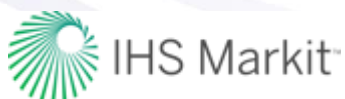




# **Evaluation support study on mandatory indication of country of origin labelling for certain meats**

Executive summary



Together with:



September 2020



## **EUROPEAN COMMISSION**

Directorate-General for Agriculture and Rural Development

Direction C - Strategy, simplification and policy analysis

Unit C.4 - Monitoring and Evaluation

Contact dissemination: [AGRI-EVALUATION@ec.europa.eu](mailto:AGRI-EVALUATION@ec.europa.eu)

European Commission

**B-1049 Brussels**

# **Evaluation support study on mandatory indication of country of origin labelling for certain meats**

Executive summary

***Europe Direct is a service to help you find answers  
to your questions about the European Union.***

**Freephone number (\*):**

**00 800 6 7 8 9 10 11**

(\*) The information given is free, as are most calls (though some operators, phone boxes or hotels may charge you).

#### **LEGAL NOTICE**

This document has been prepared for the European Commission however it reflects the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein.

More information on the European Union is available on the Internet (<http://www.europa.eu>).

Luxembourg: Publications Office of the European Union, 2020

PDF ISBN 978-92-76-20370-4 doi: 10.2762/183918

KF-02-20-503-EN-N

© European Union, 2020

Reproduction is authorised provided the source is acknowledged.

*The United Kingdom withdrew from the European Union as of 1 February 2020. During the transition period, which ends on 31 December 2020, Union law, with a few limited exceptions, continues to be applicable to and in the United Kingdom and any reference to Member States in Union law shall be understood as including the United Kingdom.*

This evaluation study was carried out by



Agra CEAS Consulting SA (BE)  
IHS Markit  
20-22 Rue de Commerce – 1000 Brussels (BE)  
Tel: +32.2.7360088  
Fax: +32.2.7321361  
Email: [info@ceasc.com](mailto:info@ceasc.com)  
Web: [www.ceasc.com](http://www.ceasc.com)



Areté s.r.l. – Research & Consulting in Economics  
Via del Gomito, 26/4 – 40217 Bologna (IT)  
Tel: +39.051.4388500  
Fax: +39.051.511186  
Email: [info@areteonline.net](mailto:info@areteonline.net)  
Web: [www.areteonline.net](http://www.areteonline.net)

**Written by:**

***Agra CEAS Consulting SA***

- Dylan Bradley
- Maria Christodoulou
- John Nganga
- Michela Bisonni

***Areté s.r.l.***

- Alberico Loi
- Mario Gentile
- Paola Parisi

**Sub-contractors:**

***AFC Public Service***

- Volker Ebert
- Elisabeth Gerwing

***AND International***

- Christian Renault
- Sibylle Parant
- Clément Lepeule
- Tanguy Chever

***Centro Statistica Aziendale***

- Leni Avataneo

***Institute for Food Studies & Agroindustrial Development (IFAU)***

- Karen Thorsted Hamann

***Incatema Consulting***

- Miguel Salvo Mendívil
- Ana González Altozano

**National experts:**

- Grzegorz Dybowski
- Iuliana Ionel

# EXECUTIVE SUMMARY

## Introduction and methodology

---

Commission Implementing Regulation (EU) No 1337/2013 lays down rules for the application of Regulation (EU) No 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers, as regards the indication of the country of origin or place of provenance on the label of fresh, chilled and frozen meat of swine, sheep, goats and poultry (henceforth referred to as Regulation (EU) No 1337/2013 or the Regulation).

General rules on food information to consumers<sup>1</sup> laid down in Regulation (EU) No 1169/2011 aim at helping consumers to make informed decisions. For this reason, the rules stipulate that certain information must appear on a food label on a mandatory basis, for example: the name of the food, the list of ingredients, the net quantity, the date of minimum durability or the "use by" date. For specific food products, the country of origin or place of provenance must also be indicated including for fresh, chilled and frozen meat of swine, sheep, goats and poultry. Regulation (EU) No 1337/2013 establishes rules on the indication of the country of origin or place of provenance on the label for these meats.<sup>2</sup>

The basic obligations of the Regulation include:

- to indicate on the label of fresh and frozen meat of certain species the country of origin or place of provenance;
- to have in place at each stage of production and distribution of these meats an identification and registration system, which ensures:
  - the link between the meat and the animal from which it is obtained;
  - the transmission of the information related to the country of origin indications together with the meat.

The evaluation study will support the Commission's internal evaluation of mandatory origin labelling for certain meats which will culminate in a legally required report to the European Parliament and the Council.<sup>3</sup> The objective of this evaluation study is to assess whether the rules on food information to consumers as regards the mandatory origin labelling for the meats covered by the Regulation as applied in Member States are: effective, efficient, coherent, relevant and bring EU added value in view of its objectives, current needs in the sector and any new problems which have emerged since implementation.

The evaluation collects and analyses the views of the main stakeholders and includes an overview of the implementation and application of the Regulation across the EU. It also examines the administrative burden, existing problems and difficulties and the continuing relevance of the Regulation. The analysis leads to evidence-based findings and conclusions on the implementation of the Regulation and recommendations on the possible need for future adjustments.

The temporal scope of the evaluation is the period from the entry into force of the Regulation on 1 April 2015, although a longer time period is used where necessary for comparative purposes.

---

<sup>1</sup> Established in Regulation (EU) No 1169/2011 (Food Information for Consumers).

<sup>2</sup> According to Regulation (EU) No 1337/2013, the term 'origin' with regard to the meats covered by this legislation is reserved for meat obtained from animals born, reared and slaughtered in one single Member State or third country.

<sup>3</sup> Required under Article 26(4) of Regulation (EU) 1169/2011.

The evaluation study analyses the impact that the Regulation has had on the various stakeholders on the market: producers, processors, traders, retailers, consumers and administrations. In addition to the impact on stakeholders in the supply chain, the study provides an analysis of the impact on trade flows between EU Member States.

Several interlocking methodologies were used to develop an evidence base from which the Evaluation Study Questions (ESQs) can be answered. The methodologies used were:

- Desk research.
- Survey of 6,250 consumers across the EU with a sample error of  $\pm 1.72\%$  at the 95% level of confidence.
- Survey of supply chain stakeholders covering the EU-28, with responses from 31 organisations representing part of the supply chain for the target meats; 42 supply chain operators (20 SMEs and 22 large companies); 11 organisations representing consumers.
- Survey of national Competent Authorities (17 complete responses).
- Case studies of 21 meat supply chains across ten Member States representative of the diversity of species, production patterns, consumption, trade volume, geographical location and supply and demand specificities.
- Interviews with EU-level stakeholders across the meat sectors and along the supply chain.

## Conclusions and recommendations

---

### **Effectiveness of the Regulation**

Consumers consider country of origin labelling to be important information at the point of purchase. There is no doubt in terms of accuracy of the information in line with the labelling definitions, but consumer understanding of these definitions is low and there are therefore doubts over consumer interpretation. In particular there is low consumer understanding of the term "*Reared in...*" as defined under Article 5, despite broad acceptance of the definition itself by consumers. As a result of the sometimes low understanding by consumers, it cannot be concluded that the information can be considered to be fully accurate, clear and useful as understood in practice by consumers and it is possible that some consumers are (inadvertently) misled. Consumers perceive origin labelling to communicate credence attributes such as safety and quality for which it is seen as a poor proxy within the EU's Single Market.

It is ***recommended that consideration be given to either running or supporting information campaigns to improve consumer understanding of origin labelling.*** Such a campaign may need to be focused on specific Member States and/or types of consumer to maximise its impact. Any campaign should make clear the EU level playing field in terms of food safety and quality.

The information provided to consumers is considered to be reliable (although the interpretation of this by consumers is key) and no systemic issues have been reported in terms of the ability of Competent Authorities to check this. Stakeholders (whether the industry, competent authorities, or consumer organisations) in some Member States have noted that the omission of loose (non-pre-packed) meat and lightly processed meat from the scope of the Regulation may cause some consumers to be misled, given also that origin labelling is compulsory for beef sold loose under Regulation (EC) No 1760/2000. In some Member States, initiatives have been taken to address perceived 'gaps'. Although voluntary schemes which communicate origin are widespread and are widely used to meet consumer demand for information and extract a competitive advantage, the use of additional mandatory national rules is not widespread. This suggests that suitable mechanisms exist at the Member State level to address perceived 'gaps' and that these are taken up where considered appropriate.

In the case of processed meat, from 1 April 2020, the provenance is labelled under Commission Implementing Regulation (EU) 2018/775 where meat is the primary ingredient and where its provenance differs from the advertised provenance of the product<sup>4</sup>. It is therefore **recommended that experience gained from the implementation of Regulation (EU) 2018/775** be used to assess the extent to which this addresses the perceived 'gap' in origin labelling provision for lightly processed meat.

The Regulation was implemented without unnecessary burdens (see *efficiency*) on the meat supply chain, facilitated by the derogations; as well as on trade, administration, and the environment. It is therefore **recommended that the derogations be retained**.

There is no clear evidence that the Regulation has had an impact on trade within the EU's Single Market, although some changes to trade flows appear to have occurred in specific cases. Therefore, it is not clear whether the Regulation has either stimulated or hindered the smooth functioning of the Single Market. However, it is relatively soon after implementation and it is **recommended that the situation should continue to be monitored**.

The traceability system required under the Regulation builds on that required and already operating under the General Food Law (Regulation (EC) No 178/2002). Information is increasingly transmitted automatically, often using blockchain technology, and is available on request where this is not the case. There is no evidence that specific information is systematically insufficient or missing. There is high expressed confidence in the effectiveness of the traceability system and few reported difficulties. On this basis, it is concluded that the traceability systems are generally effective to ensure compliance with Regulation (EU) No 1337/2013 and that the sectors can cope with the requirements.

The batch requirements did not generally result in changes to sourcing, traceability or operational practices. There is some evidence to suggest that, as expected, changes, and associated costs, were more likely to be incurred in slaughterhouses and cutting plants sourcing from multiple Member States.

The information passed on concerning rearing periods is sufficient to ensure correct labelling and can be generally verified by Competent Authorities. It is **recommended that exchanges of good practice in the verification of information on rearing periods be considered between Member States**.

The processing stage of the supply chain was the most affected by the implementation of the Regulation, even though this impact was fairly minimal. There has been little impact on other stages of the supply chain and costs have not been passed on to consumers.

### **Efficiency of the Regulation**

The evidence suggests the Regulation has had a minimal impact on the sector while also providing consumers with appropriate information to better inform their purchase decision. Cost increases and administrative burdens on operators have been successfully minimised, so in this sense, the Regulation is considered to be efficient. Traceability systems are considered to be efficient, based as they are on the availability of information under the General Food Law (Regulation (EC) No 178/2002).

---

<sup>4</sup> See also: Commission Notice on the application of the provisions of Article 26(3) of Regulation (EU) No 1169/2011 (Official Journal of the European Union, 2020/C 32/01, 31.1.2020).



The costs imposed on most operators are small, and those imposed on operators dealing with imported and domestic animals have been affordable. The pig meat sector is more likely to have experienced costs than the poultry meat and sheep/goat meat sectors.

Control costs for Competent Authorities are small within the context of official controls under Regulation (EU) 2017/625.

The batch requirements, which identify the meat as it moves through the supply chain to the consumer or mass caterer, have been efficient, given the need to provide consumers with meaningful information on provenance.

However, the (minimal) cost increases do fall mainly on the meat processing sector, and specifically on a minority of operators dealing with animals from multiple Member States, which is unable to pass them along the supply chain.

### **Coherence of the Regulation with other rules and regulations**

The objectives of the Regulation are fully consistent with the objectives of other EU legislation, with particular respect to Regulation (EC) No 1760/2000 (mandatory country of origin labelling for beef) and Regulation (EU) No 1169/2011 (food information to consumers). Both the definitions/specifications in the Regulation, and traceability requirements, are generally non-conflicting with those in other relevant EU legislation.

The labelling requirements set out by the Regulation are consistent with those in other relevant EU legislation, with the partial exception of the lack of mandatory explicit indication of the country of birth for labelling purposes, and the exclusion of loose retail sales in bulk (non-pre-packed meat) from the scope of the Regulation. Both these aspects are covered by mandatory rules in the beef sector.

The derogations provided by the Regulation are generally consistent with those in other relevant EU legislation, with the exception of a potential inconsistency vis-à-vis the derogations for beef (minced meat and imports from third countries), which are not based on systematic use of the “EU/non-EU” simplified origin indication.

Even with the above exceptions, it can nevertheless be concluded that the rules and conditions of mandatory origin labelling laid out by the Regulation have generally been coherent with other legislation at both the EU and Member State level.

The relevant national legislation identified at Member State level is consistent with the Regulation and there is no clear evidence that the Regulation has had significant unintended side effects; no significant “deadweight” has been identified.

Although there is an inconsistency between Regulation (EU) No 1337/2013 and Regulation (EC) No 1760/2000 with respect to country of birth, it is not recommended that country of birth be brought into Regulation (EU) No 1337/2013 at this stage; it is however, **recommended that the need for the country of birth indication is monitored**. Neither is it recommended that the derogation on minced meat and trimmings under Article 7 be removed at this stage due to the operational complexity that it would entail for the processing sector.

Considering that no harmonised EU legislation on mandatory country of origin labelling for processed food products has been introduced to date,<sup>5</sup> it can be concluded that it is coherent that the derogation under Article 7 of Regulation (EU) No 1337/2013 only applies

---

<sup>5</sup> With the exception of the rules laid down under Commission Implementing Regulation (EU) 2018/775, which require the provenance of the primary ingredient to be indicated where this differs from the advertised provenance of the final product.

to minced meat and trimmings, and not to the meats covered by the Regulation in general. It can also be concluded that the Article 7 derogation is fully consistent with similar derogations for blends of honeys and olive oils, and for mixes of fresh fruit and vegetables.

Although a partial inconsistency with the derogation for minced beef was identified (detailed list of relevant Member States or third countries vs. simplified “EU/non-EU” origin indication), the derogation was provided for reasons of practicality and feasibility.

The Article 7 derogation is consistent with the “EU/non-EU” designation under Commission Implementing Regulation (EU) No 2018/775. Nonetheless, it is noted that it may preclude operators from using anything other than the “EU/non-EU” designation on products containing meat where these are produced from trimmings and minced meat labelled in this manner.

### **Relevance of the Regulation**

The objectives of the Regulation remain relevant. There is a perceived increase in consumer interest in country of origin information across all meat products and market segments. This includes increased interest in origin labelling for meat sold loose and meat sold through the food service/catering sector, i.e. beyond the current scope of the Regulation, with additional legislation and/or voluntary initiatives in this area taken in some Member States (see *effectiveness*). ***It is recommended that the situation is monitored.***

Traceability systems which allow provenance to be communicated have relevance beyond the scope of Regulation (EU) No 1337/2013 due to the inter-connectedness of supply chains which are outside scope with those within scope. There is additional relevance where information on provenance is used under voluntary schemes for products outside the scope of the Regulation. However, this relevance depends on the market, which in turn depends on consumer demand for such information. It is noted that while Commission Implementing Regulation (EU) 2018/775 extends origin labelling to products in which meat is the primary ingredient from 1 April 2020, this only applies to the extent that provenance of the product itself is provided and operators can choose, among other options, to use an “EU/non-EU” designation. Should this designation be widely used, information at the Member State level will not be relevant in this market channel.

### **EU added value of the Regulation**

The EU added value of Regulation (EU) No 1337/2013 is considered to be good. In the absence of an EU Regulation regarding country of origin labelling, it is likely that a significant number of Member States would have pursued the introduction of national rules. These rules would not have had the same scope as Regulation (EU) No 1337/2013. Almost all national Competent Authorities, national professional organisations and consumer organisations felt that the absence of EU legislation concerning country of origin labelling would lead to potentially significant negative impacts. The presence of different national rules would hamper the smooth operation of the EU Single Market, increase difficulties for companies to navigate rules and would decrease consumer information.

In terms of market benefits, the entry into force of Regulation (EU) No 1337/2013 did not hamper the evolution of intra-EU trade in live animals or fresh meat, neither did it disrupt the operation of the EU Single Market. The consultation with supply chain stakeholders corroborated the finding of little impact on EU meat supply chains. Among the operators that did change their sourcing practices, the Regulation has induced operators to consolidate their sourcing flows. The Regulation addresses consumer demand for information on country of origin at a negligible cost and without causing any substantial changes to EU meat supply chains. However, the fact that consumers assign credence attributes to country of origin which are not accurate could, in theory, present a barrier to

the smooth operation of the EU Single Market. The ***recommendation above on an information campaign would improve and harmonise EU consumer understanding of the origin labelling rules.***

National rules imposed on a compulsory basis on country of origin, which go beyond the scope of Regulation (EU) No 1337/2013, to date are rare and form time-limited pilot projects. In two cases national legislation extends the scope of Regulation (EU) No 1337/2013 to include meat sold loose to avoid consumers being potentially misled where this is an important market segment. Voluntary schemes concerned with country of origin are widespread and build on the Regulation to provide further information for consumers; some private quality schemes implicitly signal country of origin, even if this is not the main focus of these schemes.

## **GETTING IN TOUCH WITH THE EU**

### **In person**

All over the European Union there are hundreds of Europe Direct information centres. You can find the address of the centre nearest you at: [https://europa.eu/european-union/contact\\_en](https://europa.eu/european-union/contact_en)

### **On the phone or by email**

Europe Direct is a service that answers your questions about the European Union. You can contact this service: – by freephone: 00 800 6 7 8 9 10 11 (certain operators may charge for these calls), – at the following standard number: +32 22999696, or – by email via: [https://europa.eu/european-union/contact\\_en](https://europa.eu/european-union/contact_en)

## **FINDING INFORMATION ABOUT THE EU**

### **Online**

Information about the European Union in all the official languages of the EU is available on the Europa website at: [https://europa.eu/european-union/index\\_en](https://europa.eu/european-union/index_en)

### **EU publications**

You can download or order free and priced EU publications from: <https://publications.europa.eu/en/publications>. Multiple copies of free publications may be obtained by contacting Europe Direct or your local information centre (see [https://europa.eu/european-union/contact\\_en](https://europa.eu/european-union/contact_en)).

### **EU law and related documents**

For access to legal information from the EU, including all EU law since 1952 in all the official language versions, go to EUR-Lex at: <http://eur-lex.europa.eu>

### **Open data from the EU**

The EU Open Data Portal (<http://data.europa.eu/euodp/en>) provides access to datasets from the EU. Data can be downloaded and reused for free, for both commercial and non-commercial purposes.



Publications Office  
of the European Union

doi: 10.2762/183918  
Isbn: 978-92-76-20370-4