difficult to label than less processed products.

**Based on responses to the call for evidence, we propose that mandatory labelling initially applies to unprocessed pork, chicken and eggs and certain minimally processed pork, chicken or egg products.**

We would like your views on which minimally processed products should be included. We do not propose to include more processed products in the scope of initial reforms. We think this proposal best balances consumer interest with what is practical for the food industry.

Existing regulations define the level of processing that food products have undergone in binary terms, as either unprocessed or processed. There is currently no agreed definition for minimally processed products. We therefore want to understand which minimally processed products to prioritise for inclusion in scope of any reforms.

‘unprocessed products’ means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed

‘processed products’ means foodstuffs resulting from the processing of unprocessed products. These products may contain ingredients that are necessary for their manufacture or to give them specific characteristics. ‘Processing’ means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes

**Question 39 a) How important do you think it is that a method of production label includes processed as well as unprocessed animal products?**

[Very important / Important / Neutral / Not very important / Not at all important / Don't know]

*CTSI opinion is that it will depend upon the effect the processing has on the product and what the consumer expectation is.*

**Question 39 b) Please explain your answer.**

*As above for 39a)*

**Question 40 a) Do you agree that labelling should include minimally processed products for pork, chicken and eggs?**

**Pork (for example, bacon)**

[Yes, I agree that labelling should cover minimally processed products / Yes, but I think that labelling should cover more processed products from the start / No, I think labelling should only cover unprocessed products / **Don't know**]

**Chicken (for example, cooked chicken slices)**

[Yes, I agree that labelling should initially cover minimally processed products / Yes, but I think that labelling should cover more processed products from the start / No, I think labelling should initially only cover unprocessed products / **Don't know**]

**Eggs (for example, hard boiled eggs)**

[Yes, I agree that labelling should initially cover minimally processed products / Yes, but I think that labelling should cover more processed products from the start / No, I think labelling should initially only cover unprocessed products / **Don't know**]

**Question 40 b) Please explain your answers.**

*CTSI's concern is that by introducing a new category of product, minimally processed, Defra will be opening up new avenues of interpretation that may not be helpful to consumers or officers. Is there evidence or data to show if consumers are concerned by how processed the product is? Officers will be faced with having to interpret and determine which category new products fit into; 'processed' or 'unprocessed' are easier situations to interpret than 'minimally processed'.*

**Question 41 a) To what extent do you agree or disagree that it is important that the following processed products be labelled with method of production standards?**

*CTSI opinion is that this should be based on consumer expectation/understanding.*

- bacon [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- sausages [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- gammon [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- sliced cooked pork meat for example, ham [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- scotch eggs [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- breaded chicken [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- ready to cook chicken [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- sliced cooked chicken meat for example, chicken slices [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- egg whites [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- hard boiled eggs [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- quiche [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]
- marinated meats [Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]

**Question 41 b) If you would like to propose an additional priority for labelling, please state below.**

[Free text box]

We could define which minimally processed products would be within scope of method of production labelling reforms, based on a defined list of products, which would be guided by responses we receive through this consultation.

**Question 42. If we did not use a list approach, please describe any alternative approaches you would propose to define which minimally processed products are included?**

*A list approach is open to argument and interpretation as food product innovation continues. A clear definition is a more effective way of doing this. If you do wish to give examples, do this in guidance.*

### **Business impacts & decisions**

To maintain a continuous supply, food companies may source pork, chicken and eggs for the same product from multiple suppliers who may have different production standards. Segregating these by production standards could be costly and wasteful. In the call for evidence, we asked for feedback on how the supply chain impacts could be reduced through good policy design. The majority of responses agreed that the following principles

would reduce the supply chain impacts associated with labelling processed products, particularly segregation costs:

- assigning production standards for a given ingredient based on the lowest standard of animal welfare in a batch, preventing the need for segregation
- labelling the production standard of only one ingredient, for processed products containing more than one type of animal product

**We propose to take forward these principles in any labelling reforms in relation to minimally processed products.** This would mean that, for example:

- a Scotch egg would only be labelled with the production standards of pork or egg (whichever is present in the greatest quantity), not with both
- a food business sourcing from farms producing to both tier 3 and tier 4 standards for a product range could label all these products as tier 4 to avoid the need for segregation (or could chose to label each pack separately)

**Question 43 a) To what extent do you agree or disagree with our proposal to label the production standard of only one ingredient, when labelling minimally processed products (for example, Scotch eggs)?**

[Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree / Don't know]

**Question 43 b) Do you agree with our proposal to assign production standards based on the lowest standard of animal welfare in a batch?**

[Yes, I agree that the lowest standard should be labelled / No, I think the highest standard should be labelled / No, I think that products should be labelled as containing a mix of welfare standards / **Don't know**]

## **Scope: how products are packaged**

Different labelling rules apply depending on how a food is presented – for example, depending on whether it is packed at the consumer's request, prepacked for direct sale or prepacked in a factory before sale. Common examples of these in practice include bacon sold loose on a meat counter in a supermarket or butcher's, prepacked for direct sale in a farm shop or market stall, or prepacked in factory before being sold on a supermarket shelf.

**Prepacked foods:** any single item for presentation as such to the final consumer and to mass caterers, consisting of a food and the packaging into which it was put before being offered for sale, whether such packaging encloses the food completely or only partially, but in any event in such a way that the contents cannot be altered without opening or changing the packaging. Prepacked food does not cover foods packed on the sales premises at the consumer's request or prepacked for direct sale (as defined in [assimilated regulation 1169/2011 on the provision of food information to consumers](#)).

**Prepacked for direct sale:** a food that is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected – for example, a coffee shop own-brand sandwich (as set out in [Food Standards Agency guidance](#) and [Food Standards Scotland Guidance](#)).

We have therefore considered where labelling should apply, and where information should accompany food on signage or notices adjacent to the relevant products in the case of non-prepacked foods. Following the above regulations, **we propose that:**

- **all unprocessed pork, chicken or egg must be labelled regardless of how it is packaged, or where it is sold.** This includes, 'loose foods', such as pork loin sold in an independent butcher or food market, as well as 'prepacked food' such as a two-pack of chicken breasts from the supermarket
- **prepacked and loose minimally processed products with pork, chicken or egg in scope must be labelled (for sale to the final consumer or to mass caterers), except foods sold by a mass caterer ready for consumption.** Most of these products which must be labelled are sold in retail settings, but this may include some sold in the food service sector, such as boiled eggs sold prepacked for direct sale in cafes

**Question 44 a) To what extent do you agree or disagree with our proposal that all unprocessed and minimally processed pork, chicken and egg products in scope are labelled regardless of whether they are packed at the consumer's request, prepacked for direct sale or prepacked in a factory before sale?**

[Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]

**Question 44 b) Please explain your answer.**

*CTSI believe that unprocessed and minimally processed pork, chicken and egg products, should be labelled regardless of whether they are packed at the consumer's request, prepacked for direct sale or prepacked in a factory before sale. This is because these products would then be brought into line with fish, as fish already has a similar labelling requirement, which also applies to fish regardless of whether they are sold packaged or loose. Consumer expectation may be raised if prepacked food alone is labelled. If the aim of the legislation is to inform consumers should that be pursued in all settings?*

**Question 45 a) To what extent do you agree or disagree with our proposal that all unprocessed and minimally processed pork, chicken and egg products in scope are labelled regardless of whether they are sold in a shop or supermarket, a restaurant or café, or from an online retailer?**

[Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]

**Question 45 b) Please explain your answer.**

*Unless the aim is to reach consumers in all settings, CTSI believe that smaller mass catering establishments, such as restaurants and cafes, should be exempt from this requirement. This would be in line with the exemption in the Calorie Labelling (Out of Home Sector) Regulations, which exempts businesses with less than 250 employees, from the requirement to provide calorie information.*

## **Scope: food service sector**

A number of restaurant chains and mass caterers already source products from assured farms, or to higher welfare standards, and advertise this information on their websites or menus. However, there is currently less method of production information typically available to consumers on products sold through the food service sector (such as cafés and restaurants) than through the retail sector. [Food and drink consumed via the food service sector makes up a significant proportion of the UK's total food and drink consumption.](#)

Along with processed products, the food service sector is a more likely destination for lower-welfare products and more challenging to provide clear information for due to the presence of multiple ingredients. In addition, supply chains are typically more complex, opaque and fragmented than in the retail sector, and sourcing decisions also change frequently.

Given this, we asked for views in our call for evidence on alternative ways to provide welfare information in the food service sector. Some respondents stated that mandatory on-menu labelling could be the most effective way to ensure a level playing field and drive consumer demand. However, many respondents noted the logistical complexity of this approach, instead proposing alternatives such as improved country of origin labelling and mandatory disclosure of welfare standards on websites.

**Based on this, our initial method of production labelling proposals focus on products sold through the retail sector only, and we are not proposing mandatory labelling requirements for the food service sector.**

**Question 46 a) To what extent do you agree or disagree with our proposal that labelling applies to products sold through the retail sector only?**

[Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree / Don't know]

**Question 46 b) Please explain your answer.**

*CTSI would be interested to understand if any research has been carried out into consumer expectation in these settings but in principle we would agree.*

The UK government also [consulted](#) in 2022 on proposed updates to public sector food and catering policy, including the Government Buying Standards for food and catering services (GBSF). The consultation sought views on proposals to promote sustainable, healthier

food in the public sector, including higher environmental and animal welfare standards. We are reviewing the responses received and will be considering how best to update the current standards for public sector food and catering.

## Defining production standards

Mandatory labels need to be underpinned by a set of agreed standards that differentiate between types of production for each species. This includes what metrics the standards are based on, what period of an animal's life they apply to, how many 'levels' are set and how these levels are defined.

When setting standards, it is important to consider: the scientific evidence base; the varying livestock production systems and how these standards can be achieved in practice on-farm; the supply chain implications, for example, segregation requirements; how the standards are understood by consumers and what is most important to them. Relevant international evidence and standards have been included in our considerations where these exist.

### Standards: what metrics the standards are based on

The proposed standards define different elements of the environment and production system which animals experience on farm. It is important to ensure these standards represent aspects which are important for animal welfare and can be clearly understood by consumers.

**We propose that the standards are based on inputs.** These inputs describe what must be provided to animals in terms of certain resources such as space and enrichment, as well as other aspects of husbandry systems such as procedures animals undergo, and breeds used. An alternative approach would be to base the standards on welfare outcomes, which are physical or behavioural measures giving an indication of an animal's lived experience. For example, lameness prevalence, mortality rates or time spent expressing natural behaviour such as perching.

Many respondents to our call for evidence supported standards based on inputs, particularly inputs relating to methods of production. Inputs were described as simpler and more objective to measure than welfare outcomes. We recognise that animal welfare can differ within the same production system based on other environmental and management factors, and our draft standards are therefore mainly based on the potential of each production system to provide good welfare.

Whilst welfare outcomes provide a more accurate representation of an animal's individual welfare, it is not currently feasible to include outcome metrics in the standards. These outcomes are difficult to measure and can be impractical to assess in a large group of animals. Significant supply chain complexity could be introduced if individual animals or

batches of animals were assessed as meeting different standards, and there would be implications for cost and additional compliance burden. We sought information on this in our call for evidence but were not made aware of any labelling scheme worldwide which achieves this.

We would seek to review the metrics and standards on a regular basis and to continue to explore the possibility of incorporating outcomes into the standards in the future, subject to further consultation.

Whilst we feel that incorporating individual outcomes metrics into the label tiers is not currently feasible, we do recognise the value of performing welfare outcomes assessments and the potential welfare benefits they afford at farm-level.

**As such, we propose that welfare outcomes assessments must be carried out on farms supplying pork, chicken or egg for products labelled with the middle tier (for example, tier 3) and above:**

- the outcomes assessment should be carried out by a suitably qualified third-party assessor and may be conducted as part of a farmer’s membership of a recognised assurance scheme
- these farms must also have a process in place to monitor their welfare outcomes, action plans in response to poor outcomes and assessment of effectiveness of action to resolve welfare issues
- the result of the outcomes assessment would not impact on the tier rating applied to the product – however, it would be a requirement to undertake the assessment to qualify for the middle tier (for example, 3) and above.

Examples of existing protocols for welfare outcomes assessments include [AssureWel](#) and [Welfare Quality](#).

In the second half of 2022, we worked with a group from the [Animal Welfare Committee](#) to identify priority metrics for each sector and develop a set of standards that could underpin the proposed label. We have limited the number of metrics to those that are evidence-based and practical to deliver. We will also work with industry to consider how the standards should interact with existing derogations for disease outbreaks if proposals are taken forward.

Please see below for the priority metrics proposed for each sector:

	<b>Proposed priority metrics</b>
<b>Pigs</b>	Stocking density
	Enrichment
	Outdoor access
	Assessment and management of welfare outcomes
	Finishing accommodation
	Farrowing system

	Tail docking (and other procedures)
--	-------------------------------------

<b>Laying hens</b>	<b>Proposed priority metrics</b>
	Stocking density
	Enrichment
	Outdoor access
	Assessment and management of welfare outcomes
	Beak trimming
	Range specification

<b>Meat chickens</b>	<b>Proposed priority metrics</b>
	Stocking density
	Enrichment
	Outdoor access
	Assessment and management of welfare outcomes
	Breed growth rate
	Range specification
	Thinning

**Question 47 a) To what extent do you agree that standards should be based on inputs which are important for welfare, given the lack of examples of labels based on welfare outcomes and the additional supply chain complexity this would involve?**

[Strongly agree / Agree / **Neutral** / Disagree / Strongly disagree / Don't know]

**Question 47 b) Please explain your answer.**

*CTSI has concerns that if we legislate in the UK, it would be difficult to enforce outside of the UK. This then creates the risk of an unequal playing field for British farmers. Assimilated legislation already prescribes the standards these farming businesses must comply with and the standards for animal welfare are enshrined in law. We have reservations that such labels would unfairly influence consumer choice.*

**Question 48 a) To what extent do you agree or disagree with requiring welfare outcomes assessments to be carried out for products labelled tier 3 and above?**

[Strongly agree / Agree / **Neutral** / Disagree / Strongly disagree / Don't know]

**Question 48 b) Please explain your answer and detail any specific considerations you would like to share, for example around the practicality of this requirement. Please include any supporting evidence where available.**

*As per Q47*

**Question 49 a) Are there additional metrics you think should be included in the draft standards (set out in the tables above)?**

For laying hens [Yes / **No** / Don't know]

For meat chickens [Yes / **No** / Don't know]

For pigs [Yes / **No** / Don't know]

**Question 49 b) If yes, please list the proposed metric(s) and explain your reasoning.**

[Free text box]

**Question 50 a) Are there any proposed metric(s) you think should not be included in the draft standards?**

For laying hens [Yes / No / **Don't know**]

For meat chickens [Yes / No / **Don't know**]

For pigs [Yes / No / **Don't know**]

**Question 50 b) If yes, please state the metric(s) and explain your reasoning.**

[Free text box]

## **Standards: setting tiered standards**

In the call for evidence, we asked how welfare information should be presented on a label. We collected views on a range of label formats including: certification logos indicating that a product meets one specific standard (such as an assurance scheme), descriptive labels with text on how the animal was reared, or tiered labels indicating relative animal welfare levels. Most respondents advocated for the inclusion of multiple tiers and provided consumer research which evidenced this is preferred by consumers. They suggested that tiers are more flexible and could allow for the incorporation of a broader range of farming systems and a wider range of products to select from. Tiers also provide retailers and other food businesses with more flexibility in deciding which tier best aligns with their desired sourcing policies, marketing strategy, and overall company brand.

**We propose a system with five tiers (for example, numbers, letters, stars or an alternative) which differentiates between products that fall below, meet, and exceed relevant baseline UK welfare regulations where:**

- **the lowest tier has no specific requirements associated with it. It indicates products that are not verified as meeting baseline UK welfare regulations for the metrics that underpin the label.**

- the next tier indicates products which meet baseline UK welfare regulations for the metrics that underpin the label (as defined in Annex B).
- the three higher tiers indicate production standards that increasingly exceed baseline UK welfare regulations.
- all requirements for a tier would need to be met for a product to be labelled as meeting that standard, with each proposed tier building on the one below.

**Question 51 a) To what extent do you agree with the proposed tiered system above?**

[Strongly agree / Agree / Neutral / Disagree / **Strongly disagree** / Don't know]

**Question 51 b) Please explain your answer.**

*CTSI would disagree with the proposed system. We already have capability to determine those farms that meet assured standards with Red Tractor / RSPCA schemes etc. It is difficult to enforce the rules and it is open to fraudulent activity where there is a premium price that will be paid for goods. The legislation is poor and not kept up with the modern world, the powers do not allow sufficient capability to investigate the potential for fraudulent activity, particularly where you have abattoirs slaughtering animals from multiple types of holdings. We are already witnessing abuse of one of the assurance schemes where non-assured animals are purchased through a livestock market and are then entered as assured to slaughter. We don't believe the scheme will add value to the average consumer and it won't be enforceable.*

Please see Annex B for a set of draft standards indicating possible requirements to be met for each tier. In the following section on label format and terminology, we welcome your views on how each of these draft tiers might be referred to on a label.

**Question 52. If you would like to suggest changes to the levels at which individual standards are set in the draft tiers, available in Annex B, please do so.**

**For laying hens**

**For meat chickens**

**For pigs**

*For all the above, CTSI don't believe there should be tiers. As previously stated, labelling alone is unlikely to improve overall animal welfare standards and it may create an unequal playing field for UK producers.*

## **Standards: period of life covered by the standards**

While farm animals spend most of their lives on farm, time spent in transport and at slaughter also pose significant welfare considerations. In the call for evidence, we asked what we would need to consider if we developed a set of standards that covered the whole

life of the animal. Respondents noted that this would be more challenging for some species than for others and highlighted many factors including: the length of time animals spent with their mothers, how often animals are moved, traceability requirements and the need to include the laying/breeding stock/mother.

**We propose that the standards initially cover the period of time the animal spends on farm and in some cases their parents too, where this is feasible and practical to monitor and enforce.** The draft standards are provided in Annex B.

Our proposals do not cover welfare in transport or at slaughter. The legislation covering welfare at slaughter already sets out strict requirements to protect the welfare of animals when slaughtered. Official Veterinarians are also present in all approved slaughterhouses to monitor and enforce animal welfare requirements. Meat imported into the UK is already required to have been produced to our sanitary and phytosanitary standards (rules on food safety and human and animal and plant health standards) and slaughtered to animal welfare standards equivalent to our domestic standards.

**For laying hens**, the draft standards apply to the life of the hen from the point it enters the laying hen house (usually at 16 weeks old) to the point it leaves the house at the end of the production cycle. We are also seeking views on whether to extend this to also include the period of life when hens are being reared as pullets (usually from day-old-chicks up to 16 weeks of age) and are keen to understand how this could work and the possible impacts.

**For meat chickens**, the draft standards apply to the life of the bird from the point it enters the broiler house (usually as a day-old chick) to the point it leaves the farm to be slaughtered.

**For pigs**, the draft standards apply to both breeding and finishing stages, covering both breeding sows and piglets. All time spent on farm is covered, but not transport in between units if pigs are moved as they grow. We know that some pigs move between systems during their lifespan, for example, pigs may be born outside and spend a portion of their lives living outside, before moving to an indoor system. In the draft standards we account for this by specifying the minimum proportion of time a pig must spend outdoors to be able to meet the highest two tiers.

**Question 53 a) Do you agree with the proposal above detailing the period of life covered by the draft standards for each sector?**

**For laying hens** [Yes, it is the right length of time / No, it is too long / No, it is too short / Don't know]

**For meat chickens** [Yes, it is the right length of time / No, it is too long / No, it is too short / Don't know]

**For pigs** [Yes, it is the right length of time / No, it is too long / No, it is too short / **Don't know**]

**Question 53 b) Please explain your answer.**

*CTSI feel that the options for answering are limited. The consultation suggests that there is only veterinary supervision at the slaughterhouse when this is not the case. The large livestock units for pigs and poultry have a lot of veterinary input and are often high health status. If labelling is to be introduced there must be consideration as to how it will be enforced and this is not just in the UK, otherwise it does become an unfair playing field. The average person in the street will not understand animal husbandry standards and may take little notice of the presence of tier numbers on packaging.*

**Question 54. We are considering extending the period of coverage for laying hens to include the pullet rearing stage. Do you have any view on how this could be applied in practice and on the impacts of such an approach?**

*CTSI has no comment to make on this.*

## **Label format and terminology**

Label format, design and terminology are critical for ensuring consumers can clearly understand how their food was produced and make informed choices. In the call for evidence, we asked about the different label formats for presenting information including tiers, descriptive terms, and certification logos. Respondents raised the importance of simplifying information for consumers with clear consistent terms, avoiding overcrowded food packaging and streamlining existing on-pack labelling where possible. Many favoured the inclusion of tiering and use of colours and pictures to make the label as intuitive as possible for consumers. Our proposed reforms seek to achieve this through a clear set of standardised terms, replacing inconsistent unregulated marketing terms. **We now wish to seek your views on the following potential features of a label:**

- (a) the tier of the product**
- (b) a colour corresponding to each tier**
- (c) an accompanying descriptor(s)**
- (d) a picture illustrating method of production**
- (e) space for an assurance scheme logo to be voluntarily included**

There are a range of options for each feature and we are seeking your input on these. We understand that many of those responding to this consultation, for example, retailers, consumer groups and welfare organisations, may already have extensive consumer research on label design. We welcome submission of any such data so that we can consider and build on this to further refine label design.

On (a) the tier of the product:

**Question 55 a) Which of the following would be most effective for presenting the tier of the product on a label? Please select one of the following:**

[Numbers / Letters / Stars / Alternative option / I don't want to see the tier included in the label format / Don't know]

**Question 55 b) Please explain why this is your preferred option and share any additional detail on your choice (for example, the specific numbers to use for each tier) and any relevant supporting evidence.**

*CTSI feel it may cause consumer confusion as they may not have knowledge about what the tier system means so choice would not be on an informed basis.*

On (b) a colour corresponding to each tier:

**Question 56 a) Do you feel that the label should include colours corresponding to each tier?**

[Yes, it is important for colours to be included / No, it is not important for colours to be included / Don't know]

**Question 56 b) If yes, please provide colour suggestions for each tier.**

[Free text box]

**Question 56 c) Are there any impacts of inclusion of colour which should be considered?**

*If colour is included, CTSI believe that it would need to be clearly differentiated from the front of pack nutrition information, so as not to risk confusing or misleading consumers, and give clarity to businesses.*

On (c) an accompanying descriptor(s):

In the call for evidence, we asked about whether the label should include terminology describing method of production (for example, free range) and/or level of welfare (for example, good, high). Views from the call for evidence were inconclusive. We are now seeking views on the specific terminology to describe each tier, including any consumer research that can be shared. We understand the following factors may be important to consider:

- comparability of terminology between species
- level of consumer understanding of existing terms in use
- importance of keeping terminology similar to that used today
- consumer understanding of what constitutes good welfare, and how that interacts with different production systems

- the balance between full transparency and clear understanding, to make easier choices
- terms which fairly reflect farming practices and enable positive communication of higher welfare standards
- the ability to update the underpinning standards without needing to update the label terminology, for example, if we move to a more outcomes-focused system.

It would be important to choose terminology that allows products in NI to continue to comply with EU food law, such as marketing standards for eggs and poultry meat, if the proposed reforms are taken forward.

Some examples of possible terms are provided in the table below based on the draft standards found in Annex B.

Level of Welfare Term		Method of Production Term			
	Pork, chicken and eggs	Pork, chicken and eggs	Pork	Chicken	Eggs
5	Unclassified	Non-UK standard	Non-UK standard	Non-UK standard	Non-UK standard
4	Standard	Indoor	Indoor	Indoor	Caged <i>OR</i> Barn
3	Improved	Enhanced Indoor	Enhanced Indoor	Enhanced Indoor	Barn
2	High	Partially Outdoor	Outdoor-Bred	Free-Range	Free-Range
1	Highest	Enhanced Outdoor	Free-Range	Enhanced Free-Range	Enhanced Free-Range

**Question 57 a) Do you feel the label should include terminology describing both method of production and level of welfare:**

[Yes, both / No, a method of production descriptor only / **No, a welfare level descriptor only** / No, the label should not include descriptive terms / Other / Don't know]

**Question 57 b) Please explain your answer or detail alternative options.**

*If applying a label it should be welfare level only and kept simple to avoid confusion with other labelling.*

**Question 58. Please share any comments on label terminology options based on the draft standards in Annex B.** This may include individual terms you feel should, or should not, be used. Please provide supporting evidence where available.

**Method of production term** *CTSI offer no comment.*

**Level of welfare term** *CTSI offer no comment.*

**Question 59. If you have proposed alternative production standards in your responses to previous questions, please provide suggestions for accompanying label terminology to match your proposals.**

*CTSI offer no comment.*

On (d) a picture illustrating method of production:

**Question 60 a) To what extent do you support the inclusion of a picture illustrating the method of production?**

[Strongly Support / Support / Neutral / **Oppose** / Strongly Oppose / Don't know]

**Question 60 b) please explain your answer.**

*It is not clear what the illustrated pictures of the method of production would look like, whether this would assist the consumer and how much space this would take up on a label to be sufficiently clear.*

On (e) space for an assurance scheme logo to be voluntarily included:

In responses to the call for evidence, there was consistent recognition of the important role assurance schemes play in giving consumers confidence on products they buy. However, there was evidence of consumer confusion due to the number of labels, terms and difficulty comparing them. We recognise the value farm assurance schemes bring and our proposals seek to complement and build on this. As such, we are considering whether the label should include space for an assurance scheme logo and provide information to consumers on whether or not a product is farm-assured. Many existing assurance scheme standards go beyond those in the draft standards (in Annex B) and their logos represent this. Some, who primarily cover animal welfare, have more in-depth welfare standards and others have much broader standards on for example, food safety and quality or the environment, giving consumers confidence across a wide range of factors.

**Question 61 a) Do you feel that the label should include a space for an assurance scheme logo?**

[Yes – the assurance logo should be part of the label / Maybe – it would depend on assurance scheme / **No – the assurance logo should be separate to the label** / Don't know]

**Question 61 b) Do you think it is important that the label tells a consumer whether the product comes from a farm which is assured or is not assured?**

[Yes – it is important for the label to provide this information / **No – this information is not relevant to the label** / Don't know]

**Question 61 c) Please explain your answer.**

*All livestock farming has to meet minimum legislative requirements for production. As per the response at Q51b, it is already difficult to enforce the rules for labelling. These rules include assurance schemes and it is open to fraudulent activity where there is a premium price that will be paid for goods. The legislation is poor, the powers do not allow sufficient capability to investigate the potential for fraudulent activity, and little enforcement activity would be carried out as Trading Standards are already under resourced to conduct proactive work on current labelling requirements*

Below is a mocked-up example to illustrate what a potential label may look like, including all the features described above.



**Question 62. Please share any comments you would like to make on the mocked-up example label.**

*CTSI believe the label could be perceived as confusing for the consumer and may increase the risk of fraudulent activity as business strive for the highest standards. We also have concerns about the quality of the legislation to enable effective enforcement. I don't believe this is what the consumer wants, and the label is confusing. In line with other schemes around food standards and safety, such as FHRS, the number 5 should denote the highest, not one (the lowest numerical option).*

### Options for providing additional information online:

Respondents to the call for evidence noted that the terms on the label should be simple and accessible to all consumers, but some consumers may wish to seek further information online. To facilitate consumer transparency, we would expect to publish further detail on the standards that underpin each label tier on gov.uk. The information provided could replicate and expand on, but wouldn't replace, the information that must appear on the label. We are considering options on whether the label includes a link to further information, such as through a QR code or website address. This could be to the gov.uk page setting out the full production standards, or a food business' own website where they would have the option to provide additional information about their specific standards.

#### **Question 63 a) Do you support providing a link to further information on the label?**

[Yes / No / Don't know]

#### **Question 63 b) Please provide detail on how this should be done and any impacts of this.**

*CTSI offer no comment.*

#### **Question 63 c) Please suggest any alternative options for signposting consumers to the information online, such as a mandatory requirement for accompanying signage in store.**

*In relation to publishing further detail on the standards that underpin each label tier on gov.uk, CTSI believe that initially there should be some alternative options for consumers, to the standards information being online. This is because not everybody has access to the internet or a smart phone and any new initiatives need to take into account the digitally excluded. These alternative options may only need to be initially available, whilst consumers get used to what the standards that underpin each label tier means.*

#### **Question 64. Please share any other comments on the label format and terminology.**

[Free text box]

## **Monitoring and enforcement**

A robust system for monitoring and enforcement is critical to ensure consumers can have confidence in the label. This would need to apply to in-scope products containing pork, chicken and egg produced in the UK or imported. Many respondents to the call for evidence noted the potential increased burden of additional auditing and suggested making use of existing accreditation and assurance schemes where possible.

We are seeking your views on a proposal which places the responsibility for accurate labelling on the Food Business Operator (FBO) applying the label. We would also like to

gather your views on whether there is an additional need for government to provide the certification needed for an FBO to apply a label.

**We propose that the responsibility would be on FBOs for ensuring the accuracy of the labelling applied to their products.** These are the businesses under whose name foods are marketed or sold. Typically, this would be a supermarket for own-brand products, or a manufacturer for branded products. The FBO would need to have suitable traceability systems in place to ensure any welfare claims can be appropriately evidenced back through their supply chain.

For any tier above the lowest tier to be applied to in-scope products, the FBO would need to be able to provide documentary evidence demonstrating that the product has been produced in a manner consistent with the standards associated with that tier. If an FBO cannot demonstrate that a product has been produced to one of those tiers, they would need to apply the lowest-tier label to the product, indicating it has not been produced to any particular production standards.

The UK government, the Scottish Government, Welsh Government and the Northern Ireland Executive would designate an enforcement authority who would have powers to:

- monitor and investigate compliance with the claimed tiers. For example, by checking that labels are correctly applied to products and that products labelled as a certain tier can be demonstrated as originating from animals raised under those standards.
- deal effectively with any non-compliance. This could result in prosecutions or imposing civil sanctions.

### **Government guidance to support FBOs**

Guidance would be published setting out how FBOs can meet their responsibility to apply accurate labelling. This would include the option of sourcing from producers who are members of farm assurance schemes that meet a minimum set of criteria including: independent ISO 17065 accreditation, a minimum of one farm inspection annually, and requirements for assessor competence.

To support this, the UK government, the Scottish Government, Welsh Government and the Northern Ireland Executive would keep an up-to-date and accessible register of farm assurance schemes and the tier or tiers their scheme is applicable to. Schemes, whether operating within the UK or overseas, would be able to submit documentary evidence to be included on this register. We propose documentation would need to be resubmitted at regular intervals to remain on the register and we seek your views below on how frequently this should be required.

For assured farmers, this would mean that their existing on-farm inspections could be used to help evidence that they meet the standards required for the top three tiers. An

estimated 95% of pigs and meat chickens, and 90% of laying hens, reared in the UK are on farms that are already members of assurance schemes.

FBOs could also meet their responsibility to apply accurate labelling, by demonstrating that a product originates from a country whose baseline legislation meets the standards for a certain tier. For example, as the UK legal baseline meets the standards for tier 4, demonstrating that a product originates from the UK and meets those requirements would be sufficient evidence for that tier label to be applied. As part of published guidance, we are considering including a country-level register setting out countries whose minimum legal baseline meets the standards associated with a particular tier. As with assurance schemes above, countries would need to send evidence to the UK government, the Scottish Government, Welsh Government and the Northern Ireland Executive to be added to the register.

**Question 65 a) To what extent do you support or oppose the proposed system of Food Business Operators being responsible for ensuring the labelling applied to their products is accurate?**

[Strongly Support / Support / Neutral / Oppose / Strongly Oppose / Don't know]

**Question 65 b) Please explain your answer and share any relevant supporting evidence.**

*CTSI supports the Food Business Operator being responsible for ensuring the labelling applied to their products is accurate. This is because it would be in line with Assimilated Regulation (EU) No 1169/2011 on the provision of food information to consumers, article 8, which states that 'The food business operator responsible for the food information shall ensure the presence and accuracy of the food information...' Food legislation generally places responsibility to ensure compliance with the FBO so it would be consistent with that. However, we would call for the law to be strengthened with regards the powers available to the enforcement authority to investigate potential non-compliance.*

**Question 66 a) To what extent do you support or oppose the proposal that membership of a recognised farm assurance scheme could be used by a Food Business Operator to help verify the production standards for UK farmers?**

[Strongly Support / Support / Neutral / Oppose / Strongly Oppose / Don't know]

**Question 66 b) Please explain your answer and share any relevant supporting evidence.**

*There will need to be benchmarking to ensure the schemes are of a similar standard and robustness.*

**Question 67 a) To what extent do you support or oppose the proposal to use guidance to recognise bodies in other countries to help support label verification for the UK market?**

[Strongly Support / Support / **Neutral** / Oppose / Strongly Oppose / Don't know]

**Question 67 b) Please explain your answer and share any relevant supporting evidence.**

*CTSI support the proposal to use guidance to recognise bodies in other countries to help support label verification in the UK market. This is because it is not always possible or feasible to travel abroad to verify the label of products originating from outside of the UK, especially for UK enforcement bodies. However, the bodies recognised in other countries would have to go through stringent checks before appearing in any guidance, in order to support label verification. This would be a pragmatic recognition that a large percentage of our food is produced in other countries so will probably be needed to avoid shortages.*

**Question 68. Please identify any assurance schemes or bodies operating abroad that you would see as equivalent to one or more of the draft tiers, detailed in Annex B.**

*CTSI is not able to comment on this.*

**Question 69 a) To what extent do you support or oppose offering a process where country-level recognition could be included in the guidance if a country's legal minimum standards met those of a particular tier?**

[Strongly Support / Support / **Neutral** / Oppose / Strongly Oppose / Don't know]

**Question 69 b) Please explain your answer and share any relevant supporting evidence.**

*CTSI supports offering a process where country-level recognition could be included in the guidance, if a country's legal minimum standards met those of a particular tier because it is believed that this would simplify the process. However, stringent checks would need to be in place to ensure that the country did meet the minimum standard of the particular tier, before being included in any guidance.*

**Question 70. Under the proposals above, farm assurance schemes would need to submit documentary evidence that they certify to one or more of the label standards, in order to be included in the government register. How frequently do you feel this evidence should be re-submitted, to ensure the register remains accurate and up to date?**

[Free text box]

**Question 71 a) In cases where a Food Business Operator has not met their responsibility to accurately label products, we propose to ensure that prosecutions can be brought for the more serious cases of non-compliance. To what extent do you support or oppose this proposal?**

[Strongly Support / **Support** / Neutral / Oppose / Strongly Oppose / Don't know]

**Question 71 b) If you oppose the proposal to allow criminal prosecutions to be brought for non-compliance, what alternative would you prefer? For example, civil sanctions. Please explain your answer and share any relevant supporting evidence.**

[Free text box]

**Question 71 c) If either criminal sanctions or civil sanctions are available, what do you think the appropriate penalties should be? Please explain your answer and share any relevant supporting evidence.**

*CTSI believe that Improvement Notices should be an available enforcement tool for less serious cases of non-compliance in relation to the accuracy of labels. Other enforcement tools such as improvement/compliance notices/fixed penalties and financial penalties should also be considered to give flexibility in different situations. Prosecutions can be the appropriate disposal but not in all situations. Compliance may be able to be achieved using other methods so we should be given those options.*

*This would be alongside the enforcement tool of prosecution for more serious cases of non-compliance. Having these enforcement tool options available would be in line with other food information accuracy enforcement. For example, the Food Information Regulations 2014 provides the enforcement tool of Improvement Notices for non-compliances in relation to misleading information and/or the food business operator not ensuring the accuracy of food information. The Food Safety Act 1990 also then provides the enforcement tool of prosecution for more serious non-compliance, such as section 15 of falsely describing food.*

### **A government role in certifying standards**

We would also like to gather your views on whether there is an additional need for government to play a role in providing the certification needed for an FBO to apply a label. This could involve official inspections carried out at farm-level by a government authority.

**Question 72 a) Do you feel there is an additional need for government inspections to form part of the certification for the label standards?**

[**Yes, there is a need for government inspections** / No, there is not a need for government inspections / Don't know]

*CTSI would support the need for Government inspections, but it needs to be clarified as to what this looks like in legislation and in practice.*

**Question 72 b) Please explain your answer and share any relevant supporting evidence.**

*CTSI understand this as regulating the industry regulator. Currently, they are farm assurance inspectors undertaking inspections and no-one is auditing the auditor. It is accepted that the standards for assurance schemes are robust but there have been concerns over the years that some assured premises do not meet minimal industry standards and this raises concerns over the standard of the assurance body inspection.*

**Question 72 c) How could such a system, where government plays a role in certifying standards, operate for imported products? Please explain your answer and share any relevant supporting evidence, including any examples of existing systems you are aware of.**

*CTSI is unsure how this would work, but if the measures proposed were adopted, going down the route of labelling, it has to be fair to industry (both the food and farming industries) and ensure there is no unequal playing field.*

**Question 72 d) Please share any additional impacts you feel may result from requiring government certification and inspection, with any relevant supporting evidence.**

*CTSI offer no comment.*

**Question 73. Please share any further comments on the monitoring and enforcement proposals.**

*CTSI offer no comment.*

## **Business impacts**

### **Geographic scope**

Our preferred approach is that any reforms are implemented on a UK-wide basis so that a consistent approach is taken across all UK administrations, noting the market access principles in the UK Internal Market (UKIM) Act 2020 of mutual recognition and non-discrimination. The UKIM Act allows all goods that can be legally sold in one part of the UK to be sold in any other part, under the mutual recognition principle for goods. If we choose to proceed with the proposed labelling reforms in GB only, qualifying Northern Ireland goods benefitting from unfettered market access could be sold in other parts of the UK without the proposed method of production labelling requirements. This could mean that some pork, chicken or egg products could be sold in England, Scotland and Wales without a method of production label, that would otherwise be applicable in GB.

GB goods moving to NI could choose to comply with GB method of production labelling requirements instead of EU marketing standards if moved under the NI Retail Movement Scheme; however, any GB goods not moved under this scheme would need to comply with relevant EU food law, such as marketing standards.

**Question 74 a) Do you agree or disagree that our proposed method of production labelling requirements should apply on a UK-wide basis?**

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know]

**Question 74 b) Please provide any evidence to support your view.**

*CTSI believe this will avoid any divergence in the market.*

**Question 75 a) What differential impacts would these proposals have on you and/or your business if mandatory method of production labelling requirements were to apply on a GB-wide basis only, and the principles of the UKIM Act continued to apply, so that qualifying NI goods moving from NI to GB not meeting the method of production labelling requirements could be sold on the GB market?**

[Free text box]

**Question 75 b) How would your business manage these impacts if method of production labelling requirements were to apply on a GB-wide basis?**

[Free text box]

**Question 76 a) What differential impacts would these proposals have on you and/or your business if mandatory method of production labelling requirements were to apply on a GB-wide basis only, with respect to the movement of goods from GB to NI?**

[Free text box]

**Question 76 b) How would your business manage these impacts if method of production labelling requirements were to apply on a GB-wide basis?**

[Free text box]

## Small and medium businesses

We want to support SMEs through any transition into expanded mandatory labelling. We are considering possible exemptions to mitigate impacts without undermining our policy objectives.

Following the exemptions set out in the assimilated regulations on the provision of food information to consumers, we are considering exempting from mandatory labelling requirements “food directly supplied by the manufacturer of small quantities of products to the final consumer or to local retail establishments directly supplying the final consumer”.

In line with existing exemptions on nutrition labelling (in the [assimilated regulations on the provision of food information to consumers, Annex V, 19](#)) we propose that “manufacturer of small quantities” refers to manufacturers with fewer than 10 employees and a balance sheet of less than £1.4 million. We propose that “local retail establishments” refers to those situated within the supplying manufacturer’s own county, plus the greater of either the neighbouring county or counties or 30 miles (50 kilometres) from the boundary of the county the manufacturer is in.

**Question 77. To what extent do you agree that this exemption would mitigate the burden on small businesses?**

[Strongly agree / Agree / Neutral / Disagree / Strongly disagree / **Don't know**]

**Question 78. What other exemptions might mitigate the impacts of our proposals on small and medium businesses?**

*CTSI believe that smaller mass catering establishments, such as restaurants and cafes, should be exempt from this requirement. This would be in line with the exemption in the Calorie Labelling (Out of Home Sector) Regulations, which exempts businesses with less than 250 employees, from the requirement to provide calorie information.*

## Impact assessment

We have produced a consultation stage Impact Assessment to explore, and where possible, monetise the impacts (costs and benefits) associated with the proposed labelling reforms. The Impact Assessment has been published alongside this consultation document as Annex C.

Our analysis is underpinned by several key assumptions and inputs, discussed in greater detail in the accompanying Impact Assessment. We welcome your evidence to strengthen or correct the analysis.

Following [RPC guidance](#), we have split our analysis into direct impacts, where the effects of the measure are immediate and unavoidable, and indirect impacts, where subsequent effects are beyond the immediate implications of the measure.

## Direct costs and benefits

The accompanying Impact Assessment (Annex C) estimates the following direct costs (negative figures) and benefits (positive figures). Estimated direct costs are costs to UK businesses over a ten-year time period:

- labelling changes costs (-£2.0m, one off) (average cost per supermarket £179k)
- familiarisation costs (-£8.9m, one off) (average cost per impacted business £122)
- monitoring and compliance costs (-£3.4m per year) (average annual cost per farm £109)
- traceability costs (not quantified)
- benefits to consumers from improved information (not quantified)

**We would welcome your views on the costing calculations and assumptions listed below for the following direct costs and benefits:**

Based on submissions to the 2021 call for evidence, we understand that most food products have a routine labelling refresh every 1 to 3 years. For our central estimate, we assume that 80% of label changes can take place as part of routine refreshes.

**Question 79. Do you agree with this estimate? Please provide evidence to support your answer.**

[Yes / No / **Don't know**]

[Free text box]

We use data from a 2010 [Campden BRI report](#) to estimate the cost per stock keeping unit (SKU) of labelling changes and assume a central cost of £3,945 (2022 prices).

**Question 80a) If you are able to provide an up-to-date figure for the cost per SKU of labelling changes, please do so below.**

[Free text box – numbers only]

**Question 80 b) Please provide any evidence to support your response.**

[Free text box]

We have assumed that all farmers will incur familiarisation and compliance costs as a result of these proposed labelling requirements, regardless of whether they choose to continue with their current production systems or to move to higher welfare production systems.

**Question 81 a) To what extent do you agree or disagree with our assumption that all producers will incur familiarisation and compliance costs as a result of these proposed labelling requirements?**

[Strongly agree / Agree / Neutral / Disagree / Strongly disagree / Don't know]

**Question 81 b) Please provide any evidence to support your response.**

[Free text box]

## **Traceability and auditing**

Our proposal would create a responsibility on Food Business Operators to ensure the accuracy of method of production labels. For a label to be accurate, there must be:

- (a) appropriate traceability mechanisms in place, to ensure that a product's stated origin is correct
- (b) farm-level inspections, to ensure that the farm fulfils the specifications of the label tier

We estimate the additional traceability costs arising from this policy to be minimal for domestic animal products due to the [existing traceability requirements in the UK](#). For example, many retailers and assurance schemes currently require full supply chain traceability, and the [Livestock Information Transformation Programme](#) is in development to improve farm-to-fork traceability.

**Question 82. Please provide any further evidence on likely traceability costs for a business.** Please specify the sector or group this evidence relates to, and use worked examples if helpful.

[Free text box]

We assume that auditing of a mandatory method of production label would either integrate with existing monitoring and enforcement regimes or would entail a small add-on cost.

**Question 83. Please provide any company-level data on the costs of undergoing an audit (for example, the costs to your business of undergoing a farm assurance scheme inspection).**

[Free text box]

## **Indirect costs and benefits**

The accompanying consultation stage Impact Assessment (Annex C) estimates the following **indirect** costs (negative figures) and benefits (positive figures), as a result of labelling encouraging an increase in the proportion of sales of higher welfare products. Estimated indirect costs are costs to UK businesses over a ten-year time period:

- benefits to society from improved animal welfare (not quantified)
- benefits to animals arising from improved welfare (not quantified)
- benefits to UK baseline farmers who can increase sales (+£46.56m per year, based upon a partial shift towards higher welfare production)
- capital expenditure for farmers choosing to move to higher welfare production practices (not quantified)

- environmental impacts (partially monetised for meat chickens as -£17.7m per year in increased greenhouse gas emissions)
  - positive impacts (for example, improved biodiversity) could offset these negative impacts and have not been quantified

We assume that farmers would only choose to invest in higher welfare systems if they expect the shift to advantage their business in the long term. As such, any related costs are considered indirect costs which we assume to be offset by profit changes for farmers.

As labelling is a market-driven lever, we expect that in the long term, food business profits would either stay the same or increase. Our modelling assumes overall profits would stay the same.

We assume that retailers currently balance their costs and prices by setting prices at a product category or business level, rather than at an individual product level. Retailers would continue to 'balance the books' after the introduction of labelling reforms. Profits for retailers may be redistributed across the product range as a result of changes in retailer stocking policies and consumer demand.

**Question 84 a) To what extent do you agree or disagree with our assumption that retailers set prices at a product category or business level?**

[Strongly agree / Agree / Neutral / Disagree / Strongly disagree / **Don't know**]

**Question 84 b) Please provide any evidence you can to support your view.**

[Free text box]

**Question 85 a) To what extent do you agree or disagree with our assumption that food business profits would overall stay the same in the long term?**

[Agree / Disagree, I think profits would overall decrease in the long term / Disagree, I think profits would overall increase in the long term / **Don't know**]

**Question 85 b) Please provide any evidence you can to support your view.**

[Free text box]

### **Business decisions**

**Question 86 a) How do you anticipate the number of higher welfare (tier 1 to 3) unprocessed and minimally processed products on shelves in scope would change due to this intervention? We are particularly interested here in responses from retailers.**

For pork products: [Increase / Decrease / **Stay the same** / Don't know]

For chicken products: [Increase / Decrease / **Stay the same** / Don't know]

For egg products: [Increase / Decrease / **Stay the same** / Don't know]

**Question 86 b) Please provide any evidence you can to support your view.**

*CTSI has reservations that these proposals will mean that the production standards will change. However, we would expect industry to state or declare that they are the highest rating possible, to appeal to consumers. This is then open to being misleading or misinterpreted.*

Our modelling assumes that most of the volume of imported meat products are sold and used in processed products (retail and out of home sector).

**Question 87 a) What percentage of all imported unprocessed and minimally processed poultry and pig meat do you believe is used in processed products (retail and out of home sector)?**

- <25%
- 25% to 50%
- 50% to 75%
- > 75%

**Question 87 b) Please provide any evidence you can to support your view.**

[Free text box]

The method of production labelling proposals cover both domestic and imported products.

**Question 88 a) Please provide detail on any additional impacts you can identify to businesses (domestic or abroad) as a result of the proposals being applied to imported products. How do you think the cost and/or volume of imported products will be affected by the labelling requirements?**

**Question 88 b) Please provide any evidence to support your answer.**

[Free text box]

**Question 89. Do you have any further comments on our Impact Assessment or any other evidence you would like to share with us?**

[Free text box]

## **Additional impacts**

**Question 90 a) To what extent do you agree that the proposals are likely to impact or improve relations between groups within the following categories protected under the [Equality Act \(2010\)](#)?**

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability

- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / **Don't know**]

**Question 90 b) To what extent do you agree that the proposals are likely to impact or provide an opportunity to improve relations between groups within the following categories protected under Northern Ireland equality legislation?**

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation
- men and women generally
- persons with a disability and persons without
- between persons with dependants and persons without.

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / **Don't know**]

**Question 90 c) Please provide any evidence to support your view.**

[Free text box]

## Wider labelling reforms

We recognise that respondents to this consultation may wish to highlight other areas where labelling reforms could offer improved transparency and consistency, providing better information to consumers and enabling farmers to receive a fair market reward for producing high-quality, high-standard food.

**Question 91.** Please share any additional areas of potential labelling reform which may deliver the benefits described above, for future consideration. Please include evidence where available.

*CTSI believe that reforms are always welcome where they add value to the consumer protection and business support landscape. However, if rules are changed, it must be ensured that enforcers have the power, resource and capability to ensure compliance and deal with swiftly and effectively where non-compliance is identified. At present this is particularly difficult with meat products due to the various roles of Environmental Health, Trading Standards, and the FSA and confusion or overlap regarding who has what powers in any given scenario.*

# Annex A - Glossary of terms

Below are a set of definitions that are used throughout this consultation. Legal definitions have been used where possible, including a link to the relevant legal text. In some cases, we have defined terms solely for this consultation to provide clarity and to minimise differing interpretations of the questions as much as possible. These definitions are indicated by an asterisk '\*'. If any labelling reforms were introduced, we would need to define such terms in law.

**\*Baseline UK welfare regulations:** The standards for animal welfare set out in UK legislation, which include standards relating to animal welfare on-farm and at slaughter. This includes, but is not limited to:

- The [Animal Welfare Act England and Wales 2006](#), [Animal Health and Welfare Act Scotland 2006](#) and [Welfare of Animals Act Northern Ireland \(2011\)](#)
- the Welfare of Farmed Animals Regulations for [England \(2007\)](#) , [Wales \(2007\)](#), [Scotland \(2010\)](#) and [Northern Ireland \(2012\)](#)
- the Mutilations (Permitted Procedures) Regulations for [England \(2007\)](#), [Wales \(2007\)](#); the [Prohibited Procedures on Protected Animals \(Exemptions\) \(Scotland\) Regulations \(2010\)](#); and the [Welfare of Animals \(Permitted Procedures by Lay Persons\) Regulations \(Northern Ireland\) \(2012\)](#).
- the Welfare at the Time of Killing Regulations for [England \(2015\)](#), [Scotland \(2012\)](#), [Wales \(2014\)](#) and [Northern Ireland \(2014\)](#).

**\*Higher welfare:** exceeding UK baseline welfare regulations

**\*UK baseline products:** those, either domestically produced or imported, that meet our baseline UK welfare regulations

**\*Higher welfare products:** those, either domestically produced or imported, that exceed our baseline UK welfare regulations

**\*Imports of lower welfare:** the subset of imported products that do not meet baseline UK welfare regulations

**Food:** any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans (definition: [Assimilated Regulation 178/2002 on the definition of 'food'](#))

**Pork, chicken and eggs:** Food products intended for human consumption derived from pigs, meat chickens, and eggs from laying hens

**Unprocessed products:** those that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed (definition: [Assimilated Hygiene Regulation 852/2004](#)))

**Processed products:** those resulting from the processing of unprocessed products. These products may contain ingredients that are necessary for their manufacture or to give them specific characteristics(definition: [Assimilated Hygiene Regulation 852/2004](#))

**Processing:** any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a

combination of those processes (definition: [Assimilated Hygiene Regulation 852/2004](#))

**Products of animal origin (POAO):** any products derived from animals or products that have a close relationship with animals. They include: fresh meat and offal, game and poultry, meat products, fish, shellfish and fish products, processed animal protein for human consumption, processed pet food or raw material for pet food production, lard and rendered fats, animal casings, milk and milk products, eggs and egg products, honey, semen, embryos, manure, blood and blood products, bones, bone products and gelatine, hides and skins, bristles, wool, hair and leathers, hay and straw, hunting trophies i.e. animal heads and skins and insect pupae (definition: [Animals and animal products: international trade regulations](#))

**Primary ingredient:** an ingredient or ingredients of a food that represent more than 50% of that food or which are usually associated with the name of the food by the consumer and for which in most cases a quantitative indication is required, for example, lamb in a shepherd's pie (definition: [Assimilated Regulation 1169/2011 on the Provision of Food Information to Consumers](#))

**\*Secondary ingredient:** any ingredient or ingredients of a food which are not primary ingredients and for which a quantitative indication is not required, for example, egg in a cake

**Mass balance:** A supply chain approach that avoids the need for segregation of ingredients. It means that the proportion of products labelled as containing a certified ingredient equates to the volume of certified ingredients sourced.

**Prepacked foods:** any single item for presentation as such to the final consumer and to mass caterers, consisting of a food and the packaging into which it was put before being offered for sale, whether such packaging encloses the food completely or only partially, but in any event in such a way that the contents cannot be altered without opening or changing the packaging (definition: [Assimilated Regulation 1169/2011 on the Provision of Food Information to Consumers](#))

**Loose food:** A food that is sold loose. This can include meat at a deli counter, unpackaged bread, market vegetables, and pick and mix sweets (definition: [Food labelling: loose foods - GOV.UK \(www.gov.uk\)](#))

**Prepacked for direct sale:** a food that is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected – for example, a coffee shop own-brand sandwich (as set out in [Food Standards Agency guidance](#) and [Food Standards Scotland Guidance](#)).

**Mass caterer:** any establishment (including a vehicle or a fixed or mobile stall), such as restaurants, canteens, schools, hospitals and catering enterprises in which, in the course of a business, food is prepared to be ready for consumption by the final consumer (definition: [Assimilated Regulation 1169/2011 on the Provision of Food Information to Consumers](#))

**Food business operator:** the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control (definition: [Assimilated Food Law Regulation No 178/2002](#))

**Food business:** any undertaking, whether for profit or not and whether public or private, carrying out any of the activities related to any stage of production, processing and distribution of food (definition: [Assimilated Regulation 178/2002](#))

**Food information:** information concerning a food and made available to the final consumer by means of a label, other accompanying material, or any other means including modern technology tools or verbal communication (definition: [Assimilated Regulation 1169/2011 on the Provision of Food Information to Consumers](#))

**Labelling:** Any words, particulars, trade marks, brand name, pictorial matter or symbol relating to a food and placed on any packaging, document, notice, label, ring or collar accompanying or referring to such food (definition: [Assimilated Regulation 1169/2011 on the Provision of Food Information to Consumers](#))

**Marketing standards:** the set of legally defined requirements governing the production, promotion and sale of certain products, including eggs and beef (amongst other products) (See [Agriculture Act 2020, Agriculture \(Law and Data\) \(Scotland\) Act 2020 013](#))

**\*Marketing terms:** words or phrases used to promote a product, and which are not legally defined or otherwise certified, for example, grass-fed

**Qualifying Northern Ireland Goods (QNIGs):** are defined as goods which either: (a) are present or have been present in Northern Ireland and are not subject to any customs supervision, restriction or control which does not arise from the goods being taken out of the territory of Northern Ireland or the European Union, or (b) are NI processed products, as defined in [The Definition of Qualifying Northern Ireland Goods \(EU Exit\) Regulations 2020](#)

## Annex B - Draft production standards

The tables below set out draft standards indicating possible requirements to be met for each tier.

### Pigs

Metric	Lowest tier	→	→	→	Highest tier
Stocking density	Not specified	The unobstructed floor area available to each weaner or rearing pig reared in a group must be at least—  (a) 0.15 m <sup>2</sup> for each pig where the average weight of the pigs in the group is 10 kg or less;  (b) 0.20 m <sup>2</sup> for each pig where the average weight of the pigs in the group is more than 10 kg, but less than or equal to 20 kg;	Minimum allowances for <b>growing pigs</b> in indoor systems/outdoor systems - Liveweight (kg) Total area (m <sup>2</sup> ) 10 = 0.15/0.5 20 = 0.225/0.5 30 = 0.3/0.5 40 = 0.4/0.73 50 = 0.47/1.3 60 = 0.55/1.5 70 = 0.61/1.5 80 = 0.675/1.67 90 = 0.715/1.67 100 = 0.75/1.72 110 = 0.8/1.72	Minimum allowances for <b>growing pigs</b> in indoor systems/outdoor systems - Liveweight (kg) Total area (m <sup>2</sup> ) 10 = 0.15/0.5 20 = 0.225/0.5 30 = 0.3/0.5 40 = 0.4/0.73 50 = 0.47/1.3 60 = 0.55/1.5 70 = 0.61/1.5 80 = 0.675/1.67 90 = 0.715/1.67 100 = 0.75/1.72 110 = 0.8/1.72	Outside shelters - Class of pig/minimum lying area (m <sup>2</sup> ) Breeding pigs Farrowing sows with piglets up to 28 days = 4.0 Dry sows = 1.5 Fattening pigs Up to 30kg (and over 40 days) = 0.30 Up to 50kg = 0.40 Up to 85kg = 0.65 Up to 110kg = 0.80

		<p>(c) 0.30 m<sup>2</sup> for each pig where the average weight of the pigs in the group is more than 20 kg but less than or equal to 30 kg;</p> <p>(d) 0.40 m<sup>2</sup> for each pig where the average weight of the pigs in the group is more than 30 kg but less than or equal to 50 kg;</p> <p>(e) 0.55 m<sup>2</sup> for each pig where the average weight of the pigs in the group is more than 50 kg but less than or equal to 85 kg;</p> <p>(f) 0.65 m<sup>2</sup> for each pig where the average weight of the pigs in the group is more than 85 kg but less than or equal to 110 kg; and</p> <p>(g) 1.00 m<sup>2</sup> for each pig where the average weight of the pigs in the group is more than 110 kg.</p>	<p>Growing/finishing pigs in straw yards - Weight (kg) Total minimum space (m<sup>2</sup>) Weaners to 35 = 0.45 36-50 = 1.17 51-75 = 1.35 76-95 = 1.50 96-110 = 1.54</p> <p>Sows must be given a minimum total floor space of 3.5m<sup>2</sup>/sow for mature adults, and 2.5m<sup>2</sup>/gilt for first and second parity animals</p>	<p>Growing/finishing pigs in straw yards - Weight (kg) Total minimum space (m<sup>2</sup>) Weaners to 35 = 0.45 36-50 = 1.17 51-75 = 1.35 76-95 = 1.50 96-110 = 1.54</p> <p>Sows must be given a minimum total floor space of 3.5m<sup>2</sup>/sow for mature adults, and 2.5m<sup>2</sup>/gilt for first and second parity animals</p>	<p>Class of animal/total area including outdoor exercise area (m<sup>2</sup>) Farrowing sows with: piglets up to 40 days = 10 piglets over 40 days and up to 30 kg = 1.0 Fattening pigs Up to 50 kg = 1.4 Up to 85 kg = 1.9 Up to 110 kg = 2.3 Breeding pigs Sows = 4.9</p>
--	--	--	---	---	---

		<p>The unobstructed floor area available to each gilt after service and to each sow when gilts and/or sows are kept in groups must be at least 1.64 m<sup>2</sup> and 2.25 m<sup>2</sup> respectively. When these animals are kept in groups of six or fewer individuals, the unobstructed floor area must be increased by 10%. When these animals are kept in groups of 40 or more individuals, the unobstructed floor area may be decreased by 10%.</p> <p>The accommodation used for pigs must be constructed in such a way as to allow each pig to—</p> <ul style="list-style-type: none"><li>- stand up, lie down and rest without difficulty;</li></ul>			
--	--	---	--	--	--

		<ul style="list-style-type: none"><li>- have a clean, comfortable and adequately drained place in which it can rest;</li><li>- see other pigs, except—<ul style="list-style-type: none"><li>(i) where the pig is isolated for veterinary reasons; or</li><li>(ii) in the week before the expected farrowing time and during farrowing, when sows and gilts may be kept out of sight of other pigs;</li></ul></li><li>- maintain a comfortable temperature;</li><li>- have enough space to allow all the animals to lie down at the same time.</li></ul> <p>Sows and gilts from holdings of 11 or more sows must be kept in groups except during the period between seven</p>			
--	--	--	--	--	--

		<p>days before the predicted day of farrowing and the day on which the weaning of piglets is complete.</p> <p>The dimensions of any stall or pen used for holding individual pigs must be such that the internal area is not less than the square of the length of the pig, and no internal side is less than 75% of the length of the pig, the length of the pig in each case being measured from the tip of its snout to the base of its tail while it is standing with its back straight. This does not apply to a female pig from seven days before predicted farrowing until weaning of her piglets or to a pig being held in a stall:</p>			
--	--	---	--	--	--

		<p>(a) while it is undergoing any examination, test, treatment or operation carried out for veterinary purposes;</p> <p>(b) for the purposes of service, artificial insemination or collection of semen;</p> <p>(c) while it is fed on any particular occasion;</p> <p>(d) for the purposes of marking, washing or weighing it;</p> <p>(e) while its accommodation is being cleaned; or</p> <p>(f) while it is awaiting loading for transportation,</p> <p>provided that the period during which it is so kept is not longer than necessary for that purpose.</p>			
--	--	---	--	--	--

Enrichment	Not specified	Permanent access to environmental enrichment required	Permanent access required to effective environmental enrichment materials in sufficient quantities to allow and encourage proper expression of rooting, pawing and chewing behaviours.	Permanent access required to effective environmental enrichment materials in sufficient quantities to allow and encourage proper expression of rooting, pawing and chewing behaviours.  >200g chewable, edible, digestible material per pig per day from weaning onwards	Permanent access required to effective environmental enrichment materials in sufficient quantities to allow and encourage proper expression of rooting, pawing and chewing behaviours.  >200g chewable, edible, digestible material per pig per day from weaning onwards
Outdoor access/ range access	Not required	Not required	Not required	Pigs must have spent a minimum proportion of their lives outdoors, from birth up to weaning.	Pigs must have spent their whole lives outdoors.

Welfare outcome assessment/  management (independently assessed)	Not required	Not required	Required	Required	Required
Finishing accommodation	Not specified	Fully slatted floors allowed	Fully slatted floors not allowed, lying area must be bedded	<p>Requirement for indoor-based finishing:</p> <p>Fully slatted floors not allowed, lying area must be bedded</p> <p>Requirement for outdoor-based finishing:</p> <p>All pigs must have access to a covered shelter which:</p> <p>a) is windproof and waterproof</p> <p>b) provides sufficient space to allow all</p>	<p>All pigs must have access to a covered shelter which:</p> <p>a) is windproof and waterproof</p> <p>b) provides sufficient space to allow all pigs to lie down comfortably at the same time</p>

				pigs to lie down comfortably at the same time	
Farrowing system	Not specified	Farrowing crates allowed	Temporary crating allowed (for 5 days or less)	No confinement allowed	No confinement allowed
Tail docking (and other procedures: teeth reduction, castration, nose-ringing)	Allowed	Tail docking and teeth reduction not allowed routinely  Castration allowed  Nose ringing allowed on animals not kept continuously in an indoor husbandry system	Castration not allowed  All other mutilations not allowed routinely.	Not allowed	Not allowed

## Laying hens

Welfare standard	Lowest tier	→	→	→	Highest tier
Stocking density	Not specified	750 cm <sup>2</sup> of cage area per hen,	9 birds/m <sup>2</sup> useable area	9 birds/m <sup>2</sup> useable area	6 birds/m <sup>2</sup> useable area

		600 cm <sup>2</sup> of which must be usable	15 birds/m <sup>2</sup> floor area Colony cages not allowed	15 birds/m <sup>2</sup> floor area 2000 hens/Ha outdoor	6 birds/m <sup>2</sup> floor area 1000 hens/Ha outdoor
Enrichment	Not specified	Litter such that pecking and scratching are possible	2 enrichment items per 1000 birds	2 enrichment items per 1000 birds, including destructible material such as straw or shaving bales	2 enrichment items per 500 birds, including destructible material such as straw or shaving bales
Outdoor access/ range access	Not required	Not required	Not required	Required (subject to notifiable disease control restrictions)	Required (subject to notifiable disease control restrictions)
Welfare outcome assessment/ management (independently assessed)	Not required	Not required	Required	Required	Required
Range specification	N/A	N/A	N/A	Provision of shade: 8m <sup>2</sup> /1000 birds. Min. 4 shelters/Ha.	Enriched range: Shelter/natural cover = 5% outdoor area; <20m between shelters; cover

				Covered area/veranda provided from 2030.	within 20m of pop-holes. Access from 12 weeks.  Covered area/veranda provided.
Beak trimming	Allowed	Allowed in order to prevent feather pecking or cannibalism	Allowed in order to prevent feather pecking or cannibalism	Currently allowed in order to prevent feather pecking or cannibalism.  Not allowed for this tier from 2030.	Not allowed – improved environment reduces stress to stop feather pecking.

## Meat chickens

Welfare standard	Lowest tier	→	→	→	Highest tier
Stocking density	Not specified	39kg/m <sup>2</sup>	30kg/m <sup>2</sup>	27.5kg/m <sup>2</sup>	21kg/m <sup>2</sup> (fixed housing) or 30kg/m <sup>2</sup> (mobile housing)

Enrichment	Not specified	Not specified	2m perch space or 0.3m <sup>2</sup> platform space and 2 pecking objects per 1000 birds	1.5 straw bales, 2m perch space or 0.3m <sup>2</sup> platform space and 2 pecking objects per 1000 birds	1.5 straw bales, 2m perch space or 0.3m <sup>2</sup> platform space and 2 pecking objects per 500 birds
Outdoor access/ range access	Not required	Not required	Not required	Required Birds have had during at least half their lifetime continuous daytime access to open-air runs.	Required Birds have had during at least half their lifetime continuous daytime access to open-air runs.
Welfare outcome assessment/ management (independently assessed)	Not required	Not required	Required	Required (subject to notifiable disease control restrictions)	Required (subject to notifiable disease control restrictions)
Range specification	N/A	N/A	N/A	Mainly covered with vegetation, minimum 1m <sup>2</sup> /bird.	Mainly covered with vegetation, minimum 1m <sup>2</sup> /bird.

				<p>Min 8m<sup>2</sup> shelter/1,000 birds, some provision included within 20m of pop-holes.</p> <p>Natural cover on <math>\geq 5\%</math> of area.</p> <p><math>\geq 2</math> dustbathing areas and at least 1/2000 birds.</p> <p>Covered area/veranda provided from 2030.</p>	<p>Min 8m<sup>2</sup> shelter/1,000 birds, some provision included within 20m of pop-holes.</p> <p>Natural cover on <math>\geq 5\%</math> of area.</p> <p><math>\geq 2</math> dustbathing areas and at least 1/2000 birds.</p> <p>Covered area/veranda provided.</p>
Lighting	Not specified	$\geq 20$ lux over $\geq 80\%$ of useable area. 6 hours darkness/ day incl. 4 hrs uninterrupted	$\geq 50$ lux of light, including natural light	Windows equating to 3% of floor area, stepped dusk	Continuous dark period $\geq 8$ hours
Thinning	Allowed	Allowed	One thin maximum	Not allowed	Not allowed

Breed growth rate	Not specified	Not specified	<p>Slow growing/ intermediate growth.</p> <p>Acceptable breeds are: – Hubbard Redbro, JA757, 787, 957, or 987. – Rambler Ranger, Ranger Classic and Ranger Gold.</p> <p>– Other breeds that pass a Government-approved rigorous welfare assessment protocol, that includes assessment of key welfare outcome measures, including growth rate, leg health and mortality</p>	<p>Slow growing/ intermediate growth.</p> <p>Minimum slaughter age of 56 days</p>	<p>Slow growing.</p> <p>Minimum slaughter age 81 days</p>
-------------------	---------------	---------------	--	---	---