



**DIRECTORATE GENERAL FOR
AGRICULTURE AND RURAL DEVELOPMENT**

**Study on mandatory origin labelling for milk,
milk used as an ingredient in dairy products,
and unprocessed meat other than beef, pig,
poultry, and sheep and goat meat**

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Executive Summary

Part B – Minor Meats

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EXECUTIVE SUMMARY

Introduction

Regulation (EU) No 1169/2011 on the provision of food information to consumers identifies the need to explore the possibility to extend mandatory origin labelling to types of meat other than beef, poultry, pig, and sheep and goat meat.

In doing so the study took account of: the need for the consumer to be informed; the feasibility of providing the mandatory indication of the country of origin or place of provenance, and an analysis of the costs and benefits of the introduction of such measures, including the impact on the internal market and on international trade.

The study investigated the 'minor meats' in three main categories: horse meat, rabbit meat and game meat.

Four options were considered regarding mandatory origin labelling for the minor meats:

- Non- mandatory action (i.e. status quo - voluntary labelling)- mandatory origin labelling is not implemented (Option 0);
- Labelling of countries of birth, rearing and slaughter – this option is based on the rules for beef labelling and provides origin information from the place of birth (Option 1);
- Labelling of countries of rearing and slaughter – this option is based on the approach of the Commission Implementing Regulation (EU) No 1337/2013 applicable to the meat of swine, sheep, goats and poultry;
- Labelling of country of hunting – this option was considered as appropriate for wild game meat where the places of birth and rearing may not be known.

The highly specific nature of minor meat production in EU Member States, together with a lack of consistent and reliable data means that it is not appropriate to attempt an economic modelling approach to extrapolate findings at EU level. Instead the investigations have focused on desk research and selected case studies in major producing countries for the various minor species meats in order to identify a typology relevant to the origin labelling for each of the categories investigated.

The production and consumption of the minor meats in the EU is highly specific at individual Member States. This together with a general lack of precise data compared to major food products means that, inevitably, the evaluation is based sometimes on certain subjective assessments.

Need for the consumer to be informed on country of origin or place of provenance

Specific studies on minor meats have confirmed that most consumers also consider origin information to be necessary for the minor meats. However the expressed high level of interest of consumers in the origin of minor meats (particularly for horse meat followed by large game meat) does not necessarily translate into a willingness to pay for origin information.

Our findings indicate that there are considerable differences between Member States for all indicators of the 'need' for EU consumers to be informed on the origin of minor meats (in terms of interest, understanding/awareness, willingness to pay, and the extent of voluntary origin labelling). There are a number of other factors concerning the minor meats that may affect the level of interest in origin information, as follows:

- **Horse meat:** the horse meat scandal appears to have increased consumer awareness and interest in the origin of meat more generally. Voluntary labelling of the place of birth, rearing and slaughter is used widely on pre-packed horse meat.
- **Rabbit meat:** voluntary origin labelling is limited. However, home country of origin was found to be important to consumers even if trade on rabbit meat is about 10% of production in the three main producing Member States - Italy, Spain and France.
- **Game meat:** There is relevant intra-EU and third country trade in large game meat and there is some voluntary origin labelling in this sector. However, as most small wild game is consumed by the hunters and only a small proportion is sold pre-packed, so origin labelling appears to be less relevant for these species. In this case, the best indication of origin for consumers regarding wild game appears to be the place of hunting.

Feasibility and costs and benefits of providing mandatory origin labelling

Option 1 – Places of birth, rearing and slaughter

Horse meat

The fact that horses may have long lives together with the complexity of supply chains means that it is unlikely to be feasible to provide full origin information retrospectively for all live horses that currently do not have such records. Then, it would be necessary to set up some sort of transition arrangements for horses without full origin records that are nevertheless declared fit for human consumption.

In contrast, voluntary systems are already in place for many horses that are reared specifically for meat production. Such systems provide full information on a horse's place of birth, rearing and slaughter. Such voluntary systems are used by dedicated horse meat producers exporting to the EU from North and South America countries, as well as by domestic horse meat producers in several EU Member States.

The costs of providing such origin information by specialist producers were not determined but are expected to be low, particularly when horses are born, reared and slaughtered in the same country (as is often the case).

Rabbit meat

Many producers operate closed cycle systems and supply chains are short. In these circumstances it is likely to be feasible to provide full origin labelling of the place of birth, rearing and slaughter at a low to medium cost.

Farmed game meat

Labelling the places of birth (or hatching), rearing and slaughter are only relevant for farmed and not for wild game meat.

The farming of small game birds generally takes place in one country and supply chains are short. It is therefore expected to be feasible to provide full origin labelling at a low cost.

Reindeer production takes place in Finland and Sweden and is highly organised with traceability systems in place. Under these circumstances it is expected to be feasible to provide full origin labelling at a low cost.

Farmed deer production in the EU usually takes place at one location. Supply chains are generally short and traceability systems are in place. But intra-EU trade and third country imports supply carcasses from different origins that may have to be separated in food businesses carrying out cutting and packing operations. Nevertheless, full origin labelling is likely to be feasible at a low to medium cost.

Option 2 – Places of rearing and slaughter

Horse meat

Once improved traceability systems for horses have been fully implemented, there will be no cost saving or other advantage from Option 2 if compared with Option 1, which provides more detailed origin information.

In the interim period, it may be possible to adopt a transition rule where, for example, information on a horse's location from a certain date could be provided on an origin label. This would of course be subject to the horse being traded as fit for human consumption. The costs of providing such information would depend on the details of the rule and are difficult to estimate without further information.

Rabbit meat and farmed game

In the majority of cases rabbits and farmed game for meat production are born and reared in the same country. Although their production can be significant in certain Member States, there is little intra-EU live animal trade for the minor meat species.

Under these circumstances it seems likely that there will be little or no cost saving by omitting the birth indication from mandatory origin labelling requirements.

Since Option 2 provides less origin information than Option 1, there does not seem to be any advantage in omitting birth information from mandatory origin indications for rabbit meat and farmed game.

Option 3 – Place of hunting of wild game

Option 3 indicates place of hunting and is appropriate for small and large wild game. If demanded, it would be possible to label the meat as 'Wild game' to distinguish it from farmed game having a different origin indication.

For small game it is expected to be feasible to provide this origin indication at a low cost because the production process invariably takes place in a single country with a short supply chain.

As there is a certain amount of intra-EU trade in large wild game meat carcasses before the cutting and packing stage, it may be that some food business operators incur costs for restructuring and equipment to ensure separation of wild game meats with different origins. Then, it would be expected that origin labelling of large wild game meat under Option 3 could be provided at a low to medium cost.

Recommendations

1. It is recommended to introduce mandatory country of origin labelling for unprocessed pre-packed minor meats if the cost is within the consumers' range of willingness to pay.
2. Implement mandatory origin labelling to indicate country of birth, country/ies of rearing and country of slaughter for pre-packed unprocessed horse meat. However, labelling rules can only be set up following the strengthening of the current horse identification and traceability system that is being improved for purposes of food safety and prevention of fraud. A specific period of rearing may have to be chosen in order to avoid excessive information on many places where a

horse may have been located. An interim measure would be necessary for horses born before a certain date when origin information cannot be provided retrospectively; for example by providing information on locations where a horse has been kept from a specified date. However, it might take many years to achieve full implementation due to the long lives of many existing horses, which currently do not have full origin records.

3. Implement mandatory origin labelling to indicate country of birth, rearing and slaughter in pre-packed unprocessed rabbit meat and farmed game. To indicate only country of rearing and country of slaughter (omitting country of birth) would be equally feasible and would be consistent with Commission Implementing Regulation (EU) No 1337/2013. However this second option does not offer cost savings and provides less origin information to the consumer.
4. Implement mandatory origin labelling to indicate country of hunting for pre-packed unprocessed wild game meat.