



Response to Joint Consultation on Fairer Food Labelling - May 2024

Background and Introduction

Scotland Food & Drink is a membership and leadership organisation, responsible for leading the delivery of Scotland's food and drink industry strategy: Sustaining Scotland; Supplying the World.

Our shared vision is that: "We want Scotland to be the best place in the world to own, operate, and work for a food and drink business. We want to be renowned as a world leader in sustainable production and responsible growth, where resilient businesses across the entire supply chain can flourish and prosper."

Our responses are shown in [blue](#) below and are based on our desire to build the industry's value and reputation and help all businesses reach their full potential.

We fully support the overarching goal of the proposed labelling system to make origin of products clearer, to enhance animal welfare transparency and help consumers make informed choices that align with their values. High welfare standards are not only crucial for animal health but also enhance the quality of products that reach consumers and provide greater market opportunities.

We are committed to working collaboratively with stakeholders to refine these proposals to ensure that the final labelling system reflects both the welfare of animals and the origin of products, which also respects the unique challenges faced by Scottish farmers. Producers should not be disadvantaged by standards that do not reflect their geographical or environmental realities.

It is essential to consider the decades of expertise and established welfare practices within organisations such as Quality Meat Scotland (QMS). Their concerns, particularly around the implications of mandating outdoor access for higher welfare levels for pigs, highlight the need for flexibility. It is important to consider whether the labelling system can recognise valid, alternative welfare metrics beyond the binary choice of "indoor vs outdoor". This might include health outcomes and enrichment quality, as well as other measures which are already approved by reputable bodies like the SSPCA.

Our Responses

About you or your organisation

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

Please select: [No](#)

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

Question 2. What is your name?

[Joe Hind, Policy Manager, Scotland Food & Drink](#)

Question 3. What is your email address?

joe@foodanddrink.scot

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

- ✓ [Industry \(multiple businesses\) – You are responding in an official capacity representing the views of multiple businesses or, the views of a trade association or, a business association](#)

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

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

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

[We are a leadership and membership organisation, and coordinate the Scotland Food & Drink Partnership, which is made up of industry bodies, academic and government agency partners.](#)

[We have approximately 400 members. Many will be affected by these proposals.](#)

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

[We have liaised with relevant partners, members, as well as internal colleagues, to formulate our response.](#)

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

Scotland Food & Drink

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

Please select: [Scotland](#)

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

Please select: [Scotland](#)

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

Please select: [Small or Medium-sized business: 10 to-249 employees](#)

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

Please select: [No](#)

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

Please select: [Trade body](#)

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

Part A: Country of Origin Labelling

Scope of consultation

Consultation questions

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

Very Important

Question 16 b) Please explain your answer.

This will aid consistency and transparency; enabling producers based across the UK to access more market opportunities and value as well as providing greater information to consumers about the origin of meat products.

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

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

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

We do not believe a list is the best approach, as products evolve over time. However, if a list approach is chosen, it should be based on volume – i.e. which are consumed most and therefore will have the greatest impact.

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

This could be defined through criteria such as:

“The criteria around country of origin applies to all minimally processed animal products which are primarily composed of meat, fish, or seafood, where the core ingredient undergoes limited processing while retaining its essential characteristics. This includes products (including but not limited to sausages, bacon, burgers and meatballs) where the animal component is processed with the aim to enhance flavour or texture without fundamentally altering the

nature of the ingredient (including mincing, seasoning, slicing, or forming into a shape) whilst still constituting a significant (25%+) component of the final product.”

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

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

Yes

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

A flag, such as Scotland’s saltire, is a powerful tool, carrying weight and high levels of recognition among consumers, which we believe will often carry expectations around origin. This is not always the case though, and a reasonableness test may be necessary. For example, for sausages, the use of a saltire is likely to suggest the pigs were reared in Scotland. For products such as tea cakes, people would be less likely to expect the ingredients to originate from Scotland even if a saltire is on the packet, but would expect production to take place in Scotland. It appears to be especially relevant for animal-based products. Its use should be regulated to ensure it is used only where accurate and appropriate – which means it should fit consumer expectations around the product. It seems likely that the current situation allows producers to use a flag alongside information which contradicts the likely impression of the flag, and this could therefore be improved.

This would help ensure that flags serve as reliable indicators of origin, enhancing consumer trust in food labelling.

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

Yes – as above.

The underlying requirement for mandatory information on food is for the height of a lower-case ‘x’ to be 1.2mm or greater. There is no placement requirement for information, and it is often placed amongst other information

on the back of the pack. Where origin information is required for the primary ingredient of food, being different to that of the food itself, it must be presented in text at least 75% of the size of the information on the food origin and in the same field of view, or as above, whichever is larger.

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

Yes

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

Make larger than 1.2mm 'x' height

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

Yes, a national flag, such as a Saltire for Scottish produce.

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

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

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

Consistency is important – and the same rules and guidance should apply to seafood as for meat and fish. There is a challenge to overcome around origin for wild caught fish and seafood, which may be caught by a British vessel, and landed in the UK, but was caught elsewhere. This would need to be carefully thought through.

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

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

No, it is not sufficiently clear at present.

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

It presents a challenge to provide up to date information, and there will be a cost to retailers to achieve this. However it is important information, and we are aware of work underway to help consumers identify the origin of certain produce, which we hope will include where products originate *within the UK*. It is fundamentally possible to achieve this and given the importance of ensuring consumers have this information, we feel it should be a requirement for online retailers to show the origin of products they are selling, down to country (devolved administration area). In the case of items which frequently change country of origin (such as smoked or fresh Salmon) it could help ensure retailers choose the local option where available, which would boost both consumer confidence and producer viability.

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

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

Yes

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

On menus or customer displays

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

Yes

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

Question 29. If measures such as mandatory origin for minimally processed meat products, increasing the visibility of origin labelling, controlling the use of national flags and/or mandating origin labelling for the out-of-home sector were introduced, what do you think are realistic timescales for businesses to implement such policies from the point at which they are announced?

1 year

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

Micro businesses

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

It is vital to understand the cost implications and provide support, especially for SMEs, but it is difficult to quantify these until the proposals are finalised.

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

It is critically important to help people understand where their food comes from, and bring the supply and demand ends of the supply chain closer to build trust and understanding. This will ultimately benefit consumers, and producers alike.

Part B: Method of Production Labelling

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

Yes

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

Transparency is an important principle of building consumer trust and, ultimately, protecting our value, brand, and reputation.

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

Yes

Question 34 b) Please explain your answer.

For consistency.

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

Our members would be impacted by these requirements to varying degrees.

Implementation period

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

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

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

It is about right

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

Question 36 c) Please explain your answer.

N/A

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

Clear guidance will help.

Scope of labelling

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

Yes, we agree labelling should focus only on these three species initially.

Question 38 b) Please explain your answer.

These are the species most closely associated with a variety of production standards and it is right to phase the requirements in and assess both positive and negative impacts.

Scope: level of processing

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

prepared meals that may contain more than one animal product would be more difficult to label than less processed products.

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

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

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

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

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

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

Very important.

Question 39 b) Please explain your answer.

Volumes of consumption are high, and the impact on both welfare and consumer awareness would be substantial, as well as providing greater ability for producers investing in higher welfare to secure market access and value from their efforts.

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

Pork (for example, bacon)

Yes, I agree that labelling should cover minimally processed products

Chicken (for example, cooked chicken slices)

Yes, I agree that labelling should initially cover minimally processed products

Eggs (for example, hard boiled eggs)

Yes, I agree that labelling should initially cover minimally processed products

Question 40 b) Please explain your answers.

As above – it is important for transparency, consistency and welfare.

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

- ✓ bacon Strongly agree
- ✓ sausages Strongly agree
- ✓ gammon Strongly agree
- ✓ sliced cooked pork meat for example, ham Strongly agree
- ✓ scotch eggs Strongly agree
- ✓ breaded chicken Strongly agree
- ✓ ready to cook chicken Strongly agree
- ✓ sliced cooked chicken meat for example, chicken slices Strongly agree
- ✓ egg whites Strongly agree
- ✓ hard boiled eggs Strongly agree
- ✓ quiche Strongly agree
- ✓ marinated meats Strongly agree

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

N/A

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

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

As stated in an earlier response, using lists may result in erroneously uncategorised items so a definition may be preferable, although it is difficult to define in such a way that it includes everything, for example both quiche and bacon.

A challenge with a definition that applies to quiche is that it may overlap products such as cake, which is presumably not intended to be covered by these proposals. It may be necessary to define by the volume/percentage of egg used.

Business impacts & decisions

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

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

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

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

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

Strongly agree

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

Yes, we agree that the lowest standard should be labelled

Scope: how products are packaged

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

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

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

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

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

Question 44 a) To what extent do you agree or disagree with our proposal that all unprocessed and minimally processed pork, chicken and egg products in scope are labelled regardless of whether they are packed at the

consumer's request, prepacked for direct sale or prepacked in a factory before sale?

Strongly agree

Question 44 b) Please explain your answer.

Consistency and transparency are key principles.

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

Strongly agree

Question 45 b) Please explain your answer.

Consistency and transparency are key principles.

Scope: food service sector

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

Disagree

Question 46 b) Please explain your answer.

Although we understand the rationale, and it would place additional requirements on providers, it is also, as acknowledged above, "a more likely destination for lower-welfare products". So a greater positive impact would arise from including foodservice.

Defining production standards

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

Agree

Question 47 b) Please explain your answer.

We agree but not strongly as we understand that standards organisations use both input and outcome-based measures and are comfortable with this. Input only indicators provide a partial picture and, in some cases, may skew unfairly against Scottish production.

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

Strongly agree

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

We share the concerns raised by QMS about the implications of input-based requirements, such as outdoor access for pigs, given the Scottish climate. We would like to see more flexibility and regional variance to reflect diverse environmental conditions where welfare may be higher in enriched indoor environments. We propose that the labelling system recognises valid, alternative welfare metrics such as health outcomes and enrichment quality, which are already approved by reputable bodies like the SSPCA.

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

For laying hens Don't know

For meat chickens Don't know

For pigs Don't know

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

N/A

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

For laying hens Don't know

For meat chickens Don't know

For pigs Don't know

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

N/A

Standards: setting tiered standards

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

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

- **the lowest tier has no specific requirements associated with it. It indicates products that are not verified as meeting baseline UK welfare regulations for the metrics that underpin the label.**
- **the next tier indicates products which meet baseline UK welfare regulations for the metrics that underpin the label (as defined in Annex B).**
- **the three higher tiers indicate production standards that increasingly exceed baseline UK welfare regulations.**
- **all requirements for a tier would need to be met for a product to be labelled as meeting that standard, with each proposed tier building on the one below.**

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

Strongly agree

Question 51 b) Please explain your answer.

It seems to be evidence based and reasonable.

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

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

For laying hens – [We defer to specialist organisations on this point.](#)

For meat chickens [We defer to specialist organisations on this point](#)

For pigs [We defer to specialist organisations on this point](#)

Standards: period of life covered by the standards

While farm animals spend most of their lives on farm, time spent in transport and at slaughter also pose significant welfare considerations. In the call for evidence, we asked what we would need to consider if we developed a set of standards that covered the whole life of the animal. Respondents noted that this would be more challenging for some species than for others and highlighted many factors including: the length of time animals spent with their mothers, how often animals are moved, traceability requirements and the need to include the laying/breeding stock/mother.

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

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

For laying hens, the draft standards apply to the life of the hen from the point it enters the laying hen house (usually at 16 weeks old) to the point it leaves the house at the end of the production cycle. We are also seeking views on whether to extend this to also include the period of life when hens are being reared as

pullets (usually from day-old-chicks up to 16 weeks of age) and are keen to understand how this could work and the possible impacts.

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

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

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

For laying hens Don't know

For meat chickens Don't know

For pigs Don't know

Question 53 b) Please explain your answer.

We defer to specialist organisations on these points. As an industry membership and leadership organisation, our principal concern is to ensure regulation that builds trust and supports the industry to grow responsibly. The technical elements of animal husbandry are better understood by other organisations and businesses directly involved.

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

Extending the period of coverage for laying hens to include the pullet rearing stage would be a proactive step towards enhancing welfare standards in poultry farming. This extension would necessitate close monitoring and enforcement of regulations from the earliest stages of a hen's life, ensuring that proper care and management practices are upheld throughout their lifecycle. Positive impacts would likely include improved welfare outcomes, enhanced

health and productivity, and increased transparency for consumers. However, operational challenges, such as logistical complexities and resource requirements, must be carefully addressed to ensure effective implementation and compliance. Overall, extending coverage to the pullet rearing stage would need to be managed carefully, and specific impacts quantified with the producers affected.

Label format and terminology

Label format, design and terminology are critical for ensuring consumers can clearly understand how their food was produced and make informed choices. In the call for evidence, we asked about the different label formats for presenting information including tiers, descriptive terms, and certification logos.

Respondents raised the importance of simplifying information for consumers with clear consistent terms, avoiding overcrowded food packaging and streamlining existing on-pack labelling where possible. Many favoured the inclusion of tiering and use of colours and pictures to make the label as intuitive as possible for consumers. Our proposed reforms seek to achieve this through a clear set of standardised terms, replacing inconsistent unregulated marketing terms. **We now wish to seek your views on the following potential features of a label:**

(a) the tier of the product

(b) a colour corresponding to each tier

(c) an accompanying descriptor(s)

(d) a picture illustrating method of production

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

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

On (a) the tier of the product:

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

Don't know

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

We defer to those better positioned to respond usefully. Instinctively, a star system feels likely to resonate with consumers, as it is already used (e.g. in hotels) and a number system may confuse (i.e. how will people know if 1 is high or low?) but there will likely be evidence of effectiveness for different systems.

On (b) a colour corresponding to each tier:

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

Don't know

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

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

On (c) an accompanying descriptor(s):

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

- comparability of terminology between species
- level of consumer understanding of existing terms in use
- importance of keeping terminology similar to that used today
- consumer understanding of what constitutes good welfare, and how that interacts with different production systems
- the balance between full transparency and clear understanding, to make easier choices
- terms which fairly reflect farming practices and enable positive communication of higher welfare standards
- the ability to update the underpinning standards without needing to update the label terminology, for example, if we move to a more outcomes-focused system.

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

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

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

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

Don't know

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

This is difficult to answer because of the challenge in balancing consumer expectations with the market benefit for producers who both meet UK legal standards, and those who invest in higher welfare systems.

The “method of production” language is very focussed on being indoors or outdoors, whereas a broader “five freedoms” approach might offer a more nuanced and comprehensive perspective than this.

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

Method of production term – we would welcome further work on this with stakeholders to arrive at the best choice for consumers and producers.

Level of welfare term - we would welcome further work on this with stakeholders to arrive at the best choice for consumers and producers.

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

Ensuring the five freedoms (freedom from hunger or thirst; discomfort; pain, injury or disease; fear or distress; alongside the freedom to express normal behaviours) are the cornerstone of modern animal welfare standards. As Annex B of the consultation paper shows, this goes beyond the binary of “indoor” vs “outdoor”. The amount of indoor space is as important to differentiate levels as providing outdoor access. Other requirements around welfare also matter such as enrichment, age before slaughter, or treatments such as castration or tail docking. It is very difficult to cover all five freedoms within a label, especially as the standards relating to the different freedoms might vary.

As such we feel a descriptor should be left out altogether and replaced with normative terms which indicates the level of overall welfare.

On (d) a picture illustrating method of production:

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

Don't know

Question 60 b) please explain your answer.

It will be hard to achieve this consistently. A still single image can only show a small snapshot of the animal's life and it seems impossible to show that the animal had high welfare from one image alone.

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

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

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

Maybe – it would depend on the assurance scheme.

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

Yes – it is important for the label to provide this information.

Question 61 c) Please explain your answer.

Transparency and consistency are key principles, and this would help ensure those are met.

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



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

It seems odd for 1 to be high, rather than low. In this specific example it also may also not be clear how this level differs from organic.

Options for providing additional information online:

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

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

Yes

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

The basic information would already be available, on the UK gov website, and having an option to enhance this would provide producers with opportunities to convey their efforts more effectively.

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

Unsure

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

We welcome further dialogue on this, as things progress, as it is likely to require more input as decisions are made.

Monitoring and enforcement

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

We are seeking your views on a proposal which places the responsibility for accurate labelling on the Food Business Operator (FBO) applying the label. We would also like to gather your views on whether there is an additional need for government to provide the certification needed for an FBO to apply a label.

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

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

label to the product, indicating it has not been produced to any particular production standards.

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

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

Government guidance to support FBOs

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

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

For assured farmers, this would mean that their existing on-farm inspections could be used to help evidence that they meet the standards required for the top three tiers. An estimated 95% of pigs and meat chickens, and 90% of laying hens, reared in the UK are on farms that are already members of assurance schemes.

FBOs could also meet their responsibility to apply accurate labelling, by demonstrating that a product originates from a country whose baseline legislation meets the standards for a certain tier. For example, as the UK legal baseline meets the standards for tier 4, demonstrating that a product originates from the UK and meets those requirements would be sufficient evidence for that tier label to be applied. As part of published guidance, we are considering

including a country-level register setting out countries whose minimum legal baseline meets the standards associated with a particular tier. As with assurance schemes above, countries would need to send evidence to the UK government, the Scottish Government, Welsh Government and the Northern Ireland Executive to be added to the register.

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

Don't know

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

We defer to others who have more expertise in this area.

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

Don't know

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

We defer to others who have more expertise in this area.

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

Don't know

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

We defer to others who have more expertise in this area.

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

Unsure

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

Strongly Oppose

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

Country level recognition assumes that standards are in place and checked through rigorous compliance processes across an entire sector. This seems unduly lenient given the purpose of these proposals is to provide confidence to consumers. Further checks should be introduced to ensure a particular tier is met across a country.

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

It depends on how frequently standards change, so we defer to those bodies to advise on this.

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

Strongly Support

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

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

They must be sufficient to ensure compliance / deter others from non-compliance. It could be a percentage of turnover.

A government role in certifying standards

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

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

Don't know

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

It remains unclear precisely how this new system will work in relation to existing standards bodies, and that will ultimately determine the need for new inspection function within Government.

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

Spot checks, at random, alongside paperwork.

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

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

Business impacts

Geographic scope

Our preferred approach is that any reforms are implemented on a UK-wide basis so that a consistent approach is taken across all UK administrations, noting the market access principles in the UK Internal Market (UKIM) Act 2020 of mutual recognition and non-discrimination. The UKIM Act allows all goods that can be legally sold in one part of the UK to be sold in any other part, under the mutual recognition principle for goods. If we choose to proceed with the proposed labelling reforms in GB only, qualifying Northern Ireland goods

benefitting from unfettered market access could be sold in other parts of the UK without the proposed method of production labelling requirements. This could mean that some pork, chicken or egg products could be sold in England, Scotland and Wales without a method of production label, that would otherwise be applicable in GB.

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

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

Strongly agree

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

Important for the internal market and consistency. It would allow traders to move goods freely between areas of the UK without changing standards or labelling.

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

We believe the proposals must apply to all relevant products sold in the UK as otherwise they will do little for welfare, given that welfare concerns often relate to imported animal products. If that is achieved, then this is a moot point. If that is not achieved, we question the merit of the proposals.

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

Our members would likely consider it to be disproportionate and contradictory to Better Regulation principles around targeting if this was introduced for GB only, with no requirement on imported products.

Question 76 a) What differential impacts would these proposals have on you and/or your business if mandatory method of production labelling

requirements were to apply on a GB-wide basis only, with respect to the movement of goods from GB to NI?

Our members would likely consider it to be disproportionate and contradictory to Better Regulation principles around targeting if this was introduced for GB only, with no requirement on imported products.

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

With difficulty.

Small and medium businesses

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

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

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

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

Strongly agree

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

Given that this is largely about information offered in retail environments, it would make sense to exempt producers (or make it voluntary) for direct sales

from SMEs to consumers, as this involves a direct relationship where trust and transparency is already likely to be in place.

Impact assessment

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

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

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

Direct costs and benefits

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

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

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

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

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

Don't know

We defer to others who will have more experience in this area.

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

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

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

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

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

Strongly agree

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

All compliance requirements carry a cost and time burden.

Traceability and auditing

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

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

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

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

We defer to others who have more experience and expertise in this area.

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

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

We defer to others who have more experience and expertise in this area.

Indirect costs and benefits

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

- benefits to society from improved animal welfare (not quantified)
- benefits to animals arising from improved welfare (not quantified)
- benefits to UK baseline farmers who can increase sales (+£46.56m per year, based upon a partial shift towards higher welfare production)
- capital expenditure for farmers choosing to move to higher welfare production practices (not quantified)
- environmental impacts (partially monetised for meat chickens as -£17.7m per year in increased greenhouse gas emissions)
 - positive impacts (for example, improved biodiversity) could offset these negative impacts and have not been quantified

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

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

We assume that retailers currently balance their costs and prices by setting prices at a product category or business level, rather than at an individual

product level. Retailers would continue to 'balance the books' after the introduction of labelling reforms. Profits for retailers may be redistributed across the product range as a result of changes in retailer stocking policies and consumer demand.

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

Don't know

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

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

Don't know

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

It is hard to quantify this.

Business decisions

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

Unsure

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

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

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

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

Unsure

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

Question 88 a) Please provide detail on any additional impacts you can identify to businesses (domestic or abroad) as a result of the proposals

being applied to imported products. How do you think the cost and/or volume of imported products will be affected by the labelling requirements?

It is likely to make manufacturers and retailers scrutinise their supply chains and enable more informed choices, which is a good thing for them, the animals, and consumers. The impact on imported products could be to reduce volume. The impact on costs is unclear as reduced demand would usually lower costs (because it increases availability), but producers may need to raise prices to reflect the additional compliance.

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

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

Additional impacts

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

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

Neither agree nor disagree

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

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

Neither agree nor disagree

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

N/A

Wider labelling reforms

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

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

It is vital for our ambitions around responsible growth that we maintain the ability to promote the world leading produce from Scotland, including meat, fish, and seafood. Nothing in the proposals suggests this is at risk, and we note the Scottish Government have been involved in developing the consultation, which is positive. We will continue to monitor progress and appreciate your efforts to ensure high quality, high standard food from Scotland can achieve greater recognition and market penetration across the UK, and abroad.