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Dear Alison,

FAWC Response to the Defra letter regarding the European Commission Report on Options for Animal Welfare Labelling and the Establishment of a European Network of Reference Centres for the Protection and Welfare of Animals

Thank you for your letter dated 1st December regarding the above to which I am replying on behalf of the Farm Animal Welfare Council. The comments here are brief as I note that Defra intends to carry out a more in-depth consultation on animal welfare labelling next year and FAWC will provide a full response to that consultation when the time comes.

You may be aware that FAWC has previously fed its thoughts regarding the above into the Commission's consultation on welfare labelling and reference centres undertaken by Civic Consulting in 2008. FAWC also produced a Report on Welfare Labelling in June 2006, clearly laying out its recommendations. More recently, in its October 2009 report on Farm Animal Welfare in Great Britain: Past, Present and Future, FAWC reiterated the importance of the labelling of (home-produced and imported) food according to its welfare provenance.

FAWC does not disagree with your 'draft general principles' regarding an EU welfare labelling scheme. However, with regards to the issue of 'harmonisation', it is important that there is a degree of harmonisation across and within member states, particularly regarding scientific assessment of animal welfare and the audit procedures used for verification of any claims. It is also likely to require harmonisation in the meaning and use of certain (descriptive) terms used by a labelling scheme. Our latest report proposes a simple two-tier classification of welfare standards, given that failure to meet the minimum should not be labelled or marketed.

The reference centre or centres could have an important role to play in this regard. FAWC envisaged the possibility of a coordinating structure at the EU level but with

responsible centres based in member states. The core centre would ensure a degree of harmonisation, coordination and exchange of information at EU level whilst allowing the national centres in member states to have a more local approach to issues. These bodies need to be authoritative and independent of commercial and other vested interests and have the trust of livestock producers, food retailers, consumers and others along the food supply chain. Indeed, whatever labelling scheme might be envisaged, it will be important that it is developed in partnership with interested parties along the food supply chain to ensure that it really has an impact in terms of improving animal welfare.

I think that these views are consistent with the ideas expressed in the European Commission report. I hope that they are of some use to you and look forward to the consultation next year.

Yours sincerely,

Professor Richard Bennett
Chairman, FAWC Ethics, Economics, Education and Regulation Standing
Committee