



**“Method of Production” labelling of animal-derived food products:
A national approach**

Humane Society International

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The need for “Method of Production” labelling

Consumer awareness of the ethical, environmental and health considerations involved with factory farming production methods is growing, and consumers are increasingly wanting to make informed choices on the animal-derived food products they purchase. Within Australia, this has been demonstrated by the doubling of the free-range egg market in the last six years alone, with the result that it now comprises over 30% of the total retail egg market value¹, representing an increase of more than 200% since 2000. Similar growth has occurred in the free-range chicken market, with one of Australia’s major chicken-producers, Inglewood Farms, reporting a tripling in sales over a 6 month period in 2005².

The growth of these industries is supported by shifting consumer attitudes to the purchasing of animal-derived products. Recent surveys have revealed that 63% of participants would be more inclined to buy free-range pig products after becoming aware of factory farming conditions. In the ACT, a 2005 survey revealed that 84% of participants felt that keeping chickens in battery cages was cruel, and 73% supported a prohibition on these cages. Moreover, a survey in Queensland in 2001 showed that many consumers rank the humane treatment of animals ahead of price³.

Despite this growth in awareness and demand, animal-derived food products are still labelled with a confusing and incoherent abundance of poorly defined and unregulated labelling terms. These include: caged / battery eggs; barn laid eggs; free-range, open-range or range eggs; grain fed; bred free-range; organic and bio-dynamic. None of these terms have a nationally consistent legal definition, or enforceable standards. A suite of voluntary standards and third party certification schemes of varying regulation have resulted in the big producers redefining the terms to suit themselves⁴, and consumers left with a spectrum of products produced under a range

¹ Australian Egg Corporation 2006. Egg industry overview.

² Demand soars for organic chicken meat. ABC Rural News, 30 November 2005.
<http://www.abc.net.au/rural/content/2005/s1519954.htm>

³ Voiceless 2007. From label to liable: lifting the veil on animal-derived food product labelling in Australia.

⁴ Choice July 2008. Free-range phony? How free are the hens that lay “free-range” eggs?

of conditions. This ambiguity does not facilitate the ability of consumers to make informed product purchases.

Health Considerations

Clear and mandatory labelling of the method of production of animal-derived food products is necessary to allow consumers to make informed decisions based on health considerations.

A suite of drugs and medicines are used during animal production in intensive farming practices. In Australia, the pig industry alone utilises over 200 different varieties⁵. Antibiotics, in particular, are routinely used in factory farming environments to control disease associated with raising animals in cramped conditions, and promote animal growth. Thirteen such antimicrobial agents are registered for use as food additives in farming environments in Australia⁶. There have been recent reports that the heavy use of such antibiotics on factory farms is creating a range of antimicrobial-resistant superbugs, including resistant versions of salmonella, campylobacter and *E. coli*, that may be transferred to humans through meat consumption⁷. This issue has been recognised by the World Health Organisation and there have been calls for a reduction in the use of antibiotics on farms as a result⁸.

Environmental Considerations

Consumers increasingly want to make environmentally conscious purchasing decisions, and clear and adequate method of production labelling will allow them to do so.

It is now commonly acknowledged that rural industries and meat farming contribute greatly to atmospheric carbon dioxide concentrations, and are subsequently one of the leading causes of global warming. However, it has recently been purported that a shift to free range production methods would not only reduce emissions associated with livestock industries, but would concurrently reduce the effects of global warming by sequestering carbon out of the atmosphere. As there is more carbon stored in soil in comparison with the atmosphere, free range farming methods can contribute to the better management of that bank of carbon. By moving animals frequently, it allows the grass to accumulate the carbon. The animals then trample the soil, enabling it to absorb the carbon. When the animals are moved, the grass is allowed to re-sprout and the process is repeated⁹. Such free range farming effectively mitigates the methane emissions associated with raising cattle¹⁰. Studies are also showing that cattle grazing

⁵ Chris Richards and Associates Swine Veterinary Consultants.

<http://chrisrichards.com.au/index.php?page=msds's>

⁶ Silbergeld EK, Price L & Graham J Antimicrobial resistance and human health. A report of the Commission on Industrial Farm Animal Production.

⁷ Putting Meat on the Table: Industrial Farm Animal Production in America. A Report of the Pew Commission on Industrial Farm Animal Production.

⁸ Poulter S. Factory farms “to blame for new superbugs”. Daily Mail, 11 August 2008.

⁹ Can cattle save us from global warming? J Walljasper. 30 June 2008.

<http://www.eatwild.com/environment.html>

¹⁰ Finishing cattle on pasture may reduce greenhouse gases. Eatwild.

on healthier grass that is allowed to regenerate produce up to 20% less methane during digestion¹¹, thereby directly contributing to a reduction in greenhouse gas emissions.

Furthermore, water usage on intensive farms is far greater than that used with free range production methods. For example, a free range pork producer would use seven times less water than an intensive farm with the same number of breeding sows¹².

Both the United Kingdom¹³ and Sweden¹⁴ are considering food labelling schemes that will provide information on greenhouse gases involved in food production, that will be linked to environmental standards relating to, among other things, energy inputs, fertiliser use, soil management, waste management and water pollution.

Ethical Considerations

Consumers must have the right to make informed purchasing decisions that align with their ethics and belief systems.

The conditions in which the 500 million animals currently in factory farming environments are housed and treated are widely documented. As education campaigns inform consumers of the common practices in these environments, including cramped and often inhumane living conditions and cruel husbandry practices¹⁵, there is an increased need for a nationally consistent labelling scheme to assist consumers to identify those products that are produced according to humane production methods and standards.

International Precedents

Australia is clearly lagging behind the European Union when it comes to the labelling of animal-derived food products. Since 2004, the EU has required the mandatory labelling of egg production systems¹⁶, and has simplified labelling on egg cartons by only allowing the use of the terms “free range eggs”, “barn laid” and “eggs from caged hens”. Furthermore, “free range” and “barn laid” are defined in legislation according to detailed standards¹⁷. The EU has also proposed an “EU animal welfare

¹¹ Methane emissions of beef cattle on forages: efficiency of grazing management systems. DeRamus HA, Clement TC, Giampola DD & Dickison PC 2003. *Journal of Environmental Quality* 32(1): 269-277.

¹² The environmental benefits of free range farming over intensive farming. Humane Society International. <http://www.humanechoice.com.au/news.html>

¹³ Eco-label will create green standard for food, says Miliband. C Clover. *The Telegraph*, 19 April 2008. <http://www.telegraph.co.uk/news/uknews/1543832/Eco-label-will-create-green-standard-for-food,-says-Miliband.html>

¹⁴ Climate labelling of food in Sweden. KRAV. <http://www.krav.se/upload/Broschyr%20EN.pdf>

¹⁵ Fair go for farm animals. RSPCA Australia. <http://www.rspca.org.au/campaign/fairgo.asp>

¹⁶ Council Regulation 2001/05/EC of 19 December 2000 amending Regulation 1907/90/EEC on certain marketing standards on eggs [1999] OJ L 2/1.

¹⁷ Commission Regulation (EC) No 2295/2003 introducing detailed rules for implementing Council Regulation (EEC) No 1907/90 on certain marketing standards for eggs as amended by Commission Regulation (EC) No 1515/2004, Annex 3.

label” which would classify products “produced under high welfare standards linked to standardised scientific indicators”¹⁸.

Federal legislation enabling a comprehensive national food labelling system, that incorporates the production method of animal-derived products, is urgently required. Currently, only product labels in the ACT and Tasmania expressly require the identification of production systems, and this only extends to egg production.

Policy Solutions

Consumers have the right to sufficient, accurate and meaningful information on the labels of animal-derived food products, to enable them to make informed food purchasing decisions. As such, there is an urgent need for a reform of all federal, state and territory legislation and regulations applying to food labelling, branding and marketing.

Such reform should ensure that labelling terms are limited, adequately defined in legislation, and linked to consistent national standards, including those for animal welfare. Definitions of terms must include criteria on the source of the product, the type of housing provided and the specific standards of husbandry, transport and slaughter. Such reform will provide consumers with protection, confidence, and an increased ability to make suitably informed choices.

Over recent years, Australia has successfully implemented mandatory food product labelling of genetically modified organisms¹⁹, and Country of Origin standards²⁰. Both of these initiatives have been enabled by the development of new Australia New Zealand Food Standards Codes. A national scheme for Country of Origin labelling, has been made possible through an amendment to the Commonwealth *Trade Practices Act 1998*, and the incorporation of the standards into state and territory legislation through the adoption of the Food Standards Code.

The *Food Standards Australia New Zealand Act 1991* (FSANZ Act) which establishes the joint body known as Food Standards Australia New Zealand has among its goals²¹:

- a) *a high degree of consumer confidence in the quality and safety of food produced, processed, sold or exported;*
- c) *the provision of adequate information relating to food to enable consumers to make informed choices;*

¹⁸ Commission of the European Communities, Commission Working Document on a Community Action Plan on the Protection and Welfare of Animals 2006-2010, 3.2

¹⁹ Australia New Zealand Food Standards Code, Standard 1.5.2.

²⁰ Australia New Zealand Food Standards Code, Standard 1.2.11; Trade Practices Amendment (Country of Origin Representations) Act 1998 (Cth).

²¹ Section 3 Objects of the Act, *Food Standards Australia New Zealand 1991* viewed online at www.comlaw.com.au

Furthermore, under Section 18 of the FSANZ Act, *the objectives (in descending priority order) of the Authority in developing and reviewing food regulatory measures and variations of food regulatory measures are:*

- 1) *the protection of public health and safety; and*
- 2) *the provision of adequate information relating to food to enable consumers to make informed choices; and*
- 3) *the prevention of misleading or deceptive conduct.*

Country of Origin labelling has demonstrated the application of a national mandatory labelling scheme, facilitated by the FSANZ Act and incorporated into state and territory legislation, for the express purpose of “providing adequate information relating to food to enable consumers to make informed choices”.

Inadequate labelling of animal-derived food products due to the confusing use of ill-defined and unregulated terms is clearly an example of the *absence* of adequate information available to allow consumers to make informed choices. The introduction of mandatory labelling of the production method of animal-derived food products is necessary to provide this information, and would be complimentary to existing mandatory labelling schemes.

Conclusion

Without adequate labelling laws and regulations, consumers are not in a position to make informed choices and purchasing decisions. The vast array of undefined and poorly regulated labelling terms is necessitating an urgent reform of all federal, state and territory legislation and regulations applying to food labelling, branding and marketing. This reform must ensure that labelling terms are limited, adequately defined in legislation, and linked to consistent national standards. Only with such a reform will consumers be provided with the knowledge to be able to differentiate products on the basis of animal welfare, health and environmental concerns, and therefore be well positioned to exercise their rights to make informed decisions.