



Animal Welfare.
Worldwide.

[FOUR PAWS / VIER PFOTEN](#) is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. Founded in 1988, the organisation advocates for a world where humans treat animals with respect, empathy and understanding. FOUR PAWS' sustainable campaigns and projects focus on companion animals including stray dogs and cats, farm animals and wild animals – such as bears, big cats, orangutans and elephants – kept in inappropriate conditions as well as in disaster and conflict zones. With offices and sanctuaries for rescued animals in eighteen countries, FOUR PAWS provides rapid help and long-term solutions.

FOUR PAWS / VIER PFOTEN glad to have the possibility to provide feedback on the Roadmap of the revision of rules on information provided to consumers. As an animal welfare organisation, FOUR PAWS welcomes Commission's initiative to review these rules, as we believe that transparency is a fundamental right for consumers and that it can help reducing unsustainable practices which are detrimental to the welfare of animals.

Front pack labelling

Consumer only spend a limited amount of time making their food choices in shop. Front pack indication therefore play a very important role for consumers, who should be allowed to decide for the most sustainable - including animal welfare friendly - choice in an eye blink. For this reason, besides a clear system indicating the quality of the food, FOUR PAWS would suggest that the review tackles the entire indication given on the front pack claims and images. Misleading and unsubstantiated claims and images are used on food packaging, decreasing the transparency of products for consumers and may decide the consumer who does not want to take the time to read the indications to make the "wrong" choice. Pictures which for instance show animals raised outside, contributing to the maintenance of permanent pastures and of the countryside can be very deceptive to the consumer if the animals are raised inside in intensive keeping systems with only little outdoor access and contribution to carbon storage. The review of the rules on front pack information could therefore be very inclusive and forbid deceptive claims and pictures.

The system must be simple enough that indications which are provided are relevant for consumers. The Roadmap rightly say that European diets are not in line with national and international dietary recommendations. In particular, there is a clear overconsumption of meat and meat products in the EU. For instance, the Lancet report 2019 suggests that "no more than 98 grams of red meat (pork, beef or lamb), 203 grams of poultry and 196 grams of fish per week" should be consumed. Such important information should be transmitted to consumers. With the review, the Commission could maybe explore providing information on the frequency on which products can be consumed. For instance, most Europeans know that it is recommended to eat at least 5 fruits and vegetables a day and such recommendations could be spread for other products.

Front pack labelling should also be ready for existing circumstances. There is a growing number of citizens who don't eat meat or animal-based products in general and for different reasons. As there is currently no EU legal definition of the terms 'vegan' and 'vegetarian', the review could be the right opportunity to feel this gap and harmonize such indications on the front pack. This would be particularly welcomed as it is not always obvious to the consumer that some products contain animal ingredients i.e. gelatine in sweets.

Helping consumers to make the “right” choices

Together with the indication which are easily accessible and understandable on the front pack, FOUR PAWS would like to highlight the importance of price in purchasing choices. Unfortunately, many products are too cheap and don't properly reflect the costs for the producers, for the environment, the animals and for public health systems. Meat and meat based products are stereotypes of these category of products, where the intensification of the production crushes humans, animals and wrongly give the impression to consumers that meat should be a cheap product – especially compared with fruits and vegetables. Hence, should the initiative aim at accompanying consumers to make the most sustainable choices, FOUR PAWS would welcome a harmonised system of pricing and taxing food products, in particular meat, which incentivise consumers to make the right choices, while protecting European producers from unfair competition from within and outside of the EU.

Extension of mandatory labelling of origin

FOUR PAWS welcomes Commission's proposition to extend the rules on mandatory origin or provenance indications to certain products. We are glad that products like “milk and milk used as an ingredient, meat used as an ingredient, rabbit and game meat” have already been identified as products for which the mandatory labelling or origin will be extended. To our knowledge there is still a lot of false assumptions and even fraud in the field of the horse meat. For this reason, FOUR PAWS would welcome that the rules are extended to the products of this specie. In addition, it is important for consumers that the indication is not only provided on the package, when the consumer purchases the product at the shop, but in all places these products can be consumed, such as in restaurant and canteens. Last but not least, in times where food chains are getting increasingly complex, the label should provide indication on the place where the animal was born, raised and slaughtered.

Coordination with other labels

FOUR PAWS welcomes Commission's approach to tackle different aspects of the food information to consumers in order to improve the sustainability of EU's food system. For this reason, we would welcome further harmonisation between the information already proposed in the roadmap and other labels for sustainability, such as the organic or hopefully the future animal welfare label and explore how the food information to consumers could increase the likeliness that consumers decide for these products.