



## The Vegan Society Response to the 2021 DEFRA Call for Evidence Labelling for Animal Welfare

*Questions 1-5 were for administrative purposes.*

**6. Please provide a summary of why you chose to respond to this call for evidence, and any relevant expertise you have.**

The ultimate welfare of all animals – in all senses including to live in health, fully able to express their natural behaviours, without being artificially separated from their parents, in appropriate groups and habitats, for their full natural life-span – is the core mission of The Vegan Society.

*Questions 7-8 were for administrative purposes*

**9. Please provide a summary of what your organisation does and where relevant who you have consulted to formulate your response.**

Our aims are a world where (1) humans do not use non-human animals, and (2) resources are used sustainably to ensure the needs of all current and future people are met well. We work by providing information, support and advice to individuals in their own lives, and with health professionals, farmers and growers, caterers, manufacturers, policy makers and any other relevant groups and organisations.

*Questions 10-15 were for administrative purposes.*

**16. What barriers are there for consumers wishing to buy food produced to UK baseline welfare or higher? Please provide supporting evidence on the drivers of the value-action gap.**

The barrier for people in the UK seeking food which does not harm the welfare of animals, is our farming of animals. The position of The Vegan Society is that welfare – the health, comfort and happiness – of non-human animals requires an end to the farming of animals. Instead, we must transition to plant-based land management and food production techniques. This would support higher welfare for free-living animals, ending the pressures of our farming of animals upon them and their habitats. The remaining artificially bred animals can only have high welfare if they live in semi-natural habitats in appropriate groupings, for the rest of their natural life-spans.

At present, most people cannot make evidence-based purchasing decisions about how animals have been harmed in food production. We are allowed to harm animals in farming in ways that most people in the UK would never consider harming animals under their own care. These facts are actively hidden from consumers. People who farm animals are actively driven to harm them, by financial pressures, by laws which remove protections from animals in farming, and because we ignore our shared ethical principle that it is wrong to cause unnecessary suffering.

We know that people are changing their food buying habits, for example based upon concerns about harms to animals, and harms of the building climate crisis. Research<sup>1</sup> by the Food Standards Agency shows that four in ten people in the UK claim to have changed, or attempted to change their diet for

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<sup>1</sup> Healthy and Sustainable Diets: Consumer Poll (2021)

<https://www.food.gov.uk/sites/default/files/media/document/healthy-and-sustainable-diets-consumer-poll.pdf>



environmental reasons since the start of the COVID19 pandemic in winter 2019-20.

As people have learned more about the reality of our current food production systems, a quarter<sup>2</sup> of people in the UK now choose more sustainable, lower meat 'flexitarian' diets.

The EU's only mandatory 'Method of Production' food labelling scheme (introduced in 2004) requires all egg cartons to say if the chickens who laid the eggs are caged, barn or free range. The UK caged chicken egg industry has since shrunk significantly<sup>3</sup>. Transparent labelling empowers people who are opposed to caging of chickens, to stop supporting those practices.

Food producers must no longer be allowed to mislead us. Labelling is key, but marketing images can also obscure the facts. We must stop showing animals grazing on pasture to promote food made from or by animals farmed intensively or indoors.

**Please provide any evidence you have on the impact and effectiveness of existing assurance schemes or labelling regulations (domestic and international).**

Launched in 1990, The Vegan Trademark<sup>4</sup> independently assesses that no animals have been used in producing a food or other product. Producers in 79 countries recognise how important this is to people, and collectively pay for over 56,000 products to be registered for The Vegan Trademark.

In The Vegan Society's independently commissioned research (February 2021), we found that 94% of shoppers who purchase vegan-friendly food and drink products (including vegans and non-vegans) actively seek out third-party vegan certification logos, such as The Vegan Trademark. (Nearly 90% showed similar purchase behaviour towards vegan healthcare products and vegan toiletries.) In 2021 alone The Vegan Society have registered nearly 10,000 products with The Vegan Trademark. This shows that people want businesses to back up their ethical claims, and a willingness for industry to do so.

**17. Should the UK government reform labelling to ensure greater consistency and understanding of animal welfare information at the point of purchase?**

Yes

**Why?**

Our food systems need to be fully honest and fully transparent with the people who are buying their products. This is critical so that we can end the food-related public health, climate and biodiversity crises, and the hidden harms to animals in our farming systems. For example, independent investigations of the Red Tractor 'Assurance' scheme routinely find extensive harms to animals on 'Red Tractor Assured' farms. As few as one in a thousand on-farm inspections conducted by Red Tractor may be 'unannounced' without prior warning to the farmer.

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<sup>2</sup> What is making flexitarians in the US and UK shift towards a meatless diet? (2021)

<https://yougov.co.uk/topics/food/articles-reports/2021/05/31/what-making-flexitarians-us-and-uk-shift-towards-m>

<sup>3</sup> UK egg statistics <https://www.gov.uk/government/statistics/egg-statistics>

<sup>4</sup> The Vegan Trademark <https://www.vegansociety.com/the-vegan-trademark>



**18. How could a set of welfare standards, defining different levels of welfare for an animal, be developed based on inputs? What are the key considerations?**

The base standard for welfare must be that every individual lives in as close to possible their natural habitats, able to express all of their natural behaviours, in appropriate groups including staying with their parents for the natural length of time, for their full natural lifespans. Higher welfare might include veterinary care, as is given to free-living animals by some vets.

**19. How could welfare outcomes be incorporated into a set of welfare standards that can then be used for a label?**

There are three fundamental levels: 1) Welfare denied, as for most farmed animals; 2) Sanctuary, where previously 'domesticated' artificially bred animals live out their lives in appropriate sanctuary environments. This is because we have bred out their survival traits which they would need to live in freedom; 3) Free-living, where animals are not farmed.

**20. What would we need to consider if we developed a set of welfare standards that covered the whole life of the animal, including slaughter and transport, and of its parents?**

If the animal experience welfare, they and their parents will not be 'slaughtered' at all. They would only travel if it is for their individual benefit, e.g. for veterinary care.

**21. Should the UK government update the welfare standards set out in the existing marketing standards for unprocessed poultrymeat and shell eggs? If so, how?**

Farming and eating animals, and things taken from them, is utterly inconsistent with the welfare of that animal, who desired to live freely.

*Questions 22-23 was N/A.*

**24. Which type of labelling could be most effective at ensuring 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?**

Mandatory

**Why?**

People need to know that the only way to ensure the welfare of animals is to stop farming them. Therefore, mandatory labelling which accurately and transparently reveals the harms to any animals used in their production will meet all three goals. Farmers must be involved in developing labelling, so that they will embrace it, and the transition to plant-based farming and food systems.

**25. To what extent do you support the principle of mandatory labelling to identify when imported meat, eggs and milk do not meet baseline UK welfare regulations?**

Strongly support

**Why?**



There must be accurate and transparent labelling for the entire global food system, to reveal the harms to animals involved.

**26. What business decisions would farmers and food businesses be likely to take in response to the introduction of mandatory labelling for animal welfare?**

They will start the vital transition towards plant-based farming and foods, once they have to accurately and transparently reveal the harms to animals in their previous working methods.

**27. How would these business decisions affect the accessibility, availability, and affordability of UK baseline and higher welfare products?**

By making plant-based food and farming the default, food systems which do not involve actively harming the welfare of animals will become accessible, available and affordable almost everyone.

**28. How would these business decisions differ if regulations introduced were only voluntary but with welfare standards defined in law?**

This would only slow the necessary transition to plant-based food and farming, causing continued harm to animals in farming, to public health, to the people most vulnerable to climate change, and to free-living animals and their habitats.

**29. Which of the following label formats do you think is most effective?**

Option 2. Labels indicating both tiers and descriptions of the method of production [(Etiquette Bien-Être Animal, Haltungsform, CIWF Italia/Legambiente labelling proposal)?]

**30. For those labels with tiering, which of the following do you think is most effective?**

Option 1. Etiquette Bien-Être (graded colours, grade A-E, comparative descriptions – for example ‘good’, ‘quite good’, ‘standard’)

**31. For those labels with descriptions of the method of production, which of the following do you think are most effective?**

Option 1. Labels with both a written and pictorial description [(Etiquette Bien-Être, CIWF Italia / Legambiente proposal)?]

**32. Overall, which of the five labels do you think is most effective? Etiquette Bien-Être Animal**

**Why?**

This allows for the necessary basic levels, which might take the following form:

- (1) **Welfare denied** – e.g. this product contains meat, and thus animals have been slaughtered; this product contains animal products where the animals themselves and/or their parents or siblings are slaughtered (e.g. eggs);
- (2) **Sanctuary** – these animals are living as naturally as possible, with no slaughter of any kind e.g. chickens and roosters free-ranging, but the chickens eggs are collected and sold;
- (3) **No animals were used** in any stage of producing this food, although free-living animal were in the habitats where it was grown.



**33. Please can you tell us your views on any domestic or international labels that indicates animal welfare.**

The EU's only mandatory 'Method of Production' food labelling scheme (introduced in 2004) requires all egg cartons to say if the chickens who laid the eggs are caged, barn or free range. The UK caged chicken egg industry has since shrunk significantly (UK egg statistics <https://www.gov.uk/government/statistics/egg-statistics>). Transparent labelling empowers people who are opposed to caging of chickens, to stop supporting those practices.

*Question 34 was N/A.*

**35. What would the impact be if current mandatory labelling was expanded to indicate the welfare of all unprocessed meat, eggs, and milk, whether imported or domestically produced?**

Mandatory accurate and transparent labelling about all aspects of food production – including the use of animals, and impacts on public health, climate change, free-living animals and the natural environment – should be universal. We emphasise that 'meat, eggs and milk' don't have welfare: animals have welfare.

*Question 36 was N/A.*

**37. To what extent might any negative impacts of labelling changes be reduced, and how?**

Government at every level must show consistent leadership, to enact and support the transition to plant-based farming and food systems for land managers, manufacturers, distributors, retailers and the people eating the food. This support must include direct financial support to move over to the protein in our food being nutritious, sustainable plant proteins.

**38. In Q35 we asked what the impacts would be of introducing mandatory labelling to indicate the welfare of all imported and domestically produced unprocessed meat, eggs, and milk. How would the impact differ if the scope of the labelling was expanded to cover prepacked processed products which are minimally processed with meat, egg, or milk as the major ingredient?**

There should be no exceptions. Universal mandatory labelling is necessary to help the food industry rapidly make the necessary changes to end the crises in animal suffering, public health, and environment including climate and biodiversity.

**39. Compared to Q38, how would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which contain meat, milk and/or eggs as primary ingredients?**

Answer as above.

**40. Compared to Q38, how would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which contain meat, milk and/or eggs as secondary ingredients?**

Answer as above.



**41. To what extent could these supply chain impacts be reduced if:**

The 'welfare' label must show the experiences of the least protected animals used.

**42. Are there other ways that these supply chain impacts could be reduced? How?**

Government investment in transitional funding for everyone from farm to table is necessary, so that we can move rapidly to sustainable, health plant-based food systems and plant proteins.

**43. When eating out, what barriers do consumers face choosing food that aligns with their values on animal welfare? How can these be overcome?**

Retail caterers must accurately and transparently receive and transmit the full information about how their ingredients are produced, in terms of use of animals as well as public health and environmental harms. Fully plant-based and vegan-friendly food products are the most straightforward way to align food with our widely shared belief that it is wrong to cause suffering unnecessarily. The Vegan Trademark is one such labelling scheme.

**44. What barriers do mass caterers face in providing welfare information and higher welfare options to consumers? How can these be overcome?**

We perceive major barriers to be (1) The current lack of accurate, transparent information about how ingredients are produced and the harm to animals, public health and environment we are causing on that production system; (2) The lack of mandatory labelling rules requiring universal declaration of the harms to animals, public health and environment in all forms of food production and retail; (3) The lack of accurate education of people in the UK about the harmful realities of our current food production systems – including organisations in the food system being allowed to actively share misinformation and conceal the truth, such as the AHDB 'We Eat Balanced' campaign; (4) The lack of Government investment at every level of the healthy, sustainable plant-based food and plant protein farming and food system which we need to achieve our goals for ending harms to animals, public health and environment.

Universal mandatory labelling of harms in food production, coupled with accurate education, proper regulation of promotion and marketing of food, and Government investment in plant-based food systems can help overcome all these barriers.

**45. Which of the following options do you think could be suitable for indicating welfare standards within the catering sector?**

Option 1. Mandatory labelling of the welfare standard at the point of sale, for example: on the menu

**Why?**

Universal mandatory labelling is necessary to help the food industry rapidly make the necessary changes to end the crises in animal suffering, public health, and environment including climate and biodiversity.



**46. In Question 35, we asked what the impacts would be of introducing mandatory labelling to indicate the welfare standards of all imported and domestically produced unprocessed meat, eggs, and milk. How would the impacts differ if the catering sector were required to disclose the welfare standards of meat, milk and eggs purchased?**

Universal mandatory labelling is necessary to help the food industry rapidly make the necessary changes to end the crises in animal suffering, public health, and environment including climate and biodiversity.

**47. Compared to mandatory disclosure, how would the impact differ if the catering sector were required to label food containing meat, milk, and eggs as primary ingredients, for example on menus?**

Answer as above.

**48. What are the key considerations when designing a monitoring and enforcement regime to verify labels for animal welfare?**

Having an accurate and transparent system will reduce the challenges in monitoring and enforcement of universal mandatory food labelling for ending harms to animals, public health, climate and environment. The system should include explicit 'whistle-blowing' protections, so that anyone animals being harmed in farming can be confident that the animals will be taken into protective sanctuary.

If the labelling on animal use took the following form, there would be no ambiguity about what kinds of deprivation of freedoms of animals in farming we as a society will continue to tolerate:

- (1) **Welfare denied** – e.g. this product contains meat, and thus animals have been slaughtered; this product contains animal products where the animals themselves and/or their parents or siblings are slaughtered (e.g. eggs);
- (2) **Sanctuary** – these animals are living as naturally as possible, with no slaughter of any kind e.g. chickens and roosters free-ranging, but the chickens eggs are collected and sold;
- (3) **No animals were used** in any stage of producing this food, although free-living animal were in the habitats where it was grown.

*Question 49 was N/A.*

**50. What role could UK farm assurance schemes play in verifying a label indicating welfare standards?**

Only if the schemes switch over to sanctuary standards – animals are living as naturally as possible, with no slaughter of any kind – and plant-based methods of production, would they have a role.

**51. What role could accreditation play in assuring the welfare standards of imports?**

Only if the schemes switch over to sanctuary standards – animals are living as naturally as possible, with no slaughter of any kind – and plant-based methods of production, would they have a role.

*Question 52 was N/A.*



**53. Are there any examples of product branding or imagery regarding the provenance and quality of meat, eggs, and milk that you think could be misleading?**

Misleading product branding and imagery are routine in the wholesale and particular retail of animal 'meat, eggs & milk'. The AHDB 'We Eat Balanced' multi-media long-term promotional scheme (<https://weeatbalanced.com/>) is a recent, large cross-sector demonstration of these intentionally deceptive practices.

The current standard marketing creates an impression of sanctuary standards – animals are living as naturally as possible, with no slaughter of any kind – which is utterly false.

**54. How could a clear and consistent, common labelling approach be best designed to consider animal welfare alongside other labels such as nutrition and eco-labelling? Please consider this from a consumer and business perspective and outline the challenges and opportunities that you see for each**

*Consumer perspective:*

Labelling on animal welfare should be separate from nutrition and environmental labelling. All these labels are important. People increasingly want to find healthier and more environmentally friendly foods, as well as foods free from the use of animals. Well-designed food products will be plant-based, sustainable and nutritionally balanced. However, intensive farming of animals such as chickens and fish can appear relatively environmentally and nutritionally acceptable, but completely deprives the animals of any quality of life whatsoever.

*Business perspective:*

All food can have environmental labelling. Having separate, mandatory environmental labelling will give businesses strong incentives to fulfil their corporate social responsibilities to end harms from e.g. climate change and ecological destruction.

Mandatory nutritional labelling gives companies incentives to bring in healthier food formulations. This means an increase in average public health, as well as meaning individuals can make their own healthier personal choices.

Mandatory, transparent labelling about how animals are harmed in the production of food will help end the worst practices. It will also move forward our collective understanding and discussions about how we want to end all suffering of animals in our farming.

**55. What are your views on:**

**1) A label based on a set of production standards on-farm which include both welfare and sustainability criteria for livestock production.**

There must be separate labels that show how animals have been harmed, and how the environment has been harmed.

This would help the UK Government make progress in our legal and ethical obligations to slow and reverse the climate crisis. There is also a global crisis in harms to animals in farming, and in harms to free-living animals. The UK has a historic duty, along with other Global North countries, to be showing consistent leadership towards ending all these harmful practices.





## **2) Separate labels with one based on a set of welfare standards, and the other based on environmental impact throughout the supply chain, including on-farm**

The UK Government needs introduce mandatory food labelling that separately and accurately report the harms to animals in farming, to free-living animals, and to the environment.

Plant-based food businesses have conducted extensive research, and can provide robust data and evidence on the carbon, land, water, biodiversity and all other aspects of environmental ‘footprints’ of plant-based food systems.

As the issues can be controversial, we urge the Government to start immediately to work with all relevant experts – especially plant-based food systems experts – to develop and agree the necessary ways to measure, monitor, evaluate and record these harms.

## **3) An assurance scheme which sets standards based on the extent to which a farm is participating in our new future farming schemes and is delivering environmental and animal health and welfare outcomes**

Voluntary ‘assurance schemes’ will not provide people with the information which they need, where farms and other food businesses do not opt in. Therefore, ‘assurance schemes’ cannot meet our urgent need to end the food-related animal welfare, public health, biodiversity and climate crises for good.