

# Enhanced animal welfare Method of Production (MoP+) labelling and sustainability labelling

Position Paper  
November 2022



## Introduction

The [Farm to Fork strategy](#) aims to reduce the environmental and climate footprint of the EU food system and facilitate the shift to healthy and sustainable diets. As part of this commitment, it seeks to further empower consumers through labelling information. A proposal for a sustainable food labelling framework is scheduled for 2024. In synergy with other relevant initiatives, the sustainable food labelling framework will cover the nutritional, climate, environmental and social aspects of food products. At the same time the European Commission is also considering options for animal welfare labelling to better transmit value through the food chain and provide transparency to consumers.

While a mandatory label of origin for animal products gives information about the geographical source, it does not disclose the conditions and the level of animal welfare under which the animal was kept throughout their lifetime. This hidden information is much awaited by citizens and consumers to understand the impact of their purchasing habits towards sustainable farming systems.

In this context, Eurogroup for Animals wishes to put forward its view on what is required for a meaningful and effective animal welfare label, how such a label can fit together with the sustainable food labelling framework, and our key considerations regarding the methodology that would underpin a sustainability labelling framework.

### 1. Eurogroup for Animals calls for a mandatory enhanced Method of Production Animal Welfare Label (MoP+)

In 2020, the Council invited the Commission to consider the development of a tiered transparent labelling scheme allowing for sufficient incentives for producers to improve animal welfare. The Council asked the Commission to consider an animal welfare label that gradually includes all livestock species, covers their entire lifetime, including transport and slaughter, and gives due consideration to all their living conditions.<sup>1</sup> While the existing EU animal welfare label on eggs only addresses one aspect of animal welfare, i.e. the housing system or Method of Production (cage, indoor or free range outdoor), the Council demands a new, enhanced Method of Production (MoP+) labelling scheme that includes more aspects of animal welfare.<sup>2</sup>

<sup>1</sup> Council of the European Union. [Conclusions on an EU-wide animal welfare label](#), Brussels, 7 December 2020.

<sup>2</sup> Ghislain, Stéphanie. 2021. [Mandatory method-of-production labelling for animal products in the EU. A case study](#). *Global Trade and Customs Journal*, 16(4): 159

An MoP+ consists of a tiered labelling scheme that groups a number of aspects of animal welfare in a rating scheme that has the capacity to communicate clear information about the entire lifetime of the animal, including transport and slaughter, taking a core set of animal welfare indicators into account.<sup>3</sup>

An EU-wide MOP+ animal welfare label needs to:

- Be mandatory
- Label all production systems from minimum EU legislation to premium levels
- Be multitiered
- Include all stages of production from rearing/breeding to transport to slaughter
- Include all farmed species (terrestrial and aquatic)
- Include imported animal products

The MoP+ method offers an objective way of labelling products across the EU Member States, by using methods of production (indoors, indoors +, free range, etc) as a basis for distinguishing products. Offering the “plus” layer, with criteria such as stocking densities, light regime and enrichment provisions, provides transparency of the level of welfare within each system. By including transport and slaughter to the criteria of the label, the consumer can access all necessary information on the animal's life to make an informed decision regarding the product.

A mandatory multi-tiered label has several advantages. It can be more cost-effective for producers but it can also ensure that it is not only the food products with higher welfare standards that are labelled. Moreover, it can incentivise producers to enhance animal welfare<sup>4</sup> at farm level in order to improve their scoring on the label. An EU-label should allow for premium levels of animal welfare to be clear to the consumer, allowing farmers and food businesses to progress and market their products in a transparent manner. Tiered labelling based on a rating scheme also encourages improvement over time.

A mandatory Method-of-Production + label is more likely to comply with the rules of the World Trade Organisation (WTO) because of the use of objective descriptors of the segments outlining how the products were derived, rather than a sole reference to animal welfare — a concept that has varying interpretation across jurisdictions.

At the moment, there are some labels in the market that are close to the concept of an MoP+, but there is not an “off the shelf” MoP+ animal welfare label that can be immediately adopted by the European Commission as the EU-wide label. Furthermore, as the Commission plans a sustainable food labelling framework, it should be considered how an animal welfare label can connect with the sustainability label.

<sup>3</sup>Parker, Christine et al. 2020. [Can labelling create transformative food system change for human and planetary health? A case study of meat](#). *International Journal of Health Policy and Management*, 10: 7

<sup>4</sup>Stein, Alexander J. and Marcelo de Lima. 2021. [Sustainable food labelling: considerations for policy-makers](#). *Review of Agricultural, Food and Environmental Studies*, pp. 7-8

## 2. Animal welfare labelling can be integrated with sustainability labelling but should not be aggregated

Eurogroup for Animals believes that an MoP+ animal welfare label should be separate and not aggregated into the overall score of a sustainability label. The result of aggregating too many aspects alongside scores on, for example biodiversity, climate change and pesticide use, is that the more aspects are included the more average the score will become. Consequently, the label will lose its meaning for consumers.<sup>5</sup> It would be even worse if heterogeneous sustainability dimensions such as environment, nutrition, social considerations, and animal welfare, were to be mixed up in a single score.

Moreover, keeping the scores for sustainability dimensions and animal welfare separated on the label will give consumers the opportunity to focus on the issues they particularly care about.<sup>6</sup> European consumers demand information on animal welfare but believe there is insufficient choice of animal friendly food products<sup>7 8</sup>. This information will be a key transparency item on food products for consumers.



<sup>5</sup> Stein, Alexander J. and Marcelo de Lima. 2021. [Sustainable food labelling: considerations for policy-makers](#). *Review of Agricultural, Food and Environmental Studies*, p. 11.

<sup>6</sup> Stein, Alexander J. and Marcelo de Lima. 2021. [Sustainable food labelling: considerations for policy-makers](#). *Review of Agricultural, Food and Environmental Studies*, p. 3.

<sup>7</sup> European Commission, Attitudes of Europeans towards Animal Welfare, 2016, Special Eurobarometer 442

<sup>8</sup> European Commission, Study on Animal Welfare Labelling, 2022,

[https://drive.google.com/file/d/1ckQ8td91oN6yKhpHpldFd4Qp3BV\\_inm7/view](https://drive.google.com/file/d/1ckQ8td91oN6yKhpHpldFd4Qp3BV_inm7/view)

Although there is a strong case for keeping the scoring of the animal welfare MOP+ label completely separate from the sustainability scoring, the two labels can be integrated and placed alongside as in the example of the Planet-score. The Planet-score was developed by a wide consortium including the French Organic Food and Farming Institute (ITAB), research organisation Sayari and consumer-research organisation Very Good Future, and a wide range of civil society organisations have been contributing with their expertise to establish a clear and “zero-greenwashing” information methodology and label.<sup>9</sup>



The Planet-score has a three-tier colour-coded animal welfare Method of Production (currently limited to farming method) label.



The French *Étiquette Bien-Être Animal* is an example of an MOP+ animal welfare label with five tiers A-E. A similar EU-wide MoP+ label could be placed alongside the Planet-score.

<sup>9</sup> Southey, Flora. 2021. [Planet Score: New eco-label factors in pesticides, biodiversity and animal welfare](#). Food Navigator, 29 July.

As in the Planet-score, an MoP+ animal welfare label could be indicated visually side by side with a sustainability label. The consumer can clearly see in which tier the product scores on animal welfare, for example from A-E, or from green to red, with graded indicators.

### 3. Sustainability labelling should allow for easy comparison within the category of animal products but also across categories between animal products and plant-based products

The Farm to Fork strategy acknowledges the health and environmental benefits of moving to more plant-based diets. To enable consumers to make sustainable choices not only within a category, but also across categories, it is key for a new sustainability labelling scheme to allow for cross-category comparisons.

The sustainability labelling scheme should make it possible for the consumer to easily compare not only between different types of animal products, but also between animal products and plant-based products. For plant-based products, an EU-wide plant-based logo should be placed where the animal welfare MoP+ label would be on animal products, alongside the product's score on sustainability. The Planet-score is a relevant illustration of how this can be achieved, with a label which is applicable both for animal products and for vegetal products, as well as for food products containing both vegetal and animal products, on the basis of the same intuitive frame.



*Planet-score label for plant-based products (left) and for animal products (right).*

\*consumer survey based on a 1000-person sample, representative of the French population aged 18 or more

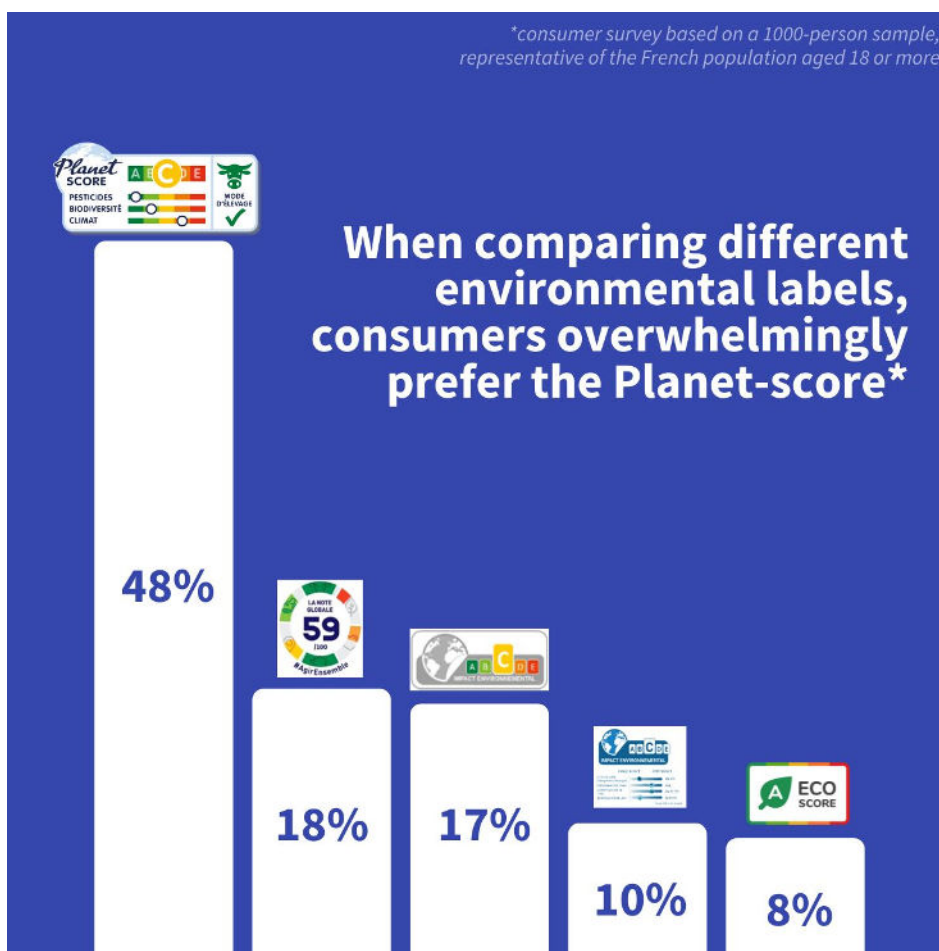


Illustration of what consumers want as a relevant and transparent environmental and animal welfare labelling on food products, as consumer surveys have recently shown in France.

#### 4. A methodology that supports the Farm to Fork strategy's vision of a healthy, sustainable food system

A transformative labelling scheme must have a methodology that is aligned with the vision behind the label. Otherwise there is a risk that the label reproduces current unsustainable consumption and production trends.<sup>10</sup> For instance, the Product Environmental Footprint (PEF) methodology is mainly an indicator of yields in vegetable production and productivity in animal farming, and as such it does not capture a number of important positive and negative externalities of the food production process (such as biodiversity loss due to synthetic fertilisers and pesticides, saturation of nitrogen cycle's carrying capacities at local scales, carbon storage, animal welfare, etc).<sup>11</sup> The same is true for fish.

<sup>10</sup> Parker, Christine et al. 2020. [Can labelling create transformative food system change for human and planetary health? A case study of meat](#). *International Journal of Health Policy and Management*, 10: 2

<sup>11</sup> BEUC. 2021. [Towards meaningful consumer information on food ecological impact](#), p. 3-4

Although the Farm to Fork Strategy states that 'Farmed fish and seafood generate a lower carbon footprint than animal production on land', and a labelling scheme needs to give consumers a more detailed level of information, the Aquaculture Advisory Council has clarified that 'The overall emission of greenhouse gases (GHG) per kg of edible flesh at the farm gate from finfish aquaculture is similar to pig meat and broiler meat', and recognised that the high environmental impacts come from intensive, fed aquaculture systems, while extensive, non-fed aquaculture systems that deliver higher welfare standards also deliver the lower environmental impacts.<sup>12</sup>

When applied to food, the PEF rewards intensive production systems<sup>13</sup> meaning for example that the most intensively produced eggs from hens in cages get a much better "sustainability" PEF score than free-range eggs. Organic eggs would come out the worst.<sup>14</sup> This is mainly due to the amount of time the animals leave and the space they take. This is clearly a major shortcoming of the PEF that is not aligned with the scenario of sustainable food systems with "less but better" food products from animal farming. Another example is that the PEF category rules (PEFCR) for marine fish currently being developed do not include fishing methods, and so miss some of the most important sustainability information. They do not include freshwater fish and does therefore not provide consumers with information on some of the main species on the market e.g. rainbow trout, and most sustainable products on the market, e.g. carp.

If the sustainability label integrated animal welfare, it needs to align with the aim of an EU-wide animal welfare label of improving animal welfare and better transmitting value in the food chain, providing transparency to consumers. It should choose a methodology that supports the Farm to Fork vision of reducing antibiotic use, increasing organic farming, improving animal welfare and changing food consumption patterns to align with healthy, sustainable diets.

A scoring system such as the Planet-score is much preferable to the PEF, as it uses a methodology that both uses the Life-Cycle Assessment principles, but goes far beyond and captures much more completely and transparently the complexities of the food systems (e.g. links with Planet Boundaries, and clearly states animal welfare).

<sup>12</sup> Aquaculture Advisory Council, 2021. [Recommendation on the climate footprint of the EU food system](#)

<sup>13</sup> See Brimont, Laura and Mathieu Saujot (Iddri). 2021. [Affichage environnemental alimentaire: révéler les visions pour construire un compromis politique](#). SciencesPo, No. 08. English summary [here](#).

<sup>14</sup> See BEUC. 2021. [Towards meaningful consumer information on food ecological impact](#), p. 4



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