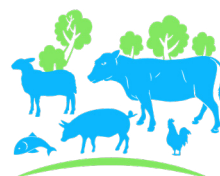




# Labelling for Animal Welfare in the UK

Promoting Consumer Choice, Supporting British Farmers and Improving Animal Welfare

Dr Steven McCulloch



**Conservative  
Animal Welfare  
Foundation**

## Executive Summary

Animal welfare labelling provides British consumers with key information about the standards that farmed animals are reared in to produce their food. The British public and animal protection organisations have long called for mandatory labelling for animal welfare to provide such information at the point of purchase.<sup>1</sup> In particular, animal protection organisations have called for labelling based on method of production and whether animals have been stunned prior to slaughter.<sup>2</sup>

The production of shell eggs provides an excellent case study into how mandatory method of production labelling has successfully provided information to consumers to drive improvements in farm animal welfare. Since 2004, it has been mandatory within the EU and UK to label shell eggs as “organic”, “free range”, “barn”, “caged”, or “imported/non-EU”.<sup>3</sup> The mandatory labelling for shell eggs has driven substantial improvements in animal welfare. In the UK, consumers changed their purchasing behaviour such that the production of cage-free eggs nearly doubled over a decade, from 31.6% of the market in 2003 to 55.7% in 2013.<sup>4</sup>

UK governments have previously cited EU membership as a barrier to introducing mandatory labelling within the UK.<sup>5</sup> Hence, the UK’s departure from the EU presents an opportunity to improve animal welfare through mandatory welfare labelling.<sup>6</sup> However, the UK’s departure from the EU also presents major risks to animal welfare, through the import of meat, dairy, and eggs produced to lower welfare standards than our own.<sup>7</sup> Generally, the UK has higher farm animal welfare standards compared to potential trade partners. The mandatory labelling of domestically produced meat, dairy, and eggs is the only WTO-compliant method of imposing the same requirements on imported products, which are often produced in conditions below the UK legislative baseline.<sup>8</sup>

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<sup>1</sup> UK Government and Parliament, “Petition: Method of Production Labelling for All Meat and Dairy Foods Sold in the UK,” <https://petition.parliament.uk/archived/petitions/38011>. Compassion in World Farming, “Overwhelming Majority of British People Want Clear Labelling Showing How Their Meat and Dairy Was Produced, New Poll Finds,” <https://www.ciwf.org.uk/media/press-releases-statements/2021/12/overwhelming-majority-of-british-people-want-clear-labelling-showing-how-their-meat-and-dairy-was-produced-new-poll-finds>; D. Bowles et al., “Food Labelling and Animal Welfare: Ensuring Animals Have a Good Life by Advocating on Their Behalf,” (RSPCA, 2021).

<sup>2</sup> Bowles et al., “Food Labelling and Animal Welfare: Ensuring Animals Have a Good Life by Advocating on Their Behalf.”

<sup>3</sup> Gov.UK, “Egg Marketing Standards,” <https://www.gov.uk/guidance/egg-marketing-standards>.

<sup>4</sup> Compassion in World Farming, “CIWF Submission to Defra Labelling Call for Evidence “ (CIWF, 2021), 19.

<sup>5</sup> UK Government and Parliament, “Petition: Method of Production Labelling for All Meat and Dairy Foods Sold in the UK”.

<sup>6</sup> S. P. McCulloch, “Brexit and Animal Welfare Impact Assessment: Analysis of the Opportunities Brexit Presents for Animal Protection in the UK, EU, and Internationally,” *Animals* 9, no. 11 (2019).

<sup>7</sup> S. P. McCulloch, “Brexit and Animal Welfare Impact Assessment: Analysis of the Threats Brexit Poses to Animal Protection in the UK, EU and Internationally,” *Animals* 9, no. 3 (2019).

<sup>8</sup> Department for Environment Food and Rural Affairs, “Labelling for Animal Welfare: Call for Evidence,” (London 2021).





The UK generally, but not always, has higher animal welfare compared to other nations. For example, the UK has higher pig welfare standards compared to the EU and US, following its implementation of a full ban on sow stalls in 1999. Despite this, it does not necessarily follow that the UK has high animal welfare standards per se. For instance, 60% of the UK's breeding sows are severely confined in crates for nearly a quarter of their adult breeding lives.<sup>9</sup> Furthermore, 70-80% of pig's tails are docked, a mutilation carried out to prevent tail biting, which occurs due to the inappropriate environments pigs are reared in.<sup>10</sup> And almost all pigs are stunned prior to slaughter using carbon dioxide, which is proven to be highly aversive; so much so that the European Food Safety Authority (EFSA) has recommended that the EU ban the practice.<sup>11</sup>

The UK's higher (relative) welfare standards and lower (absolute) standards explains both the status quo of animal welfare labelling in Britain, as well as the urgent need for reform. A range of industry- and NGO-led certification schemes and retailer-based standards provide information to the consumer about welfare provenance. The Assured Food Standards (AFS) Red Tractor scheme has the largest coverage in the UK, but its standards are generally at or barely above the legislative baseline.<sup>12</sup> RSPCA Assured is the leading animal welfare label, but it has far lower market penetration.<sup>13</sup> The Soil Association is a leading certifier for farmed animals kept in organic conditions, with high welfare standards, but represents only a niche segment of the market.<sup>14</sup> There is no method of slaughter labelling, though some voluntary assurance schemes, including Red Tractor, RSPCA Assured, and Soil Association Organic, require stunning prior to slaughter for certification.

The plethora of labelling schemes in the UK and sometimes misleading marketing creates a lack of transparency and confusion for British consumers. A 2021 Opinium poll (n=1,990) found 68% of respondents agreed that animal products should be labelled to show the conditions that animals had been reared in, similar to labelling for shell eggs.<sup>15</sup> Furthermore, a 2015 Eurobarometer poll (n=1,372) found that 72% of UK citizens were willing to pay (WTP) more for products sourced from animal welfare-friendly systems.<sup>16</sup> Mandatory labelling can therefore drive improvements in animal welfare through increased stocking by retailers and consumer demand for higher welfare products. Labelling also rewards farmers who produce to UK baseline or higher standards, through the clear provision of information on a government-backed label.

<sup>9</sup> S. McCulloch, "Farm Animal Welfare in the UK: What Does the British Public Want?," (UK: Conservative Animal Welfare Foundation, 2023).

<sup>10</sup> Charlotte Regan, 14 February, 2020, <https://www.worldanimalprotection.org.uk/blogs/why-little-pig-lost-his-tail-cruel-practice-tail-docking>.

<sup>11</sup> Søren Saxmose Nielsen et al., "Welfare of Pigs at Slaughter," EFSA Journal 18, no. 6 (2020). Eurogroup for Animals, "EFSA (Finally) Affirms That CO2 Stunning Is Incompatible with Pig Welfare at Slaughter," <https://www.eurogroupforanimals.org/news/efsa-finally-affirms-co2-stunning-incompatible-pig-welfare-slaughter>. Department for Environment Food and Rural Affairs, "Results of the 2022 FSA Slaughter Sector Survey in England and Wales," (London, UK2022).

<sup>12</sup> Assured Food Standards, "Homepage," <https://redtractor.org.uk/>.

<sup>13</sup> RSPCA Assured, "Homepage," <https://www.rspcaassured.org.uk/>.

<sup>14</sup> Soil Association, "Better for Animals," <https://www.soilassociation.org/take-action/organic-living/why-organic/better-for-animals/>.

<sup>15</sup> Compassion in World Farming, "Overwhelming Majority of British People Want Clear Labelling Showing How Their Meat and Dairy Was Produced, New Poll Finds".

<sup>16</sup> European Commission, "Attitudes of Europeans Towards Animal Welfare: Special Eurobarometer 442," (Brussels: European Commission, 2016).



Red Tractor is the dominant labelling scheme that certifies animal welfare standards in Britain. It covers over 90% of chickens reared for meat and around 95% of pigs in the UK, and just under half of beef cattle and sheep in England.<sup>17</sup> The scheme operates to distinguish British-produced food from imported food. Given the many serious and highly prevalent farm animal welfare issues in the UK, Red Tractor marketing claims of high welfare produce are potentially confusing for British consumers. Red Tractor and other national industry-based schemes exist to champion British farmers and support their food producer members.<sup>18</sup> It is not obvious why industry-based schemes would be substantially motivated by animal welfare per se, and this report argues that their animal welfare standards are principally driven by economic considerations. This argument is consistent with UK-based industry-based labelling schemes having welfare standards that are generally barely above minimum legislative standards. In contrast, government has a guardianship role for animal welfare as well as a role to balance economic considerations.<sup>19</sup> For these reasons, only a government-regulated mandatory scheme can be reliably trusted to provide transparent information to British consumers to drive improvements in animal welfare and reward farmers for producing above the legislative baseline.

The UK Government ran a Call for Evidence on animal welfare labelling in September 2021, and published its summary of responses in August 2022.<sup>20</sup> DEFRA's policy objectives were to support farmers meeting or exceeding UK welfare standards by ensuring that they are rewarded by the market; improving animal welfare by unlocking untapped market demand; and ensuring UK baseline and higher welfare products are accessible, available, and affordable for consumers to choose food which aligns with their own values.<sup>21</sup> DEFRA summarised its findings as: public polls finding high levels of support for mandatory labelling; conflicting evidence on the prioritisation of animal welfare for consumers, including willingness to pay; civil society organisations and members of the public preferring mandatory labelling; industry associations generally preferring an industry-led approach; and broad support for mandatory labelling of imported products.<sup>22</sup>

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<sup>17</sup> RSPCA, "RSPCA Submission to Defra Labelling Call for Evidence" (RSPCA, 2021). Assured Food Standards, "What Red Tractor Credentials Mean for Pig Scheme Members," <https://redtractorassurance.org.uk/pigs-rewards/>. David Bowles, RSPCA, pers. comm.

<sup>18</sup> Assured Food Standards, "Your Frequently Asked Questions Answered," <https://redtractor.org.uk/faq/>. Quality Meat Scotland, "Homepage," <https://qmScotland.co.uk/>.

<sup>19</sup> Farm Animal Welfare Council, "Farm Animal Welfare in Great Britain: Past, Present and Future," (London: Farm Animal Welfare Council, 2009).

<sup>20</sup> Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare," (London2022); Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence."

<sup>21</sup> In line with the devolution of animal health and welfare policy, the Call for Evidence was for England, Wales, and Northern Ireland only. Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence."

<sup>22</sup> Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare."



In March 2023, DEFRA gave a presentation to stakeholders on a planned Consultation on animal welfare labelling to take place from April 2023.<sup>23</sup> DEFRA proposed a mandatory animal welfare label based on a tiered A-E method of production plus-based scheme.<sup>24</sup> The UK scheme was to be applied to pigs, chickens reared for meat, and layer hens, and restricted to unprocessed food to begin with. However, in July 2023 DEFRA announced that despite public appetite for improved labelling for animal welfare, it did not consider the time was right to consult on proposals to reform labelling.<sup>25</sup> Instead, it would continue to work with industry to explore how government can harness the market to improve information provision for consumers and raise standards of animal welfare.

This report reviews the animal welfare labelling landscape in the UK and the EU, to inform future labelling policy. The report examines the Red Tractor and industry-based labelling schemes generally. RSPCA Assured and Soil Association Organic labelling schemes are reviewed and found to promote high welfare standards. The report recommends that membership of RSPCA Assured and Soil Association Organic could be a requirement for higher tiers within a future government-regulated mandatory labelling scheme. It discusses the interplay between British supermarket retailers and farm assurance and animal welfare labelling schemes and provides a case study of retailer Lidl, which has launched “Welfare Windows”, a method of production-based labelling scheme for fresh chicken, duck, turkey, pork and egg products.<sup>26</sup> Lidl Welfare Windows labels include the method of production category, explanatory text, and an image to visually convey the method of production. The report commends this and proposes that a mandatory government scheme includes such information.

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<sup>23</sup> Department for Environment Food and Rural Affairs, “Animal Welfare Labelling: Presentation on Consultation Proposals, March 2023,” (2023).

<sup>24</sup> Similar to the voluntary French Étiquette Bien-Être Animal scheme. Étiquette Bien-Être Animal, “Homepage,” <https://www.etiquettebienetreanimal.fr/en/>.

<sup>25</sup> Ben Cooke, “Defra Shelves Animal Welfare Labels for Chicken and Pork,” The Times, July 20 2023.

<sup>26</sup> Lidl, “Method of Production Labelling,” <https://corporate.lidl.co.uk/sustainability/animal-welfare/welfare-windows>.



There are twelve animal welfare labelling schemes in the EU.<sup>27</sup> This report provides a brief summary of the EU schemes categorised as either animal welfare labels, or method of production-based labels. All of these are voluntary, apart from Germany's mandatory BMEL Tierwohl Initiative scheme. The German scheme is the first mandatory national animal welfare label, and the report recommends that the UK Government investigate it further. The BMEL Tierwohl Initiative is a method of production scheme with five categories.<sup>28</sup> It will apply to fattening pigs as a first step, and the German Government intends to expand the scheme to other species and the wider food sector. The more recent EU member state voluntary welfare labelling schemes tend to also be based on method of production.<sup>29</sup>

DEFRA's March 2023 proposal was for a method of production plus-based tiered scheme that was similar to the French Étiquette Bien-Être Animal label. The report provides a case study of Étiquette Bien-Être Animal and finds it to be a sophisticated scheme that will provide key information to consumers in order to purchase food products in line with their values on animal welfare.<sup>30</sup> Most of the EU schemes are run by animal protection NGOs, sometimes together with industry organisations.<sup>31</sup> It is noteworthy in this context that compared to the EU, the British labelling landscape is dominated in terms of market penetration by industry-based schemes such as Red Tractor.

Elements within the farming industry have claimed that method of production is not a reliable indicator of welfare.<sup>32</sup> Given the importance of this issue,<sup>32</sup> the report discusses the link between the system, or method of production, and animal welfare. Animal welfare relates to how well farmed animals are adapted to their environments.<sup>33</sup> The method of production determines the environment that farmed animals are reared in (for instance, free range or indoor), as well as in some cases the nature of the animals themselves (for instance, fast or slower growing chickens). For these reasons, method of production is the fundamental determinant of the welfare state of farmed animals. Furthermore, such a labelling system provides a practical policy solution, and British consumers associate animal welfare with method of production.

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<sup>27</sup> Alice Di Concetto, "Food Labelling and Animal Welfare: Research Note #2," (European Institute for Animal Law and Policy, 2021).

<sup>28</sup> The five categories are indoor housing, indoor plus space, indoor with fresh air, outdoor runs/pasture, and organic. Federal Ministry of Food and Agriculture, "Animal Husbandry Label and Amendments to Federal Building Code Adopted in Bundestag," <https://www.bmel.de/EN/topics/animals/animal-welfare/state-run-animal-welfare-label-pigs.html>.

<sup>29</sup> Alice Di Concetto, "Farm Animal Welfare and Food Information for European Union Consumers: Harmonising the Regulatory Framework for More Policy Coherence," *European Journal of Risk Regulation* (2023).

<sup>30</sup> Étiquette Bien-Être Animal, "Homepage".

<sup>31</sup> Di Concetto, "Food Labelling and Animal Welfare: Research Note #2."

<sup>32</sup> Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare.,"; Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence."

<sup>33</sup> Donald M Broom, "Animal Welfare: Concepts and Measurement," *Journal of animal science* 69, no. 10 (1991). McCulloch, "Farm Animal Welfare in the UK: What Does the British Public Want?."



For these reasons, method of production is in fact widely used as a basis for labelling. This form of labelling has been mandatory for shell eggs since 2004.<sup>34</sup> Method of production labelling is also mandatory for fish and seafood in the UK. There are regulated marketing standards for higher welfare method of production terms for fresh poultry.<sup>35</sup> The British pig industry and the RSPCA have developed standard method of production terms for pigs.<sup>36</sup> The retailer Lidl also has a successful method of production label, and newer EU voluntary labelling schemes tend to be method of production-based.<sup>37</sup> For these reasons, a government-regulated mandatory labelling system should be primarily based on method of production.

Those opposed to method of production labels often claim that stockmanship is the key determinant of welfare.<sup>38</sup> Stockmanship is an important, but ultimately secondary issue, and the report provides arguments to support this. For instance, some systems, such as farrowing crates, cannot provide for the welfare needs of pregnant and lactating sows no matter what the level of stockmanship.<sup>39</sup> Furthermore, given the highly prevalent nature of major welfare problems such as lameness in chickens reared for meat, or widespread tail docking in pigs, if stockmanship was the primary determinant of welfare, it would raise serious questions about British farmers themselves.<sup>40</sup> Welfare problems such as lameness in meat chickens are so prevalent precisely because they are systemic; they are related to genetic selection for fast growing birds, as well as other method of production factors such as high stocking densities.<sup>41</sup>

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<sup>34</sup> Gov.UK, "Egg Marketing Standards".

<sup>35</sup> The higher standards are "extensive indoor" or "barn-reared", "free range", "traditional free range", and "free range total freedom". Gov.UK, "Poultry Meat Marketing Standards" <https://www.gov.uk/guidance/poultry-meat-marketing-standards>.

<sup>36</sup> Agriculture and Horticulture Development Board, "The Code of Practice for the Labelling of Pork and Pork Products: Pig Production Terms," <https://www.porkprovenance.co.uk/pigproduction.asp>. RSPCA Assured, "Pig Rearing Systems and Pork Labels," <https://www.rspcaassured.org.uk/farm-animal-welfare/pigs/pig-rearing-systems-and-pork-labels/>.

<sup>37</sup> Lidl, "Method of Production Labelling". For example, *Étiquette Bien-Être Animal*, "Homepage".

<sup>38</sup> Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare."

<sup>39</sup> S. McCulloch, "Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs," (UK: Conservative Animal Welfare Foundation, 2022).

<sup>40</sup> Regan Why the Little Pig Lost His Tail - the Cruel Practice of "Tail Docking". RSPCA, "Eat. Sit. Suffer. Repeat: The Life of a Typical Meat Chicken," (Royal Society for the Prevention of Cruelty to Animals, 2020).

<sup>41</sup> RSPCA, "Eat. Sit. Suffer. Repeat: The Life of a Typical Meat Chicken." Better Chicken Commitment, "The Better Chicken Commitment," <https://betterchickencommitment.com/uk/>.



Method of production labels tend to include many welfare criteria, and also include assessment of welfare outcomes through regular on-farm assessments. The report highlights this for the British retailer Lidl's Welfare Windows, as well as the Étiquette Bien-Être Animal scheme.<sup>42</sup> This point rebuts a further argument against method of production labels; leading labels are not simply method of production, but what Eurogroup for Animal has called "method of production plus".<sup>43</sup> DEFRA's March 2023 proposal was for such a method of production plus label, since it was to be based primarily on method of production, including a range of important welfare inputs, as well as assessment and management of welfare outcomes.<sup>44</sup> Arguably, given the importance of method of production as the fundamental welfare determinant, the fact that a wide range of welfare inputs are important, and the reality that assessment of welfare outcomes is important, any government-regulated mandatory scheme should be method of production plus-based.

This report therefore recommends a mandatory method of production plus animal welfare labelling scheme. Based on first principles, the scheme would require at least three tiers; one at the minimum UK legislative standard, one below, and one higher. Given that there are a variety of levels of higher welfare compared to the UK baseline, and that the purpose of the scheme is to drive welfare improvements, the report recommends three tiers above the UK legal baseline. Hence, the report broadly supports DEFRA's proposed method of production-based tiered A-E scheme as proposed in March 2023.<sup>45</sup> The report recommends that the scheme applies to farmed salmon and trout when first rolled out, as well as pigs, chickens reared for meat, and laying hens. Ultimately, the benefits for British consumers, the farming industry, and animal welfare will be greater the wider the scope of the policy. Therefore, the report recommends that the Government roll out labelling policy to more species/sectors, and from retail to the out-of-home food sector soon after implementation and policy learning following the first roll out.

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<sup>42</sup> Lidl, "Chicken Production Methods," <https://corporate.lidl.co.uk/sustainability/animal-welfare/welfare-windows>. Lidl, "Pork Production Methods," <https://corporate.lidl.co.uk/sustainability/animal-welfare/welfare-windows/pork>. Étiquette Bien-Être Animal, "Homepage".

<sup>43</sup> Eurogroup for Animals, "Animal Welfare and Food Labeling: Initiating the Transition through High Quality Consumer Information," (Brussels, Belgium: Eurogroup for Animals, 2020).

<sup>44</sup> Department for Environment Food and Rural Affairs, "Animal Welfare Labelling: Presentation on Consultation Proposals, March 2023."

<sup>45</sup> Ibid.





Finally, in the UK, it is a legal requirement to stun all farm animals prior to slaughter, with an exemption for meat for the Muslim and Jewish religious communities.<sup>46</sup> Despite this, there is a substantial oversupply of non-stunned meat, which is both consumed domestically and exported abroad.<sup>47</sup> Mandatory labelling providing information about stunning can help reduce this problem. The report recommends a separate and standalone label to provide information on stunning prior to slaughter. There are two options for such a label. A simpler approach would be for two labels: “Stunned” and “Non-stunned”. Such a labelling scheme would be a significant improvement on the status quo. Despite this, the scheme would not recognise the reality that halal stunning procedures are generally considered to be less optimal for animal welfare, normally because the stunning methods are not permitted to kill animals at the same time.<sup>48</sup> For this reason, a third label “Halal-stunned” could be included in a standalone labelling scheme to indicate method of slaughter.

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<sup>46</sup> *The Welfare of Animals at the Time of Killing (England) Regulations 2015; The Welfare of Animals at the Time of Killing (Scotland) Regulations 2012; The Welfare of Animals at the Time of Killing (Wales) Regulations 2014; The Welfare of Animals at the Time of Killing (Northern Ireland) Regulations 2014.*

<sup>47</sup> S. McCulloch and L. Riley, “Reforming UK Non-Stun Slaughter Law: Economic Impacts of Licensing and Bans on Meat Exports from Germany, New Zealand, and Other Nations,” (London: Conservative Animal Welfare Foundation, 2022).

<sup>48</sup> For example, see EFSA Panel on Animal Health and Welfare, “Scientific Opinion on Electrical Requirements for Poultry Waterbath Stunning Equipment,” EFSA Journal 12, no. 7 (2014). Charlotte Berg and Mohan Raj, “A Review of Different Stunning Methods for Poultry—Animal Welfare Aspects (Stunning Methods for Poultry),” *Animals* 5, no. 4 (2015).



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## Introduction

Animal welfare labelling can provide consumers with consistent, clear information at the point of purchase. For this reason, animal protection organisations and the public have long called for mandatory labelling for animal welfare. In particular, they call for labelling on method of production and whether the animal was stunned prior to slaughter.<sup>49</sup> In response, UK governments have previously cited EU membership as a barrier to introducing mandatory labelling within the UK.<sup>50</sup>

Leaving the EU risked importing meat, dairy and eggs raised in lower welfare conditions than the UK, when forging new trade deals.<sup>51</sup> Recent Conservative governments have repeatedly committed to not lowering animal welfare standards after leaving the EU and when negotiating new trade deals.<sup>52</sup> Indeed, the UK's departure from the EU can actually provide an opportunity to improve animal welfare through mandatory animal welfare labelling.<sup>53</sup> A mandatory labelling scheme can help British consumers clearly identify whether products have been produced according to minimum UK or higher standards, as well as those that have been raised in standards below the UK legal baseline.<sup>54</sup>

Mandatory labelling complements the UK Government's post-Brexit agricultural policy, based on the public goods for public money principle, for instance under the Agriculture Act 2020 in England.<sup>55</sup> Under the Agriculture Act, animal welfare is listed as a public good. Hence, UK governments can provide financial support for farmers to improve welfare, and mandatory labelling is a means to provide information about welfare standards to British consumers at the point of purchase.

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<sup>49</sup> UK Government and Parliament, "Petition: Method of Production Labelling for All Meat and Dairy Foods Sold in the UK". Bowles et al., "Food Labelling and Animal Welfare: Ensuring Animals Have a Good Life by Advocating on Their Behalf."

<sup>50</sup> UK Government and Parliament, "Petition: Method of Production Labelling for All Meat and Dairy Foods Sold in the UK".

<sup>51</sup> McCulloch, "Brexit and Animal Welfare Impact Assessment: Analysis of the Threats Brexit Poses to Animal Protection in the UK, EU and Internationally." RSPCA, "RSPCA Submission to Defra Labelling Call for Evidence".

<sup>52</sup> E.g., Victoria Prentice recognises this in the 2021 DEFRA Call for Evidence on animal welfare labelling: "Our manifesto was very explicit that in all of our trade negotiations, we will not compromise on our high environmental protection, animal welfare and food standards. I want us to ensure that consumers are able to differentiate between products that meet or exceed the UK's high welfare standards and those that do not." Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence," 4.

<sup>53</sup> McCulloch, "Brexit and Animal Welfare Impact Assessment: Analysis of the Opportunities Brexit Presents for Animal Protection in the UK, EU, and Internationally."

<sup>54</sup> Though despite the benefits of mandatory labelling, it is also critically important for the UK Government to prevent the import of lower welfare goods into the UK, and not simply rely on consumers to choose goods produced to UK baseline standards or higher when purchasing products at the supermarket.

<sup>55</sup> Agriculture Act 2020.





For these reasons, the Conservative Government committed to consulting on labelling for animal welfare in its 2021 Action Plan for Animal Welfare.<sup>56</sup> DEFRA launched a Call for Evidence in September 2021, which received over 1600 responses, and published its summary of findings in August 2022.<sup>57</sup> In her Foreword to the Call for Evidence, Victoria Prentis MP, then-Minister of State for DEFRA, stated the following:

**“As a nation we care enormously about animal welfare and increasingly about environmental standards. Consumer information and labelling are part of the toolbox that we have when it comes to creating a better food system for people and the planet.”**

(Victoria Prentis, DEFRA Minister)<sup>58</sup>

In the Call for Evidence documents, DEFRA outlined the Government’s policy objectives as to:

1. Support farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market;
2. Improve animal welfare by unlocking untapped market demand for higher welfare products; and
3. Ensure UK baseline and higher welfare products are accessible, available, and affordable so that it is easy for consumers to choose food products that align with their values.

Following the publication of Henry Dimbleby’s National Food Strategy Review in 2022, DEFRA published the Government’s Food Strategy in June 2022.<sup>59 60</sup> In the white paper, the Government stated that it would consult on proposals to “improve and expand” current mandatory labelling requirements on domestic and imported products, to help British consumers “identify when products meet or exceed our high UK animal welfare standards”.<sup>61</sup>

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<sup>56</sup> Department for Environment Food and Rural Affairs, “Action Plan for Animal Welfare,” (London: Department for Environment, Food and Rural Affairs, 2021).

<sup>57</sup> Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare.” Department for Environment Food and Rural Affairs, “Labelling for Animal Welfare: Call for Evidence.”

<sup>58</sup> Department for Environment Food and Rural Affairs, “Labelling for Animal Welfare: Call for Evidence,” 4.

<sup>59</sup> Henry Dimbleby, “National Food Strategy: The Plan (Part Two: Final Report),” (2022).

<sup>60</sup> Department for Environment Food and Rural Affairs, “Government Food Strategy,” (London, UK2022).

<sup>61</sup> DEFRA’s statement in full: “On animal welfare: in 2023, we will consult on proposals to improve and expand current mandatory labelling requirements, and to introduce equivalent measures in the foodservice sector. Building on responses to government’s recent Call for Evidence on food labelling for animal welfare, proposals will cover domestic and imported products, considering our international trade obligations, and will help consumers identify when products meet or exceed our high UK animal welfare standards.” *Ibid.*, 26-27.



In March 2023, DEFRA gave presentations to stakeholders to communicate its consultation proposals.<sup>62</sup> In the presentation, DEFRA proposed a mandatory method of production-based labelling system, based on a tiered A-E scheme.<sup>63</sup> In terms of scope, DEFRA proposed it would apply to pigs, chickens reared for meat, and layer hens, and to begin with would cover only unprocessed and certain minimally processed products.

Despite the Government commitment to consult on labelling set out in its Food Strategy, DEFRA announced in July 2023 that it did not consider the time was right to consult on proposals to reform labelling for animal welfare.<sup>64</sup> Instead, DEFRA stated that it intended to work with industry to explore how the market could be used to improve the provision of information for consumers, and to raise the standards of animal welfare.

The Conservative Animal Welfare Foundation published a report “Mandatory Labelling” (Shann, 2020) in November 2020.<sup>65</sup> It focused on the theory of labelling, human benefits, impacts on animals, and costs of labelling. This report focuses on the benefits and need for mandatory labelling outside of the EU. It draws on the DEFRA 2021 Consultation and subsequent developments in policy to explore what type of labelling will be preferable from the point of view of consumers, animal welfare, and British farmers. This report discusses how method of production is a key determinant of the welfare of farmed animals. It illustrates the success of method of production labelling schemes such as Lidl’s Welfare Windows for chicken and pork, and the French *Étiquette Bien-Être Animal* label.<sup>66</sup> The report also discusses animal welfare labelling schemes in the EU, including Germany’s mandatory BMEL Tierwohl Initiative scheme, which has five method of production categories.<sup>67</sup>

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<sup>62</sup> Department for Environment Food and Rural Affairs, “Animal Welfare Labelling: Presentation on Consultation Proposals, March 2023.”

<sup>63</sup> The labelling scheme was similar to the French *Étiquette Bien-Être Animal* label. *Étiquette Bien-Être Animal*, “Homepage”.

<sup>64</sup> Cooke, “Defra Shelves Animal Welfare Labels for Chicken and Pork.”

<sup>65</sup> A. Shann, “Mandatory Labelling,” (London: Conservative Animal Welfare Foundation, 2020).

<sup>66</sup> Lidl, “Method of Production Labelling”.

<sup>67</sup> Federal Ministry of Food and Agriculture, “Animal Husbandry Label and Amendments to Federal Building Code Adopted in Bundestag”.



## DEFRA's 2021 Call for Evidence on Labelling for Animal Welfare

The Government published its summary of responses to the 2021 Call for Evidence in August 2022.<sup>68</sup> DEFRA outlined the following five headline messages based on the submissions of respondents:

1. Polls find high levels of public support to reform animal welfare food labelling.
2. Conflicting evidence on consumer prioritisation of animal welfare when purchasing goods, and willingness to pay for higher welfare goods.
3. Civil society organisations and the public generally prefer mandatory labelling, based on benefits for animal welfare, consumer transparency, and benefits for British farmers meeting and exceeding baseline UK regulations.
4. Industry associations generally prefer an industry-led approach to labelling, and many question the effectiveness of mandatory labelling, as well as cite burdens to farmers and businesses.
5. Broad support for mandatory labelling of imported products, including those opposed to mandatory labelling of domestic produce.

Findings from the 2021 Call for Evidence are also discussed in relevant sections of this report. In the final section of DEFRA's summary of evidence, the Government outlined the next steps as exploring mandatory labelling, particularly because it can ensure that lower welfare imports are labelled clearly. DEFRA states:<sup>69</sup>

**“Building on the findings of this call for evidence, in 2023 the UK Government will therefore consult on proposals to improve and expand current mandatory labelling requirements for animal welfare, and to introduce complementary measures in the food service sector. These proposals will cover both domestic and imported products, taking into account our international trade obligations.”**

(DEFRA, 2022)

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<sup>68</sup> Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare.”

<sup>69</sup> *Ibid.*, 25.



## The Government’s March 2023 Policy Position: Mandatory Method of Production Labelling for Animal Welfare

In March 2023 DEFRA gave a presentation to stakeholders on its Consultation proposals.<sup>70</sup> DEFRA officials reiterated the policy objectives to ensure that consumers can choose food that aligns with their values and is accessible, available, and affordable; to support farmers who meet or exceed UK baseline standards; and to improve animal welfare through unlocking market demand for higher welfare food.

The Government proposed a mandatory A-E tiered system of labelling. In the system, tier E would represent standards below the UK legal baseline (i.e., for some imported food), tier D would represent the UK legal baseline (i.e., domestic and imported food produced at, but not above, the minimum legal standard in the UK). Tiers C, B, and A would represent increasingly higher welfare standards.<sup>71</sup>


E	D	C	B	A
Below UK legal baseline	UK legal baseline	Incrementally increasing welfare standards 		

Figure 1 : The Government’s proposed labelling scheme in March 2023.

DEFRA advised that the proposed scheme would apply to pigs, chickens reared for meat, and laying hens to begin with. The reasons provided were that these are the sectors with the most animals, those with simpler supply chains, and those with existing standards that could be used to build on.<sup>72</sup> Prior to the stakeholder meeting, DEFRA had met with the Government’s Animal Welfare Committee (AWC) to identify metrics that were evidence-based and practical to deliver. These are illustrated in Table 1 below.

<sup>70</sup> Department for Environment Food and Rural Affairs, “Animal Welfare Labelling: Presentation on Consultation Proposals, March 2023.”

<sup>71</sup> The proposal was therefore for a method of production plus system, which combines method of production and animal welfare information in a single label. See [Eurogroup for Animals](#), “Animal Welfare and Food Labeling: Initiating the Transition through High Quality Consumer Information.” Specifically, it was similar to the French *Étiquette Bien-Être Animal* scheme. *Étiquette Bien-Être Animal*, “Homepage”. The *Étiquette Bien-Être Animal* scheme is discussed later in this report.

<sup>72</sup> I.e., the mandatory method of production categories for shell eggs, the Poultry Meat Marketing Regulations, and the Pork Provenance Code.



Table 1: Priority welfare inputs to develop the A-E welfare standards.<sup>73</sup>

<b>Pigs</b>	<b>Meat chickens</b>	<b>Laying hens</b>
Stocking density	Stocking density	Stocking density
Enrichment	Enrichment	Enrichment
Outdoor access	Outdoor access	Outdoor access
Assessment and management of welfare outcomes	Assessment and management of welfare outcomes	Assessment and management of welfare outcomes
Farrowing system	Slower growing breeds	Beak trimming
Tail docking (and other procedures: teeth clipping, castration, nose ringing)	Range specification	Range specification
	Lighting	
	Thinning	

In terms of the range of goods to be covered by the label, DEFRA proposed that it would apply to the retail sector only to begin with. It would initially apply only to unprocessed foods, such as chicken breast, and some minimally processed food, for instance ham. Hence, the scheme would not apply to the out-of-home sector, or to processed foods more generally, at least to begin with. The justification for restricting scope was so that policy could be implemented more simply and practically.

<sup>73</sup> See later sections of this report discussing the debate about method of production labelling, animal welfare inputs, and animal welfare outcomes. Elements within the farming industry argue against method of production labelling and emphasise factors such as stockmanship. It is revealing to look at this table in this context. For pigs, meat chickens, and laying hens, stocking density, enrichment, and outdoor access are all key welfare inputs that are part of the “method of production” and can be quantified. They relate to the two fundamental welfare needs for farmed animals of first space (“stocking density”), and secondly what are essentially other environmental goods (“enrichment”). “Outdoor access” often provides both more space and greater enrichment (for instance, consider the earth for pigs to root and dig, and chickens to peck and scratch). “Farrowing systems” for pigs, “slower grower breeds” and “beak trimming” relate to the housing/ environment of pregnant and lactating sows, the genetic nature of chickens reared for meat, and mutilations for laying hens due to being kept in substandard environments (either caged or non-caged). The later section of this report discusses how animal welfare is ultimately the outcome of how well a farmed animal is adapted to its environment (which is therefore based on both its nature, and the environment). In pigs “tail docking” is a mutilation indicating a substandard environment. And in chickens reared for meat “lighting” and “thinning” are manipulations of the environment that are ultimately detrimental to welfare. All these factors in the table are key determinants of the welfare of farmed animals, and they can all properly be considered as factors within a method of production animal welfare scheme. The inclusion of “assessment and management of welfare outcomes” for all three pigs, chickens reared for meat, and laying hens, is sensible to ensure higher welfare standards are being met, and to account for factors such as stockmanship, etc.

In the presentation, DEFRA communicated its plan to launch a Consultation on welfare labelling policy proposals in spring 2023. During 2023, it would work with stakeholders to firm up policy on labelling. And by May 2024, the Government would introduce legislation on mandatory welfare labelling. Mandatory labelling would then be phased in as part of the business cycles during 2024-2026.

In July 2023, DEFRA announced that there was public appetite for improved welfare labelling. Despite this, it did not consider it the right time to consult on proposals to reform labelling for animal welfare.<sup>74</sup>

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<sup>74</sup> Cooke, "Defra Shelves Animal Welfare Labels for Chicken and Pork."



## Does the UK Have High Animal Welfare Standards? “Yes” (in Relative Terms), and “No” (in Absolute Terms)

To understand both the status quo of labelling in the UK, and the need for government-regulated mandatory labelling, it is important to appreciate the distinction between “relative” and “absolute” animal welfare standards in Britain.

The Assured Food Standards (AFS) Red Tractor label is the dominant scheme that claims to provide information to consumers about animal welfare standards. The benefit of the label is that it provides consumers with information about the product they purchase, such as that it was produced from animals born and reared in the UK.<sup>75</sup> The value of this information is that UK legislative standards are in general, but not always, higher than those in other nations.<sup>76</sup> For instance, Red Tractor assured pork will not have been produced from sows who spend all or part of their pregnancies in sow stalls. In contrast, pork produced in EU nations will generally be produced from sows that spend the first month of their 115-day pregnancy in stalls.<sup>77</sup> Pork imported from sows in the United States and some other nations will have been produced from sows who spend the entirety of their 115 days pregnancy in sow stalls.<sup>78</sup> Hence, since the UK has rightly implemented a complete ban on sow stalls since 1999, Red Tractor assured pork will generally have been produced from pigs who were reared in higher standards compared with imported pork. For pig meat, we can say that the UK therefore has high animal welfare standards relative to many other nations.

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<sup>75</sup> Assured Food Standards, “About Red Tractor Assurance,” <https://redtractorassurance.org.uk/about-red-tractor/>.

<sup>76</sup> E.g., see S. P. McCulloch, “Brexit and Animal Protection: Legal and Political Context and a Framework to Assess Impacts on Animal Welfare,” *Animals* 8, no. 11 (2018).

<sup>77</sup> And the UK imports 65% of the pig meat it consumes from the EU. RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence”.

<sup>78</sup> McCulloch, “Brexit and Animal Welfare Impact Assessment: Analysis of the Threats Brexit Poses to Animal Protection in the UK, EU and Internationally.”



Despite the above, the AFS Red Tractor scheme permits the use of farrowing crates.<sup>79</sup> Farrowing crates are almost identical to sow stalls in the degree of physical and behavioural confinement that they cause. Scientific research provides good evidence that farrowing crates cause substantial suffering in sows.<sup>80</sup> In the UK and under the Red Tractor scheme, almost all indoor sows are confined in farrowing crates for five weeks of each pregnancy, so for nearly a quarter of their adult breeding lives.<sup>81 82</sup> Furthermore, tail docking of piglets is permitted under the Red Tractor scheme with the approval of a veterinary surgeon, and is widely practiced.<sup>83</sup> Tail docking is performed to prevent tail biting and chewing in growing pigs, which is caused by keeping them in suboptimal environments. Finally, Red Tractor permits the use of carbon dioxide stunning in pigs prior to slaughter.<sup>84</sup> Carbon dioxide stunning has been proven to be highly aversive to pigs, and causes significant suffering prior to slaughter.<sup>85</sup> Around 60 % of the UK's breeding sows are confined in farrowing crates each litter, 70-80% of growing pigs have their tails docked, and in 2022 88% of pigs were stunned prior to slaughter using carbon dioxide.<sup>86</sup> Hence, for pig meat, we can say that the UK does not have high welfare standards in an absolute sense.

The question of whether the UK has high animal welfare standards in a relative and an absolute sense provides a useful lens to appreciate both the status quo of labelling in the UK, as well as the need for mandatory government-regulated reform. The Red Tractor label in effect provides information to the consumer such that welfare standards are in many cases higher than those of imported meat. It therefore provides a useful function to ensure that consumers can identify and purchase goods that are produced at least to UK legislative baseline standards. Despite this, as discussed later in this report, Red Tractor standards are generally either at or barely above the minimum UK legislative baseline. Hence, for the benefit of British consumers, animal welfare, and farmers producing over the UK baseline, government-regulated mandatory labelling is an urgent requirement.<sup>87</sup>

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<sup>79</sup> [Assured Food Standards](#), "Pigs Standards," (London, UK2022).

<sup>80</sup> [McCulloch](#), "Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs."

<sup>81</sup> *Ibid.*

<sup>82</sup> Farrowing crates are banned in Sweden (1988), Norway (2000), and Switzerland (2007). Germany has a partial ban on farrowing crates, effective from 2035, with confinement permitted for five days around farrowing. Austria has a similar ban, effective from 2033, with confinement permitted until the end of the critical phase of the suckling pig's life. A court in New Zealand has found farrowing crates to be unlawful and the Government has subsequently announced it will phase out crates by 2025. *Ibid.*

<sup>83</sup> [Assured Food Standards](#), "Pigs Standards."

<sup>84</sup> *Ibid.*

<sup>85</sup> [Nielsen et al.](#), "Welfare of Pigs at Slaughter." Eurogroup for Animals, "EFSA (Finally) Affirms That CO2 Stunning Is Incompatible with Pig Welfare at Slaughter".

<sup>86</sup> [McCulloch](#), "Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs." [Regan](#) Why the Little Pig Lost His Tail - the Cruel Practice of "Tail Docking". [Department for Environment Food and Rural Affairs](#), "Results of the 2022 FSA Slaughter Sector Survey in England and Wales."

<sup>87</sup> Remaining parts of this report provide arguments for this claim. In short, only a government-regulated mandatory scheme can provide consistent and reliable information to consumers about the welfare provenance of food at the point of purchase.



The above example illustrates UK relative and absolute animal welfare standards in terms of pig farming. More broadly, in the UK 70-80% of farmed animals are reared within intensive systems.<sup>88</sup> These intensive systems are in many cases not compatible with high animal welfare standards. Indeed, in many sectors large proportions of animals suffer through prevalent diseases such as lameness. The graph below, from McCulloch (2023), illustrates the proportions of animals in each sector reared intensively in the UK. Below, some highly prevalent welfare problems are documented within each sector. The purpose is to show that despite the UK generally having high welfare standards in a relative sense, it is evidently not the case that the UK has high standards in an absolute sense.

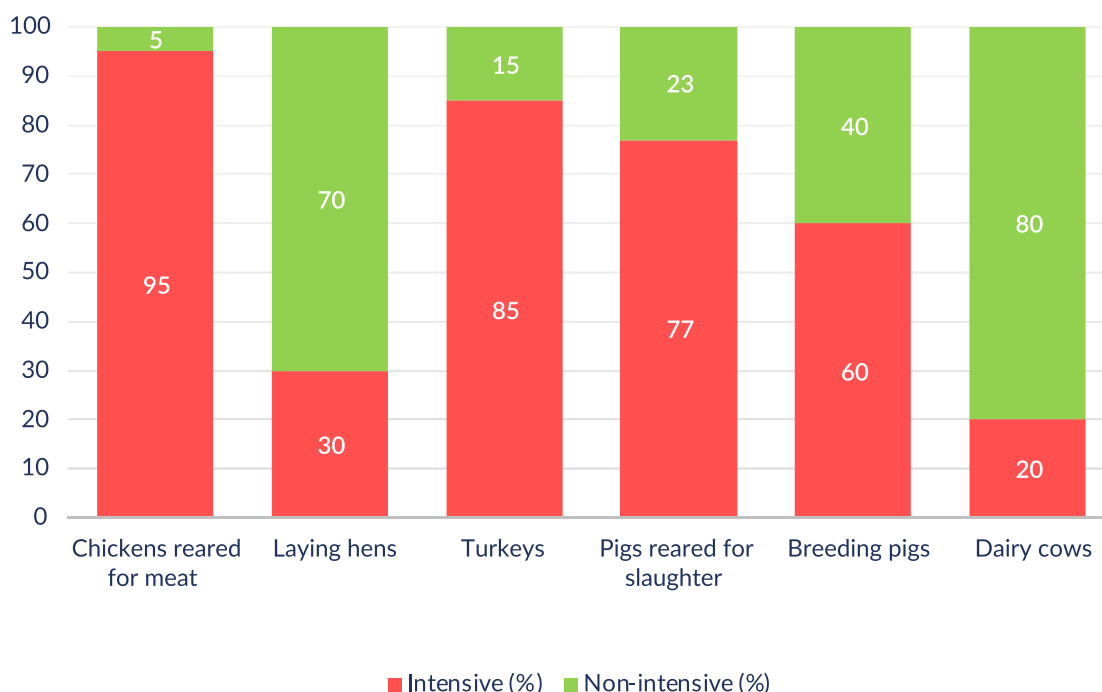


Figure 2: Approximate percentages of animals intensively farmed in each sector.<sup>89 90 91 92 93 94</sup>

<sup>88</sup> Compassion in World Farming, "UK Factory Farming Map," <https://www.ciwf.org.uk/factory-farm-map/>.

<sup>89</sup> Chickens reared for meat: Elena Salazar, Simon Billing, and Mark Breen, "We Need to Talk About Chicken," (Eating Better, 2020), 8. (Figure based on e-mail from British Poultry Council.)

<sup>90</sup> Laying hens: Gov.UK, "UK Egg Packing Station Throughput and Price Dataset," (DEFRA, 2023).

<sup>91</sup> Turkeys: 2021 RSPCA Assured market penetration for turkeys was 14.9%. David Bowles, RSPCA, pers. comm. See also Compassion in World Farming, "Turkeys," <https://www.ciwf.org.uk/farm-animals/turkeys/>; RSPCA, "Farming Turkeys," <https://www.rspca.org.uk/adviceandwelfare/farm/turkeys/farming>.

<sup>92</sup> Pigs reared for slaughter: 2021 RSPCA Assured market penetration for slaughtered pigs was 22.5%. David Bowles, RSPCA, pers. comm. Most RSPCA Assured growing pigs are reared indoors to higher welfare standards. According to the RSPCA website, only 3% of pigs spend their entire lives outdoors. RSPCA, "Farming Pigs," <https://www.rspca.org.uk/adviceandwelfare/farm/pigs/farming>

<sup>93</sup> Breeding pigs: McCulloch, "Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs.," National Pig Association, "NPA Briefing on Farrowing Crates," (Warwickshire: National Pig Association, 2021).

<sup>94</sup> Dairy cows: E.g., see Compassion in World Farming, "The Grass Is Greener - the Plight of UK Dairy Cows," <https://www.ciwf.org.uk/news/2016/04/the-grass-is-greener-the-plight-of-uk-dairy-cows-f1>; Tom Levitt, "They Don't Belong in a Concrete Shed: Cows Still Happiest Outside," The Guardian, 3 April 2021.

Figure 2 is taken from McCulloch (2023), which discusses in detail the link between intensive farming and poor welfare.<sup>95</sup> For present purposes and to illustrate, in the UK around 25% of chickens reared for meat are lame for two weeks of their six to seven week lives;<sup>96</sup> around 30% of laying hens are kept in highly restrictive cages throughout their laying period;<sup>97</sup> up to 20% of dairy cows are permanently housed year-round, and the prevalence of lameness in the UK dairy herd is consistently high at around 20%.<sup>98</sup>

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<sup>95</sup> McCulloch, "Farm Animal Welfare in the UK: What Does the British Public Want?." S McCulloch, "British Farming Methods Need Reform to Match High Animal Welfare Standards," The House (2023).

<sup>96</sup> RSPCA "Eat. Sit. Suffer. Repeat: The Life of a Typical Meat Chicken." Toby G Knowles et al., "Leg Disorders in Broiler Chickens: Prevalence, Risk Factors and Prevention," PloS one 3, no. 2 (2008).

<sup>97</sup> Gov.UK, "UK Egg Packing Station Throughput and Price Dataset."

<sup>98</sup> Agriculture and Horticulture Development Board, "Lameness in Dairy Cows," <https://ahdb.org.uk/knowledge-library/lameness-in-dairy-cows>.





## Reforming Animal Welfare Labelling: Label Categories to Consider

Animal welfare labels can be categorised in various ways, which helps to understand the various strengths and weaknesses of those available. This section illustrates the different types of labels, based in large part on the language used in DEFRA's 2021 "Labelling for animal welfare: Call for evidence" document.<sup>99</sup> These categories are then applied to discussion of options for labels in the remainder of this report. For example, the UK's RSPCA Assured label is voluntary, NGO-based, covering all life (rearing, transport, slaughter), single level certification.

It is also helpful to build on the terms in the DEFRA 2021 Call for Evidence. For example, under "label format" it is helpful to consider labels as either tiered, descriptive, or certification logo. Furthermore, and importantly for this report and labelling policy, it is useful to consider the term "method of production plus" to refer to schemes that are based on method of production but also wider animal welfare considerations, including outcomes.<sup>100 101</sup> Hence, labels could be considered as "Animal welfare", "method of production" or "method of production plus"/ "mixed" labels".<sup>102</sup>

Given that DEFRA's proposed A-E scheme would have included consideration of welfare outcomes (see Table 1), it is a method of production plus type of scheme/label.

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<sup>99</sup> Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence."

<sup>100</sup> Eurogroup for Animals, "Animal Welfare and Food Labeling: Initiating the Transition through High Quality Consumer Information."

<sup>101</sup> It is useful because many of the newer generation labels within the EU are method of production plus labels. They are based on primarily on method of production but also use other animal welfare criteria. Method of production plus labels account for the complexity of welfare status and assessment and in many ways can be used to refute arguments directed at pure method of production labels (though this report would argue that method of production per se is the fundamental, or the most important determinant of animal welfare).

<sup>102</sup> In the context of EU animal welfare labelling schemes, Di Concetto (2023) has described four types of labels: 1. The Organic Certification, 2. Private animal welfare labels, 3. Method of production labels, and 4. A new generation of labels that combine method of production and animal welfare information. Di Concetto, "Farm Animal Welfare and Food Information for European Union Consumers: Harmonising the Regulatory Framework for More Policy Coherence."

Table 2: Typology of animal welfare labels, with language based on the DEFRA 2021 Call for Evidence.<sup>103</sup>

Category	Types
<b>Approaches to labelling</b>	Mandatory
	Voluntary but defined in law
	Industry-led
<b>Life stage</b>	Rearing
	Slaughter
	Whole life (including transport, and slaughter, and parents)
<b>Defining welfare standards</b>	Inputs
	Outcomes
	Combination
<b>Label format</b>	Tiered
	Descriptive
	Certification logo

<sup>103</sup> Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence."

## The UK Labelling Context

### Country of Origin Labelling for Meat

In the UK, country of origin labelling is mandatory for meat, fish and seafood products.<sup>104</sup> For beef and veal, products must be labelled with the country where the animal was born, as well as the country of rearing and slaughter. Meat from all unprocessed poultry, sheep, goats and pigs must be labelled with the country of rearing and the country of slaughter. Fish and seafood must be labelled using the production method (“caught in”, “caught in freshwater”, or “farmed”). Freshwater fish must be labelled with the country they were caught in.

### Regulation and Marketing Standards for Shell Eggs and Unprocessed Chicken

In the UK, labelling regulations for animal welfare apply to a minority of food products. Under retained EU law, it is mandatory for shell eggs to be labelled either according to method of production, or with a non-UK/EU standard label for imports with lower standards.<sup>105</sup> The EU regulated shell eggs through mandatory method of production labelling due to concerns about importing lower welfare products arising from the prohibition on barren battery cages from 2012.<sup>106</sup>

Unprocessed poultry meat raised to higher than baseline standards also has a voluntary regulated poultry meat marketing standard. The higher standards are “extensive indoor” or “barn-reared”, “free range”, “traditional free range”, and “free range total freedom”.<sup>107</sup> For instance, a chicken breast that is produced under free range conditions can be marketed as “free range”, provided the conditions it is reared in are in accordance with those laid out in the labelling regulations. The vast majority of chicken meat is produced intensively indoors at or near baseline legislative standards and is not labelled with such defined terms.

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<sup>104</sup> Gov.UK, “Food Labelling: Country of Origin,” <https://www.gov.uk/guidance/food-labelling-country-of-origin>.

<sup>105</sup> Marketing standards for shell eggs are under retained EU law and based on the EU Laying Hens Council Directive 1999/74/EC. Under the EU law, non-enriched (barren) cages have been prohibited since 1 January 2012. Enriched cages must provide at least 750cm<sup>2</sup> area per hen, and alternative systems (free range and barn) must provide for laying hens to move freely with a maximum stocking density of nine laying hens per m<sup>2</sup>. European Commission, “Food Safety: Laying Hens,” [https://food.ec.europa.eu/animals/animal-welfare/animal-welfare-practice/animal-welfare-farm/laying-hens\\_en](https://food.ec.europa.eu/animals/animal-welfare/animal-welfare-practice/animal-welfare-farm/laying-hens_en).

<sup>106</sup> David Bowles, RSPCA, pers. comm.

<sup>107</sup> Gov.UK, “Poultry Meat Marketing Standards “.



Table 3: EU and UK marketing standards defining method of production for shell eggs.<sup>108</sup>

Code	Laying system
<b>0</b>	"Organic"
<b>1</b>	"Free range"
<b>2</b>	"Barn"
<b>3</b>	"Caged"
<b>Non-UK/EU</b>	Imported lower than EU/UK standard

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<sup>108</sup> Gov.UK, "Egg Marketing Standards".

## British Lion Eggs

British Lion, launched in 1998, certifies over 90% of UK eggs.<sup>109</sup> Eggs which are stamped with the British Lion mark are produced in line with the British Lion Code of Practice to ensure high standards of food safety. The Code covers the entire production chain and ensures vaccination of hens against Salmonella, as well as a passport-like traceability system to ensure hens, eggs, and feed are fully traceable. Whilst not a labelling scheme for animal welfare, the British Lion mark also includes the method of production category, as illustrated below.

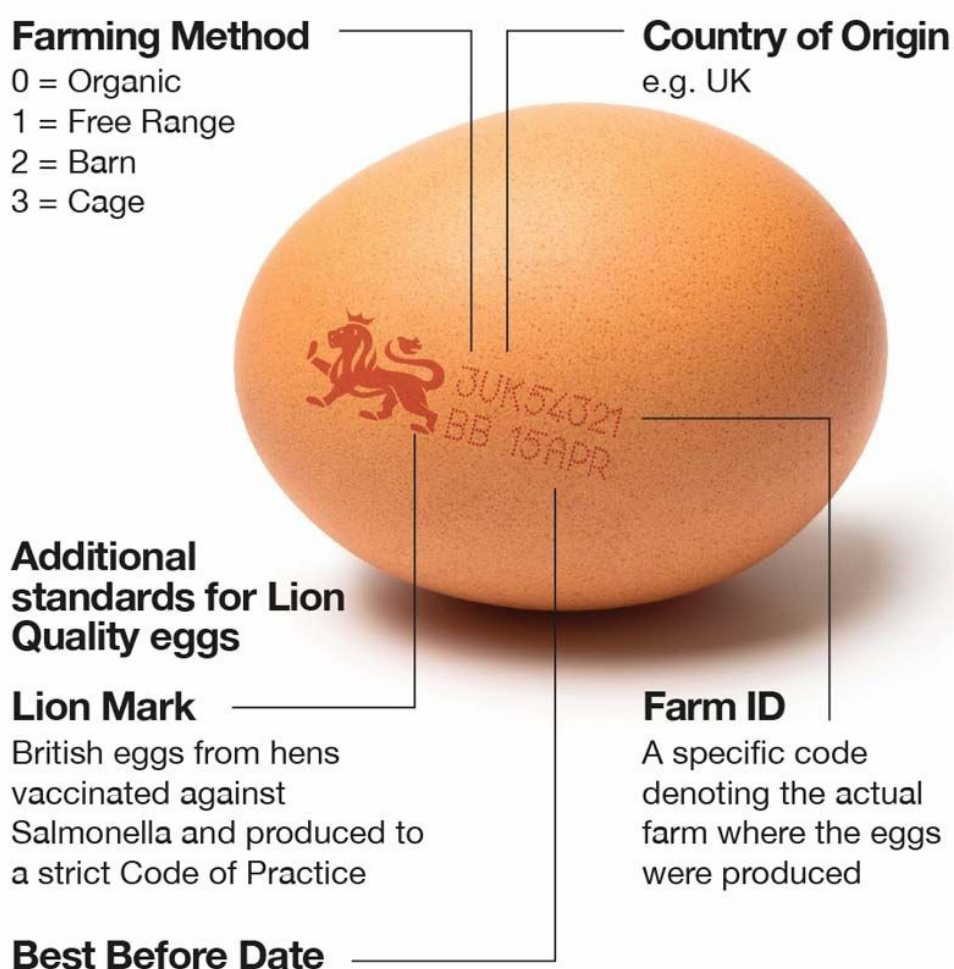


Figure 3: The British Lion mark explained. Copied from British Lion Eggs (undated).<sup>110</sup>

<sup>109</sup> British Lion Eggs, "Egg Info," <https://www.egginfo.co.uk/british-lion-eggs>.

<sup>110</sup> Ibid.

## Voluntary Labelling in British Pig Farming: The Pork Provenance Code

The Pork Provenance Code is a voluntary code of practice to supply the pig meat supply chain with guidelines for “clear, consistent and unambiguous” labelling on pig meat.<sup>111</sup> The Code is run by the Agriculture and Horticulture Development Board (AHDB)<sup>112</sup> and was agreed with the RSPCA. The Code calls for the country of origin of the pig meat to be clearly displayed on package labelling. Furthermore, it defines voluntary labels for higher welfare pig production methods.<sup>113</sup> These are “Free range”, “Outdoor bred”, and “Outdoor reared”.<sup>114</sup>

“Free range” pigs are born and reared outside for their lifetimes. “Outdoor bred” pigs are born outside, and then moved indoors when they are weaned at four to five weeks of age. “Outdoor reared” pigs are born outside and reared outside for around half of their lives, when they are moved indoors for further fattening/finishing. Note that pigs tend to be slaughtered at four to seven months of age. Hence, “outdoor bred” pigs can spend only around one sixth of their lives outdoors. “Outdoor reared” pigs can spend only around half of their lives outdoors. Both “outdoor bred” and “outdoor reared” pigs will be born outdoors in free farrowing systems. Hence, the sows who produced the piglets will benefit, as well as the “outdoor bred” and “outdoor reared” pigs benefiting from an outdoor environment during the time they are outdoors.

Despite the above, these labels are likely to be confusing for British consumers. Arguably, the average British consumer will not consider that an “outdoor bred” piglet spends over 80% of its life indoors, or that an “outdoor reared” pig will spend half of its life indoors. The Pork Provenance Code is therefore a good example of how animal welfare labelling schemes funded by the farming industry are designed primarily with economic interests in mind. In this case, the vast majority of pigs in the UK are reared indoors. Despite this, the British public often associates outdoor access with higher welfare.<sup>115</sup> Hence, the Pork Provenance Code gives the impression to British consumers that the pork they purchase is produced from pigs living outdoors, when in reality for most of their lives in the case of “outdoor bred” pigs and for half of their lives in the case of “outdoor reared” pigs, they are in fact being reared indoors.

<sup>111</sup> Agriculture and Horticulture Development Board, “The Code of Practice for the Labelling of Pork and Pork Products: Introduction,” <https://www.porkprovenance.co.uk/code.asp>.

<sup>112</sup> The AHDB is the levy board which represents farmers, growers, and others in the supply chain.

<sup>113</sup> From an economic perspective, a key ask for the British pig industry is for imports of pig meat to be clearly labelled. Sow stalls/gestation crates have been legally prohibited in the UK since 1999. The EU has had a partial ban on stalls since 2013, and they are routinely used for up to four weeks at the start of the sow’s pregnancy. Given that it is cheaper to produce pig meat within sow stalls/gestation crates, and the UK imports 65% of the pork it consumes from the EU, British pig producers understandably desire clear labelling of imports, as well as messaging that it has likely been produced in lower welfare standards. McCulloch, “Brexite and Animal Welfare Impact Assessment: Analysis of the Threats Brexite Poses to Animal Protection in the UK, EU and Internationally.” RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence”.

<sup>114</sup> Agriculture and Horticulture Development Board, “The Code of Practice for the Labelling of Pork and Pork Products: Pig Production Terms”.

<sup>115</sup> E.g., see McCulloch, “Farm Animal Welfare in the UK: What Does the British Public Want?”





## The Voluntary Animal Welfare Labelling Landscape in the UK: Dominant Industry-Based Schemes, Higher Welfare NGO Schemes, and Supermarket Standards

In addition to the labelling regulations and industry marketing terms, there are numerous voluntary schemes in the UK. The leading British industry-based scheme is the AFS Red Tractor label. Voluntary NGO-based schemes include RSPCA Assured and Soil Association Organic. All large supermarket retailers in the UK have policies on animal health and welfare and in many cases their own accreditation schemes.

This section provides an overview of key assurance schemes, based on the British Veterinary Association (BVA) UK Farm Assurance Schemes Infographic, published in 2018.<sup>116</sup> The infographic outlines UK farm assurance schemes standards in the context of BVA priorities for farm animal welfare. It is part of the BVA's #ChooseAssured campaign, which encourages the veterinary profession and public to purchase UK products which have been assured. The infographic is reproduced with permission on the following page.

The BVA infographic first reveals the dominance of national, industry-based voluntary schemes in the UK. The AFS Red Tractor, Lion Eggs Code of Practice, Quality Meat Scotland (QMS), Farm Assured Welsh Livestock, and Northern Ireland Beef and Lamb Farm Quality Assurance Scheme are all industry-based schemes with large coverage/market penetration.<sup>117</sup> The dominance, based on their coverage and market penetration, of these industry-based schemes is the arguably the most important feature of the status quo of the UK animal welfare assurance schemes landscape.<sup>118</sup> For this reason, the AFS Red Tractor scheme and the significance of industry-based dominance is considered in detail in the following section.

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<sup>116</sup> British Veterinary Association, "Farm Assurance Schemes," <https://www.bva.co.uk/take-action/our-policies/farm-assurance-schemes/>.

<sup>117</sup> The multiple industry-based schemes arise first because of the devolved nature of the UK with England, Scotland, Wales and Northern Ireland as constituent nations. And secondly, because of the different farmed animals sectors within each nation.

<sup>118</sup> To the author's knowledge, the degree of dominance, based on coverage and market penetration, of animal welfare assurance by industry-led schemes is unique to the UK.



A second point relates to the life stages that the assurance schemes cover. Quality Meat Scotland, AFS Red Tractor (pigs and meat poultry only), and RSPCA Assured (except from sourcing of dairy calves) provide lifetime assurance. The other industry-owned schemes do not cover slaughter, and the Soil Association Organic does not cover transport. Third, all schemes in the BVA infographic include veterinary involvement, support the responsible use of antimicrobials, and have measures in place to protect animal health and prevent the spread of disease.

Fourth, a key criterion within the welfare schemes is whether the standards prohibit environments that substantially reduce behavioural opportunity. This criterion refers in particular to the use of farrowing crates in breeding sows, and the use of cages in laying hens. As seen in the BVA infographic, the industry-based standards AFS Red Tractor and Quality Meat Scotland schemes permit the use of farrowing crates in sows, and the Lion Eggs Code of Practice permits the use of enriched (modified) cages for laying hens. The RSPCA Assured and Soil Association Organic schemes both prohibit farrowing crates for breeding sows and the use of cages for laying hens.

Finally, a key omission from the BVA infographic is reference to the genetic selection of farmed animals such that their very nature leads to a high risk of developing serious welfare problems. This is a particular issue for chickens reared for meat consumption, for which the UK has a prevalence of lameness of around 25%.<sup>119</sup> This is a major welfare issue in large part because over one billion chickens are reared for meat consumption annually, which represents over 95% of all land farmed animals slaughtered in the UK. Arguably, there could also be more information on welfare issues in fish farming, which is a sector that has tended to be neglected within animal welfare to date.

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<sup>119</sup> RSPCA, "Eat. Sit. Suffer. Repeat: The Life of a Typical Meat Chicken." Knowles et al., "Leg Disorders in Broiler Chickens: Prevalence, Risk Factors and Prevention."












# #ChooseAssured UK Farm Assurance Schemes Infographic

Below is a reference grid that sets out BVA priorities for farm animal\* welfare against what is addressed in the standards of different UK farm assurance schemes. Products may be assured by more than one of these schemes or an assurance scheme not addressed in this graphic. Please check the label of food products carefully.

As part of the #ChooseAssured campaign, BVA is encouraging the veterinary profession and the wider public to #ChooseAssured by purchasing UK animal-derived products that are farm assured. Through the campaign we're raising awareness of the great work of the UK's farm assurance schemes and the crucial work of vets within the schemes to safeguard high animal health and welfare.

\*including farmed fish

Please note that this list of the BVA's welfare priorities is not exhaustive and these priorities will be addressed and assessed differently across the different schemes. The level of welfare achieved across the different schemes may vary. For more detailed information about the different standards and requirements used by farm assurance schemes please visit their respective websites.	 Farm Assured Welsh Livestock	 British Lion Eggs Code of Practice	 Northern Ireland Beef and Lamb Farm Quality Assurance Scheme	 Quality Meat Scotland	 Red Tractor	 RSPCA Assured	 Soil Association
<b>Animals are stunned before slaughter</b>	Assurance does not cover slaughter	Assurance does not cover slaughter	Assurance does not cover slaughter	✓	✓	✓	✓
<b>Veterinary involvement</b> Veterinary professionals are involved in livestock health planning and review	✓	✓	✓	✓	✓	✓	✓
<b>Prohibit environments that substantially reduce behavioural opportunity</b> Enriched cages for laying hens Farrowing crates for sows (pre-birth until weaning)	N/A – Scheme only applies to beef and lamb	Permits enriched cages for laying hens	N/A – Scheme only applies to beef and lamb	Permits farrowing crates for sows (pre-birth until weaning)	Permits farrowing crates for sows (pre-birth until weaning)	✓	✓
<b>Support responsible use of antimicrobials</b>	✓	✓	✓	✓	✓	✓	✓
<b>Animal health and biosecurity</b> Measures to protect animal health and prevent the spread of disease	✓	✓	✓	✓	✓	✓	✓
<b>Lifetime assurance</b> Animals spend their whole lives on an assured farm, livestock transport is assured ie. standards assure the management of health and welfare during transportation and scheme has standards to ensure welfare at slaughter**	Assurance does not cover slaughter	Assurance does not cover slaughter	Assurance does not cover slaughter	✓	Pigs and meat poultry only	All species except dairy – dairy calves can be sourced from non-assured farms	Assurance does not cover transport
<b>Measures to protect the environment</b> ie. guidance on preventing environmental contamination, pollution and minimising waste	✓	✓	✓	✓	✓	Farmed salmon and trout only	✓

\*\*Schemes may address some of these areas even if products are not lifetime assured.

Last reviewed: January 2019, Review date: 2022

Figure 4: BVA #ChooseAssured UK Assurance Schemes Infographic. Reproduced with permission from the British Veterinary Association.



## The Assured Food Standards Red Tractor Scheme

The AFS Red Tractor, founded in 2000, is the UK's largest food assurance scheme.<sup>120</sup> It is a not-for-profit company that "champions" British produce, farmers, and consumer safety. Red Tractor is funded from fees from farmers and food companies who use the scheme.<sup>121</sup> It was created to restore confidence in the British farming industry after the damage caused by BSE, salmonella, and foot and mouth disease.<sup>122</sup>

The standards cover animal welfare, food safety, traceability, and environmental protection. The scheme covers 50,000 British farmers and £14 billion worth of British food and drink. Red Tractor claims its logo provides peace of mind that produce is "traceable", "safe", and "farmed with care".<sup>123</sup> Red Tractor certifies poultry, dairy, beef and lamb and pork. The certification covers over 90% of chickens reared for meat and around 95% of pigs in the UK, under half of sheep and around 40% of beef cattle in England.<sup>124</sup>

Red Tractor has been the subject of significant national media attention in recent years, following undercover investigations by animal rights groups. The *Mail* reported alleged abuses at Hogwood Farm in Warwickshire, which supplied pig meat to Tesco.<sup>125</sup> The *Mirror* has reported undercover footage on Bickmarsh Hall Farm, which reared pigs for Cranswick Country Foods, supplier of Asda and Tesco.<sup>126</sup> The *Independent* ran a story on undercover footage from Lincolnshire-based farms that supplied Red Tractor assured chickens reared for meat to the Co-op.<sup>127</sup> Related to such media attention, the *Times* has reported that British supermarkets have asked for more unannounced farm inspections to help restore credibility in the Red Tractor scheme.<sup>128</sup>

<sup>120</sup> Assured Food Standards, "Homepage".

<sup>121</sup> Assured Food Standards, "Your Frequently Asked Questions Answered".

<sup>122</sup> Assured Food Standards, "Our Impact and History," <https://redtractor.org.uk/about-red-tractor/our-impact-and-history/>.

<sup>123</sup> For farmed with care, Red Tractor states: "The welfare of Red Tractor assured farm animals is integral to our standards. We ensure they are healthy with the right living space, food and water. Red Tractor farmers are also required to have regular visits by vets to ensure the wellbeing of their animals." Assured Food Standards, "About Red Tractor," <https://trade.redtractor.org.uk/join-us/about-red-tractor/>.

<sup>124</sup> RSPCA, "RSPCA Submission to Defra Labelling Call for Evidence " 22. Assured Food Standards, "What Red Tractor Credentials Mean for Pig Scheme Members". Guy Poppy, "What Sits Behind the Chicken on Your Plate? Guy Poppy Explains," Assured Food Standards, <https://redtractor.org.uk/2021/05/13/what-sits-behind-the-chicken-on-your-plate-guy-poppy-explains/>.

<sup>125</sup> David Wilkes, "Cannibal Pigs 'Eat Each Other Alive' at Farm That Supplies Pork for Tesco, a Year after Officials Found It Had No Breach of Animal Welfare Standards," Mail Online, 16 July 2018.

<sup>126</sup> Nada Faroud, "Exclusive: Inside Grim Lives of Farmed Pigs Forced to Live in Squalor and Left for Hours to Die," Mirror, 11 March 2023.

<sup>127</sup> Rebecca Speare-Cole, "Co-Op under Fire as Footage Shows 'Sick and Suffering' Chickens at Supply Farms," Independent, 7 August 2023.

<sup>128</sup> Ben Webster, "Supermarkets Call for More Surprise Checks on Red Tractor Farms," The Times 2018.



## Red Tractor Welfare Standards and the UK Legislative Baseline

Undercover investigations often focus on alleged abuses that would possibly not be compliant with animal welfare legislation, such as under the Animal Welfare Act 2006 in England and Wales.<sup>129</sup> In the event of a breach of welfare law, such practices would also not be compliant with Red Tractor standards. However, the Red Tractor scheme has been criticised more generally for having standards that are in many cases at the legal baseline only, and in other cases not far above the legal baseline.<sup>130</sup> This often forms part of the critique of Red Tractor from animal protection groups in media articles like those cited above.

In 2012 Compassion in World Farming (CIWF) and OneKind analysed various UK labelling schemes based on the following five criteria: environment (e.g., housing); husbandry; stockmanship, handling, transport, and slaughter; genetics and breeding; and auditing.<sup>131</sup> Schemes assessed included Assured Food Standards (Red Tractor), the British Lion Code, RSPCA Freedom Food (now RSPCA Assured), Quality Meat Scotland (QMS), and the Soil Association.

Schemes which offered significant advantages compared to normal industry practice (i.e., the UK legislative baseline), were scored as bronze, silver, or gold, depending on the welfare benefits of the scheme. Aside from Assured Chicken Production free-range, the Assured Food Standards (Red Tractor) failed to achieve a bronze, silver, or gold for all of the species and sectors that it covered. CIWF and OneKind concluded with the following summary for Assured Food Standards:

**“The Assured Food Standards (AFS) schemes generally scored poorly... The AFS standards offer few welfare benefits compared with standard industry practice and generally only ensure compliance with minimum legislative requirements (the interpretation of which is considered inadequate in some cases).”**

(Pickett, 2021, p.5)

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<sup>129</sup> And, for example, the Welfare of Farmed Animals (England) Regulations 2007. *Animal Welfare Act 2006. The Welfare of Farmed Animals (England) Regulations 2007.*

<sup>130</sup> George Mombiot, “It’s Time to Wean Ourselves Off the Fairytale Version of Farming,” *The Guardian*, 29 May 2015. Martin Hickman, “The ‘Good Food’ Stamp Barely Worth the Label It’s Printed On,” *Independent*, 1 May 2012. Tim Ridgway, “The Red Tractor Label: What Does It Really Mean?,” *Animal Equality United Kingdom*, <https://animalequality.org.uk/blog/2021/06/22/the-red-tractor-label-what-does-it-really-mean/>.

<sup>131</sup> These criteria were based on the Farm Animal Welfare Council’s (FAWC) five freedoms. *Farm Animal Welfare Council*, “Farm Animal Welfare in Great Britain: Past, Present and Future.” S. P. McCulloch, “A Critique of FAWC’s Five Freedoms as a Framework for the Analysis of Animal Welfare,” *Journal of Agricultural and Environmental Ethics* 26, no. 5 (2013).



The CIWF and OneKind study was reported in 2012. However, it is evident from Red Tractor species/sector standards and the Red Tractor website that the standards remain at or barely above minimum legislative requirements in many cases.<sup>132</sup> Examples are provided below for standards for chickens reared for meat and for pigs. Despite this, and as discussed below, the Red Tractor label could arguably be perceived by the British consumer to have higher standards than this. In some cases, this relates to the distinction between UK standards, which are generally higher than those in other countries, and imported products.<sup>133</sup>

One area where Red Tractor standards are higher than the UK legislative baseline is at slaughter. Slaughter legislation in the UK, as in many other countries, mandates that farmed animals are stunned, or rendered insensible to pain, prior to slaughter.<sup>134</sup> However, the legislation permits a derogation (i.e., exemption) for animals slaughtered for meat for the Muslim and Jewish communities. Red Tractor certification requires that all animals are stunned prior to slaughter, and hence is more stringent compared to the UK baseline.<sup>135</sup>

An important instance where Red Tractor regular Certified standards are barely above the UK legislative baseline is for broiler chickens (also see the sub-section on “Enhanced Welfare” for broiler chickens later in this section). Red Tractor chicken standards have the potential for enormous impact on animal welfare, since over 95% of the land farmed animals slaughtered in the UK, amounting to over one billion farmed animals each year, are chickens reared for meat consumption. And the majority of these are reared intensively using fast-growing breeds of chicken, including under the Red Tractor scheme.<sup>136</sup> Stocking density has a significant impact on the welfare of broiler chickens, and the Better Chicken Commitment, for instance, includes a requirement for lower stocking densities for this reason.<sup>137</sup> In the FAQ section on animal welfare, the Red Tractor website states the following:

**“In fact, we require our Red Tractor Certified farmers to meet a number of standards that are over and above the current legislation. For chickens this includes more living space than UK regulations demand and environmental enhancement in barns to encourage natural behaviours. Over the last 20 years our standards have led to a dramatic reduction in the use of antibiotics and improved animal health.”**

(Assured Food Standards, undated)<sup>138</sup>

<sup>132</sup> Assured Food Standards, “Pigs Standards.” Assured Food Standards, “Chicken Standards,” (London, UK2022). Assured Food Standards, “Dairy Standards,” (London, UK2022).

<sup>133</sup> For instance, as the UK has implemented a complete ban on sow stalls, Red Tractor certified pork is not produced from pigs kept in sow stalls. In contrast, the EU permits the use of sow stalls for up to four weeks, so most pig meat imported from the EU will have been produced from systems using sow stalls.

<sup>134</sup> *The Welfare of Animals at the Time of Killing (England) Regulations 2015; The Welfare of Animals at the Time of Killing (Scotland) Regulations 2012; The Welfare of Animals at the Time of Killing (Wales) Regulations 2014; The Welfare of Animals at the Time of Killing (Northern Ireland) Regulations 2014.*

<sup>135</sup> The requirement to stun prior to slaughter in particular benefits animals because of the oversupply of non-stunned animals in the UK. See McCulloch and Riley, “Reforming UK Non-Stun Slaughter Law: Economic Impacts of Licensing and Bans on Meat Exports from Germany, New Zealand, and Other Nations.”

<sup>136</sup> And they are not reared in higher standards according to the voluntary poultry meat marketing standards. Gov.UK, “Poultry Meat Marketing Standards”.

<sup>137</sup> Better Chicken Commitment, “The Better Chicken Commitment”.

<sup>138</sup> Assured Food Standards, “Your Frequently Asked Questions Answered”.





The above Red Tractor claim, and the underlying standards, is an instance of Red Tractor standards being barely above the legislative baseline, but at the same time using the slightly higher standard to promote products certified with the label as higher welfare.

The legislative maximum stocking density for broiler chickens in the UK is 39kg/m<sup>2</sup>.<sup>139</sup> The Red Tractor maximum stocking density is 38kg/m<sup>2</sup>.<sup>140</sup> Red Tractor assured chickens reared for meat therefore have 2.6% more space compared to the legislative maximum. Arguably, this is a relatively insignificant increase in space allowances per chicken. The 39kg/m<sup>2</sup> legislative maximum means that each bird has the space of around one sheet of A4 paper. The additional kilogram per metre squared, or 2.6% increase in space, means that each bird has the equivalent of an additional post-it note. Whether 38kg/m<sup>2</sup> or 39kg/m<sup>2</sup>, these are high stocking densities with respect to permitting chickens to perform highly motivated natural and normal behaviours, and escape from potentially aggressive birds.

The Red Tractor scheme does mandate that certified farms use straw bales, perches, and natural light for chickens reared for meat consumption. Straw bales and perches provide environmental enrichment that can improve the welfare of chickens. Despite this, arguably the key determinants of welfare in chickens are genetics, in particular the use of fast-growing chickens, as well as stocking density. As discussed in later sections of this report, RSPCA Assured and Soil Association Organic, as higher welfare assurance schemes, do not permit fast growing chickens, and mandate lower stocking densities. This is to prevent lameness and other diseases, and to promote the performance of natural and normal behaviours.

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<sup>139</sup> Gov.UK, "Broiler (Meat) Chickens: Welfare Recommendations " <https://www.gov.uk/government/publications/poultry-on-farm-welfare/broiler-meat-chickens-welfare-recommendations>.

<sup>140</sup> Assured Food Standards, "Our Poultry Standards," <https://redtractor.org.uk/our-standards/poultry/>.



## Red Tractor’s “Our Pork Standards” Webpage: Transparent Consumer Information?

The Red Tractor pork standards and information provided for consumers on its website provides an instructive case study. The Red Tractor’s “Our Pork Standards”, as stated on its website, are copied with minor editing below.<sup>141</sup>

Table 4: Red Tractor pork standards, as stated on its website (Assured Food Standards, undated).<sup>142</sup>

	Standard
1	Staff must be trained and competent to do job
2	Pigs must be identifiable by tag, tattoo, or mark when leaving farm for traceability
3	Pigs must have safe, comfortable, and hygienic housing <sup>143</sup>
4	Pigs must have sufficient sized housing and kept in appropriate groups
5	Pigs with outdoor access must have shelter and bedding for thermal comfort
6	Pigs must receive a healthy diet
7	Health and welfare must be proactively managed
8	Certified units must participate in the “real welfare” scheme
9	Health and welfare must be well managed during transportation

A British consumer may interpret these standards to be high. Despite this, most, if not all, of the above standards are no higher than the UK legal baseline, i.e., relevant legislation such as the Animal Welfare Act 2006 in England and Wales and the Welfare of Farmed Animals (England) Regulations 2007 include provisions that directly or indirectly entail such standards.<sup>144</sup>

<sup>141</sup> Assured Food Standards, “Our Pork Standards,” <https://redtractor.org.uk/our-standards/pork/>.

<sup>142</sup> Ibid.

<sup>143</sup> The webpage states further conditions related to ventilation, bedding, and lighting.

<sup>144</sup> *Animal Welfare Act 2006. The Welfare of Farmed Animals (England) Regulations 2007.*



The Red Tractor “Our Pork Standards” webpage is arguably missing important information for consumers. There are three major welfare issues in British pig farming. These are first, farrowing crates for breeding sows; secondly, tail docking in piglets; and thirdly, the use of carbon dioxide to stun pigs prior to slaughter. These are widely acknowledged concerns within the animal welfare community, including the veterinary profession, animal welfare scientists, and animal protection NGOs.<sup>145</sup> Despite this, at the time of writing in November 2023, the Red Tractor’s “Our Pork Standards” webpage does not mention either farrowing crates, tail docking in piglets, or carbon dioxide stunning.<sup>146</sup>

At the time of writing in November 2023, the Red Tractor “Our Pork Standards” webpage carried a large foregrounded banner photograph image of around 20 growing/fattening pigs, mostly facing toward the viewer, behind a wire fence in an outdoor environment.<sup>147</sup> Directly underneath the banner image, the webpage states “To be Red Tractor Assured, our pig farmers must work tirelessly to maintain a rigorous set of standards that keep animal welfare at their core...”.<sup>148</sup>

The British public prefers farmed animals to live in more extensive, more natural, and often outdoor conditions.<sup>149</sup> Hence, a photograph of outdoor pigs is likely to be appealing to British consumers. Despite this, Red Tractor certification does not require that growing and fattening pigs have outdoor access. Furthermore, the vast majority of Red Tractor-assured growing and fattening pigs are reared indoors.<sup>150</sup> Given that Red Tractor standards do not require pigs to have outdoor access, and that the majority of Red Tractor-assured pigs are reared indoors, the image of outdoor pigs could potentially create the wrong impression for British consumers.

<sup>145</sup> In November 2022, the Conservative Animal Welfare Foundation launched a campaign, the Crate Escape, backed by CIWF and Humane Society International UK, to ban farrowing crates in the UK. The Government includes phasing out crates as a priority area within its Animal Health and Welfare Pathway. Tail docking is effectively prohibited in law, with exemptions for exceptional cases, despite 70-80% of indoor housed pigs having their tails docked in the UK. The European Food Safety Agency (EFSA), has advised the EU to ban carbon dioxide stunning, due to its aversive nature to pigs. S McCulloch, “The Crate Escape: Winchester Animal Welfare Expert Joins Calls for Ban on Pig Farrowing Crates,” University of Winchester, <https://www.winchester.ac.uk/news-and-events/press-centre/media-articles/the-crate-escape-winchester-animal-welfare-expert-joins-calls-for-ban-on-pig-farrowing-crates.php>. Gov.UK, “Animal Health and Welfare Pathway,” (London2022). Regan Why the Little Pig Lost His Tail - the Cruel Practice of “Tail Docking”. Eurogroup for Animals, “EFSA (Finally) Affirms That CO2 Stunning Is Incompatible with Pig Welfare at Slaughter”.

<sup>146</sup> Assured Food Standards, “Our Pork Standards”.

<sup>147</sup> Ibid.

<sup>148</sup> Ibid.

<sup>149</sup> McCulloch, “Farm Animal Welfare in the UK: What Does the British Public Want?.”

<sup>150</sup> See Figure 2 of this report; around 77% of pigs slaughtered in the UK are reared intensively. RSPCA Assured certifies around 23% of growing and fattening pigs, but the majority of these are reared indoors. Only around 3% of growing pigs are reared free range and spend their whole lives outdoors.



A further area where Red Tractor certification is above the legal baseline is its prohibition on the castration of male pigs.<sup>151</sup> The castration of male pigs is widespread in continental Europe. The procedure is conducted to avoid the change in taste of meat caused by testosterone in male pigs, so-called “boar taint”. Castration of male pigs is a mutilation that is generally performed without anaesthesia or analgesia (pain relief). The Red Tractor prohibition of castration of male pigs therefore benefits pig welfare. Whilst the welfare benefits should be noted, to add full context, it is important to appreciate that pigs are generally slaughtered at a younger age and lower weight in the UK, at around four to seven months. In contrast, pigs in continental Europe are often slaughtered at an older age and heavier weight. Hence, the cultural and culinary differences in the production and consumption of meat in the UK lend themselves to the higher Red Tractor standards in the case of pig castration.<sup>152</sup>

## Is The Red Tractor Label Transparent?

A key argument for mandatory labelling relates to the lack of transparency in current labels, and the potential confusion this causes to British consumers. In this context, it is instructive to look at the Red Tractor standards, as well as the information it provides to British consumers on its website. First, Red Tractor claims the following on its webpage on animal health and welfare:<sup>153</sup>

**“Animal welfare is the number one priority for all Red Tractor livestock farmers. They work tirelessly to ensure the wellbeing of their animals and have regular vet visits to ensure herd and flock health is maintained.”**

(Assured Food Standards, undated) (Emphasis added)

<sup>151</sup> Assured Food Standards, “Pigs Standards.”

<sup>152</sup> The AHDB website states on boar taint: “Routine castration is not carried out in the UK, especially as assurance schemes do not permit castrated animals to enter the market. Instead, males are slaughtered at a lighter weight, as it is believed that increasing slaughter weight leads to greater sexual maturity, causing greater androstenone levels.” Agriculture and Horticulture Development Board, “Boar Taint,” <https://ahdb.org.uk/knowledge-library/boar-taint>.

<sup>153</sup> Note that at least within the URL of the Red Tractor page, this claim is presented as “fact”: Assured Food Standards, “All Red Tractor Farmers Strive for the Very Best in Animal Welfare and Health,” <https://redtractor.org.uk/animal-welfare-and-health-fact-23/>.



The claim that animal welfare is the number one priority for all Red Tractor farmers is questionable. Farms are businesses, and as economic enterprises they must remain financially viable to operate and survive in a capitalist market. This point may suggest that rather than animal welfare, economic viability is perhaps more likely to be the number one priority for many farmers, including Red Tractor-certified farmers.<sup>154</sup>

Furthermore, it is questionable whether Red Tractor farmers can “ensure” the wellbeing of animals on many farms. As stated earlier, Red Tractor certification has very high market penetration in certain sectors. For instance, they certify around 90% of chickens reared for meat, and almost all pigs. Given this, Red Tractor certified farmers should broadly be representative of the general population of British farmers. And there are well documented widespread health and welfare problems for farmed animals in these sectors.

For example, many Red Tractor-certified farmers will rear fast-growing chickens with high prevalences of lameness. This problem follows from the genetic nature of fast-growing chickens being highly predisposed to suffering from lameness. Similarly, around 60% of the UK pig breeding herd are kept indoors, and almost all indoor breeding pig units use farrowing crates. Farrowing crates cause such a severe degree of physical and behavioural confinement of sows, that they are not compatible with providing for their welfare needs.<sup>155</sup>

In addition, assuming Red Tractor dairy farmers are a reasonably representative sample of British dairy farmers, then the UK dairy herd has had around 20% lameness prevalence for decades, which is partly attributed to breeding for higher milk yields, rather than a more robust cow.<sup>156 157</sup>

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<sup>154</sup> This is not a criticism of Red Tractor farmers, but follows simply from the nature of farming as an economic enterprise.

<sup>155</sup> McCulloch, “Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs.”

<sup>156</sup> Agriculture and Horticulture Development Board, “Lameness in Dairy Cows”.

<sup>157</sup> Farm Animal Welfare Council, “Opinion on the Welfare of the Dairy Cow,” (London: Farm Animal Welfare Council, 2009). European Food Safety Authority, “Scientific Report on the Effects of Farming Systems on Dairy Cow Welfare and Disease,” *The EFSA Journal* 1143 (2009).



In this context, it is noteworthy that respondents to the DEFRA 2021 Call for Evidence pointed to the lack of transparency in the current system of voluntary labelling.<sup>158</sup> In addition to this, animal protection groups have referred to how a government-regulated mandatory label scheme can facilitate the fundamental debate about animal welfare in society. For instance, the RSPCA stated the following in its submission to the 2021 DEFRA Call for Evidence:

**“Beyond supporting both consumers’ ability to make a *more informed choice* about which production systems they wish to support and their willingness to pay for better welfare, *improved information* can help better equip consumers to engage in a fundamental and vital societal debate about sustainability, including animal welfare.”**

(RSPCA, 2021) (Emphasis added)

The Red Tractor marketing communicates a message to reassure consumers of high welfare standards for certified produce, yet this impression does not tell the whole story of how the standards operate against the legal baseline and the lives of animals on the farm. The RSPCA’s claim about the importance of mandatory labelling to inform the wider debate about animal welfare in society is highly pertinent in this context, especially given that Red Tractor is by far the leading certification scheme in the UK and has very widespread coverage.

## Red Tractor “Enhanced Welfare”

In 2020 Red Tractor launched a new “Enhanced Welfare” range, which fulfils the criteria of the Better Chicken Commitment.<sup>159</sup> The range was developed in consultation with producers, animal welfare NGOs, and stakeholders in the food and retail services. The range includes “Enhanced Welfare”, “Free Range”, and “Organic” labels.<sup>160</sup> The scheme uses slower growing chicken breeds, and requires more space, natural light, and environmental enrichment.<sup>161</sup>

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<sup>158</sup> Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare,” 9.

<sup>159</sup> Assured Food Standards, “Our Poultry Standards”. Assured Food Standards, “How Choosing Higher Welfare Chicken Could Become More Affordable for Families,” <https://redtractorassurance.org.uk/news/how-choosing-higher-welfare-chicken-could-become-more-affordable-for-families/>.

<sup>160</sup> Compassion in World Farming, “Red Tractor Launches Enhanced Welfare Module for Chicken,” <https://www.compassioninfoodbusiness.com/our-news/2020/06/red-tractor-launches-enhanced-welfare-module-for-chicken>.

<sup>161</sup> Assured Food Standards, “How Choosing Higher Welfare Chicken Could Become More Affordable for Families”.





The “Enhanced Welfare” scheme uses the slower growing Hubbard Redbro breed. Space requirements are maximum stocking densities of 30kg/m<sup>2</sup>, for example up to 15 x 2kg birds per square metre, compared to the 38kg/m<sup>2</sup> for the standard Red Tractor certification (and 39kg/m<sup>2</sup> for the legislative baseline).<sup>162</sup> The additional space plus environmental enrichment encourages natural behaviours such as pecking, scratching, wing flapping, and use of perches.<sup>163</sup>



Figure 5: The Red Tractor “Enhanced Welfare” module for broiler chickens. Image copied from CIWF (2020).<sup>164</sup>

The Red Tractor “Enhanced Welfare” range has the potential to bring about substantial improvements in farm animal welfare. As discussed earlier in this section, over 95% of the land farmed animals reared and slaughtered in the UK are chickens reared for meat consumption, meaning over one billion chickens annually. Hence, if only one percent of Red Tractor-certified chicken farmers transitioned to “Enhanced Welfare” standards, this could significantly improve the welfare of ten million sentient birds. For this reason, the Red Tractor “Enhanced Welfare” standards are warmly welcomed and encouraged.

<sup>162</sup> RSPCA, “Red Tractor Enhanced Welfare,” <https://www.rspcaassured.org.uk/frequently-asked-questions/red-tractor-enhanced-welfare/>.

<sup>163</sup> The RSPCA has welcomed Red Tractor’s Enhanced Welfare label, particularly in relation to fulfilling the Better Chicken Commitment. The RSPCA states that the Red Tractor Enhanced label does not adopt the RSPCA’s higher standards for transport and slaughter, and that its own assessment and auditing process is more rigorous, including unannounced visits by trained assessors. RSPCA, “Red Tractor Enhanced Welfare”.

<sup>164</sup> Compassion in World Farming, “Red Tractor Launches Enhanced Welfare Module for Chicken”.



Despite this, this report has major reservations about industry-based schemes for certifying animal welfare. This is especially the case when they are the dominant in terms of market penetration, as they are in the UK. Furthermore, there is a danger that “Enhanced Welfare” and other higher welfare schemes may further muddy the waters and cause more confusion for British consumers. For instance, Red Tractor might publish statements that could be read as general claims about high animal welfare due to its “Enhanced Welfare” range standards, despite this applying to far fewer farms, and therefore animals, compared to the standard certification.<sup>165</sup>

### **Summary: The Problem with the Dominance of Industry-Based Welfare Labelling and the Need for a Government-Regulated Mandatory Scheme**

An earlier section of this report highlighted the dominance of industry-based farm assurance schemes in the UK as being a unique feature of welfare labelling, compared to other nations.<sup>166</sup> This feature has major relevance for both the provision of transparent information to British consumers, as well as for the welfare of billions of sentient farmed animals reared for meat, eggs, and dairy products.

Whilst there are no doubt some benefits of industry-based schemes, they raise a fundamental question when they are dominant labels providing assurance on animal welfare standards. This is because a strong motivation behind the design, auditing, and marketing of industry-based schemes will be an economic one. From a rational self-interested economic perspective, there is no good reason why industry-based schemes should prioritise welfare or accurate information for consumers, unless this promotes economic gain.<sup>167</sup>

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<sup>165</sup> In a way analogous to current Red Tractor marketing arguably trading on conflating high welfare standards in the UK per se, with high welfare standards in the UK compared to other nations.

<sup>166</sup> The context of multiple industry-based schemes arises first because of the devolved nature of the UK with England, Scotland, Wales, and Northern Ireland as constituent nations. And secondly, because of the different farmed animals sectors within each nation.

<sup>167</sup> The US animal rights lawyer Gary Francione makes this view related to welfare reforms in society generally. Whilst the author does not follow Francione in his wider views, the report agrees with the lesser claim that when the farming industry (as opposed to government) dominates animal welfare labelling, the standards will be based primarily on what that industry perceives to benefit it economically. [G. Francione and R. Garner](#), *The Animal Rights Debate: Abolition or Regulation?* (New York: Columbia University Press, 2010).



Consider, for instance, the QMS website. The first heading on its homepage is “Putting Red Meat First”, and under the heading the website states the following:<sup>168 169</sup>

**“QMS works across the red meat supply chain; from farm to fork to improve the efficiency, sustainability, integrity and profitability of the Scottish red meat sector, helping to maximise its contribution to the Scottish economy.”**

(Quality Meat Scotland, undated)

Improving the efficiency and profitability of the meat sector in any nation, and maximising its contribution to the economy, is often in conflict with animal welfare. Indeed, it is the drive to improve efficiency and profitability of livestock farming generally that has been the prime cause of many of today’s most severe and widespread problems, through the intensification of farming practices. To explain, in a DEFRA-commissioned report, the economist McNerney (2004) writes in his abstract:<sup>170 171</sup>

**“Following an exploration of the valuation of animal welfare within the conventional economics framework of ‘demand’, the paper sets out a simple model of the *inherent conflict* between animal welfare (as perceived by humans) and livestock productivity (as pursued by increasingly ‘intensive’ methods of production). This is essentially a conflict between the animals’ benefit and human benefit.”**

(Emphasis added)

In his report, McNerney constructs a graph “Conflicts between animal welfare and productivity”, to illustrate the relationship between livestock productivity (x axis) and perceived welfare (animal benefit).<sup>172</sup> He writes that intensive systems will be closer to point D, representing “minimal welfare”, which crosses with a welfare minimum baseline he constructs, the space under which he labels “cruelty”.<sup>173</sup>

<sup>168</sup> Quality Meat Scotland, “Homepage”.

<sup>169</sup> At the time of writing in November 2023 the Quality Meat Scotland homepage carried a video including an indoor breeding sow and a young piglet interacting in a straw bedding environment, with no farrowing crate visible. Given that almost all indoor breeding sows in the UK are confined in farrowing crates from around one week prior to farrowing until the piglets are weaned at around four to five weeks, this video material is potentially confusing to consumers. Video material from the vast majority of breeding pig farms would include a confined sow with no or minimal bedding kept on slatted flooring (which blocks the underground drainage system) and the metal bars of a farrowing crate causing severe physical restriction, such that the sow is unable to interact properly with her piglets. McCulloch, “Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs.” Quality Meat Scotland, “Homepage”.

<sup>170</sup> John McNerney was a member of the Farm Animal Welfare Council (FAWC), an independent body advising the British Government on farm animal welfare policy.

<sup>171</sup> John McNerney, “Animal Welfare, Economics and Policy: Report on a Study Undertaken for the Farm & Animal Health Economics Division of Defra,” (London 2004), no page.

<sup>172</sup> *Ibid.*, 18.

<sup>173</sup> *Ibid.*, 20.



It is for these reasons, the conflict between productivity and welfare, that the Farm Animal Welfare Council (FAWC) recommended in its landmark 2009 report “Farm Animal Welfare in Great Britain: Past, Present and Future” that government act as “guardian” for animal welfare.<sup>174</sup> Farmed animals are sentient beings, and their wellbeing should not be left to the economic imperatives and the vagaries of the market. Following the same reasoning, the standards under which farmed animals are reared should not be substantially influenced by industry-based certification schemes.

It is important to state that these comments are not a criticism of the British farming industry. To hold that view would be to misunderstand the argument being made. Rather, the argument implies a criticism of successive UK governments, rather than the British farming industry. This is because it has been the policy of successive governments to permit the UK status quo of the dominance of industry-based welfare labelling. And whereas the farming industry is driven primarily by economic motivations, following the FAWC (2009) report, governments have a rightful guardian role and responsibility to protect the welfare of farmed animals.

The industry-based dominance of animal welfare labelling in the UK provides the central argument for a government-backed mandatory labelling scheme. In July 2023, DEFRA announced that it would not consult on mandatory labelling at the present time and that it would continue to work with industry to explore how government can harness the market to improve information provision for consumers and raise standards of animal welfare (Cooke, 2023).<sup>175</sup> For the reasons discussed above, this is a necessarily misguided approach. Only a government-regulated mandatory label can provide transparent and reliable information to British consumers and drive significant improvements in animal welfare based on well-established public preference for high welfare standards.

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<sup>174</sup> Farm Animal Welfare Council, “Farm Animal Welfare in Great Britain: Past, Present and Future.”

<sup>175</sup> Cooke, “Defra Shelves Animal Welfare Labels for Chicken and Pork.”



## RSPCA Assured

RSPCA Assured is the leading higher animal welfare assurance scheme in the UK. It was launched as Freedom Food in 1994 with standards for pigs and laying hens.<sup>176</sup> The assurance scheme developed to include standards and certification of sheep and dairy cows (1995), meat chickens and turkeys (1997), farmed ducks (1999), salmon (2002), and rainbow trout (2015). Freedom Food was rebranded as RSPCA Assured in 2015, in the same year that farrowing crates were banned under the standards for pigs. RSPCA Assured is a voluntary animal welfare certification scheme that does not use method of production on its labels. This is despite the RSPCA as an organisation campaigning for government-regulated mandatory method of production-based labelling.<sup>177</sup>

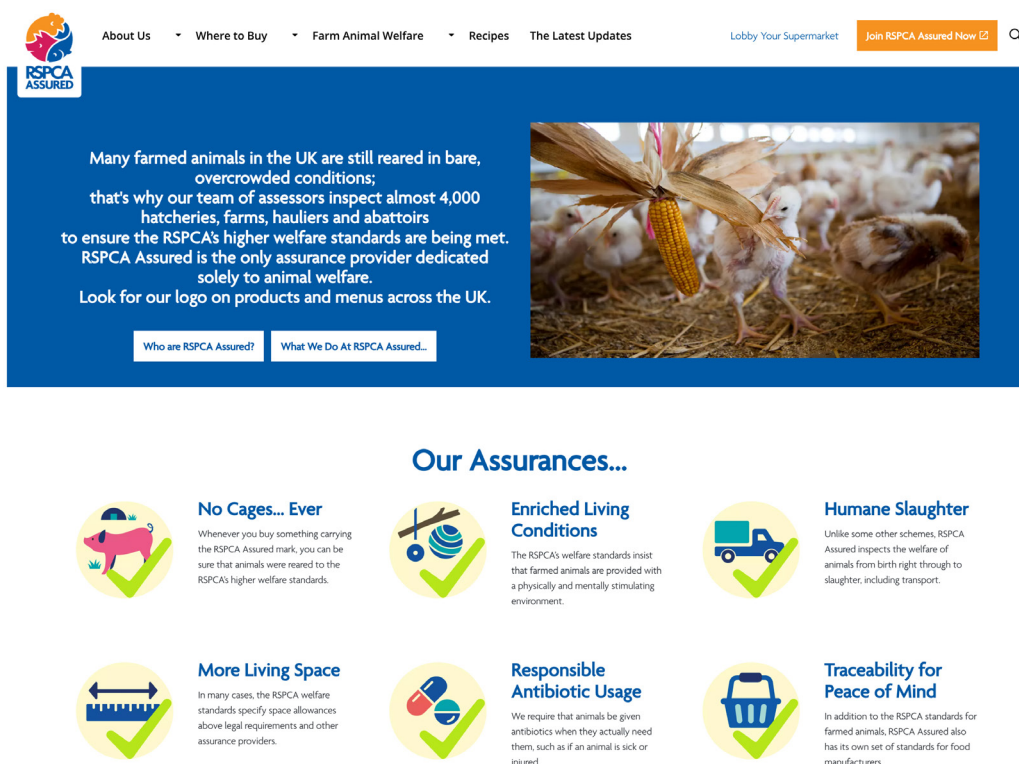


Figure 6: Screenshot of part of the RSPCA Assured website. Published with permission of the RSPCA.<sup>178</sup>

<sup>176</sup> RSPCA Assured, "Our Story," <https://www.rspcaassured.org.uk/about-us/our-story/>.

<sup>177</sup> Bowles et al., "Food Labelling and Animal Welfare: Ensuring Animals Have a Good Life by Advocating on Their Behalf."

<sup>178</sup> RSPCA Assured, "Homepage".

The RSPCA Assured website provides a useful illustration of successes including McDonalds switching to using exclusively RSPCA Assured pork in 2013, the Co-op sourcing 100% of its own brand pork from RSPCA Assured providers in 2018, and Sainsbury's doing the same in 2020. These successes also reveal the importance of the interplay between farm assurance schemes for animal welfare and retailers and food outlets, which by nature of their market share can have huge impacts on driving higher animal welfare standards through changes in consumer consumption.

However, production under the RSPCA Assured scheme represents just a small proportion of the total number of animals farmed. According to the RSPCA this is under 1% for beef and sheep, just 1-2% of chickens reared for meat, 15% of turkeys and 23% of pigs.<sup>179</sup> These figures can be compared with the much higher coverage and market penetration of industry-based schemes. Red Tractor, for instance, covers over 90% of chickens reared for meat and most pigs in the UK, under half of sheep, and around 40% of beef cattle in England.<sup>180</sup>

The RSPCA Assured website states that its standards are based on scientific research and developed to be commercially viable in consultation with veterinary surgeons and the farming industry.<sup>181</sup> The RSPCA Assured website states that animals have better lives because:<sup>182</sup>

- They are not genetically selected for excessive rapid growth
- There is good access to food and water
- Cages and crates are banned
- There is access to litter and bedding
- Animals can perform natural behaviours
- When appropriate for species, animals can go outdoors
- Stockperson training is mandatory
- Humane treatment at transport and slaughter (all animals are pre-stunned)

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<sup>179</sup> David Bowles, RSPCA, pers. comm. Figures are based on RSPCA Assured 2021 data.

<sup>180</sup> RSPCA, "RSPCA Submission to Defra Labelling Call for Evidence" 22.

<sup>181</sup> RSPCA, "RSPCA Welfare Standards," <https://science.rspca.org.uk/sciencegroup/farmanimals/standards>.

<sup>182</sup> RSPCA Assured, "What difference do higher welfare standards actually make?," <https://www.rspcaassured.org.uk/about-us/what-do-high-standards-really-mean/>.





Table 5 illustrates some key differences between RSPCA Assured and UK minimum legal standards. RSPCA Assured farms provide more space for farmed animals to move around and perform natural and normal behaviours.

Table 5: RSPCA Assured standards to illustrate higher welfare conditions.

Sector	RSPCA Assured
<b>Farmed fish</b> <sup>183</sup>	<p>Lower stocking density reduces aggression</p> <p>Water quality including oxygenation and temperature</p> <p>Training of staff related to handling of fish e.g., for vaccination or size grading</p> <p>Pre-stunning mandated prior to slaughter and slaughter by carbon dioxide, suffocation or bleeding out is prohibited</p>
<b>Pigs</b> <sup>184</sup>	<p>Free farrowing required and farrowing crates prohibited</p> <p>Lower stocking densities</p> <p>Bedding and materials to root and manipulate</p> <p>Routine use of mutilations including tail docking, teeth clipping, and nose-ringing outdoor sows is prohibited</p>
<b>Chickens reared for meat</b> <sup>185</sup>	<p>Slower growing breeds to reduce lameness</p> <p>More space/lower stocking density</p> <p>Enrichment such as perches and hay bales</p> <p>Shade and shelter for free range chickens</p> <p>Shackling of chickens upside down prior to slaughter is prohibited</p>
<b>Turkeys</b> <sup>186</sup>	<p>More space/lower stocking density</p> <p>Enrichment such as perches, straw bales, and objects to peck</p> <p>Indoor housed turkeys must be provided with natural daylight</p> <p>Free range turkeys must have shade and shelter</p> <p>Routine beak trimming is not permitted</p> <p>Trained persons to catch turkeys prior to transport</p> <p>Shackling upside down is not permitted</p>

<sup>183</sup> RSPCA Assured, "Salmon & Trout," <https://www.rspcaassured.org.uk/farm-animal-welfare/salmon-trout/>.

<sup>184</sup> RSPCA Assured, "Pigs," <https://www.rspcaassured.org.uk/farm-animal-welfare/pigs/>.

<sup>185</sup> RSPCA Assured, "Meat Chickens," <https://www.rspcaassured.org.uk/farm-animal-welfare/chickens/>.

<sup>186</sup> RSPCA Assured, "Turkeys," <https://www.rspcaassured.org.uk/farm-animal-welfare/turkeys/>.





<b>Egg laying hens</b> <sup>187</sup>	<p>Modified or colony cages are prohibited</p> <p>Free range and barn systems promote natural behaviours including nesting, perching, and dust bathing</p> <p>Enrichment materials including nest boxes, perches, straw bales, and objects to peck provided</p>
<b>Cows reared for beef</b> <sup>188</sup>	<p>Calves must be fed at least 6 litres of milk daily for the first 8 weeks of life</p> <p>Barns and hutches must be well ventilated and well bedded</p> <p>Individually hutched calves must be grouped at least one week before weaning at 8 weeks</p> <p>Farms must have veterinary health and welfare plan</p> <p>Fully slatted systems for finishing cattle are prohibited</p> <p>Environmental enrichment such as cow brushes to groom and scratch</p> <p>Disbudding and castration to be conducted only by a trained person. Disbudding must take place before five weeks and castration under two months. Long-acting pain relief must be provided.</p>
<b>Dairy cows</b> <sup>189</sup>	<p>Access to pasture for as much of the year as possible</p> <p>Measures to reduce lameness and mastitis include foot bathing facilities and herd health plans</p> <p>Farmers must treat any lameness and mastitis rapidly and effectively</p> <p>Environmental enrichment such as cow brushes to groom and scratch</p> <p>Standards related to minimising stress at calving</p>

<sup>187</sup> RSPCA Assured, "Egg-Laying Hens," <https://www.rspcaassured.org.uk/farm-animal-welfare/egg-laying-hens/>.

<sup>188</sup> RSPCA Assured, "Beef Cattle," <https://www.rspcaassured.org.uk/farm-animal-welfare/beef-cattle/>.

<sup>189</sup> RSPCA Assured, "Dairy Cows," <https://www.rspcaassured.org.uk/farm-animal-welfare/dairy-cows/>.

## RSPCA Assured Pig Rearing Systems and Method of Production Pork Labels

This report supports government-regulated mandatory method of production plus labelling. One of the arguments provided by elements within the food and farming industry is that method of production is not a good indicator of welfare. This claim is addressed and rebutted later in this report. Despite the claim, method of production labels are widely used for animal welfare labelling, as evidenced in this report. The RSPCA has categorised pig rearing systems and pork labels on its website for the benefit of consumers.<sup>190</sup> The categories are found in Table 6.

Table 6: Pig rearing systems and pork labels (RSPCA, 2022).<sup>191</sup>

System	Description
<b>“Standard indoor”</b>	Farrowing and lactating sows likely kept in farrowing crates
<b>“Higher welfare indoor”</b>	Pigs kept in individual pens or indoor arcs for farrowing
<b>“Outdoor-bred”</b>	Pigs born in outdoor systems but reared indoors after weaning
<b>“Outdoor-reared”</b>	Pigs born outdoors and reared outdoors for half of their lives
<b>“Free range”</b>	Pigs born and raised outdoors for the entirety of their lives
<b>“Organic”</b>	Pigs raised to higher welfare standards and must have permanent access to the outdoors

Whilst these labels provide some useful information to consumers, this report argues that the labels “Outdoor-bred” and “Outdoor-reared” are potentially confusing for British consumers. This has been discussed earlier in this report. In short, “Outdoor-bred” pigs are kept outdoor only up until weaning at four to five weeks. “Outdoor reared” pigs are kept outdoors for around twelve weeks. In the UK pigs tend to be slaughtered at around six months. Many consumers will believe that both “Outdoor-bred” and “Outdoor-reared” pigs spend significantly longer than this outdoors. In particular, the term “Outdoor-reared” would most obviously be interpreted as referring to a pig that has been reared for the entirety of its life outdoors.

<sup>190</sup> RSPCA Assured, “Pig Rearing Systems and Pork Labels”.

<sup>191</sup> Ibid.



These terms are also contained in the Pork Provenance Code, owned by the British pig industry.<sup>192</sup> Whilst there may be an economic motivation for the pig industry to suggest to consumers that pigs are reared outdoors, when they are not, there appears to be no good reason for RSPCA Assured to use this problematic term. For this reason, the report recommends that RSPCA Assured review the use of the term “Outdoor-reared” in particular, and replace it with a term that is a better reflection of reality and more transparent for British consumers.

## Does RSPCA Assured Have High Welfare Standards?

Earlier in this report media attention of Red Tractor assured farms was documented, followed by a discussion of Red Tractor welfare certification standards. It should be noted that some RSPCA Assured farms have also been subject to exposés by animal protection organisations. For instance, in 2020 Direct Action Everywhere activists occupied RSPCA Assured Hoads Farm in East Sussex, which supplied free range eggs to large UK supermarkets.<sup>193</sup> The activists filmed ill birds and rotting corpses at the farm, and left with around 50 “liberated” hens. The RSPCA Assured scheme suspended Hoads farm from its certification scheme pending an investigation.

Given that RSPCA Assured, the UK’s leading higher animal welfare assurance scheme, has been subject to direct action similar to Red Tractor, does the scheme generally have high welfare standards, and, related to this, should the British consumer trust the scheme? There are two key ways to approach this question. The most important is simply to compare the RSPCA Assured standards with UK legislative baseline standards. When this is done, it is clear that RSPCA Assured standards are clearly above the UK legal baseline.<sup>194</sup> This report has documented major health and welfare problems in UK farming such as the use of farrowing crates in breeding pigs and cages for laying hens, mutilations such as tail docking of pigs, highly prevalent lameness in chickens reared for meat, and lameness and outdoor access for dairy cows.

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<sup>192</sup> Agriculture and Horticulture Development Board, “The Code of Practice for the Labelling of Pork and Pork Products: Pig Production Terms”.

<sup>193</sup> Anon., “RSPCA Assured Probes Hoads Farm after ‘Shocking’ Video,” BBC News, <https://www.bbc.co.uk/news/uk-england-sussex-51269967>.

<sup>194</sup> For this reason, McCulloch (2023) has recommended that the UK Government and devolved administrations should use RSPCA Assured standards as a blueprint for mandatory animal welfare standards to aim for. Indeed, there is some evidence this is happening, given the overlap of the Government’s priority areas under the Animal Health and Welfare Pathway with RSPCA standards. McCulloch, “Farm Animal Welfare in the UK: What Does the British Public Want?.” Gov.UK, “Animal Health and Welfare Pathway.”



As Table 5 illustrates, the RSPCA Assured scheme prohibits farrowing crates, cages for laying hens and tail docking in pigs. It mandates slower growing chickens and lower stocking densities to reduce lameness, together with enhanced environmental enrichment to promote natural behaviour. For dairy cows RSPCA Assured mandates access to pasture for as much of the year as possible, and measures to reduce lameness and mastitis include foot bathing facilities and herd health plans. RSPCA Assured certification requires more stringent auditing, including welfare outcomes, as well as unannounced checks on farms.<sup>195</sup>

Secondly, it is important to consider the nature of the organisation that owns the scheme and how it is financed. Earlier in this report it was argued that the Red Tractor and other industry-based schemes may ultimately prioritise economic considerations. This follows from their nature as industry-based and financed organisations, with an overriding aim to champion and represent British farmers. In contrast, the RSPCA is a charitable organisation established in 1824 to protect the welfare of animals. The RSPCA is financed by charitable donations, and RSPCA Assured receives fee payments from certified farmers. Given this, it is reasonable to conclude that the primary priority of the RSPCA and the RSPCA Assured is to protect the welfare of farmed animals.

## How Can Existing Higher Animal Welfare Assurance Schemes Such as RSPCA Assured Complement a Government-Regulated Mandatory Scheme?

The RSPCA Assured scheme has significantly higher standards than the UK legislative baseline, and the status of the organisation as a charitable organisation/NGO means it can generally be trusted to promote animal welfare and provide transparent information to British consumers. Furthermore, the organisation has considerable experience and expertise, through providing higher welfare assurance for over a quarter of a century.<sup>196</sup> Given this, how could it complement a government-regulated mandatory animal welfare labelling system?

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<sup>195</sup> RSPCA Assured, "Farm Assessments Explained," <https://www.rspcaassured.org.uk/about-us/farm-assessments/>.

<sup>196</sup> RSPCA Assured, "Our Story".



DEFRA's March 2023 proposal was for a tiered A-E method of production plus labelling scheme, with tier D as the UK legislative baseline and tiers A-C representing higher standards than this.<sup>197</sup> Such a government scheme could mandate that higher tiers, for instance A-C, require membership of higher welfare third party assurance schemes, such as RSPCA Assured. This approach combines the benefits of trust and transparency in a government-regulated mandatory scheme, with the expertise and capacity of schemes such as RSPCA Assured. This report recommends that the Government adopts such an approach to achieve the policy objectives set out in its 2021 DEFRA Call for Evidence, as well as maximise efficiency in policy making in animal welfare labelling.

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<sup>197</sup> [Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence."](#) [Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare."](#)



## Soil Association Organic Standards

The Soil Association is the UK's leading organic certifier, with a range of schemes from food and farming to catering, beauty and fashion. The UK organic sector is a niche though growing market, worth £3.1 billion in sales in 2022.<sup>198</sup> The Soil Association certifies chicken and eggs, cows, pigs, sheep, and fish and aquaculture. It works with AssureWel to measure welfare outcomes as part of its standards.<sup>199</sup> The Soil Association describes its philosophy on its website:<sup>200</sup>

**“The Soil Association developed the world’s first organic standards in the 1960s. Our licensees must meet strict European laws about the production of organic food. They must also go further in key areas such as animal welfare, protecting human health, and safeguarding the environment. No system of farming has higher levels of animal welfare than farms working to Soil Association organic standards.”**

(Soil Association, undated)

The Social Association Organic certification scheme arguably has the highest standards for animal welfare in the UK. For instance, the CIWF and OneKind 2012 comparison of UK schemes ranked the Soil Association top for all species/sectors analysed.<sup>201</sup> The CIWF and OneKind analysis is dated, but based on input standards such as space requirements. The Soil Association Organic Standards remains the most stringent UK animal welfare scheme.



Figure 7: The Soil Association logo (left) and Organic certification label (right).

<sup>198</sup> Organic Research Centre, “Organic Market Delivers Strong Performance in Exceptionally Challenging Year,” <https://www.organicresearchcentre.com/news-events/news/organic-market-delivers-strong-performance-in-exceptionally-challenging-year/>.

<sup>199</sup> Soil Association, “Better for Animals”. Soil Association, “Improve Animal Welfare,” <https://www.soilassociation.org/farmers-growers/low-input-farming-advice/improve-animal-welfare/>.

<sup>200</sup> Soil Association, “Our Standards,” <https://www.soilassociation.org/our-standards/>.

<sup>201</sup> Heather Pickett, “Farm Assurance Schemes & Animal Welfare - How the Standards Compare: Executive Summary,” (Godalming: Compassion in World Farming, OneKind, 2012).



## Animal Welfare Standards for Organic Chicken and Eggs, Cows, Pigs, and Fish and Aquaculture

Soil Association Organic standards mean that animals must have access to pasture and are truly free range.<sup>202</sup> Farmers must provide sufficient space, light, and comfort for animals to move and for them to express natural behaviours. Soil Association Organic standards prohibit cages for laying hens and farrowing crates for breeding sows, as well as mutilations like beak trimming and tail docking. Organically farmed animals must be fed a diet that is natural and free from genetically modified organisms, and organic farming bans the routine use of antibiotics and wormers. Table 7 summarises standards for organic chickens and eggs, cows, pigs, and fish.

Table 7: Soil Association Organic standards for chickens, cows, pigs, and fish and aquaculture.<sup>203</sup>

Species/sector	Standards
<b>Organic chicken and eggs</b>	Flocks five times smaller than free range systems
	Continuous daytime access to diverse outdoor range
	Beak trimming prohibited
	Enrichment to perform natural behaviours such as foraging, dust bathing, and pecking
	Slower growing and more robust breeds used Organic chickens reared for meat live for twice as long as intensively reared fast-growing breeds
<b>Organic cows</b>	Access to outdoor pasture for as much time as possible Indoor zero grazing systems not permitted
	Well bedded spacious indoor barns when cows must be housed indoors
	Minimum of 60% forage in diets
	Lower and more sustainable milk yields, protecting health and welfare

<sup>202</sup> Soil Association, "Better for Animals".

<sup>203</sup> Ibid.



<b>Organic pigs</b>	Kept outdoors year-round; indoor housing only permitted in severe weather conditions, with access to outdoor run
	Tail docking prohibited
	Farrowing crates for breeding sows prohibited
	Pigs are weaned at 40 days, compared to the 21-day standard for intensively reared pigs
<b>Organic fish and aquaculture</b>	Lower stocking densities to allow more space to reduce stress and disease risk
	Restrictions on routine treatment of disease incentivises farmers for better management practices that promote health and welfare
	Soil Association fish farms must follow FAWC 'Opinion on the Welfare of Farmed Fish at the Time of Killing' recommendations



## Supermarket Schemes, Labelling and Information Provision to British Consumers

Supermarket retailers can have an enormous impact on animal welfare given their large market share. They can influence animal welfare through their animal welfare and sourcing policies, as well as through the information they provide to British consumers. For instance, all supermarkets have committed to sell only cage-free shell eggs from 2025.<sup>204</sup> Similarly, Waitrose and Marks & Spencer have signed up to the Better Chicken Commitment, with other supermarkets under pressure to follow.<sup>205</sup> Such policies drive major reforms in farming practices, which ultimately lead to much improved farm animal welfare.

The top ten supermarket retail chains in the UK by turnover are Tesco, Sainsbury's, Asda, Morrisons, Aldi, Co-op, Lidl, Waitrose & Partners, Iceland, and SPAR.<sup>206</sup> Marks & Spencer is also considered in this section as a British retailer based on its commitment to higher welfare policies.<sup>207</sup> Waitrose, Marks & Spencer, Sainsbury's, and the Co-op are generally considered to be retailers with more commitments to higher welfare standards.<sup>208</sup> The 2021 Business Benchmark for Farm Animal Welfare (BBFAW) scored Marks & Spencer and Waitrose as Tier 1, with consideration of animal welfare as being integral to business strategy. Sainsbury's, the Co-op, Tesco and Morrisons were assessed as Tier 2, with some evidence of implementation in their business strategy.<sup>209</sup>

## Supermarkets and British Farm Assurance Schemes

All major British retailers have webpages providing information to British consumers about animal welfare, with the more progressive supermarkets providing more information.<sup>210</sup> Most supermarkets place a strong emphasis on sourcing fresh produce from British farmers in their marketing. For instance, Aldi states: "From farming and fishing, to growing and baking, our Great British suppliers help us produce exceptional food all year round."<sup>211</sup> Such marketing implicitly or explicitly refers to animal welfare, other ethical standards such as the environment, as well as the economic motivation to support British farmers. In relation to this, supermarkets promote farm and animal welfare assurance schemes, in particular British industry-based schemes such as the Red Tractor.

<sup>204</sup> FarmingUK, "All Major Retailers to Go Cage-Free by 2025," Farming UK, [https://www.farminguk.com/news/all-major-retailers-to-go-cage-free-by-2025\\_42707.html](https://www.farminguk.com/news/all-major-retailers-to-go-cage-free-by-2025_42707.html).

<sup>205</sup> Chris Packham, "Dear Supermarkets, Even the Government Backs Higher Welfare Standards for Chickens," *Independent*, 10 April 2022.

<sup>206</sup> Robert McHugh, "Top 10 Supermarket Retail Chains in the UK," *European Supermarket Magazine* 2023.

<sup>207</sup> M&S, "Our Animal Welfare Standards," <https://corporate.marksandspencer.com/sustainability/reports-quick-reads/our-animal-welfare-standards>.

<sup>208</sup> The Co-op's Animal Welfare Standards and Performance document interestingly states the following: "We have, for many years, been pioneering in our approach to improving the welfare of animals. In the 1990s, we even broke the law to be the first retailer to label the living conditions of laying hens." (Emphasis added.) Co-op, "Co-Op Animal Welfare Standards & Performance," (2021).

<sup>209</sup> Business Benchmark on Farm Animal Welfare, "Benchmark," <https://www.bbfaw.com/benchmark/>.

<sup>210</sup> Most supermarket retailers publish policy documents on animal health and welfare, with some supermarkets such as Waitrose (40 pages), Sainsbury's (38 pages), the Co-op (52 pages) and Tesco (41) having comprehensive documents providing information about their animal welfare strategy and species and sector specific information. Waitrose & Partners, "Our Approach to Animal Welfare," (2021). Sainsbury's, "Sainsbury's Animal Health & Welfare Report 2022," (2022). Co-op, "Co-Op Animal Welfare Standards & Performance." Tesco, "Animal Health and Welfare Report: 2021/22 Reporting Year," (2022).

<sup>211</sup> Aldi, "At Aldi, We're Proud to Support British,"

<https://www.aldi.co.uk/corporate/corporate-responsibility/fairer/british-quality>.



British consumers buy much of their meat, dairy, and eggs in supermarkets, and encounter farm assurance and animal welfare labels during their shopping. Many of the supermarket webpages and policies on animal welfare emphasise that the produce they sell is certified to such standards. For instance, after stating that its farmers care for animals by following the five freedoms of animal welfare, the Co-op states:<sup>212 213</sup>

**“We support animal welfare through schemes such as Red Tractor, RSPCA Assured and our own-brand animal welfare standards. In fact, all our own-brand meat, poultry and British dairy products sold under the Co-op brand are produced from farms that are accredited to a national farm assurance scheme, such as Red Tractor, which ensures high standards of animal welfare.”**

(The Co-op, undated)

Similarly, at the time of writing in November 2023, the Aldi webpage on animal welfare foregrounds icons with images of the Red Tractor and RSPCA Assured labels, which then link to a webpage entitled “Certification” with brief information on various farm assurance, animal welfare, and other ethical schemes.<sup>214</sup> The relevance is that supermarket retailers with enormous potential impact are relying on the standards within such schemes and magnifying their impact.

The merits and problems of voluntary industry-based farm assurance schemes and animal welfare are discussed earlier in this report. In summary, industry-based farm assurance schemes are largely motivated by economic factors. At the same time, organisations who manage such schemes understand the British public prefers higher welfare, more extensive, more natural, and often outdoor systems. This contradiction, or at least tension, can then lead to potentially confusing marketing for consumers, for instance through pictures of outdoor growing pigs, when the vast majority of pigs are reared indoors.

The problem with respect to supermarket retailers is that marketing such industry-based schemes effectively endorses them. Hence, the supermarket retailers are magnifying the impact (both positive and negative) of such schemes, including those parts which are potentially confusing for their customers, and which perpetuate a false belief that the UK animal welfare standards are high per se, rather than simply high in comparison to many other countries.

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<sup>212</sup> Co-op, “Animal Welfare,” <https://www.coop.co.uk/our-suppliers/animal-welfare>.

<sup>213</sup> Similarly, Tesco states: “Where available (in terms of both species and geography) there is an expectation that all parts of the supply chain are certified to a recognised and accredited Farm Assurance Scheme.” Tesco, “Maintaining and Improving Animal Welfare,” <https://www.tescopl.com/sustainability/documents/policies/maintaining-and-improving-animal-welfare/>.

<sup>214</sup> Aldi. “Animal Welfare.” <https://www.aldi.co.uk/corporate/corporate-responsibility/fairer/animal-testing-and-welfare>.



## Supermarket Welfare Standards and Information Provision to Consumers

More progressive retailers such as Marks & Spencer, Waitrose, and the Co-op source either exclusively or higher proportions of their meat, dairy, or eggs from British farms. Many of the supermarket retailers list or reference the five freedoms of animal welfare on their websites and policy documents and state that their suppliers farm in accordance with them.

The Waitrose website states that it is “First for animal welfare” and that it has won more CIWF awards than any other supermarket.<sup>215</sup> All of its chickens reared for meat are reared on British farms and have more space to roam, peck, and play, and its egg-laying hens have been free range since 2008. All Waitrose breeding sows are outdoors, and the retailer does not source from farms using sow stalls or farrowing crates. Hence, all the pork that Waitrose sells is “outdoor bred”. All Waitrose fresh milk is free range, with its dairy cows spending more than half the year outside.

Overall, the Waitrose website provides useful information to British consumers, with progressive policies significantly above the UK legislative baseline, and webpages dedicated to each farmed animal sector. The problem arises more for supermarkets that have less progressive animal welfare policies. For instance, Asda’s Animal Welfare webpage states first that all its meat must be stunned before slaughter.<sup>216</sup> It then goes on to state that all its Own Brand fresh pork is sourced from “recognised welfare schemes such as the Red Tractor”.

The merits of Asda’s sourcing and positive marketing of Red Tractor therefore follow from the discussion earlier in this report. The benefit is that Red Tractor pork has not, for example, been produced from breeding sows severely confined during all or part of their pregnancy in sow stalls. The downside is that Red Tractor standards, being barely above the UK legislative baseline, continue to permit the use of farrowing crates, which cause the same degree of severe confinement as stalls, though they are used one week prior to farrowing through to weaning of piglets at four weeks.

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<sup>215</sup> Waitrose & Partners, “Animal Welfare,” <https://www.waitrose.com/ecom/content/sustainability/animal-welfare>. See also links to species/sector-based pages.

<sup>216</sup> ASDA, “Animal Welfare,” <https://www.asda.com/creating-change-for-better/better-planet/farming-and-nature/animal-welfare>.



The Asda site goes on to state that all EU pork is, at a minimum, sourced from farms where they are confined for only 28 days following insemination, in line with EU law on sow stalls. Asda even states that it ensures all EU pork is compliant with the EU legislation. To the average British consumer these statements may be read in a positive light. The reality is that sow stalls have been banned in the UK since 1999, due to the extreme confinement and severe welfare problems that they cause.<sup>217</sup> Hence, Asda appears to be communicating a sourcing policy to British consumers in a positive light, when the farming practice has been legally banned in the UK for nearly a quarter of a century.<sup>218</sup>

Again, the Asda website states that 100% of its UK and EU Own Brand fresh pork has not been produced through the use of “routine” mutilations such as tail docking or teeth clipping, “except when guided by a veterinary surgeon within a health plan”. The problem is that the tail docking of piglets is in effect arguably *routine*, in both the UK and the EU. Regan (2020) writes that 70-80% of pigs reared in the UK have their tails docked, almost always without anaesthesia or pain relief.<sup>219</sup> Of course, it matters little to the piglets whether a veterinary surgeon has signed off on widespread tail docking. And of course, tail docking is performed to prevent tail biting, which occurs because pigs are reared in environments which do not meet their welfare needs.

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<sup>217</sup> McCulloch, “Brexit and Animal Protection: Legal and Political Context and a Framework to Assess Impacts on Animal Welfare.”

<sup>218</sup> The statement in full reads as follows: “Following changes to the European Legislation, we ensure all purchased EU pork is, as a minimum, compliant to the revised legislation and therefore comes from farms where sows are not confined throughout the whole of their gestation period. This confinement is for a maximum of 28 days post insemination where they are then loose housed.” ASDA, “Animal Welfare”.

<sup>219</sup> Regan Why the Little Pig Lost His Tail - the Cruel Practice of “Tail Docking”.



## Case Study: UK Retailer Lidl's Method of Production Label – “Welfare Windows”

The UK retailer Lidl outlines its Animal Welfare policy on its website.<sup>220</sup> The retailer foregrounds the five freedoms and includes a presentation on these by the animal welfare scientist Emma Baxter. Lidl's standards for labelling are laid out in its 16-page “Farm Animal Health and Welfare Policy” document.<sup>221</sup> In the document, Lidl includes making sure all animals live a good life, championing young farmers, and delivering hyper-transparency within its sustainability business plan.

The retailer collaborates with the Aquaculture Stewardship Council (ASC), Agricultural and Horticultural Development Board (AHDB), British Retail Consortium (BRC), Compassion in World Farming (CIWF), Linking Environment and Farming (LEAF), National Farmers Union (NFU), Marine Stewardship Council (MSC), Organic Farmers and Growers, Red Tractor, Responsible Use of Medicines in Agriculture Alliance (RUMA), and RSPCA Assured.<sup>222</sup> Lidl's higher welfare standards products are certified by RSPCA Assured and organic third party assurance schemes as laid out in Table 8.

Table 8: Lidl's higher welfare standards and third-party assurance schemes. Table copied from Lidl's “Farm Animal Health and Welfare Policy”.<sup>223</sup>

Product	Higher Welfare Commitment
<b>Chicken</b>	All free range chicken must be RSPCA Assured
<b>Laying hens</b>	All free range and organic shell eggs must be RSPCA Assured
	Additionally, all organic shell eggs must be certified to the Organic Farmers and Growers standard
<b>Pork</b>	All outdoor-bred pork must be RSPCA Assured
<b>Salmon</b>	All ‘Deluxe’ farmed salmon must be RSPCA Assured
<b>Turkey</b>	All ‘Deluxe’ turkey must be RSPCA Assured

<sup>220</sup> Lidl, “Animal Welfare,” <https://corporate.lidl.co.uk/sustainability/animal-welfare>.

<sup>221</sup> Lidl, “Farm Animal Health and Welfare Policy,” (2022).

<sup>222</sup> *Ibid.*

<sup>223</sup> *Ibid.*, 6.

Lidl introduced method of production labelling for chicken in 2019, with the aim of “empowering” consumers to make informed purchasing decisions.<sup>224</sup> Following a successful trial for chicken meat, Lidl has since extended “Welfare Windows”, its method of production-based labelling scheme, to fresh duck, turkey, pork and egg products. Lidl reports how 89% of its customers found that Welfare Windows for chicken helped them understand different farming methods.<sup>225 226</sup> Large majorities of customers felt the labelling scheme helped them make more educated choices about the meat they were buying (87%), feel more positive toward the supermarket selling the meat (80%), trust the supermarket using this type of labelling based on transparency of animal welfare standards (80%) and would like to see the same type of labelling across more meat products (87%).

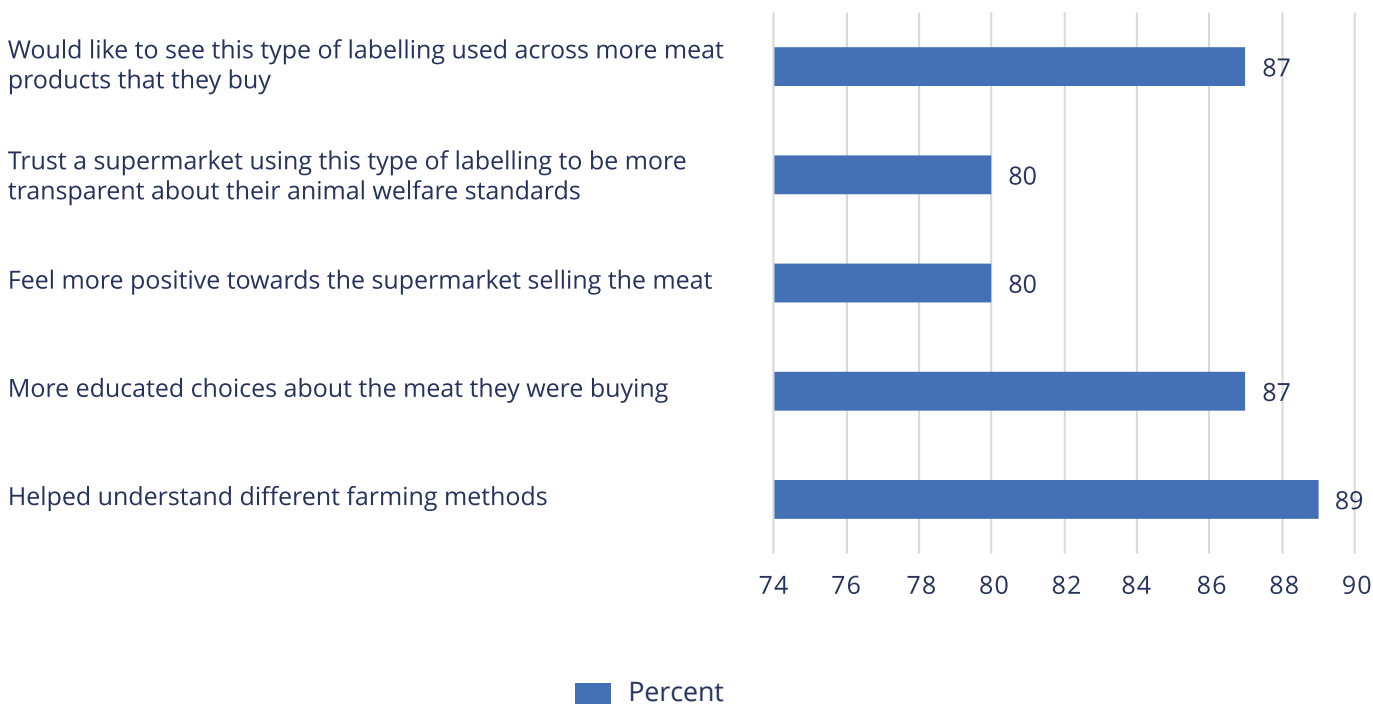


Figure 8: Lidl customers’ responses to research on Welfare Windows for chicken trial. Graph constructed based on data from Lidl (undated).<sup>227</sup>

<sup>224</sup> Lidl, “Chicken Production Methods”.

<sup>225</sup> Ibid.

<sup>226</sup> This finding resonates with the point that the RSPCA makes in its submission to the DEFRA 2021 Call for Evidence for mandatory method of production labelling to facilitate a wider debate about animal welfare standards amongst the British public. RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence”.

<sup>227</sup> Lidl, “Chicken Production Methods”.



## Lidl’s Chicken Welfare Windows and Method of Production Standards

Lidl sources all of its fresh chicken from British farms, which is grown to Red Tractor Standards.<sup>228</sup> The Chicken Welfare Windows labels are “Indoor”, “British indoor”, “British Indoor+”, “British Free Range”, and “British Organic”. The Lidl website states that the majority of chickens sold are from Red Tractor assured British indoor farming systems.



Figure 9: Lidl Welfare Windows method of production labels for chicken meat.<sup>229</sup>

Lidl publishes its criteria for the five Chicken Welfare Windows labels on its website.<sup>230</sup> The criteria to determine the method of production are space allowance, access to natural daylight and outdoors, animal welfare/enrichment, breed, and assurance partners. The specifications for the five chicken method of production labels are found in Table 9 below.

<sup>228</sup> Ibid.

<sup>229</sup> Ibid.

<sup>230</sup> Ibid.

Table 9: Lidl method of production standards for chicken meat. Table is screenshot from Lidl website.<sup>231</sup> (Arrow and “increasing welfare” label added by author.)

Method of Production	Indoor	British Indoor	British Indoor+	British Free Range	British Organic
<b>Space Allowance</b>	Maximum stocking density of 39kg/m <sup>2</sup> - 42 kg/m <sup>2</sup>	Maximum stocking density of 38 kg/m <sup>2</sup>	Maximum stocking density of 30 kg/m <sup>2</sup>	Maximum stocking density of 27.5 kg/m <sup>2</sup>	Maximum stocking density of 21 kg/m <sup>2</sup> in fixed housing Maximum stocking density of 30 kg/m <sup>2</sup> in mobile housing
<b>Access to natural daylight and outdoors</b>	Farmed in indoor farms with no requirement for access to natural daylight	Farmed in indoor barns with natural daylight	Farmed in in door barns with natural daylight at all times during natural daylight period	Access to outdoors is available up to 8 hours a day	Easy access to outdoors from an early area (weather conditions considered)
<b>Animal Welfare/ Enrichment</b>	It is recommended that producers explore different types of environmental enrichment, however nothing is required	One and a half perching bales as a minimum, one pecking object and two metres of perch space per 1,000 birds	One and a half standard sized long chopped straw bales, two metres of perch space and one pecking object per 1,000 birds	Indoors - At least one bale, two metres of perch space and one pecking object per 1,000 birds Outdoors - Natural shelter is encouraged, such as hedges and trees	Birds are given access to an outdoor range at an early as possible age. This can provide access to aerial perches, natural dusting areas and access to woodland When indoors there must be at least two enrichments per 500 birds
<b>Breed</b>	No requirement	No requirement	Slow growing breed	Slow growing breed	Slow growing breed
<b>Assurance Partners</b>	N/A	Red Tractor	RSPCA Assured Red Tractor	RSPCA Assured Red Tractor	Organic Farmers & Growers EU Organic Label RSPCA Assured Red Tractor

Increasing welfare

In the 2021 DEFRA Call for Evidence on labelling, some elements within the farm and food industry questioned the relation between method of production and animal welfare outcomes.<sup>232</sup> For this reason, one of the objectives of this report is to demonstrate that method of production is a key determinant of welfare, and that method of production should be used as a basis for any mandatory labelling scheme.

<sup>231</sup> Ibid.

<sup>232</sup> Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare,” 12.

Lidl's method of production-based labels and criteria clearly demonstrate that method of production is a key determinant of welfare, and that method of production-based labels are practical and commercially successful. Moving from left to right across the Lidl label method of production systems, there is:

1. Greater space allowance
2. Greater access to natural daylight and the outdoors
3. Greater animal welfare/environmental enrichment
4. Slower growing breeds are required
5. Zero animal welfare assurance certification partners to multiple (including RSPCA Assured and organic schemes).

The animal welfare inputs in points 1-4 above are associated with improved animal welfare in the scientific literature.<sup>233</sup> Membership of higher welfare assurance schemes, such as RSPCA Assured and organic labels, means the requirement for further animal welfare inputs, as well as assessment of animal welfare outcomes, for instance through annual on-farm audits. Hence, the information provided in the table demonstrates how method of production-based labelling correlates with welfare outcomes for farmed animals.

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<sup>233</sup> For reviews see [EFSA AHAW Panel et al.](#), "Welfare of Broilers on Farm," *EFSA Journal* 21, no. 2 (2023). [RSPCA](#), "Eat. Sit. Suffer. Repeat: The Life of a Typical Meat Chicken."



## Lidl's Pork Welfare Windows and Method of Production Standards for Pigs

Lidl sources all of its fresh pork and sausages from Red Tractor or RSPCA assurance schemes.<sup>234</sup> The Lidl website states that all pigs have access to enrichment (straw, toys, and wood), are not castrated, and are closely monitored for health and welfare. Lidl claims it is the first UK retailer to provide information directly on its pork products through its Welfare Windows initiative. The Lidl scheme methods of production for pork are “Indoor”, “British Indoor”, “British Outdoor Bred”, “British Outdoor Reared”, “British Free Range”, and “British Organic”.

This report has frequently used the example of pig farming as a case study to discuss animal welfare and method of production labelling. Figure 10 illustrates Lidl Welfare Windows method of production labels for pig meat. One of the sections within the DEFRA 2021 Call for Evidence related to whether images and/or words should be used for animal welfare labelling. Lidl's Welfare Windows labels provide an instructive example in this context.<sup>235</sup>



Figure 10: Lidl Welfare Windows method of production labels for pig meat. <sup>236</sup>

<sup>234</sup> Lidl, “Pork Production Methods”.

<sup>235</sup> Department for Environment Food and Rural Affairs, “Labelling for Animal Welfare: Call for Evidence.”

<sup>236</sup> Lidl, “Pork Production Methods”.



## Lidl Welfare Windows and Information Provision on Labels

The labels include three elements: first, the method of production label in capital letters, e.g., “Indoor”; secondly, text beneath this to explain to consumers what the method of production label means; and thirdly, an image to visually represent the method of production. The benefit of the text to explain the method of production to consumers should be clearly evident from this report. The terms “Outdoor bred” and “Outdoor reared” are widely used method of production terms in the labelling of pig meat.

Despite this, as this report has highlighted, the term “Outdoor Reared” is particularly confusing; it suggests that pigs are reared outdoors for the entirety of their lives, when they are kept outdoors only for 12 weeks of their six months or so existence. For this reason, the value of the text which accompanies the method of production label should be clear. In the case of Lidl’s Welfare Windows for Pork, the text reads “Pigs are born in fields, with shelters, after twelve weeks they move to comfortable straw barns with natural enrichment” (see Figure 10).

The benefit of additional text to accompany a method of production label is demonstrated here with a potentially confusing label. However, the principle for the benefit of additional information provision to consumers, through explanatory text on a label, is a general one. It is not obvious, for instance, that consumers would appreciate the difference between “Free range” and “Organic” pork, in part perhaps because pigs reared in organic conditions are also reared in free range conditions.

Note also the limits of such explanatory text. This can be illustrated with Lidl’s “Indoor” pork label. The explanatory text for the label states “Pigs are grown to the legal animal welfare standards of the country”. Whilst this might be true (assuming that the pigs were in fact reared in conditions that conformed to the law, which is not always the case), the explanatory text appears to understate the reality of the situation.

And that is that pork reared in the United States, for instance, would likely be produced from sows that spend the entirety of their adult breeding lives severely confined in sow stalls, not to mention other standards that are far lower than the UK legislative baseline. This is a more urgent and real issue in the case of pork imported from the EU, since the UK imports 65% of the pig meat it consumes from the EU.

Finally, it is useful to briefly consider the benefits of the image. The key point that the Lidl pork label images convey appears to be whether the pigs are reared indoors or outdoors, depending on whether they are represented as being within the barn housing or outside. The limits of using images can perhaps be seen from the distinctions between some of the labels (e.g., “British Free Range” and “British Organic”).

But the overall benefits of a visual representation, i.e., an image, on a label, appear to be threefold. First, the image conveys some information to the consumer rapidly, without the need to read accompanying text. This may help both when first purchasing a product, and also to speed up recognition of a desired product when purchasing on subsequent occasions (i.e., the consumer purchases the product based on recognition of the image on the label, and not the name of the label itself). Secondly, given the multicultural nature of British society, a significant proportion of consumers may not be able to read English. Hence, the image is a necessary requirement for recognition of labels for this constituency of consumers. And thirdly, the use of images may promote the wider debate about animal welfare standards in society (as will the accompanying text), which has been documented as a benefit of mandatory animal welfare labelling elsewhere in this report.

A final point relates to the overall visual nature of the Lidl label. The label is green and dark grey for all tiers. This contrasts with the multicoloured tiered A-E label scheme that DEFRA proposed in its March 2023 stakeholder presentation meeting.<sup>237</sup> Arguably, DEFRA's multicoloured A-E system (i.e., where each tier had a different colour) was clearer from a recognition point of view between different tiers (simply because the colours are starkly different).

Furthermore, it is noteworthy that the Lidl scheme does not use a letter or number to grade the tiers. At least part of the reason for this is that it may be the case that at least two tiers are not considered higher or lower than the other. To explain, it seems clear that "British Indoor" is higher welfare than "Indoor". But despite this, it may be the case that "Free Range" is not necessarily lower than "Organic" (though based on the table below, "Organic" pigs do in fact have higher space provision, so the standard is the superior one). For this reason, Lidl could consider adding numbers or letters to indicate that these welfare labels were in fact transitive, i.e., by moving from "Indoor" to "Organic" they denote increasingly higher welfare schemes.

Hence, Lidl's Welfare Windows method of production-based labels illustrate the benefits of both images and additional explanatory text. In short, arguably the more accurate information that can be practically included on a label the better. But perhaps the above point about Lidl's "Indoor" (non-UK) label illustrates the limits of information provision on the label itself. This points to the need for further explanatory information about the labels, which Lidl and other labelling schemes provide on their websites.

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<sup>237</sup> Department for Environment Food and Rural Affairs, "Animal Welfare Labelling: Presentation on Consultation Proposals, March 2023."





Lidl publishes its criteria for the six pork production method labels on its website. The criteria to determine the method of production are space allowance, animal welfare/enrichment, farrowing, and assurance partners. The specifications for the six pork method of production labels are found in the table below.

Table 10: Lidl method of production standards for pork. Table is screenshot from Lidl website.<sup>238</sup> (Arrow and “increasing welfare” label added by author.)

Method of Production	Indoor	British Indoor	British Outdoor Bred	British Outdoor Reared	British Free Range	British Organic
<b>Space Allowance</b>	Stocking density as per legal requirements	Indoor housing: 0.15-1.0 m <sup>2</sup> minimum per pig (depending on weight) 1.64-6m <sup>2</sup> minimum per adult pig (depending on group size and composition)	Indoor housing: 0.15-1.0 m <sup>2</sup> minimum per pig (depending on weight) RSPCA: 0.5-1.72 m <sup>2</sup> minimum per growing pig (bedding materials typically straw). 2.7-7.5 m <sup>2</sup> minimum per adult pig (depending on group size and composition)	Indoor housing: 0.15-1.0 m <sup>2</sup> minimum per pig (depending on weight) RSPCA: 0.5-1.72 m <sup>2</sup> minimum per pig (bedding materials typically straw). 2.7-7.5 m <sup>2</sup> minimum per adult pig (depending on group size and composition)	Shelters: 0.15-1.0 m <sup>2</sup> minimum per pig (depending on weight) Outdoor area: 12-40 m <sup>2</sup> minimum per pig (depending on management system). 2.7-7.5 m <sup>2</sup> minimum per adult pig (depending on group size and composition)	Shelters: 0.6-1.3 m <sup>2</sup> minimum per pig (depending on weight) Outdoor area: 0.4-0.8 m <sup>2</sup> minimum per pig (depending on weight)
<b>Animal Welfare/ Environmental Enrichment</b>	Access to environmental enrichment materials Castration is permitted Routine tail docking and teeth reduction not permitted* *unless justified by vet	Access to range of environmental enrichment materials such as straw, toys and wood to encourage pigs' inquisitive nature Castration, routine tail docking* and teeth reduction are not permitted *unless justified by vet	Access to environmental enrichment such as straw, hay and saw dust Castration and tail docking* are not permitted *unless justified by RSPCA and vet	Access to environmental enrichment such as straw, hay and saw dust Castration and tail docking* are not permitted *unless justified by RSPCA and vet	Access to environmental enrichment such as straw, hay and saw dust Additional objects such as footballs can be considered Castration and tail docking are not permitted Constant access to fields for duration of life span	Access to environmental enrichment such as straw, hay and soil Castration, teeth clipping, tail docking and nose ringing are prohibited* GM free diet *unless justified by vet
<b>Farrowing</b>	Farrowed indoors Confinement systems are allowed	Farrowed indoors Confinement systems are allowed	Free farrowing Zero confinement	Free farrowing Zero confinement	Free farrowing Zero confinement	Free farrowing Zero confinement
<b>Assurance Partners</b>	N/A	Red Tractor or Quality Meat Scotland	RSPCA Assured Red Tractor or Quality Meat Scotland	RSPCA Assured Red Tractor or Quality Meat Scotland	RSPCA Assured Red Tractor or Quality Meat Scotland	Organic Farmers & Growers EU Organic Label Red Tractor or Quality Meat Scotland

Increasing welfare

<sup>238</sup> Lidl, "Pork Production Methods".



Moving from left to right across the Lidl label method of production systems:

1. Greater space allowance
2. Greater animal welfare/environmental enrichment
3. Sow stalls and farrowing crates as close confinement systems causing severe restriction of movement permitted to prohibited.
4. Zero animal welfare assurance certification partners to multiple (including RSPCA Assured and Organic).

All of these are associated with increasing levels of animal welfare in the scientific literature, which is widely accepted.<sup>239</sup>

Similar to Lidl's method of production-based criteria for chicken, points 1-3 above are associated with higher welfare standards and outcomes. Note that "Organic" has higher space allowances compared to "Free Range", so is effectively a higher welfare label. Point 4 similarly leads to higher welfare through the membership of higher welfare assurance schemes, which incorporate further criteria related to welfare inputs as well as assessment of welfare outcomes, for instance through annual farm auditing.

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<sup>239</sup> For reviews, see [EFSA Panel on Animal Health Welfare et al.](#), "Welfare of Pigs on Farm," EFSA Journal 20, no. 8 (2022). [McCulloch](#), "Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs."



## Animal Welfare Labelling in the European Union

There are around twelve animal welfare labelling schemes in the EU. Eurogroup for Animals (2020) and Di Concetto (2021, 2023) provide useful summaries of the EU context.<sup>240</sup> This section draws from these sources and includes a summary of the EU schemes, categorised as animal welfare and method of production labels, in Tables 11 and 12 respectively. The DEFRA 2021 Call for Evidence also included a summary of the EU labelling schemes and consulted on opinions about the merits of the various labels.<sup>241</sup> Most of the labelling schemes are founded and run by animal protection organisations. The Danish Bedre Dyrevelfærd (Better Animal Welfare) scheme is run by the Danish Veterinary and Food Administration together with a coalition of retailers.<sup>242</sup>

Animal welfare food labels exist in Spain, Denmark (two), the Netherlands, Germany (four), Austria, Italy, and France.<sup>243</sup> Most of these are labels to certify certain levels of animal welfare, though three are based on method of production. The certification labels are either one level (similar to the RSPCA Assured label in the UK), or multiple levels/tiered, with between two and five tiers. Levels/tiers are represented by numbers, letters, or symbols including stars (gold, silver, and bronze) or hearts (indicating levels of animal welfare compassion).

More recent schemes tend to be based on method of production, rather than certifying animal welfare standards alone. Some, for instance, the French Étiquette Bien-Être Animal scheme, are method of production plus schemes, which are primarily based on method of production but also include animal welfare criteria.<sup>244</sup> The schemes have varying levels of coverage in terms of the production stage (on farm, transport, slaughter), and species/sector scope (broiler chickens, laying hens, pigs, dairy cows, etc).

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<sup>240</sup> Eurogroup for Animals, "Animal Welfare and Food Labeling: Initiating the Transition through High Quality Consumer Information." Di Concetto, "Food Labelling and Animal Welfare: Research Note #2." Di Concetto, "Farm Animal Welfare and Food Information for European Union Consumers: Harmonising the Regulatory Framework for More Policy Coherence."

<sup>241</sup> Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence.": Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare."

<sup>242</sup> Bedre Dyrevelfærd, "The Governmental Animal Welfare Label " <https://bedre-dyrevelfaerd.dk/servicemenu/english>.

<sup>243</sup> Di Concetto, "Food Labelling and Animal Welfare: Research Note #2."

<sup>244</sup> Étiquette Bien-Être Animal, "Homepage".



## Germany's BMEL Tierwohl Initiative

The German BMEL Tierwohl Initiative scheme, run by the German Federal Ministry of Agriculture, is the first national mandatory animal welfare label.<sup>245</sup> The BMEL Tierwohl Initiative is a method of production scheme with five categories: indoor housing, indoor plus space, indoor with fresh air, outdoor runs/pasture, and organic. The scheme will apply to fattening pigs as a first step, and the German Government intends to expand the scheme to other species and the wider food sector. The report recommends that the UK Government investigate the German scheme further to inform its own policy development. Di Concetto writes of the mandatory German labelling scheme:<sup>246</sup>

**“Additionally, in 2022, the German Federal Ministry of Food and Agriculture (Bundesministerium für Ernährung und Landwirtschaft) enacted a mandatory label of farming methods on all pork products, including those sold in retail, online and at farmers markets. The German label aims to inform consumers on whether the animals were raised indoors, indoors with more space than provided in the law, indoors with outdoor access or free-range or organic.”**

(Di Concetto, 2023)

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<sup>245</sup> Federal Ministry of Food and Agriculture, “Animal Husbandry Label and Amendments to Federal Building Code Adopted in Bundestag”.

<sup>246</sup> Di Concetto, “Farm Animal Welfare and Food Information for European Union Consumers: Harmonising the Regulatory Framework for More Policy Coherence,” 9.



## European Union Animal Welfare Labelling Policy

Eurogroup for Animals has advocated for a “method of production plus” label in the EU, for instance similar to the French Étiquette Bien-Être Animal scheme.<sup>247</sup> Eurogroup argue that mandatory labelling ensures all products are labelled, and not just ones that score highly on welfare; that consumers perceive regulation by the Government as more reliable compared to private certification; and that a mandatory multi-level label would be more effective at harmonizing practices across the EU and providing targets that are practical for producers to identify.

In the 2015 EU Animal Welfare Strategy the European Commission suggested the creation of a framework to increase the transparency of information to consumers on animal welfare at the point of purchase.<sup>248</sup> The EU 2015 Eurobarometer survey found that over half (52%) of EU citizens look for identifying labels when purchasing animal welfare friendly products.<sup>249</sup> In 2020 the European Commission announced the creation of a new standardised EU animal welfare label for food products.<sup>250</sup> Following this, a working group was established within the Directorate General for Health (GD SANTE) Platform on Animal Welfare, which recommended a voluntary label for animal welfare. Later in 2020, the Council of the EU adopted Conclusions for an EU-wide voluntary animal welfare label.<sup>251</sup>

As discussed earlier in this report, in a March 2023 stakeholder presentation DEFRA proposed that it would consult on a labelling scheme that was similar to the French Étiquette Bien-Être Animal. This scheme is covered in more detail in the following section.

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<sup>247</sup> Eurogroup for Animals, “Animal Welfare and Food Labeling: Initiating the Transition through High Quality Consumer Information.”

<sup>248</sup> Di Concetto, “Food Labelling and Animal Welfare: Research Note #2.”

<sup>249</sup> European Commission, “Attitudes of Europeans Towards Animal Welfare: Special Eurobarometer 442.”

<sup>250</sup> Di Concetto, “Farm Animal Welfare and Food Information for European Union Consumers: Harmonising the Regulatory Framework for More Policy Coherence,” 2.

<sup>251</sup> *Ibid.*, 3.



EU Welfare Labels: Animal Welfare Labels









Label	Name	Country	Year founded	Organisations	Certification type	Information type	Species / sectors <sup>252</sup>	Production stage
	ANDA Huevos	Spain	2013	Asociación Nacional para la Defensa de los Animales – ANDA (nonprofit organisation) and AVIALTER (inter-branch organization) (nonprofit - private)	Single level	Animal welfare	H, soon expanding to p.	On farm only
	Anbefalet af Dyrenes Beskyttelse	Denmark	1992	Dyrenes Beskyttelse (nonprofit organisation)	Single level	Animal welfare	P, t, bc, h, c, d, bu, s, d, ge, b. Soon to expand to f.	Breeding to slaughter
	Bedre Dyrevelfærd	Denmark	2017	The Danish Veterinary and Food Administration with a coalition of retailers (public-private)	Multi-level, three levels (hearts)	Animal welfare	P, bc, c, da.	Breeding to transport for slaughter
	Beter Leven	Netherlands	2007	Dierenbescherming (nonprofit)	Multi-level, three levels (stars)	Animal welfare	Bc, h, c, da, r, t.	Breeding to slaughter
	Bmel Tierwohl Initiative	Germany	Forthcoming	The Federal Ministry of Agriculture	Multi-level, three levels	Animal welfare	P, t, cb, da.	Farm to slaughter
	Für Mehr Tierschutz	Germany	2013	Deutsche Tierschutzbund (nonprofit)	Multi-level, two levels (stars)	Animal welfare	Bc, p, h, da.	Breeding to slaughter
	Initiative Tierwohl	Germany	2015	A coalition of producers, processors, and retailers (private)	Single level certification	Animal welfare	P, bc, t.	Farm to slaughter
	Tierschutz Kontrolliert	Austria	2012-2013	Four Paws (nonprofit)	Multi-level, two levels (gold and silver)	Animal welfare	P, da, c, h, du, sh, go, bc, t.	Breeding to slaughter

Table 11: EU animal welfare labelling schemes. Data taken with permission from Di Concetto (2021).<sup>253</sup>

<sup>252</sup> P = pigs, t = turkeys, bc = broiler chickens, h = egg laying hens, c = beef cattle/calves, bu = buffalo, sh = sheep/lamb, go = goats, du = ducks, ge = geese, b = bison, f = fish, r = rabbits, da = dairy cows.

<sup>253</sup> Di Concetto, "Food Labelling and Animal Welfare: Research Note #2."

### EU Welfare Labels: Method of Production Labels

Label	Name	Country	Year founded	Organisations	Certification type	Information type	Species / sectors <sup>254</sup>	Production stage
	Etichettatura Benessere Animale	Italy	2020	CIWF Italia and Legambiente (nonprofit)	Multi-level, from 0-4 (pigs) 0-5 (dairy cows)	Method of production (housing system)	P, da.	On farm
	Étiquette Bien-Être Animal	France	2018	CIWF France, La Fondation Droit Animal, Ethique et Sciences (LFDA), Oeuvre d'Assistance aux Bêtes d'abattoirs (OABA), and Casino (nonprofit-private sector)	Multi-level, from A to E	Method of production (housing system, transport duration, and slaughter method) and animal welfare level	Bc, soon to expand to p.	Breeding to slaughter
	Haltungsform	Germany	2019	Coalition of retailers (private sector)	Umbrella label, multi-level from 1 to 4. <sup>255</sup>	Method of production (housing system)	Bc, p, t, c, da, du, r.	On farm

Table 12: EU method of production-based labelling schemes. Data taken with permission from Di Concetto (2021).<sup>256</sup>

<sup>254</sup> P = pigs, t = turkeys, bc = broiler chickens, h = egg laying hens, c = beef cattle/calves, bu = buffalo, sh = sheep/lamb, go = goats, du = ducks, ge = geese, b = bison, f = fish, r = rabbits, da = dairy cows.

<sup>255</sup> Di Concetto (2021) describes an umbrella label as one which categorizes various labels into different segments and levels in order to rationalize proliferating labels. Di Concetto, "Food Labelling and Animal Welfare: Research Note #2."

<sup>256</sup> Ibid.

## EU Method of Production Plus Case Study: Étiquette Bien-Être Animal

Étiquette Bien-Être is a French animal welfare assurance scheme launched in June 2017.<sup>257</sup> The scheme was founded by animal protection organisations CIWF France, Œuvre d'assistance aux, La bêtes d'abattoirs (OABA), Fondation droit animal, éthique et sciences (LFDA) and retailer Groupe Casino. It is managed by the NGO Association Étiquette Bien-Être Animal, which sets welfare standards and auditing procedures. The scheme currently includes four animal protection NGOs, seven retailers and food service stakeholders, and 10 producers and agrifood processor organisations.

“The Étiquette Bien-Être Animal label provides consumers with clear, reliable and robust information on the methods under which the animals involved in the making of a food product were farmed, from birth to slaughter, including rearing and transport.”

(Étiquette Bien-Être Animal, undated)<sup>258</sup>

The Étiquette Bien-Être Animal label provides both a tiered A-E score, as well as the method of production. The scheme covers the animal’s whole lifespan, from rearing to transport and slaughter. It currently covers chickens reared for meat and is soon to be rolled out to pigs. The grade provided for chickens is based on 230 criteria related to animal welfare, and is based on annual audits conducted by an independent inspector. Products are currently sold in Carrefour, Groupe Casino, franprix, Intermarché, Lidl, Monoprix, and Les nouveaux commerçants.

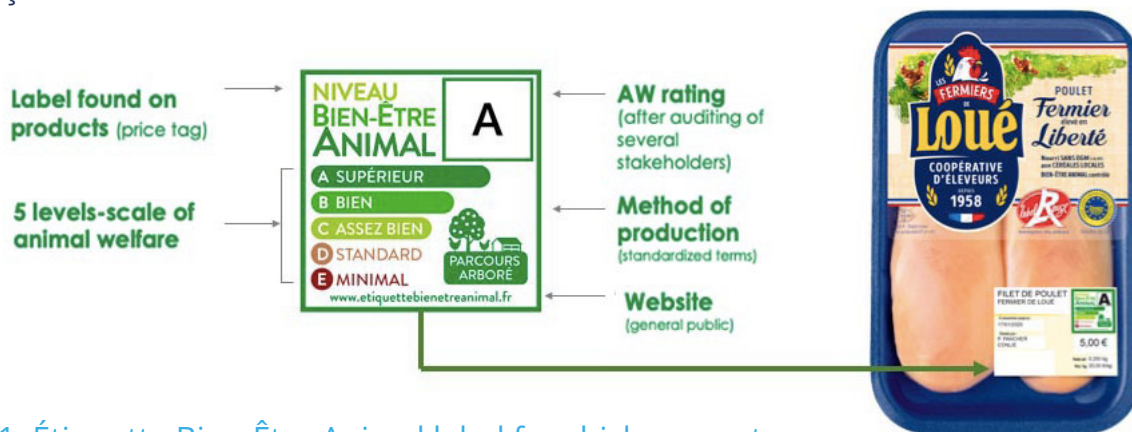


Figure 11: Étiquette Bien-Être Animal label for chicken meat. Image taken from Étiquette Bien-Être Animal (undated).<sup>259</sup>

<sup>257</sup> Information for this section is taken from the Étiquette Bien-Être Animal website. See Étiquette Bien-Être Animal, “Homepage”.

<sup>258</sup> Ibid.

<sup>259</sup> Étiquette Bien-Être Animal, “Pioneering Label,” <https://www.etiquettebienetreanimal.fr/en/un-etiquetage-pionnier/>.





Table 13 lists the Étiquette Bien-Être Animal methods of production grades for chicken.

Table 13: Étiquette Bien-Être Animal grades and methods of production.

Welfare grade	Method of production (French)	Method of production (English)
<b>A</b>	Parcours arboré	Free range
<b>B</b>	Accès à l'extérieur	Outdoor access
<b>C</b>	Bâtiment amélioré	Improved indoors
<b>D</b>	Bâtiment en progrès	Transitioning to improved indoors
<b>E</b>	En bâtiment	Indoors

The table in Figure 12 illustrates the welfare criteria included for Étiquette Bien-Être Animal tiers A-E. The text is in French and included for illustrative purposes. Similar to the criteria for the UK supermarket Lidl case study in a preceding section of this report, it is clear that higher tiers are based on higher standards for welfare inputs. For instance, from the table it can be seen from the fourth row that tiers D (+10%), C (+40%), B (+53%), and A (+68%) require chickens reared for meat to have increasing space allowances. Greater space allowance and lower stocking densities are associated with better welfare outcomes for chickens reared for meat. For instance, a requirement of the Better Chicken Commitment is space allowances of 20kg/m<sup>2</sup>, compared to the legislative standards in the UK of 30kg/m<sup>2</sup>, and the Red Tractor certified industry standard of 29kg/m<sup>2</sup>.<sup>260</sup>

<sup>260</sup> Better Chicken Commitment, "The Better Chicken Commitment".

**Extrait des 230 critères évaluant le niveau de Bien-Être Animal des poulets :**

	NIVEAU A	NIVEAU B	NIVEAU C	NIVEAU D	NIVEAU E
Accès à l'extérieur	✓	✓			
Lumière naturelle en bâtiment d'élevage	✓	✓	✓ d'ici fin 2022	✓ d'ici fin 2024	
Mise en place de dispositifs permettant aux poulets d'exprimer leurs comportements naturels	Perchoirs et objets à piquer	Perchoirs ou objets à piquer	Perchoirs et objets à piquer	Perchoirs et objets à piquer d'ici mi-2021	
Espace supplémentaire en bâtiment par rapport au minimum réglementaire	+68%	+53%	+40%	+10%	*
Durée de vie minimale des poulets	81 jours	56 jours			
Rythme de croissance des poulets	Lent	Intermédiaire ou lent	Intermédiaire		
Durée maximale de transport des poulets	4 heures	6 heures	8 heures		
Document engageant le transporteur sur le respect de la protection animale	✓	✓	✓	✓	
Obligation d'insensibilisation (étourdissement) préalable à la saignée	✓	✓	✓	✓	
Vidéo de contrôle sur certaines zones dans les abattoirs où les animaux vivants sont manipulés	✓	✓			

\*Exigence réglementaire dans l'Union Européenne :  $\geq 238\text{cm}^2/\text{kg}$  de poulet

Figure 12: Étiquette Bien-Être Animal criteria for chicken meat.<sup>261</sup>

<sup>261</sup> Étiquette Bien-Être Animal, "Homepage".

## Mandatory Animal Welfare Labelling: Need and Benefits

The status quo of labelling related to animal welfare in the UK arguably lacks transparency and can create confusion for consumers at the point of purchase. The DEFRA 2021 Call for Evidence found that this view was common amongst members of the public, civil society organisations, and academic organisations.<sup>262</sup> This transparency problem is particularly an issue for products that are imported, processed, or sold in the food service sector and online. But as this report has documented, the problem of potentially confusing labelling applies to leading certification schemes and fresh unprocessed meat. Citizens and consumers who prefer to purchase higher welfare food will in many cases be purchasing products which were not produced in accordance with their values about animal welfare. A government-regulated mandatory labelling scheme is the only way to ensure transparency and trust in order to resolve this problem.

Consumer confusion is compounded by the plethora of welfare assurance schemes operating in the UK, which are discussed in preceding sections of this report.<sup>263</sup> For instance, RSPCA Assured and Soil Association Organic standards have far higher welfare requirements compared to the Red Tractor scheme, which is generally at or barely above the UK legislative baseline. The problem is worsened by often misleading branding and imagery. As Shann (2020) has reported, the Advertising Standards Agency (ASA) is a watchdog to prevent such a practice, but misleading labels are nonetheless “rife” in UK supermarkets and other stores.<sup>264</sup>

In its submission to the DEFRA 2021 Call for Evidence, the RSPCA state how mandatory labelling prevented confusing and misleading labelling of egg cartons and drove improvements in animal welfare:<sup>265</sup>

**“When mandatory labelling was introduced for eggs in 2004, confusing/misleading labeling [sic] ceased, as all cartons had to show one of four methods of production: caged, barn, free range, organic. This resulted in a long term shift away from eggs from caged hens to eggs from free range systems.”**

(RSPCA, 2021)

Following the policy objectives within the DEFRA 2021 Call for Evidence, the needs and benefits of mandatory labelling are for British consumers, farm animal welfare, and UK farmers. The following sections covers these in more detail.

<sup>262</sup> Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare,” 9-10.

<sup>263</sup> Ibid.

<sup>264</sup> Shann, “Mandatory Labelling,” 6.

<sup>265</sup> RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence” 14.



## Benefits for British Consumers: Accurate and Trusted Labels to Make an Informed Choice

The Government has outlined three policy objectives for animal welfare labelling as supporting farmers that meet or exceed UK welfare regulations; improving animal welfare by unlocking market demand for higher welfare; and ensuring UK baseline and higher welfare products are accessible, available, and affordable for consumers so they can choose products which align with their values.<sup>266</sup>

In her Foreword to DEFRA's Call for Evidence on welfare labelling, then-Minister of State Victoria Prentis MP announced the Government's awareness of public support for labelling.<sup>267</sup>

**"We know that the public is largely in favour of the Government setting further standards to ensure greater consistency and understanding of welfare information at the point of purchase."**

(Prentis, 2021)

This section summarises British public support for high animal welfare and mandatory animal welfare labelling.

## British Public Support for High Animal Welfare Standards

An earlier Conservative Animal Welfare Foundation report "Farm Animal Welfare in the UK: What Does the British Public Want?" explores public opinion in depth.<sup>268</sup> That report summarises British public opinion on farmed animal welfare, based on a large number of independent and demographically representative polls, conducted between 2015 and 2023. In summary, the report finds that there is a major welfare gap between what the British public, as citizens and consumers, want for animal welfare, and the reality of most farming in the UK. The British public consistently call for high standards, with farmed animals reared in more natural, extensive, and often outdoor conditions. A 2015 Eurobarometer survey (n=1,321), for instance, found that 98% of UK respondents believed it to be important to protect farmed animal welfare (very important, 78%; somewhat important, 20%).<sup>269</sup>

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<sup>266</sup> Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence," 4.

<sup>267</sup> Ibid.

<sup>268</sup> McCulloch, "Farm Animal Welfare in the UK: What Does the British Public Want?."

<sup>269</sup> European Commission, "Attitudes of Europeans Towards Animal Welfare: Special Eurobarometer 442."



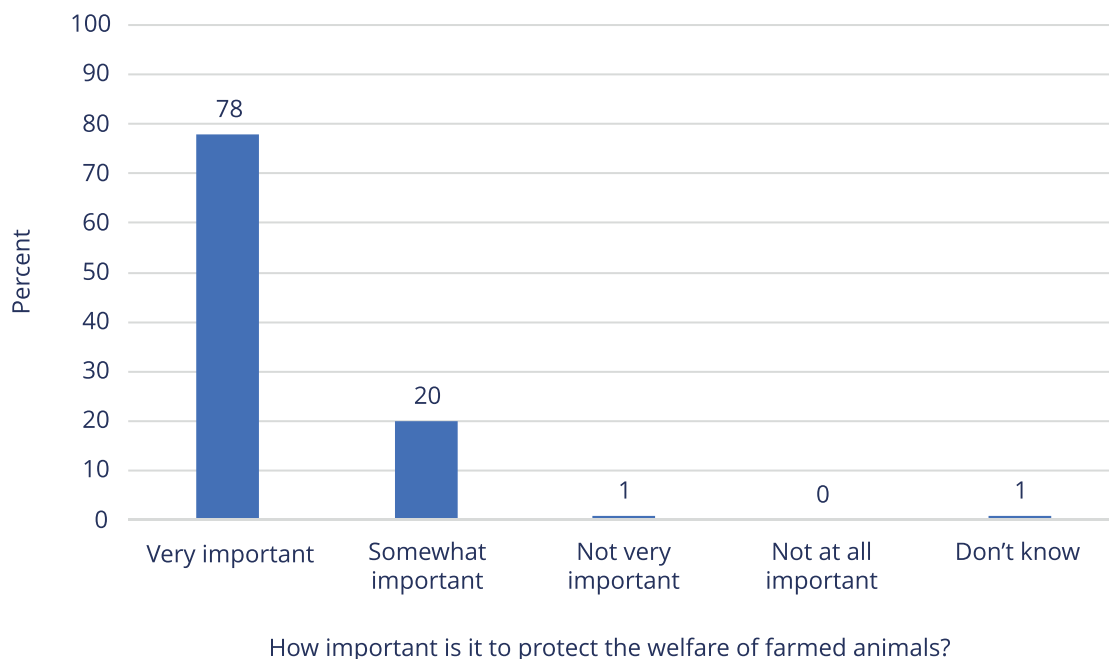


Figure 13: How important is it to protect the welfare of farmed animals for UK citizens?<sup>270</sup>

However, 70-80% of farmed animals in the UK are raised indoors within intensive conditions.<sup>271</sup> Figure 2 of this report provides a breakdown for major farmed species and sectors for the proportion of intensively and non-intensively farmed animals. McCulloch (2023) argues that the British public is right to believe that more natural, extensive, and often outdoor environments are better suited to meet the welfare needs of farmed animals.<sup>272</sup> This is because more extensive conditions provide a complex of welfare opportunities for farmed animals, such as more space and a more complex environment to live in. Such environments permit farmed animals to perform highly motivated natural and normal behaviours, which are necessary to meet their welfare needs.

<sup>270</sup> Ibid.

<sup>271</sup> Compassion in World Farming, "UK Factory Farming Map".

<sup>272</sup> McCulloch, "Farm Animal Welfare in the UK: What Does the British Public Want?."

## Public Support for Animal Welfare Labelling

Key polls demonstrating public support for labelling are summarised in DEFRA’s summary of responses to the Call for Evidence.<sup>273</sup> In a 2021 CIWF-commissioned Opinium poll (n=1990), 68% of respondents agreed that animal products should be labelled to show the conditions that animals have been reared in, similar to the way shell eggs are labelled. The poll found large majorities across the main political parties, with Conservative (66%), Labour (80%) and Liberal Democrat (71%) voters all demonstrating substantial support for method of production labelling.

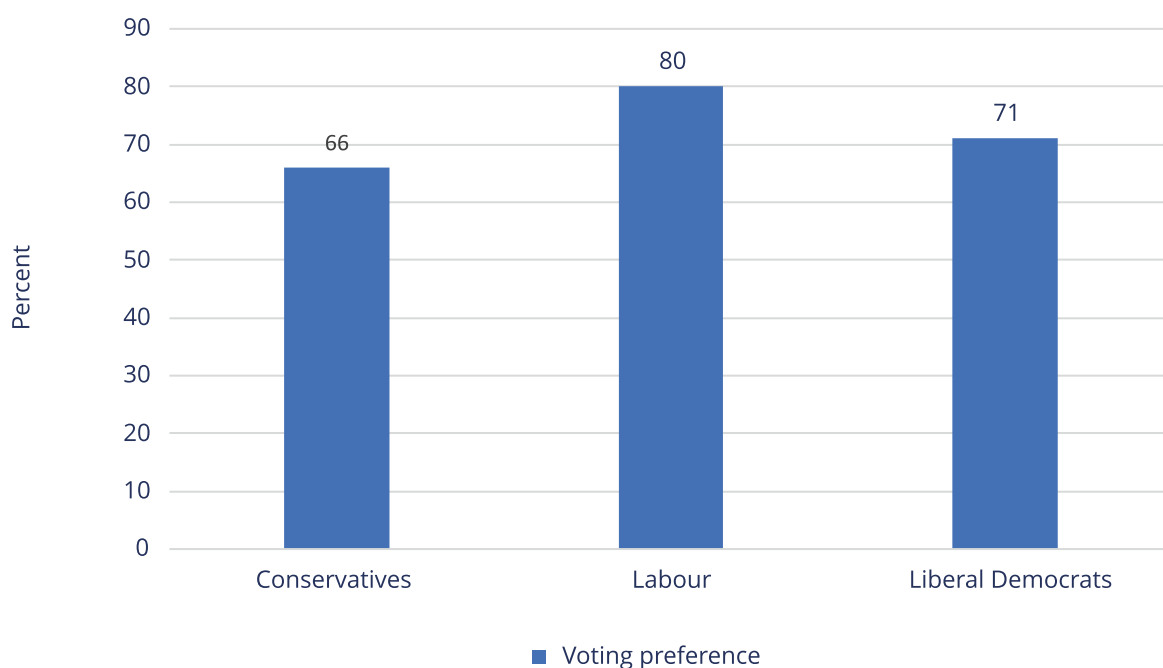


Figure 14: Do you think that meat and dairy products should or should not be labelled to show the conditions that animals have been reared in, similar to the way shell eggs are currently labelled?<sup>274</sup>

<sup>273</sup> Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare.”

<sup>274</sup> Compassion in World Farming, “Overwhelming Majority of British People Want Clear Labelling Showing How Their Meat and Dairy Was Produced, New Poll Finds”.

In a YouGov poll (n=1652) 55% of UK adults polled would support labels on meat products indicating how the animal was raised and slaughtered.<sup>275</sup> And in 2013, a Qa Research poll (n=1001) found that 83% of respondents believed that method of production labelling should be extended to all animal products.<sup>276</sup> In the 2018 Health and Harmony consultation, 72% of respondents supported government setting further standards to ensure greater consistency and understanding of animal welfare at the point of purchase.<sup>277</sup>

A poll reported by Mintel in 2019 found that animal welfare, at 45%, was the number one reason for buying food or drink with ethical certification. The same poll found that 60% of UK adults find it difficult to know the difference between various sustainability or ethical schemes.<sup>278</sup> In a 2021 RSPCA-commissioned poll (n=1,000), 42% of respondents preferred a grading system label, such as gold, silver, and bronze, whereas 31% preferred written information on labels.<sup>279 280</sup>

## Public Willingness to Pay for Higher Animal Welfare

In a 2015 Eurobarometer survey (n=1,321), 72% of UK citizens were willing to pay (WTP) more for products sourced from animal welfare-friendly production systems. Nearly half (47%) were WTP up to 5% more, 16% were WTP 6-10% more, 6% were WTP 11-20% more, and 3% were WTP over 20% more. Only 23% of citizens were not WTP more for more animal welfare-friendly products, and 4% responded that it depends on the price of the product.

<sup>275</sup> Cited in Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare," 9.

<sup>276</sup> Cited in Shann (2020) and DEFRA (2022): Shann, "Mandatory Labelling." Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare."

<sup>277</sup> Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence," 5. Department for Environment Food and Rural Affairs, "Health and Harmony: The Future for Food, Farming and the Environment in a Green Brexit," (London, UK: HMSO, 2018).

<sup>278</sup> Mintel, "Eating with a Conscience: Ethical Food and Drink Sales Hit £8.2 Billion in 2018," <https://www.mintel.com/press-centre/eating-with-a-conscience-ethical-food-and-drink-sales-hit-8-2-billion-in-2018/>.

<sup>279</sup> RSPCA, "RSPCA Submission to Defra Labelling Call for Evidence " 16.

<sup>280</sup> Grading systems also include, for example, a lettered A-E system, such as the scheme DEFRA proposed in its March 2023 stakeholder presentation.





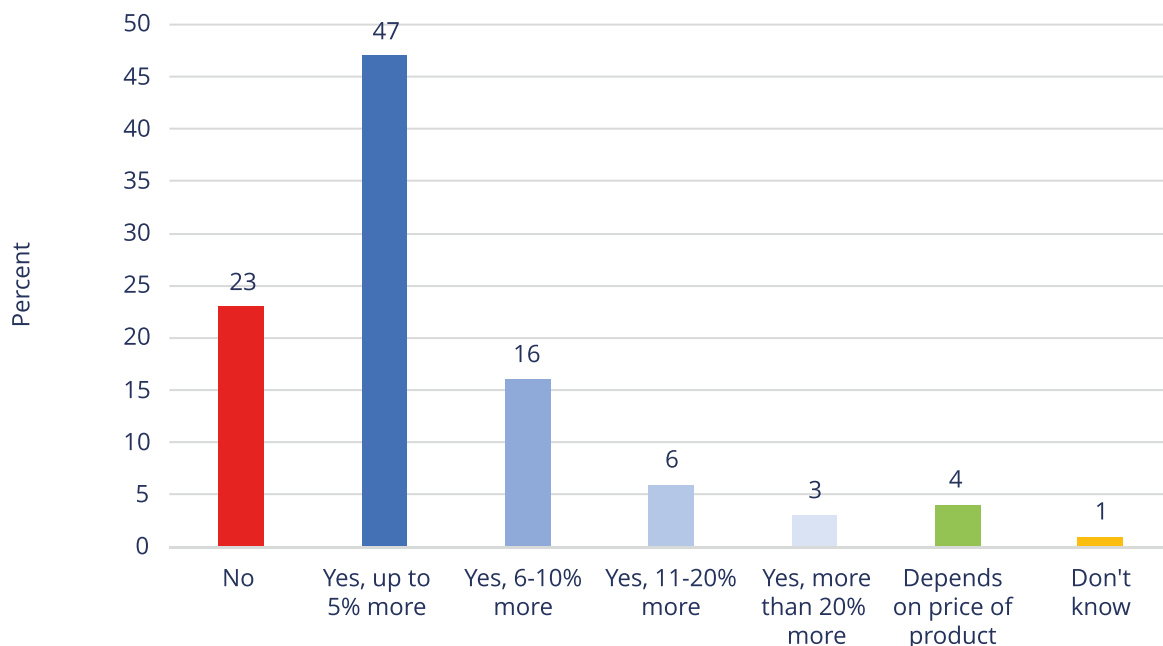


Figure 15: Would you be willing to pay more for products sourced from animal welfare-friendly production systems?<sup>281</sup>

In its submission to the DEFRA 2021 Call for Evidence, the RSPCA highlight how mandatory labelling is key to inform the broader societal debate about animal welfare and sustainability:<sup>282</sup>

**“Beyond supporting both consumers’ ability to make a more informed choice about which production systems they wish to support and their willingness to pay for better welfare, improved information can help better equip consumers to engage in a fundamental and vital societal debate about sustainability, including animal welfare. We propose the Government mandates and effectively implements a clear, transparent, and meaningful MoPL [method of production labelling] system whereby all relevant food products are labelled with an agreed MoPL term.”**

(RSPCA, 2021)

<sup>281</sup> European Commission, “Attitudes of Europeans Towards Animal Welfare: Special Eurobarometer 442.”

<sup>282</sup> RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence “ 5.

## Animal Welfare Benefits: Living a Better Life

In 2009 the Farm Animal Welfare Council (FAWC) proposed that government act as “guardian” for animal welfare.<sup>283</sup> The moral basis of the recommendation is that farmed animals such as chickens, fish, pigs, cows, sheep and goats are sentient beings. For this reason, the treatment of sentient animals should not be left to the vagaries of the market. This report has shown how voluntary industry-based schemes are often not transparent and potentially confusing for British consumers.

This reality, the status quo, is not a criticism of the British farming industry. Rather, it follows from economic self-interest theory that any scheme designed and overseen by any industry will ultimately prioritise its own economic interests. It is for this reason that the Government’s role of guardianship must extend to regulate animal welfare labelling, and in particular reform current policy by introducing mandatory labelling for as wide a scope as is practically possible.

## What Is Animal Welfare and How Does it Relate to Labelling Policy?

Animal welfare refers to the physical and mental wellbeing of an animal. Broom (1991) has defined animal welfare as an animal’s “state as regards its attempts to cope with its environment”.<sup>284</sup> The World Organization for Animal Health (WOAH) define animal welfare as the “physical and mental state of an animal in relation to the conditions in which it lives and dies.”.<sup>285</sup> McCulloch (2015, 2023) has defined animal welfare as follows:<sup>286</sup>

**“Animal welfare describes a state of complete physical health and mental wellbeing, where the nature of the sentient animal is in harmony with its living and non-living environment and its bodily integrity is respected.”**

These conceptions of animal welfare are useful when formulating labelling policy on animal welfare. Broom’s focus on welfare as being about coping with its *environment* suggests the system or housing which animals are kept in are of critical importance. The WOAH reference to the conditions in which an animal lives and dies suggest the need to consider labelling at all stages of an animal’s life, including rearing and slaughter.

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<sup>283</sup> Farm Animal Welfare Council, “Farm Animal Welfare in Great Britain: Past, Present and Future.”

<sup>284</sup> Broom, “Animal Welfare: Concepts and Measurement.”

<sup>285</sup> World Organisation for Animal Health, “Terrestrial Code: Introduction to the Recommendations for Animal Welfare,” [https://www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrial-code-online-access/?id=169&L=1&htmlfile=chapitre\\_aw\\_introduction.htm](https://www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrial-code-online-access/?id=169&L=1&htmlfile=chapitre_aw_introduction.htm).

<sup>286</sup> S. P. McCulloch, “The British Animal Health and Welfare Policy Process: Accounting for the Interests of Sentient Species” (University of London, 2015).

McCulloch, “Farm Animal Welfare in the UK: What Does the British Public Want?”



McCulloch's conception stresses the relation between the nature of animals, including their genetic make-up, and the environment. These definitions all refer to the environments that animals are kept in. This leads on to the discussion about methods of production in the following sections.

## Labelling as a Mechanism to Drive Higher Animal Welfare Standards

Labelling is critical for animal welfare because it provides consumers with the information they need to make informed decisions at the point of purchase. As discussed in the previous section, British consumers consistently demonstrate that they value the welfare of farmed animals very highly.<sup>287</sup>

Alice Di Concetto, founder of the European Institute for Animal Law and Policy, writes how food labelling has the power to translate consumer values into higher welfare for farmed animals:<sup>288</sup>

**“Beyond consumer empowerment, disclosing information on farming methods can lead to the improvement of the treatment of animals through market pressure by allowing virtuous producers to signal their products and pressuring others to upgrade their production methods to remain attractive.”**

(Di Concetto, 2023)

The following section provides a case study on how this process has proven successful in the case of mandatory method of production labelling for shell eggs.

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<sup>287</sup> McCulloch, “Farm Animal Welfare in the UK: What Does the British Public Want?.”

<sup>288</sup> Di Concetto, “Farm Animal Welfare and Food Information for European Union Consumers: Harmonising the Regulatory Framework for More Policy Coherence,” 2.



## Case Study: Mandatory EU Method of Production for Shell Eggs Has Improved the Lives of Billions of European Hens

Labelling for shell eggs provides an excellent case study for the power of mandatory method of production labelling to drive major improvements in the welfare of farmed animals. The EU introduced mandatory labelling for shell eggs and their cartons in 2003. Under law, all EU eggs were to be labelled according to their method of production (0 = “organic”, 1 = “free range”, 2 = “barn”, and 3 = “caged”), or as non-EU (i.e., imported) eggs.<sup>289</sup>

After the EU law was passed, the consumption of non-caged eggs increased substantially in all member states, including the UK. The graph in Figure 16 demonstrates these changes. In 2003, prior to the implementation of the EU law, 31.6% of shell eggs in the UK were produced in cage-free systems. Ten years later, in 2013, the proportion of shell eggs produced in cage-free systems had nearly doubled to 55.7%.<sup>290</sup>

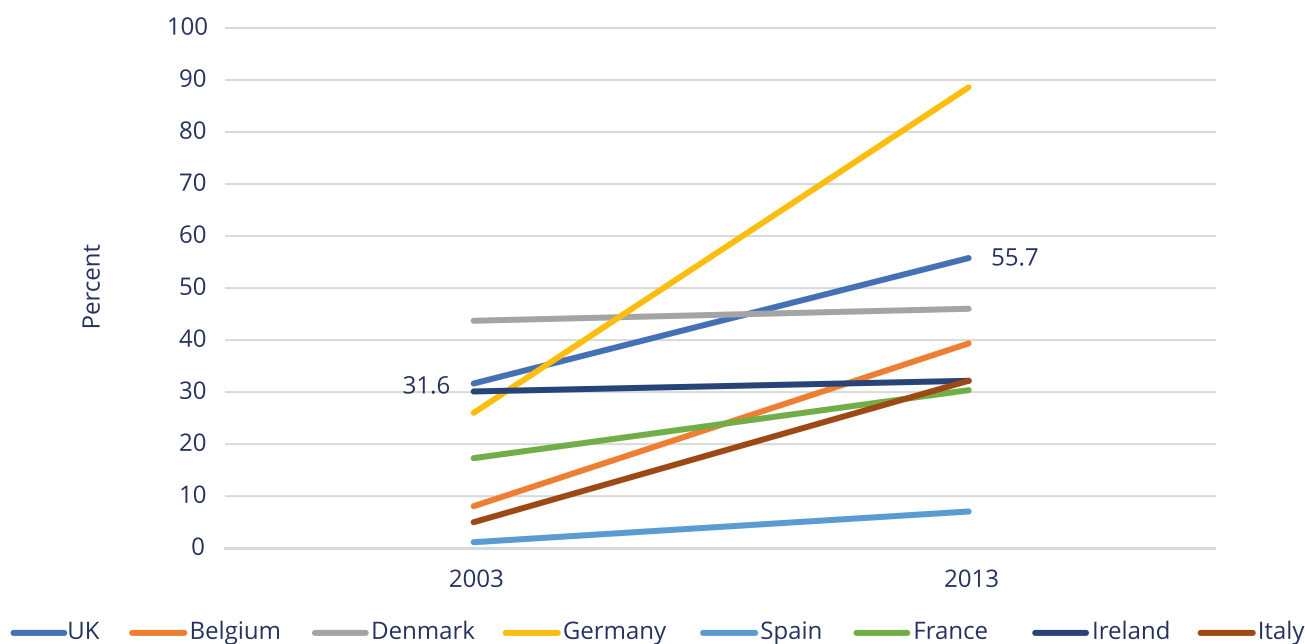


Figure 16: Trend in cage-free/alternative shell egg production in the UK and selected EU member states prior to compulsory labelling in 2003 to 2013. Percent figures included for UK trend line.<sup>291</sup>

<sup>289</sup> European Commission, “Food Safety: Laying Hens”.

<sup>290</sup> Figures from EU CIRCAC data included in the CIWF submission to the DEFRA 2021 Call for Evidence. Compassion in World Farming, “CIWF Submission to Defra Labelling Call for Evidence” 19.

<sup>291</sup> Graph constructed from EU CIRCAC data included in the CIWF submission to the DEFRA 2021 Call for Evidence. Ibid.

The huge increases in the production of eggs from cage-free systems were not restricted to the UK, and other EU nations experienced even greater changes as a result of mandatory labelling. Belgium saw an increase from 8.1% in 2003, to 39.4% in 2013, a nearly five-fold increase. Germany's cage-free production tripled from 26.0% in 2003 to 88.7% in 2013.<sup>292</sup>

Scientific research demonstrates that the welfare of laying hens is better in non-caged compared to cages systems. Hens in cage-free systems have more space and a more enriched environment that are necessary to perform highly motivated natural and normal behaviours. These include pecking and scratching at the earth, wing flapping, dust bathing, and nesting.<sup>293</sup>

The RSPCA wrote the following in relation to this in its submission to the DEFRA 2021 Call for Evidence on labelling:<sup>294</sup>

**“The lesson from eggs is that only a Government led mandatory labelling scheme covering all major production methods (baseline as well as higher welfare) can help ensure the consumer has access to sufficient, meaningful information on a label to facilitate the bridging of the value-action gap.”**

(RSPCA, 2021)

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<sup>292</sup> Figures from EU CIRCAC data included in the CIWF submission to the DEFRA 2021 Call for Evidence. Ibid.

<sup>293</sup> For a review, see [EFSA AHAW Panel et al.](#), “Welfare of Laying Hens on Farm.”

<sup>294</sup> RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence “ 5.



## Method of Production Labelling and Animal Welfare

### What Is Method of Production?

“Method of production” is a term used to describe the environment that a farmed animal is kept in. For instance, laying hens can be kept in organic, free range, barn, or cage systems. In the case of eggs, these terms are regulated in the EU and the UK continues to use the terms under retained EU law.<sup>295</sup> The RSPCA describes the meaning of method of production as follows:<sup>296</sup>

**“Method of production labelling identifies and describes the primary farming system used to rear the animal - for example, free range - and helps consumers make an informed choice about which production methods to support through their purchases.”**

(Bowles et al., 2021)

Similarly, there are regulated terms in the EU and UK for higher welfare fresh poultry.<sup>297</sup> The British pig industry has agreed upon the method of production terms “free range”, “outdoor bred”, and “outdoor reared”.<sup>298</sup> The RSPCA uses these terms, and has added the terms “standard indoor”, and “higher welfare indoor” for its RSPCA Assured scheme.<sup>299 300</sup> Again, the retailer Lidl has constructed the terms “Indoor”, “British Indoor”, “British Indoor+”, British Free Range”, and “British Organic” for its Welfare Windows chicken meat scheme.<sup>301</sup> Lidl has similar method of production-based labels for laying hens, pigs, turkeys, and ducks.<sup>302</sup>

As McCulloch (2023) has discussed, animal welfare is related to how well a farmed animal is adapted to the environment it is kept in.<sup>303</sup> Animal welfare is fundamentally determined by the nature of the animal (i.e., what the animal is, including its genetics related to natural and artificial selection), and its living and non-living environment (including housing, provisions of resources such as food and water, and stockmanship).

<sup>295</sup> Gov.UK, “Egg Marketing Standards”.

<sup>296</sup> Bowles et al., “Food Labelling and Animal Welfare: Ensuring Animals Have a Good Life by Advocating on Their Behalf.”

<sup>297</sup> Gov.UK, “Poultry Meat Marketing Standards”.

<sup>298</sup> Agriculture and Horticulture Development Board, “Pork Provenance: The Code of Practice for the Labelling of Pork and Pork Products,” <https://www.porkprovenance.co.uk/>.

<sup>299</sup> RSPCA Assured, “Pig Rearing Systems and Pork Labels”.

<sup>300</sup> Though note that RSPCA Assured is an animal welfare certification scheme that does not use method of production terms on its labels.

<sup>301</sup> Lidl, “Chicken Production Methods”.

<sup>302</sup> Lidl, “Method of Production Labelling”.

<sup>303</sup> McCulloch, “Farm Animal Welfare in the UK: What Does the British Public Want?.”



## Method of Production, Stockmanship, and Other Inputs to Animal Welfare

The measurement of animal welfare standards can be considered as related to “inputs” and “outcomes”. Inputs include the method of production and stockmanship. Outcomes include measures such as disease prevalence, certain specified behaviours, feather coverage in hens, intact tails in pigs, mortality, and so on.<sup>304</sup> Method of production includes both the nature of the farmed animal (especially genotype) and the environment it lives in. The method of production is a fundamental determinant of animal welfare, considered as the physical and mental state of the animal. The relationship between welfare inputs, animal welfare, and measurable welfare outcomes, is illustrated in Figure 17.

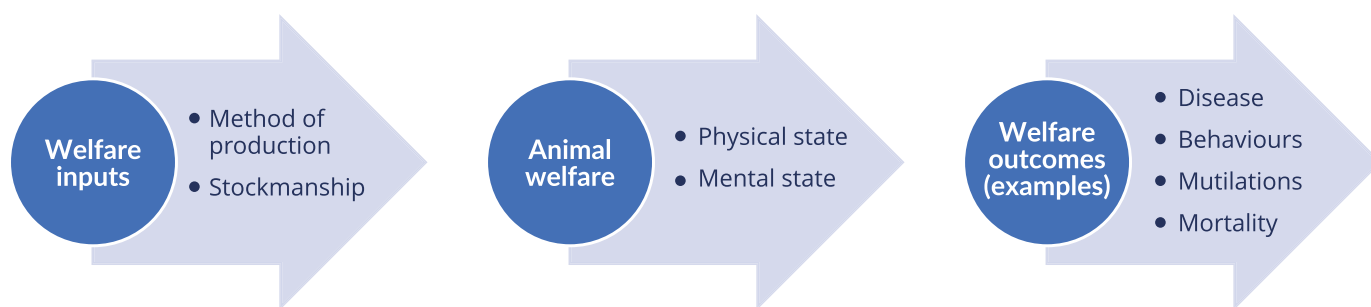


Figure 17: Animal welfare considered in relation to “inputs” and examples of “outcomes”.

<sup>304</sup> British Veterinary Association, “BVA, AGV, BVPA SVS Response to Defra Call for Evidence on Labelling for Animal Welfare,” (BVA, 2021).



## Method of Production Is the Fundamental Determinant of Animal Welfare

A claim sometimes made by elements within the farming industry is that method of production is not a good indicator of welfare.<sup>305</sup> If this were true, it would be a powerful argument against method of production labelling, since it would sever the causal link between method of production and animal welfare. Those who propose that method of production has little causal impact on animal welfare often at the same time argue that it is stockmanship, and not the system or method of production, which determines or strongly influences animal welfare. There are a number of problems with this argument. Given the importance of this point in relation to labelling schemes, the following is provided as a rebuttal to that argument:

1. The long-standing nature and widespread prevalence of many of the most important farm animal welfare problems in the UK strongly suggest they are systemic, i.e., related to the system (method of production), rather than stockmanship. For example, 25% lameness in broiler chickens and around 20% lameness in dairy cattle.<sup>306 307</sup>
2. There are some systems or methods of production which are simply not able to meet the welfare needs of animals, no matter what the level of stockmanship. A good example is the farrowing crate, which causes a degree of confinement which is not compatible with positive welfare, i.e., a life worth living.<sup>308</sup> In effect, some housing systems provide environments that are incompatible with providing for the welfare needs of animals.
3. Methods of production also include the breeding and genetics of animals. Fast growing chickens reared for meat effectively have a 25% risk of developing lameness due to their genetic nature.<sup>309</sup> Again, the stockman is very limited in this context. Similarly, the FAWC pointed out some years ago that the high prevalence of lameness in the UK dairy herd was a consistent feature and in part related to genetics.<sup>310</sup>
4. There is a wealth of scientific evidence which supports the above positions. And there is a broad consensus about the importance of methods of production, including the breeding/genetics of farmed animals (influencing the nature of the animal), and how housing and other aspects of the environment have a major influence on the welfare or quality of life of farmed animals.<sup>311</sup>

<sup>305</sup> Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare," 12.

<sup>306</sup> The same applies of course to any country with longstanding and highly prevalent welfare problems within any sector.

<sup>307</sup> RSPCA, "Eat. Sit. Suffer. Repeat: The Life of a Typical Meat Chicken." Knowles et al., "Leg Disorders in Broiler Chickens: Prevalence, Risk Factors and Prevention." Agriculture and Horticulture Development Board, "Lameness in Dairy Cows".

<sup>308</sup> McCulloch, "Farm Animal Welfare in the UK: What Does the British Public Want?." McCulloch, "British Farming Methods Need Reform to Match High Animal Welfare Standards."

<sup>309</sup> RSPCA, "Eat. Sit. Suffer. Repeat: The Life of a Typical Meat Chicken." Knowles et al., "Leg Disorders in Broiler Chickens: Prevalence, Risk Factors and Prevention."

<sup>310</sup> Farm Animal Welfare Council, "Opinion on the Welfare of the Dairy Cow."

<sup>311</sup> For example, see scientific reviews by the European Food Safety Authority: EFSA AHAW Panel et al., "Welfare of Laying Hens on Farm." EFSA AHAW Panel et al., "Welfare of Broilers on Farm." EFSA Panel on Animal Health Welfare et al., "Welfare of Pigs on Farm."



5. Of course, stockmanship is important in all systems. But those who argue against the importance of method of production often make a spurious argument by comparing good stockmanship in a more highly intensive system, with poor stockmanship in a more extensive system. The relevant issue at stake is whether, and to what extent, methods of production influence/impact animal welfare. To explore this, different systems/methods of production must be compared with *the same quality of stockmanship*. When this is done, it is clear that the method of production substantially impacts welfare. The term “welfare potential” can be used in this context to illustrate this point, such that some systems have a far higher potential for good welfare, assuming a certain level of stockmanship.<sup>312</sup> The term “welfare potential” is also used to indicate that certain systems, for example free range systems for laying hens, have far greater potential, for instance compared to cages or barns, since further environmental inputs/enrichments can be added, for instance overhead foliage. In contrast, cages and barn systems are far more restricted in terms of their welfare potential by their very nature (e.g., in terms of space for cages in particular).

6. There is an ironic implication of the argument that stockmanship is more important than the system or method of production, given that this claim is often made within the farming industry. The longstanding (decades) and highly prevalent (widespread, affecting large numbers of farmed animals within sectors) nature of many of the most important farm animal welfare problems in the UK has been stated above. If the system or method of production is not the cause of these problems, and stockmanship was the fundamental determinant of welfare, *then it follows that poor stockmanship has and continues to be the cause of these longstanding and widespread welfare problems*. For example, it would be the case that the mutilation of tail docking in 70-80% of intensively reared indoor pigs is not performed because of the system they are reared in.<sup>313</sup> Rather, if the argument was valid, the cause would be poor stockmanship within the indoor pig industry, since most pig farmers resort to mutilations to prevent tail biting. The same reasoning would apply to lameness in broiler chickens and dairy cows, and other prevalent welfare concerns. If this was the case, it would be an indictment of British farmers, given the longstanding and widespread nature of such problems, and the degree of suffering involved. Of course, this is not the position of this report, since the report follows scientific evidence such that these kinds of problems are in fact caused by the breeding/genetics of the animals involved, and/or the housing and related inputs (such as stocking density) that these animals are kept in. I.e., *the major welfare problems in the UK, and within intensive production systems generally, are fundamentally caused by the method of production, rather than stockmanship*.

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<sup>312</sup> Eimear Murphy and Amélie Legrand, “Introduction to the Concept of ‘Welfare Potential’ of Production Systems and Its Practical Relevance to Welfare Labelling,” *Frontiers in Animal Science* 4.

<sup>313</sup> Regan Why the Little Pig Lost His Tail - the Cruel Practice of “Tail Docking”.



7. The motivation for elements within the farming industry to argue that stockmanship is more important than method of production can be explained by economic reasons. As documented in this report, 70-80% of farmed animals in the UK are reared intensively. For example, almost all breeding sows kept indoors (60% of the national breeding herd) are housed in farrowing crates, and 30% of laying hens are housed in cages. The National Pig Association (NPA) and the British Egg Industry Council are industry bodies whose purpose is to support its producer members, many of whom farm using such systems. These sector bodies then lobby and influence national lobbying organisations such as the National Farmers Union (NFU). Hence, the lobbying position argues against methods of production and that stockmanship is the key determinant of welfare, because a large proportion of farmers, as members, engage in intensive farming practices using such systems or methods of production. However, as discussed above, this would have the unfortunate implication that stockmanship of British farmers is poor, given the longstanding and highly prevalent nature of welfare problems in many sectors.

In their paper on welfare potential, production systems, and labelling, Murphy and Legrand point to the fundamental impact of production systems on welfare potential:<sup>314</sup>

**“Farm animal welfare is inextricably linked to, and limited by, the welfare potential of the production system. Welfare potential is determined by the method of production, with key housing features and the genetics of the animal being the primary defining factors. Housing systems with close confinement, or using animals selected for productivity to the detriment of welfare, such as fast-growing broilers, cannot deliver good welfare as the causes of poor welfare are an inherent part of the system.”**

(Murphy and Legrand, 2023)

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<sup>314</sup> Murphy and Legrand, “Introduction to the Concept of” Welfare Potential” of Production Systems and Its Practical Relevance to Welfare Labelling.” 316.



## Justification for a Method of Production-Based Animal Welfare Labelling Scheme

Following on from the above, the case for a method of production-based labelling system can be provided as follows:

1. The method of production or system a farmed animal is kept in is a major determinant of its welfare (as demonstrated in the section above). This also includes the nature of the animal, which is especially influenced by its genetic makeup (genotype).
2. The method of production affects a farmed animal for a substantial duration, and in most cases the great majority, of its living experience. For instance, a layer hen would live in a cage, barn, or free-range system for around one year of its life, during its laying period. In contrast, whether the hen was stunned prior to slaughter affects it for up to around two minutes of its life.<sup>315</sup>
3. Methods of production translate into workable labels that can be clearly displayed on food packaging. There is clear evidence that this has worked for shell eggs, where method of production labelling is mandatory (see earlier in this report).<sup>316</sup> But there is evidence that method of production labelling works for a range of voluntary schemes, such as the Lidl Welfare Windows range in the UK and the French Étiquette Bien-Être Animal scheme.
4. The public consistently demonstrates an interest in the method of production of farmed animals, and (rightly) considers method of production as a key determinant of animal welfare. For instance, mandatory method of production in shell eggs has led to a near doubling in the production and consumption of cage-free shell eggs in the UK from 31.6% in 2003 to 55.7% in 2013.<sup>317</sup> Similarly, 88% of the British public believe using cages for farmed animals is cruel, and 77% support a ban on the use of cages.<sup>318</sup> The retailer Lidl in the UK rolled out its Welfare Windows method of production labelling to laying hens, pigs, turkeys, and ducks, after its success with chicken meat.<sup>319</sup> There are standard method of production terms for pig meat used by the British pig industry and the RSPCA (despite some of these terms being confusing for consumers).<sup>320</sup>

<sup>315</sup> McCulloch and Riley, "Reforming UK Non-Stun Slaughter Law: Economic Impacts of Licensing and Bans on Meat Exports from Germany, New Zealand, and Other Nations."

<sup>316</sup> Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare." RSPCA, "RSPCA Submission to Defra Labelling Call for Evidence".

<sup>317</sup> Figures based on EU CIRCAC data included in the CIWF submission to the DEFRA 2021 Call for Evidence. Compassion in World Farming, "CIWF Submission to Defra Labelling Call for Evidence" 19.

<sup>318</sup> Compassion in World Farming, "88% of UK Public Think Cages Are Cruel," CIWF, <https://www.ciwf.org.uk/news/2020/12/88-of-uk-public-think-cages-are-cruel>.

<sup>319</sup> Lidl, "Chicken Production Methods".

<sup>320</sup> Agriculture and Horticulture Development Board, "The Code of Practice for the Labelling of Pork and Pork Products: Pig Production Terms". RSPCA Assured, "Pig Rearing Systems and Pork Labels".



5. It is also important to note that the method of production does not necessarily determine the tier, in a tiered animal welfare labelling system. To illustrate, in DEFRA's March 2023 A-E scheme, both organic and free-range method of production systems would have the potential to achieve the A tier. This is first because there is substantial overlap between the method of production categories themselves; indeed "free range" and "organic" eggs are both produced using a *free-range* method of production systems.<sup>321</sup> Secondly, there is no reason to believe that, a priori and as a necessary rule, no two methods of production should not be able to belong to the same tier. Hence, it may be the case that, for instance, pigs raised in (highly enriched) indoor conditions, as well as those raised outdoors, could achieve the higher tiers (A, B, etc). This would depend on the specific details of the scheme.<sup>322</sup> And we can be relatively sure that for pigs, for instance, there are likely to be some tiers (B, C, and perhaps even D, UK baseline), which would include both indoors and outdoor-reared pigs.<sup>323</sup> This ultimately follows because of the complexity of the criteria that would underpin the tiers themselves. I.e., the tiers would likely not be simply based on a single criterion (which then determined the method of production). But rather, they would be based on many criteria. The French *Étiquette Bien-Être Animal* scheme, for example, has around 200 criteria for each species/sector.<sup>324</sup>

## The Practical Necessity of a Labelling System Primarily Based on Inputs

Finally, it is important to consider that labelling policy for animal welfare must be practical and workable. Earlier sections of this report have demonstrated the fundamental importance of welfare inputs, and particularly method of production, as a key determinant of animal welfare. Labelling schemes based either on method of production alone, or method of production plus other welfare related criteria (including outcomes) are in existence and are proven to operate successfully in the marketplace, as evidenced in this report.<sup>325</sup> Despite this, it is worth considering how a labelling scheme that was not primarily based on welfare inputs, including method of production, might work. This is in particular because some stakeholders argue that welfare inputs are not a reliable measure of animal welfare, and thus there should be far greater reliance on welfare outcomes.

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<sup>321</sup> All Soil Association eggs, for instance, are free range. [Soil Association](#), "Better for Animals".

<sup>322</sup> Most RSPCA Assured pigmeat is produced from pigs reared indoors. Only 3% of pig meat is produced from pigs that spend their whole lives outdoors, i.e., are free range. In contrast, the Soil Association mandates outdoor access. See earlier sections of this report.

<sup>323</sup> Based on the DEFRA March 2023 stakeholder presentation proposal. Department for Environment Food and Rural Affairs, "Animal Welfare Labelling: Presentation on Consultation Proposals, March 2023."

<sup>324</sup> [Étiquette Bien-Être Animal](#), "Homepage".

<sup>325</sup> For example, Lidl's Welfare Windows, *Étiquette Bien-Être Animal*, etc.



The RSPCA and CIWF have significant expertise and experience in animal welfare labelling, based on decades of work in the policy area.<sup>326</sup> The responses of these organisations to the DEFRA 2021 Call for Evidence on basing a label on welfare outcomes is instructive for the development of animal welfare labelling. Both point out the problems with basing a scheme substantially on welfare outcomes. The RSPCA states:<sup>327</sup>

**“Our view, based on extensive experience of assessing welfare outcomes in practice and analysing the resulting data, is that in general, the system is not yet advanced, precise, consistent or robust enough to use as part of a mandatory welfare labelling system.”**

(RSPCA, 2021)

And CIWF:<sup>328</sup>

**“Input measures also remain essential due to the difficulties ensuring verification of welfare outcomes. This is partly due to challenges in ensuring consistency of measuring between different evaluators and also due to the sporadic nature of some measures (e.g., there might be an outbreak of injurious pecking or tail biting in one flock or group of hens or pigs respectively that might be missed or over-measured).”**

(CIWF, 2021)

Indeed, the Government acknowledges this point in its 2022 DEFRA summary of responses:<sup>329</sup>

**“There remains an evidence gap around how welfare labelling could be based on welfare outcomes alone. There do not appear to be any domestic or international examples of a labelling scheme based on welfare outcomes rather than method of production.”**

(DEFRA, 2022)

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<sup>326</sup> The RSPCA runs RSPCA Assured, and CIWF has been involved in the development of the French Étiquette Bien-Être, for instance.

<sup>327</sup> RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence”.

<sup>328</sup> Compassion in World Farming, “CIWF Submission to Defra Labelling Call for Evidence”.

<sup>329</sup> Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare,” 13.





## Incorporating Welfare Outcomes into a Method of Production Plus Scheme

The case has been made in earlier sections of this report for a mandatory method of production-based welfare labelling scheme. There are three key arguments for a method of production-based scheme:

1. The method of production is a fundamental determinant of the welfare status of farmed animals. This is because of the critical importance of the nature (e.g., genetics) of farmed animals, and the environments that they are housed in.
2. British consumers (rightly) associate method of production with animal welfare outcomes.
3. Method of production-based schemes provide a practically workable policy solution for labelling.

Despite the importance of method of production, including for instance the genetics of farmed animals within those systems, it is important also to consider welfare outcomes. The BVA, AGV, BVPA, and SVS response to the 2021 DEFRA Call for Evidence on labelling make this point:<sup>330 331</sup>

**“As a welfare labelling system is developed, it will be important to avoid oversimplification when considering how different production systems address animal health and welfare needs. It is paramount to recognise that welfare outcomes are not *solely* dependent on the type or size of different production systems, and that consideration should be given to welfare outcomes across the supply chain.”**

(BVA et al, 2021) (Emphasis added)

The point from the BVA and its specialist divisions is well made. Leading animal welfare labelling schemes such as RSPCA Assured include assessment of welfare outcomes in their auditing process for this reason. Hence, it would be recommended that a government-regulated mandatory scheme should also assess welfare outcomes. This raises two questions. First, who would assess the welfare outcomes? And secondly, would all tiers (e.g., on an A-E system) require assessment of welfare outcomes?

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<sup>330</sup> The British Veterinary Association, the Association of Government Veterinarians, the British Veterinary Poultry Association, and the Sheep Veterinary Society.

<sup>331</sup> British Veterinary Association, “BVA, AGV, BVPA SVS Response to Defra Call for Evidence on Labelling for Animal Welfare,” 1-2.





In response to the first question, many respondents to the 2021 DEFRA Call for Evidence stated that a mandatory label should build on pre-existing successful labels.<sup>332</sup> One way to do this would be to mandate that in order to qualify for the higher tiers (e.g., A and B), farms would need to be part of a reputable independent assurance scheme (such as RSPCA Assured, in the case of British farmers). Note that this is how the UK supermarket retailer Lidl operates its Welfare Windows scheme; membership of higher welfare third party assurance schemes, including RSPCA Assured and Soil Association Organic, is required for the higher tiers. This report supports this position, which has the merit of building on the years of expertise and experience developed within these assurance schemes, and also reduces the burden on government. In this way, a government-regulated mandatory label includes assessment of welfare outcomes through membership and auditing of a third-party welfare assurance scheme, such as RSPCA Assured.

In response to the second question, at least for a labelling scheme with a sufficient number of tiers (such as five in an A-E system), it seems sensible that not all tiers would require assessment of welfare outcomes. So, for instance, in an A-E tiered system, where D is the UK legislative baseline, one possible option would be that tiers D and E did not require assessment of welfare outcomes. Of course, from a purely animal welfare perspective, it would be preferable if all tiers were required to undergo assessment for welfare outcomes. However, government labelling policy must be practical and balanced to be successful. Hence, it seems reasonable that the lower tier or tiers would require no or minimal assessment of welfare outcomes.

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<sup>332</sup> Department for Environment Food and Rural Affairs, "Summary of Responses to the Call for Evidence on Labelling for Animal Welfare."



## Slaughter Labelling and Animal Welfare

Slaughter legislation in the UK mandates that all animals are stunned prior to slaughter, meaning they are rendered insensible to pain.<sup>333</sup> Despite this, the legalisation includes a derogation, or exemption, for non-stun slaughter to produce food for Jewish and Islamic communities. Scientific evidence finds that stunning prior to slaughter is better for animal welfare.<sup>334</sup> And indeed the UK Government's preferred position is that all animals are stunned prior to slaughter, but that it recognises the right of religious communities to practice their beliefs.<sup>335</sup> Despite this, and as documented in McCulloch and Riley (2022), there is a substantial amount of meat produced from non-stunned animals that enters the mainstream food chain.<sup>336</sup>

### Recommendation for a Standalone "Stunned" and "Non-Stunned" Label Scheme

Hence, there is a clear requirement for labels to indicate whether animals are stunned prior to slaughter.<sup>337</sup> This report recommends a simple separate and standalone label, in addition to a method of production-based label. Such a label could indicate simply whether the meat is from an animal which has been stunned, or whether it has not been stunned, prior to slaughter. This would mean two separate labels of "Stunned" or "Non-stunned" to provide relevant information for the British consumer, as illustrated in Figure 18. This recommendation is in line with similar recommendations by the RSPCA and CIWF, in their submissions to the 2021 DEFRA Call for Evidence on labelling.<sup>338</sup>



Figure 18: Separate and standalone "Stunned" and "Non-stunned" labels to indicate whether farmed animals were stunned prior to slaughter.

<sup>333</sup> *The Welfare of Animals at the Time of Killing (England) Regulations 2015; The Welfare of Animals at the Time of Killing (Scotland) Regulations 2012; The Welfare of Animals at the Time of Killing (Wales) Regulations 2014; The Welfare of Animals at the Time of Killing (Northern Ireland) Regulations 2014.*

<sup>334</sup> McCulloch and Riley, "Reforming UK Non-Stun Slaughter Law: Economic Impacts of Licensing and Bans on Meat Exports from Germany, New Zealand, and Other Nations."

<sup>335</sup> Department for Environment Food and Rural Affairs, "Labelling for Animal Welfare: Call for Evidence."

<sup>336</sup> McCulloch and Riley, "Reforming UK Non-Stun Slaughter Law: Economic Impacts of Licensing and Bans on Meat Exports from Germany, New Zealand, and Other Nations."

<sup>337</sup> RSPCA, "RSPCA Submission to Defra Labelling Call for Evidence". Compassion in World Farming, "CIWF Submission to Defra Labelling Call for Evidence". British Veterinary Association, "BVA, AGV, BVPA SVS Response to Defra Call for Evidence on Labelling for Animal Welfare."

<sup>338</sup> RSPCA, "RSPCA Submission to Defra Labelling Call for Evidence". Compassion in World Farming, "CIWF Submission to Defra Labelling Call for Evidence".



The justification for a separate standalone label first relates to sociocultural factors involved in the slaughter debate, as well as the urgent need for a practical and workable government-regulated mandatory labelling scheme for animal welfare. First, the debate about stunning animals is highly controversial. If government were to include the requirement for stunning within higher tiers (for instance A and B), then there is a risk that the development of a mandatory labelling system would be less realistic.

Secondly, given that animals spend far more of their existence living on farm, compared to the period of time immediately prior to slaughter, precedence should certainly be given to implementing policy on a method of production-based animal welfare label. Despite this, the stunning issue is very important both from an animal welfare perspective, as well as from a consumer choice perspective. Hence, it follows that government policy should be for two separate labels, one method of production-based, and a second label providing information on stunning prior to slaughter.

A third key reason is that many members of the Jewish and Muslim communities will prefer to purchase food products with higher tiers on the method of production-based scheme, despite preferring to purchase non-stun meat in line with their religious beliefs. Given the large Muslim and Jewish populations in the UK, and their legally recognised right to observe religious practices, this is a strong reason for separate labels to cover the rearing of animals on farm, and during the slaughter process.

Finally, there is a law-based justification for a label indicating whether animals have been stunned prior to slaughter. As stated above, UK law states that all animals must be stunned prior to slaughter, with exemptions for meat destined for religious communities. Despite this, there is a considerable oversupply of non-stunned meat. For this reason, a mandatory label can facilitate the observance of the law, such that meat produced from animals without being stunned is produced only for Muslim and Jewish communities, in line with legislation.



## Consideration of an Alternative “Stunned”, “Halal-Stunned”, and “Non-Stunned” Label Scheme

The report therefore proposes a separate and standalone “Stunned” and “Non-stunned” labelling scheme. Despite this, there is arguably a problem with such an approach. This is that many methods of stunning which are acceptable to the Muslim community for halal meat, are considered less optimal from an animal welfare science perspective.<sup>339</sup> Hence, there is a risk that consumers purchase products labelled as “stunned”, which are produced using halal stunning methods that may be less effective than conventional stunning practices. In effect, the straightforward “Stunned” and “Non-stunned” labels, though the scheme is straightforward, does have a major drawback: the “Stunned” label effectively includes two categories, conventional stunned and Halal-stunned.

For this reason, there is also an argument for a third label “Halal stunned”, under a mandatory labelling scheme. Note that this should be beneficial for both the majority British Muslim community who accept food products produced by modified stunning techniques in accordance with halal practice, and non-Muslim and secular consumers who may prefer conventional non-stunned/non-halal food. In this case, there would be three separate labels: “Stunned”, “Halal-stunned”, and “Non-stunned”, as illustrated in Figure 19.



Figure 19: Separate and standalone “Stunned”, “Halal-stunned” and “Non-stunned” labels to indicate whether farmed animals were stunned prior to slaughter.

Note that this scheme provides maximum information to British consumers. Using this scheme, all three constituencies of consumers have the relevant information provided to them. UK non-Muslim and non-Jewish consumers can identify and choose to purchase the “Stunned” label, in line with UK slaughter legislation. The majority of the UK Muslim population, who accept halal-stunning methods, can identify and choose meat with the “Halal-stunned” label, in line with their religious beliefs. And Jewish and a minority of Muslim consumers can identify and choose to purchase meat with the “Non-stunned” label, also in line with their religious beliefs.

<sup>339</sup> For example, see [EFSA Panel on Animal Health and Welfare](#), “Scientific Opinion on Electrical Requirements for Poultry Waterbath Stunning Equipment.” [Berg and Raj](#), “A Review of Different Stunning Methods for Poultry—Animal Welfare Aspects (Stunning Methods for Poultry).”

## Farmer Benefits: Reward for Higher Welfare

The British farming industry has for some time (rightly) complained about being undercut by lower welfare imports of food on UK supermarket shelves. In many cases, higher animal welfare standards entail increased production costs. For instance, group housing of pregnant sows costs more in both capital, due to space requirements, and straw bedding, compared to sow stalls. The DEFRA Call for Evidence summary of responses sets out the problem for UK farmers as follows:<sup>340</sup>

**“There is currently no clear, consistent way to differentiate between products that meet or exceed the UK’s baseline welfare regulations – whether domestically produced or imported – and those that do not. Therefore, UK farmers may be undercut by imports of lower welfare and may not be able to capture the value of their products that meet baseline UK welfare regulations.”**

(DEFRA, 2021)

Furthermore, the problem is particularly significant in the post-Brexit context, where the UK is negotiating trade deals with other nations and trade blocs. The RSPCA emphasised this point in its submission to the 2021 DEFRA Call for Evidence on labelling:<sup>341</sup>

**“Agreeing trade deals without mandatory labelling of imported products would undercut UK producers that are producing to higher - or even baseline UK - standards, potentially putting them out of business and leading to a race to the bottom.”**

(RSPCA, 2021)

The DEFRA Call for Evidence summary of responses reports a consensus that all stakeholders, including industry, support mandatory labelling of lower welfare imports.<sup>342</sup> Despite the benefits to the farming and food industry of mandatory animal welfare labelling, DEFRA has documented how in its 2021 Call for Evidence around half of food companies and the majority of industry associations did not support government reform of labelling. On page 11 of DEFRA’s summary of responses, the following reasons were provided. These are copied, together with a brief response based on the contents of this report.<sup>343</sup>

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<sup>340</sup> Department for Environment Food and Rural Affairs, “Labelling for Animal Welfare: Call for Evidence,” 11.

<sup>341</sup> RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence” 13.

<sup>342</sup> Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare.”

<sup>343</sup> Department for Environment Food and Rural Affairs, “Labelling for Animal Welfare: Call for Evidence,” 11.



- *“the belief that retailers are already incentivised to tap into existing consumer demand for higher-welfare products, rendering government intervention unnecessary”*

It is true that retailers are incentivised to tap into consumer demand for higher-welfare products. Despite this, it is not the case that government intervention is unnecessary. As detailed in this report, there is a major lack of transparency in current UK animal welfare labelling. The lack of transparency is potentially confusing for British consumers at the point of purchase. The British public, as consumers and citizens, have a right to make an informed choice about the welfare provenance of the food they purchase. Transparent and reliable information is a necessary condition for the British public to make informed choices.

- *“the potential for unwarranted costs to industry”*

All government regulation will involve some financial costs. However, the costs in the case of animal welfare labelling are fully warranted. British consumers have a right to make informed choices at the point of purchase. Furthermore, government’s role as guardian for animal welfare means it has a duty to protect and advance the welfare of farmed animals.<sup>344</sup> For the reasons provided in this report, this duty can only be fulfilled through a government-regulated mandatory labelling system.

- *“the potential for increased food prices for consumers and a potential decrease in product choice if retailers chose not to stock lower-welfare products”*

The DEFRA policy proposal for a tiered A-E scheme would have the potential to provide consumers with greater choice than the status quo. Though note also that the salient issue at stake is not simply choice, but informed choice. Currently, it is difficult for consumers to make an informed choice due to the lack of transparency and widespread confusing labelling and marketing. As is discussed in this report, much of this arises due to the dominance of industry-based farm assurance schemes, which have a primary economic motivation for their schemes, animal welfare standards, and marketing.

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<sup>344</sup> Farm Animal Welfare Council, “Farm Animal Welfare in Great Britain: Past, Present and Future.”



- *“scepticism that labelling could alter consumer purchasing habits”*

The success of mandatory method of production labelling has been clearly demonstrated in the case of shell eggs. This has been the case both in the UK and across the EU. Mandatory labelling of shell eggs resulted in an almost doubling of the production of non-caged eggs in the UK. This was driven by consumer purchasing behaviour. And as the RSPCA has stated in its submission to the DEFRA 2021 Call for Evidence, the far more limited uptake of higher welfare chicken meat is in fact very good evidence that voluntary labelling schemes work far less well.<sup>345</sup>

- *“the belief that reform is unnecessary given the existing high animal welfare standards in the UK”*

The question of whether the UK does or does not have high welfare standards is crucial to labelling policy. For this reason, the issue is discussed throughout this report. It is true that the UK has high animal welfare standards in a relative sense, compared to many other nations (though not all). Despite this, it is not true that the UK has high standards per se, meaning for the farmed animals themselves. If this were the case, the UK would not confine 60% of its breeding pig herd in farrowing crates, house 30% of its egg-laying flock in cages, dock the tails of 70-80% of its growing pigs, or have a 25% prevalence of lameness in broiler chickens.<sup>346</sup>

Despite the above points, it is noteworthy that DEFRA reports how individual farmers tended to be supportive of government reforms of labelling.<sup>347</sup> Furthermore, three of the top ten UK food retailers supported mandatory animal welfare labelling. James Bailey, Executive Director at Waitrose, has publicly stated his company’s support for mandatory animal welfare labelling in his article “Mandatory animal welfare labelling is a win for British farmers and consumers” for The Grocer:<sup>348</sup>

**“For decades, we have adopted higher farming and welfare standards at Waitrose – not because it gives us an advantage commercially, but because we’re a purpose-led organisation and we think it’s the right thing to do. It gives animals a better quality of life, [improves] our farmers pride and happiness and, because better standards necessitate better farming practices, it can help reduce our impact on the environment too.”**

(James Bailey, Executive Director at Waitrose, 2022)

<sup>345</sup> RSPCA, “RSPCA Submission to Defra Labelling Call for Evidence”.

<sup>346</sup> McCulloch, “Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs.” Laying hens: Gov.UK, “UK Egg Packing Station Throughput and Price Dataset.” Regan Why the Little Pig Lost His Tail - the Cruel Practice of “Tail Docking”. RSPCA, “Eat. Sit. Suffer. Repeat: The Life of a Typical Meat Chicken.”

<sup>347</sup> “Among individual respondents, almost all (including interested members of the public and those who identified as academics, farmers, and vets) said that the UK government should reform labelling to promote greater consistency and understanding of animal welfare information at the point of purchase.” Department for Environment Food and Rural Affairs, “Summary of Responses to the Call for Evidence on Labelling for Animal Welfare,” 10.

<sup>348</sup> James Bailey, “Mandatory Animal Welfare Labelling Is a Win for British Farmers and Consumers,” The Grocer,

<https://www.thegrocer.co.uk/supply-chain/mandatory-animal-welfare-labelling-is-a-win-for-british-farmers-and-consumers/668716.article>.





## Summary and Recommendations

Labelling to certify animal welfare standards in the UK is dominated by national industry-based schemes, with the largest being Red Tractor. Such schemes are funded by the farming industry and champion the producers who they represent.<sup>349</sup> National industry-based schemes essentially operate to distinguish British produce from imported food. The benefit of this is that the UK generally, but not always, has higher animal welfare standards compared to other nations.<sup>350</sup> For instance, for pig meat, the UK has a full ban on the sow stall, whereas the EU has only a partial ban.

The problem with industry-based schemes dominating UK welfare labelling is that whilst claims to higher animal welfare standards may be valid in a relative sense, compared to other nations, it is often not the case that farmed animals certified under such schemes have high welfare per se. This is because Red Tractor and other industry-based schemes are generally at or barely above the UK legislative baseline.<sup>351</sup> And UK legislative standards are not always high in an absolute sense, i.e., for the lived reality of farmed animals. To provide examples, UK legislation and Red Tractor permits farrowing crates for pregnant and lactating sows, as well as modified cages for laying hens, which are not high welfare systems.<sup>352</sup>

The UK's departure from the EU presents an opportunity for the Government to reform animal welfare labelling. DEFRA was set to consult on proposals for a mandatory method of production-based tiered A-E labelling scheme.<sup>353</sup> However, DEFRA later announced in July 2023 that despite public support for mandatory labelling, it would not consult at this time.<sup>354</sup> Instead, it would work with industry to explore how government can harness the market to improve information provision for consumers and raise standards of animal welfare.

<sup>349</sup> [Assured Food Standards](#), "Your Frequently Asked Questions Answered".

<sup>350</sup> [McCulloch](#), "Brexit and Animal Welfare Impact Assessment: Analysis of the Threats Brexit Poses to Animal Protection in the UK, EU and Internationally."

<sup>351</sup> [Assured Food Standards](#), "Pigs Standards." [Assured Food Standards](#), "Chicken Standards." [Assured Food Standards](#), "Dairy Standards."

<sup>352</sup> Farrowing crates, for instance, are not only not high welfare systems, but fail to meet the welfare needs of sows kept within them. This follows from the severe degree of physical and behavioural confinement, such that sows are able to stand up and lie down, but are not able to even turn around. [McCulloch](#), "Banning Farrowing Crates in the UK: Transitioning to Free Farrowing to Meet the Welfare Needs of Pigs."

<sup>353</sup> Department for Environment Food and Rural Affairs, "Animal Welfare Labelling: Presentation on Consultation Proposals, March 2023."

<sup>354</sup> [Cooke](#), "Defra Shelves Animal Welfare Labels for Chicken and Pork."



This report has reviewed animal welfare labelling in the UK and EU. It has made the case that only a government-regulated mandatory labelling system can provide transparency at the point of purchase, drive improvements in animal welfare, and reward farmers who produce at or above the legislative baseline. Specifically, the report makes the following two key recommendations:

**1.** Government should consult on and pass legislation for a mandatory animal welfare labelling system. The labelling scheme should:

- a.** Be a “method of production plus” labelling system. I.e., the criteria for labels should be based on method of production, as well as including other welfare related inputs and outcomes as criteria.
- b.** Be a tiered system. The number of tiers may differ between species/sectors, following the differences in methods of production used, for example in chickens reared for meat, laying hens, and pigs.
- c.** Include one tier at the legislative baseline, one tier below for imports that do not meet the baseline, and two to four tiers above the legislative baseline, depending on the species/sector.
- d.** Be labelled with method of production and either A-E or 1-5 (or similar, based on the number of tiers).
- e.** Informed by leading voluntary method of production-based labelling schemes, such as the French *Étiquette Bien-Être Animal* and British Lidl Welfare Windows, to inform the details included on the labels.<sup>355</sup> This report provides short summaries of both schemes as case studies.
- f.** Include the method of production term, the tier, a visual image to represent the method of production, and brief explanatory text. A government website should include further information on the welfare criteria for the various tiers.
- g.** Require that higher tiers have third party certification, for instance through RSPCA Assured or Soil Association Organic schemes in the UK.<sup>356</sup>

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<sup>355</sup> *Étiquette Bien-Être Animal*, “Homepage”. Lidl, “Method of Production Labelling”.

<sup>356</sup> RSPCA Assured, “Homepage”. Soil Association, “Better for Animals”.



**h.** Have a scope as wide as practically possible, to maximise consumer choice, animal welfare improvements, and reward farmers producing to higher than legislative baseline standards. The scope here refers both to species/sectors of farmed animals, as well as the various categories of food, e.g., retail to catering and out of home, and fresh produce to processed.

**i.** Be implemented first for pigs, chickens reared for meat, laying hens, and farmed fish (salmon and trout). These are both the species/sectors with the greatest numbers of animals, as well as those where existing method of production-based labels and schemes are used commercially.

**2.** Government should further legislate for a mandatory separate and stand-alone label to indicate whether animals have been stunned before slaughter. The labelling scheme should:

**a.** Include “Stunned” and “Non-stunned” labels.

**b.** Explore having three categories, “Stunned”, “Halal-stunned”, and “Non-stunned”. This is to differentiate produce from animals that who have been stunned using conventional methods, which are generally higher welfare, with those that have been halal-stunned.<sup>357</sup>

**c.** Have a scope as wide as practically possible, in term of species/sector and food categories.

**d.** Ensure the government website includes further information on the welfare criteria for the stun/slaughter labelling scheme.

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<sup>357</sup> For example, see [EFSA Panel on Animal Health and Welfare](#), “Scientific Opinion on Electrical Requirements for Poultry Waterbath Stunning Equipment,” *EFSA Journal* 12, no. 7 (2014). [Charlotte Berg and Mohan Raj](#), “A Review of Different Stunning Methods for Poultry—Animal Welfare Aspects (Stunning Methods for Poultry),” *Animals* 5, no. 4 (2015).



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**Steven McCulloch**

Senior Lecturer in Human-Animal Studies  
Animal Welfare Research Group,  
University of Winchester,  
UK.

[Steven.McCulloch@winchester.ac.uk](mailto:Steven.McCulloch@winchester.ac.uk)

Steven McCulloch is Senior Lecturer in Human-Animal Studies at the Animal Welfare Research Group, University of Winchester. Steven qualified as a veterinary surgeon from the University of Bristol and holds a BA Philosophy from Birkbeck College, University of London. He has a PhD from the Royal Veterinary College, University of London, for his thesis "The British animal health and welfare policy process: accounting for the interests of sentient species". He is a diplomat of the European College of Animal Welfare and Behavioural Medicine and a recognised European veterinary specialist in Animal Welfare Science, Ethics and Law. Steven's research is focused on the science, ethics, and policy of animal protection.

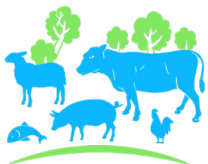


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