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From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

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To: Mr Jeppe TRANHOLM-MIKKELSEN, Secretary-General of the Council of the European Union

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Subject: COMMISSION STAFF WORKING DOCUMENT EVALUATION of the mandatory indication of the country of origin or place of provenance for fresh, chilled and frozen meat of swine, sheep, goats and poultry

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Delegations will find attached document SWD(2021) 218 final.

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**COMMISSION STAFF WORKING DOCUMENT**

**EVALUATION**

**of the mandatory indication of the country of origin or place of provenance for fresh,  
chilled and frozen meat of swine, sheep, goats and poultry**

{SWD(2021) 220 final}

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## GLOSSARY

<b>Term or acronym</b>	<b>Meaning or definition</b>
BSE	Bovine spongiform encephalopathy
EU	European Union
FIC Regulation	Regulation (EU) No 1169/2011 on the provision of food information to consumers
OJ	The Official Journal of the European Union

## 1. INTRODUCTION

Swine, sheep, goat and poultry meats are widely consumed in the European Union (EU). The Commission's impact assessment on general food labelling<sup>1</sup> confirmed that the origin of those types of meat has appeared to be an important consumer concern. Moreover, the mandatory indication of origin for beef and beef products, in place since 2000<sup>2</sup> following the bovine spongiform encephalopathy crisis (BSE crisis), has raised consumer expectations for labelling of the meat they buy.

In the framework of the 2011 law on food information (the so-called 'FIC Regulation'<sup>3</sup>), the EU also imposed a mandatory requirement to declare and label the origin<sup>4</sup> of fresh, chilled or frozen meats of swine, sheep, goats and poultry<sup>5</sup>.

The Commission considered several options to prepare its implementing rules on how to apply the FIC Regulation's mandatory labelling requirements for the aforementioned types of meats. The challenge was to find an optimal solution for implementing rules that would provide consumers with necessary and helpful information on the meat's origin in a way that: (i) met the mandatory legal requirement; (ii) avoided unnecessary burdens for the meat supply chain and national administrations; (iii) did not raise prices for consumers; and (iv) did not disrupt trade.

Following the dedicated impact assessment<sup>6</sup>, the European Commission adopted in 2013 the implementing regulation laying down rules for the application of the FIC Regulation as regards the indication of the country of origin or place of provenance for meats of swine, sheep, goat and poultry<sup>7</sup> ('Regulation (EU) No 1337/2013'). The Regulation started to apply on 1 April 2015.

In line with its 'better regulation' agenda, the Commission is committed to periodically evaluate all EU activities intended to have an impact on society and the economy. The Commission therefore decided to assess Regulation (EU) No 1337/2013 five years after its entry into force. This staff working document presents the evaluation undertaken by the Commission. The underlying analysis takes into the account the situation on the EU

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<sup>1</sup> European Commission staff working document '[Impact assessment report on general food labelling issues](#)', January 2008.

<sup>2</sup> Introduced by Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products ([OJ L 204, 11.8.2000, p. 1](#)).

<sup>3</sup> Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, [OJ L 304, 22.11.2011, p. 18](#).

<sup>4</sup> In the FIC Regulation, the concept of 'country of origin' of a food is determined in accordance with Articles 23 to 26 of Council Regulation (EEC) No 2913/92. Accordingly, the term 'country of origin' is reserved for meat obtained from animals born, reared and slaughtered in a single Member State or non-EU country. 'Place of provenance' means any place where a food is indicated to come from (according to Article 2(g) of the FIC Regulation).

<sup>5</sup> Combined nomenclature headings 0203, 0204 and 0207 of Annex XI to the FIC Regulation. For the sake of consistency with the FIC Regulation and Regulation (EU) No 1337/2013, this staff working document uses mainly the term 'swine meat', which term corresponds to the term "pig meat" used in the evaluation support study and other quoted documents.

<sup>6</sup> For details see: European Commission, Impact assessment: '[Mandatory Origin Indication for Unprocessed Pig, Poultry, Sheep and Goat Meat](#)', December 2013.

<sup>7</sup> Commission Implementing Regulation (EU) No 1337/2013 of 13 December 2013 laying down rules for the application of Regulation (EU) No 1169/2011 of the European Parliament and of the Council as regards the indication of the country of origin or place of provenance for fresh, chilled and frozen meat of swine, sheep, goats and poultry, [OJ L 335, 14.12.2013, p. 19](#).

single market<sup>8</sup> from 2015 onwards and in the EU of 28 Member States<sup>9</sup>, and covers the five main evaluation criteria: (i) effectiveness; (ii) efficiency; (iii) relevance; (iv) coherence; and (v) EU added value. The evaluation is mainly based on the evaluation support study<sup>10</sup> and outcomes of the stakeholder consultation activities, including an online public consultation<sup>11</sup>.

In addition to analysing Regulation (EU) No 1337/2013, this evaluation contributes to the broader assessment of the origin-labelling policy and a report from the Commission to the European Parliament and the Council<sup>12</sup>.

This evaluation is also relevant in light of the new comprehensive approach to food sustainability outlined in the ‘farm-to-fork’ strategy<sup>13</sup>, which is at the heart of the European Green Deal<sup>14</sup>. Mandatory origin labelling and a new food-labelling framework aim to empower consumers to make better food choices, thus facilitating the shift to sustainable consumption and healthy diets. The lessons learned from the evaluation could therefore help to better promote the consumption of food that is healthy and environmentally friendly.

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<sup>8</sup> In the EU’s single market (sometimes called the ‘internal market’) people, goods, services, and money can move around freely. More information on the EU single market can be found on the Europa website: [https://ec.europa.eu/info/policies/single-market\\_en](https://ec.europa.eu/info/policies/single-market_en).

<sup>9</sup> For the purposes of this evaluation, which covers the period from 2015 onwards, the United Kingdom has been considered as a member of the European Union (EU-28). The United Kingdom withdrew from the EU on 1 February 2020, entering a transition period until 31 December 2020, during which time EU law, with a few limited exceptions, continued to be applicable to and in the United Kingdom.

<sup>10</sup> Agra CEAS and Areté, [‘Evaluation study of mandatory country of origin labelling for certain meats’](#), September 2020.

<sup>11</sup> See the link on Europa: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/1892-Evaluation-of-mandatory-country-of-origin-labelling-for-certain-meats/public-consultation>.

<sup>12</sup> According to the legal obligation stemming from Article 26(4) of the FIC Regulation.

<sup>13</sup> [https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal/actions-being-taken-eu/farm-fork\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal/actions-being-taken-eu/farm-fork_en).

<sup>14</sup> [https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en).

## 2. BACKGROUND TO THE INTERVENTION

### 2.1. Description of the intervention and its objectives

One of the main objectives of the common agricultural policy is to ensure the production of high-quality food. Although origin labelling cannot be directly linked with a product's intrinsic quality characteristics, consumers are increasingly interested in local food systems and in short supply chains. Consumers also have growing concerns about – and expectations for – food safety, food quality, the environment, and animal-welfare. Working alongside other EU policies, the common agricultural policy must continue to respond to society's demands and concerns and help farmers to anticipate developments in dietary habits and market preferences.

In this context, food labelling is a powerful market tool that allows consumers to make informed choices. Interest in food-origin labelling has been growing in recent years, in particular for animal products. There are several reasons for this. For example, consumers may perceive domestically produced products as being of higher quality or more sustainable and safe, or they may want to support local production. Food producers also support origin labelling to promote domestically produced food against imports.

The FIC Regulation of 2011 allowed for setting implementing rules that could vary from one type of meat to another, taking into account: (i) the principle of proportionality; and (ii) the administrative burden for both food-business operators and enforcement authorities. In 2013, the Commission carried out an impact assessment<sup>15</sup> and commissioned a dedicated study<sup>16</sup> to examine how best to display the country of origin or place of provenance for meats of swine, sheep, goats and poultry. The impact assessment looked at how best to collect and make public information on the most important places in the life of the animal: its place of birth, its place of rearing, and its place of slaughter. The results of the analytical work showed that consumers were most interested in knowing the place where the animal was reared. The analytical work also showed that providing mandatory information on the place of birth of the animal required the creation of new traceability systems at farm level, which would create new costs. The analytical work showed that the place of slaughter could be indicated on a label at an affordable cost and gave valuable information to the consumer. On the issue of what geographical level to present this information (by country, by region etc.), the evidence from the impact assessment was that indicating the Member State or non-EU country would be the most relevant information for consumers.

Regulation (EU) No 1337/2013 was adopted in 2013 and entered into force in 2015. The Regulation focused on three main objectives:

- providing consumers with the mandatory origin information for meat, as required by the legislation;
- avoiding unnecessary burden for the meat supply chain and national administrations, avoiding trade disruptions, and preventing increases in prices for consumers;
- ensuring that the information provided is accurate, meaningful and verifiable by the competent authorities.

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<sup>15</sup> See also footnote **Error! Bookmark not defined.** for full reference.

<sup>16</sup> LEI Agricultural Economics Research Institute, Wageningen UR (NL), [Study on mandatory origin labelling for pig, poultry and sheep & goat meat](#), June 2013.

The mandatory labelling rules of the Regulation covered fresh, chilled and frozen meat in any form of cut (including minced meat) that was unprocessed and pre-packed. Meat sold ‘loose’ at retail (e.g. from a butcher) and packed on the sales premises at the consumer’s request was out of scope of the Regulation. For the concerned types of meat, the Regulation introduced the following obligations:

- to indicate the country of rearing, slaughtering or origin on the label;
- to put in place an appropriate identification and registration system which allows at each stage of production and distribution, to (i) ensure the link between the meat and the animal from which it is obtained; and (ii) to make it possible to send the information on the country-of-origin indications together with the meat. These obligations are implemented through a set of practical measures, as described below.
- Article 3 of the Regulation requires food-business operators to have in place a traceability system to ensure: (i) the link between the meat and the animal or group of animals from which it has been obtained; and (ii) that reliable information is sent along the supply chain until the final consumer.
- Article 4 of the Regulation contains rules for the formation of batches of meat<sup>17</sup>, since these batches can greatly affect the normal butchering workflow and sourcing practices.
- Article 5 of the Regulation sets out criteria to link the production phases with the information displayed on labels, since animals are often reared in more than one country.
- Article 6 of the Regulation allows a derogation for meat from non-EU countries that is imported to be placed on the EU market and reared and/or slaughtered in a non-EU country.
- Article 7 of the Regulation lays down ‘flexibility’ measures for minced meat or trimmings<sup>18</sup>. Specific simplified apply for those categories of products, since the production volumes and the processing chain make it difficult to easily ensure physical separation of the different batches.
- Article 8 of the Regulation allows food-business operators<sup>19</sup> to add to the mandatory indications on the label other supplementary information referring to the provenance of the meat, given that there may be consumer interest in this information.

The intervention logic is illustrated in Figure 1. It starts with the problems identified, and then moves to objectives, instruments, expected outputs and possible impacts.

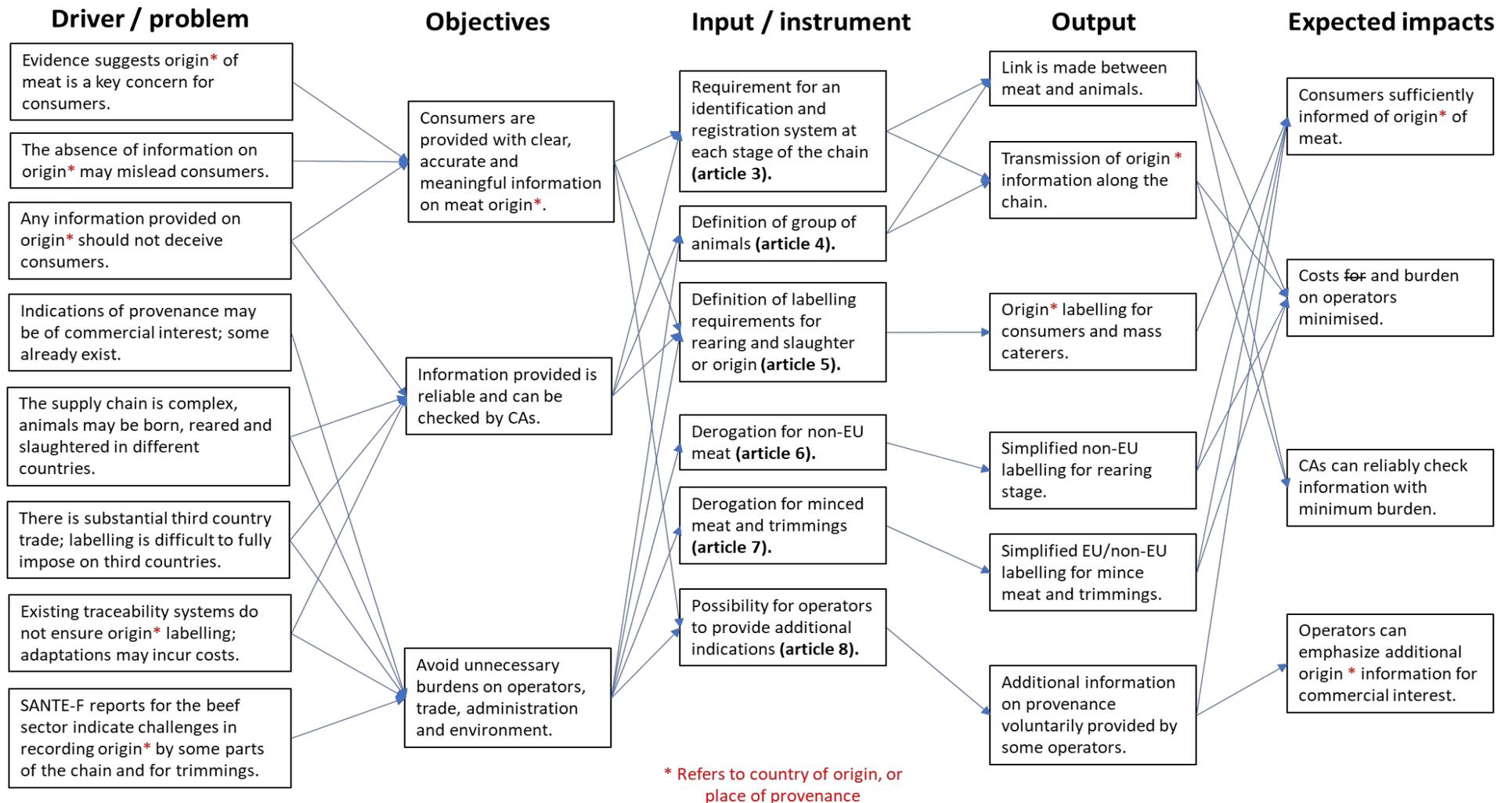
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<sup>17</sup> ‘Batch’ means meat obtained from a single species (swine, sheep, goat or poultry) with or without bone, whether or not cut or minced, that has been cut, minced or packed under practically identical conditions (as defined in Article 2(b) of Regulation (EU) No 1337/2013).

<sup>18</sup> ‘Trimmings’ means small pieces of swine, sheep, goat or poultry meat, recognised as fit for human consumption and produced exclusively during trimming operations, when boning carcasses, or when cutting up meat (as defined in Article 2(a) of Regulation (EU) No 1337/2013).

<sup>19</sup> ‘Food-business operator’ means the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control, as defined in Article 3(3) of Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety ([OJ L 31, 1.2.2002, p. 1](#)).

**Figure 1: Model of intervention logic – summary**



Legend: CAs: national competent authorities; third-country: non EU Country; SANTE F-reports: audits and analysis of DG Health and Food Safety related to the beef sector, see notably: [https://ec.europa.eu/food/audits-analysis/overview\\_reports/index.cfm](https://ec.europa.eu/food/audits-analysis/overview_reports/index.cfm), [http://ec.europa.eu/food/fvo/specialreports/rep\\_details\\_en.cfm?rep\\_id=5](http://ec.europa.eu/food/fvo/specialreports/rep_details_en.cfm?rep_id=5); [https://ec.europa.eu/food/audits-analysis/audit\\_reports/details.cfm?rep\\_id=784&rep\\_inspection\\_ref=xxx](https://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=784&rep_inspection_ref=xxx).

Source: Evaluation support study.

## 2.2. Baseline and points of comparison

The mandatory origin provisions developed in the FIC Regulation apply, among others, to swine, sheep, goat and poultry meats. These provisions were based on similar existing rules adopted in 2000-2010 for other foods i.e. honey, fruit, vegetables, fish, beef, beef products, olive oil, bananas, wine, hops, and eggs.

The underlying motivations for setting the mandatory origin labelling for various types of food were different. For beef and beef products, it was the BSE crisis. For all other foods, the rationale was instead the close link between the food's origin and the specific characteristics of the food in question.

Because the rules on beef labelling had been in place for a decade before, the extension of compulsory origin labelling to swine, sheep, goat and poultry meats ensured that the bulk of unprocessed meat<sup>20</sup> consumption in the EU was covered by the rules requiring the origin of meat to be clearly labelled.

Before Regulation (EU) No 1337/2013, there was no systematic and harmonised information on the country of origin and place of provenance on labels for swine, sheep, goat and poultry meats available on the EU single market. However, as consumers' sensitivity to the origin of food grew over the years, private certification schemes on meat origin were developed. A study from 2012<sup>21</sup> identified 901 certification schemes in the EU-28 in total (including geographical indications). More than half of those certification schemes (468 schemes in total) concerned meats and their origin. Information on meats and their origin was covered by 60% of these 468 schemes. A 2012 study showed that origin information at country or regional level was already available on a voluntary basis for around 86% of meat sold in the EU<sup>22</sup>.

In the 2013 impact assessment carried out in preparation for the legislation, the Commission considered the following three policy options:

- the simple model with mandatory labelling that indicates only an origin in an EU or non-EU country (origin EU/non-EU/mixed);
- the intermediate model, with mandatory labelling of country of rearing and of slaughter;
- the beef model, including all the information in the intermediate model, but also adding the mandatory indication of the country of birth.

During the 2013 impact assessment, the Commission chose to follow the intermediate model based on mandatory labelling of country of rearing and of slaughtering. The other two policy options were discarded as either not providing meaningful information to final consumers (the option based on the simple model), or as too burdensome (the option based on the beef model). The chosen option was considered optimal to provide accurate, clear and useful information on the origin of the meats to consumers, while: (i) avoiding excessive administrative burden for operators and competent authorities; and (ii) having minimal effects on the standard practice.

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<sup>20</sup> According to the Commission impact assessment of 2013, other meats (mainly horse, rabbit and game) accounted only for less than 1% of EU meat consumption.

<sup>21</sup> Ipsos and London Economics Consortium, [Consumer Market Study on the Functioning of Voluntary Food Labelling Schemes for Consumers in the European Union](#), December 2013.

<sup>22</sup> GfK EU3C, EU Custom Research and Coordination Centre, [Consumer Market Study on the Functioning of the meat market for consumers in the European Union](#), December 2012.

It should also be noted that the existing traceability systems<sup>23</sup> were considered already fit for purpose, i.e. they provided all the information needed for operators to correctly label the meat for the country of origin or place of provenance without generating excessive new costs or administrative burden.

Furthermore, the risk of ‘renationalisation’ of meat consumption (with consumers only consuming meat raised and slaughtered in their own country) would have been higher under the model with mandatory indication of the country of birth (beef model), thus affecting intra-EU trade and hampering the functioning of the EU single market.

### 3. IMPLEMENTATION/STATE OF PLAY

Regulation (EU) No 1337/2013 was directly applicable in all Member States from 1 April 2015. For some Member States (Denmark, Ireland and Italy), national law was needed to set up a specific control regime. In other countries (Greece, Poland and Romania), the existing national rules were amended to ensure compliance with the Regulation.

In some Member States, national rules and initiatives going beyond the Regulation have been adopted, or at least have been considered. In Greece and Poland for example, national legislation specified additional requirements to provide information on the country of origin for fresh, chilled and frozen meat of swine, sheep, goat and poultry that is sold ‘loose’ (i.e. not pre-packed). Finland and France have issued additional national rules to extend the mandatory indication of origin or place of provenance to two other categories of meat: meat used as an ingredient and meat sold in the catering sector.

The evaluation has also identified private, voluntary, quality-assurance schemes in Member States: some explicitly focusing on origin (in Denmark and Ireland), or only implicitly referring to origin (in the Netherlands). In Germany and Spain, voluntary schemes have also provided information on regional origin, sometimes covering products out of the Regulation’s scope.

For details on the implementation approaches taken by the Member States selected for the evaluation and an inventory of their national rules on country of origin, see [Annex 3](#).

The surveyed competent authorities of the concerned Member States did not declare systematic challenges or problems with implementation of Regulation (EU) No 1337/2013. However, the information gathered during the evaluation process from literature review, desk research and as part of Member-State case studies did reveal some potential barriers and new challenges for implementation of the EU rules. These potential barriers and new challenges are summarised in the bullet points below.

- **There are potentially misleading practices in the implementation of Regulation (EU) No 1337/2013.** Some Member States set up national rules and initiatives going beyond the current scope of the Regulation in response to the concerns of stakeholders (mainly consumers) and to meet stakeholders’ additional needs. Although the national initiatives and additional needs do not raise problems of implementation of the Regulation as such, they indicate consumers’ concerns that

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<sup>23</sup> Systems set up in compliance with EU legislation on food law and food-safety procedures and in conjunction with the legislation on the identification and registration of livestock.

they may be misled, and pose challenges for ensuring a level-playing field across operators.

- **Some surveyed national competent authorities have reported difficulties in monitoring compliance.** The resource constraints they face lead them to prioritise their focus by checking compliance with food-safety rules only (and not the other aspects of the legislation). Some national competent authorities also face challenges in the feasibility and level of monitoring that can be carried out due to the fragmented structure of the supply chain.
- **There have been difficulties in implementing the batch requirements.** This has been identified as a problem in a few Member States that rely on imports – mainly in the swine meat and poultry meat sectors. The fact that meat of several origins may be involved posed challenges for operators, slaughterhouses and cutting plants that source from multiple origins.

The three issues listed above, as well as the unintended side effects of the Regulation, are analysed further in Section 5 of this staff working document.

## 4. METHOD

### 4.1. Short description of methodology

The analysis presented in this staff working document is mainly based on the corresponding evaluation support study<sup>10</sup>. The evaluation support study applied several interlocking methodologies to answer a series of evaluation questions and therefore provides qualitative and quantitative evidence.

To ensure the completeness, reliability and robustness of the data used in the evaluation, a variety of different methods and tools were used. These included desk research, stakeholder surveys (of consumers, supply-chain operators, and national competent authorities) and case studies. Those methods, supplemented by the online public consultation, were also used to collect the views of the main stakeholders. Case studies are briefly outlined below, while other tools are included in the synopsis of the stakeholder consultation in [Annex 2](#).

Twenty-one case studies across 10 Member States were carried out for the purpose of the evaluation. The case studies were selected to ensure their representativeness in production, consumption, trade volume and geographical coverage. More concretely, the selection was based on a qualitative assessment of relevant quantitative data for the following five key criteria:

- level of per capita consumption;
- self-sufficiency – extent to which domestic production fulfils consumption;
- production level and export;
- balance of trade of live animals;
- farm structure (specialisation and size).

These five criteria were relevant and useful for selecting case studies in the swine and poultry sectors, but could not be applied in the sheep and goat meat sectors. This is due to the very low levels of consumption of sheep and goat meat in most Member States and the concentration of production in a handful of Member States<sup>24</sup>. The case studies selected are summarised in Table 1.

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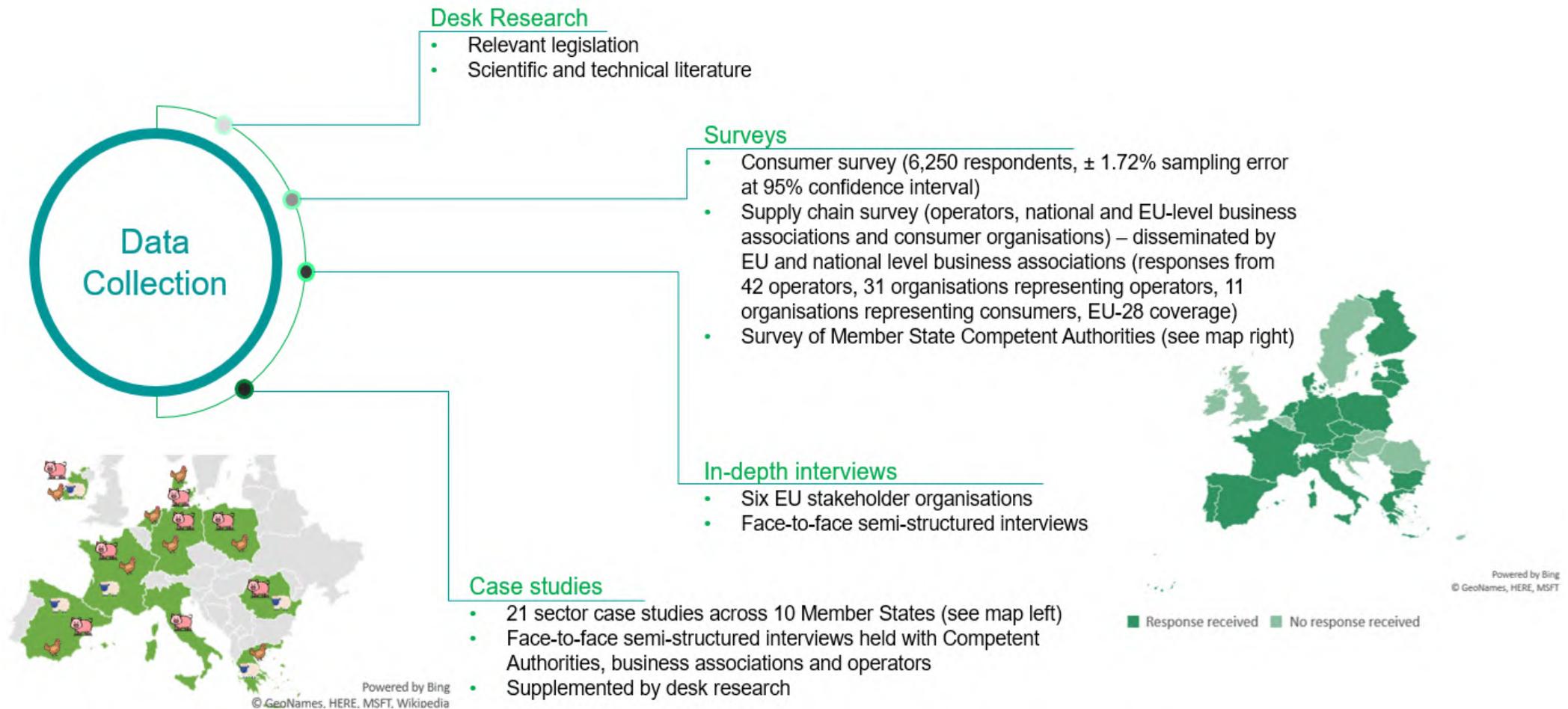
<sup>24</sup> For more info on production, trade and apparent use of meat, see also DG AGRI-JRC dashboard [https://datam.jrc.ec.europa.eu/datam/mashup/PROD\\_TRADE\\_USE/index.html](https://datam.jrc.ec.europa.eu/datam/mashup/PROD_TRADE_USE/index.html).

**Table 1. Selected case studies - main characteristics for the swine and poultry meat sectors and explanations for the sheep and goat meat sectors.**

<b>Member State</b>	<b>Swine meat sector</b>	<b>Poultry meat sector</b>	<b>Sheep &amp; goat meat sector</b>
<b>Denmark</b>	Notable consumers Net exporters Specialised farms Generally exporting live animals	Moderate to high consumption with low production in deficit; generally small sized farms	No case study in the sector
<b>France</b>	Moderate consumption and broadly self-sufficient (farming systems differ)	Notable producers and/or exporters; moderate-to-small sized farms	Fairly high consumption in strong deficit
<b>Germany</b>	Large consumption and net exporters with more mixed farms; generally importing live animals	Notable producers and (generally) net exporters generally reliant on live animal imports; large farms; moderate-low consumption	No case study in the sector
<b>Greece</b>	No case study in the sector	Low consumption and production in broad equilibrium	Very high consumption with deficit
<b>Ireland</b>	Large consumption and net exporters with more mixed farms; generally importing live animals	Moderate to high consumption; broad equilibrium; large industrial farms (live animal flows vary)	High consumption with strong surplus
<b>Italy</b>	Notable or moderate consumption and in deficit (farming systems differ)	No case study in the sector	No case study in the sector
<b>Netherlands</b>	No case study in the sector	Notable producers and (generally) net exporters generally reliant on live animal imports; large farms; moderate-low consumption	No case study in the sector
<b>Poland</b>	Moderate consumption and broadly self-sufficient (farming systems differ)	Notable exporters and producers with moderate-to-small sized farms	No case study in the sector
<b>Romania</b>	Moderate-to-small producers in deficit with low consumption levels; generally with smaller, mixed farms	No case study in the sector	Fairly high consumption in very strong deficit
<b>Spain</b>	Notable consumption and net exporters with industrial farms; generally exporting live animals	Moderate to high consumption; broad equilibrium; large industrial farms (live animal flows vary)	Fairly high consumption in surplus

Source: own compilation based on the evaluation support study.

Figure 2: Data-collection tools



Source: IHS Markit & Areté, PowerPoint presentation ‘Evaluation study of mandatory country-of-origin labelling for certain meats’, September 2020.

## 4.2. Limitations and robustness of findings

Thanks to the sound analytical framework and the methodological approach (including the quantitative and qualitative approaches), it was possible to cover the scope of the evaluation set out in the roadmap<sup>25</sup>, notably:

- to assess whether the rules on food information for consumers on the mandatory origin labelling for certain meats as applied in Member States are effective, efficient, coherent, relevant, and bring EU added value;
- to present an overview of the implementation of the Regulation in every EU Member State, in order to: (i) identify any administrative burden; (ii) identify existing barriers/obstacles; (iii) identify best practices and/or new challenges; and (iv) propose recommendations for adjustments;
- to provide valuable input for the overall assessment of the origin-labelling policy.

The consistency of the collected data was checked through cross-variable analysis. The sources of evidence described in the methodology were deemed accurate and relatively robust for the purposes of the evaluation. Nevertheless, the findings from the evaluation support study faced data limitations (limitations of data availability and data reliability<sup>26</sup>) and led therefore to less granular results and an uneven level of detail for the five evaluation themes.

## 5. ANSWERS TO THE EVALUATION QUESTIONS

### 5.1. Effectiveness

#### 5.1.1. Effectiveness of mandatory origin-labelling rules

The evaluation assessed how and to what extent the main objectives of Regulation (EU) No 1337/2013 were achieved. To recall, the Regulation laid down the following main objectives: (i) to provide clear, accurate and meaningful information to consumers; (ii) to avoid unnecessary burden on operators, trade, administration and the environment; and (iii) to ensure that the information provided is reliable and can be checked by enforcement authorities.

#### *Provide clear, accurate and meaningful information to consumers*

To assess whether the information on meat origin provided to consumers is meaningful, the external evaluator conducted a consumer survey.

Overall, the surveyed consumers considered labelling of meat origin to be important information at the point of purchase. Most consumers (62%) were either ‘quite’ or ‘very satisfied’ with the current level of information provided, a third (32%) were ‘neutral’, and only 6% were either ‘quite’ unsatisfied or ‘very unsatisfied’. Those respondents who were not satisfied with the information on meat origin that they receive gave the

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<sup>25</sup> The evaluation roadmap can be consulted on the Europa website: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/1892-Evaluation-of-mandatory-country-of-origin-labelling-for-certain-meats>.

<sup>26</sup> Notably: (i) incomplete or inaccurate data on production; (ii) inconsistencies between the various sources of trade data (e.g. from Eurostat and the Association of Poultry Processors and Poultry Trade in the EU Countries (AVEC)); and (iii) limitations on data availability for intra-EU trade data compared for example with extra-EU trade due to the different reporting obligations for operators.

following main reasons for their dissatisfaction: too little information (46%), information not being clear enough (32%), and information that was confusing (15%).

Consumer satisfaction should be interpreted alongside consumers' lack of understanding of the key terms and definitions used in Regulation (EU) No 1337/2013. Only 5% of consumers correctly understood the main terms of the Regulation, i.e. 'reared in', 'slaughtered in' and 'origin'. The consumer survey revealed that 29% of consumers correctly understood two of the three terms, and that 44% correctly understood only one of the terms, while more than a fifth (22%) did not correctly understand any of the terms. Consumers who correctly understood all three terms are more likely to be 'quite satisfied' with the information provided and less likely to have a 'neutral' opinion.

The understanding of consumers varied across Member States as set out in the bullet points below.

- Consumers in Austria were more likely to correctly understand the term 'reared in', while those in Bulgaria, Latvia, Portugal, Romania and Hungary were less likely to correctly understand this term.
- Consumers in Austria were also more likely to understand correctly the term 'slaughtered in...' as were those in Czechia, Greece, Lithuania and Slovenia. Consumers in Belgium, Bulgaria, the Netherlands and Slovakia were the least likely to correctly understand this term.
- Consumers in Bulgaria, Croatia, Estonia, Finland, Greece, Hungary, Romania, Slovakia and Slovenia were more likely to understand correctly the term 'origin' than consumers in Austria. Consumers in Belgium were more likely to say that they did not understand the term than consumers in other Member States.

The most correctly understood term was 'slaughtered in' (62%), followed by 'origin' (29%) and then 'reared in' (26%). It is also worth noting that the correct understanding of the term 'origin' appears to have declined between 2012 and 2019<sup>27</sup>.

The consumer survey has also provided some conclusions on how consumers accept the definitions behind the terms 'reared in', 'slaughtered in' and 'origin', as set out in the bullet points below.

- Some consumers (notably in Finland and Sweden) were likely to consider themselves misled by the labelling on rearing, particularly as regards the rearing period (the time spent to rear the animal).
- Consumers in several Member States (notably Belgium, Finland, France, Italy, Latvia, the Netherlands, Slovakia, Slovenia and Sweden) seemed to be misled by labels indicating the place of slaughter without indicating the place of rearing.
- On the term 'origin', the evidence of potential misunderstanding is rather mixed: the main expectation appears to be that the animal should be born in the named country, which is consistent with the definition of the term.

Finally, consumers were asked how they use the labelling information in their meat-purchasing decisions. According to the consumer survey, only 17% of people considered country of origin as the criterion they looked at first when making a purchase decision. This means that country of origin is less important for consumers than price (cited by 31% of consumers as the first criterion they looked at) and expiry date (cited by 29% of

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<sup>27</sup> In comparison to the survey of the Bureau Européen des Unions de Consommateurs (2013), 'Consumer survey on origin labelling on food', (2013), <https://www.beuc.eu/publications/2013-00043-01-e.pdf>.

consumers). Overall, 33% of consumers indicated origin either as the first or second criterion they looked for in their meat purchases. The results of the consumer survey corroborate those from the supply-chain survey: most consumer organisations said that consumers look at origin information all the time or often in their meat-purchasing decision. It should be noted that the 2019 Eurobarometer on food safety<sup>28</sup> found that origin was the most important purchase criterion, ahead of price. The difference between these findings may be due to ‘prompting’ qualities in the Eurobarometer question, which makes it more likely that consumers will choose and provide a positive answer.

On willingness to pay for meat from a preferred origin, a quarter (25%) of the surveyed consumers said that they usually use origin indications simply to choose between two products of the same price, and 23% of them either did not know or did not pay enough attention to notice the price difference between meat from different countries. Among respondents who used an origin indication to inform their purchasing decisions, more than half (52%) said that they pay more for meat from their preferred country, but most pay only a little bit more.

This finding should be treated with some caution, since actual consumer behaviour often deviates from the consumer preferences stated in surveys<sup>29</sup>. This is a relevant consideration as origin labelling could imply higher prices for the final products. Furthermore, it should also be noted that interviews with EU-level associations suggested that the fresh-meat retail offer in most Member States is largely restricted to domestic sources and, in practice, consumers usually do not have any choice to make.

### ***Ensure that the information provided is reliable and can be checked by enforcement authorities***

Analysis of the results from the supply-chain survey showed that three quarters (73%) of the respondents systematically receive information on the animals or groups of animals (batches) from which the received meat is produced. Results of the supply-chain survey also showed some simplification in information transmission across the supply chain: 41% of operators declared that they had received the full information from the previous link in the chain. However, only 30% said that they had passed this full information on to the next link in the chain.

A fifth (20%) of national competent authorities told the survey that full information on rearing periods is passed on through the supply chain. A further fifth (20%) stated that abbreviated information is passed on. Some 27% of national competent authorities indicated that a combination of the two approaches is used. A third (33%) of national competent authorities said that they did not know what information is provided (N=15).

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<sup>28</sup> See: European Food Safety, ‘2019 Eurobarometer on Food Safety in the EU’, <https://www.efsa.europa.eu/en/corporate/pub/eurobarometer19>.

<sup>29</sup> See: European Commission (2015), ‘Study on the mandatory indication of country of origin or place of provenance of unprocessed foods, single ingredient products and ingredients that represent more than 50% of a food’; [https://ec.europa.eu/food/sites/food/files/safety/docs/labelling\\_legislation\\_final\\_report\\_ew\\_02\\_15\\_284\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/labelling_legislation_final_report_ew_02_15_284_en.pdf).

All EU-level organisations agreed that the existing traceability system under Regulation (EC) No 178/2002<sup>30</sup> setting out traceability requirements on food-business operators facilitates compliance with Regulation (EU) No 1337/2013 through the transmission of reliable information. Furthermore, the survey of national competent authorities showed that the traceability systems currently in place are ‘fully effective’ (47% of competent authority respondents agreed with this) or ‘moderately effective’ (41% agreed).

On verifying the reliability of the information on the label, most national competent authorities (60%) reported that they did not encounter any problem in checking the accuracy of the label. The remaining 40% of surveyed authorities reported the following problems: (i) rearing periods not being specified; (ii) incorrect construction of batches; (iii) intentionally (and unintentionally) incorrect paperwork where systems are not electronic; (iv) lack of transmission of specific (and required) information; and (v) the aggregation of batches of poultry meat with different origin indications meaning that labels list more than one country of origin. High rates of non-compliance, notably due to difficulties encountered by the national competent authority in checking the information, were reported in two Member States: the Netherlands and Romania.

The following bullet points give details on the reported specific (i.e. non-systemic) problems in each meat sector.

- In the swine meat sector:
  - incorrect labelling in the period immediately after entry into force of the Regulation, and some initial inspection problems where the criteria used in the beef sector were applied erroneously (in Spain);
  - teething problems (in Germany);
  - non-commercial holdings where traceability is unlikely to be documented properly (in Ireland, Italy and Romania).
- In the poultry meat sector:
  - misleading practice of selling imported loose chicken fillets alongside whole birds, with the latter clearly labelled as being of domestic origin in butchers’ shops (France, Greece and Ireland);
  - circumventing the requirements of the Regulation by lightly processing imported poultry meat so that it falls outside the Regulation’s scope (Germany).
- In the sheep and goat meat sector:
  - sheep meat and goat meat sold ‘loose’ at retail where the display arrangement implies the meat is domestic, when it is in fact imported (e.g. Greece)<sup>31</sup>;
  - origin information on imported meat of lambs is much less prominent than other indications which suggest a solely domestic provenance (Spain).
  - Non-commercial flocks of sheep and goats kept in backyard and then slaughtered for local consumption (i.e. not entering the commercial supply chain) are often not identified (Romania).

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<sup>30</sup> Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety ([OJ L 031 1.2.2002, p. 1](#)).

<sup>31</sup> This problem stems from large price differences between domestic and imported meat, coupled with a supply deficit during peak demand periods of the year (such as Easter), and was sufficient to prompt national rules to ensure clarity.

### *Avoid unnecessary burdens on operators, trade, administration and the environment*

From the outset, Regulation (EU) No 1337/2013 was designed to provide an opportunity to reduce burdens on supply-chain actors.

- Article 4 (on the definition of a group of animals) and Article 6 (allowing a derogation for meat imported from non-EU countries) aimed at reducing the burden of monitoring.
- Definitions and derogations used under Article 5 (laying down rearing periods by species) (and more precisely: (i) the exclusion of piglets and day-old chicks from the labelling obligation; and (ii) the possibility of putting more than one country of rearing and slaughter on a label) aimed at simplifying the labelling and then reducing the burden on operators.
- The derogations provided under Articles 6 and 7 (i.e. the derogation to use ‘EU’/‘non-EU’ designations on minced meat and trimmings) provided an opportunity to: (i) reduce the burden on operators to segregate meat of different origins; and (ii) give operators more flexibility to combine meat to achieve the required characteristics.

The evidence gathered in the evaluation demonstrated that definitions and derogations played a central role in limiting administrative burden on operators and national competent authorities. Respondents to the supply-chain survey said that they considered all provisions of the Regulation to be useful for simplified compliance with the requirements, but to differing degrees. At least half the respondents thought that Articles 4, 6 and 7 simplified the provisions to a ‘great extent’ or to a ‘moderate extent’. In contrast, 38% of respondents did not feel that Article 5 on rearing periods provided any simplification. Overall, Articles 5 and 7 appeared less relevant in the Member States that had national origin schemes that pre-dated the Regulation (e.g. France), because the national rules imposed stricter definitions and rules.

When assessing the simplifications by type of species processed, the picture is more complex, as set out in the following bullet points.

- **The poultry meat sector:** Operators in the poultry meat sector were more likely, than operators in other sectors, to find that Article 4 provided a simplification, and that Article 6 did not provide a simplification. In addition, operators in the poultry meat sector said that Article 5 was useful, because it meant that the location of birth did not have to appear on a label, thus reducing the burden where poultry were reared in different locations (this was the case in Ireland).
- **The swine meat<sup>32</sup> sector:** The case studies found little evidence that Articles 4-8 resulted in clear reductions in burden in the swine meat sector. However, operators said that Article 5 made a significant contribution to reducing the burden (in Poland), and Article 7 was mentioned as having had a small positive impact (in Germany). Article 7 was also not considered relevant when imported live pigs are used in the processed meat sector where the product does not carry provenance indications (this was the case in Italy).

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<sup>32</sup> For the sake of consistency with the texts of the legal acts to which the evaluation refers (notably Regulation (EU) No 1337/2013 and ‘FIC Regulation’), the term ‘swine meat’ is used in this staff working document, and corresponds to the term ‘pig meat’ used in the evaluation support study.

- **The sheep and goat meat sector:** as with the other sectors, the case studies found little evidence that Articles 4-8 reduced the burden in the sheep/goat meat sector; it was noted in one Member State (Spain) that the overall burden is not substantial in any case.

National competent authorities were also asked to what extent various provisions of the Regulation simplified their task of checking operators' compliance with the Regulation. Articles 4 and 6 were both seen by national competent authorities as 'greatly' (38% of respondents) or 'moderately' simplifying checks (46% of respondents). Respondents had similar views of Article 5 and Article 7. They saw Article 8 (allowing additional voluntary information) as creating the least simplification. At least 12 national competent authorities found that the implementation of the Regulation had resulted in extra work to ensure that operators are complying with the provisions. However, the extra work was not generally considered substantial and was largely related to training costs and the adjustment of monitoring procedures and manuals, while ongoing monitoring costs appeared to be minimal.

In the 2013 impact assessment, the European Commission reported that the environmental impacts of introducing country-of-origin labelling were expected to be minimal. Most interviewed EU organisations said that Regulation (EU) No 1337/2013 had not had any impact on the environment. However, case studies and interviews with EU organisations suggested the Regulation had had some impact on emissions (a positive or negative impact depending on the emissions and on the nature of the change induced) and on waste (a negative impact linked to replacement of the unused existing packaging).

#### **5.1.2. Effect of mandatory origin labelling on the EU single market**

The Commission's impact assessment of 2013 raised, as one of the key concerns, linked an issue of possible 'renationalisation' of trade as a result of the introduction of general mandatory rules on labelling of the swine, sheep, goat and poultry meats. The situation where consumers only buy meat produced in their own country, might therefore have a negative impact on the efficiency and competitiveness of the meat industry.

The evaluation analysis confirmed there were two tendencies that could lead to renationalisation: consumer 'nationalism' (i.e. consumer preference for meat seen as produced in their own country); and retailers choosing to reduce the risk of mislabelling by limiting the number of meat suppliers they deal with.

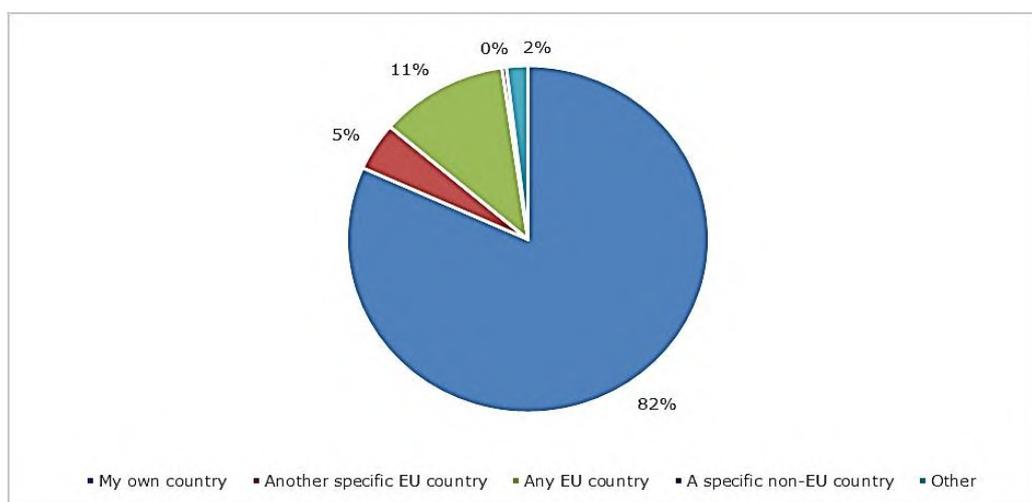
Former surveys<sup>33</sup> have already demonstrated that consumers consider products from their own country as being safer and of higher quality. These surveys also showed that consumers are willing to support their national and local supply chain. The survey carried out in November and December 2019 as part of the evaluation showed that consumers tended to be particularly 'nationalist' when it came to fresh meat. The national preference was stronger in some Member States than others and seemed to be related to a lack of exposure to imported products. Consumers tended to be less 'nationalist' in smaller Member States which are not able to meet domestic demand with domestic supply (such as Belgium or Malta) or in Member States that export a lot (like

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<sup>33</sup> Notably the consumer survey by the Food Chain Evaluation Consortium (FCEC) as part of the '[Study on the application of rules on voluntary origin labelling of foods and on the mandatory indication of country of origin or place of provenance of meat used as an ingredient](#)', carried out for the European Commission, July 2013.

the Netherlands). The vast majority of consumers who said they used origin indications to inform their purchase decisions stated that they had a preference for EU meat and in particular for meat from their own country. This preference can be seen in the figure below.

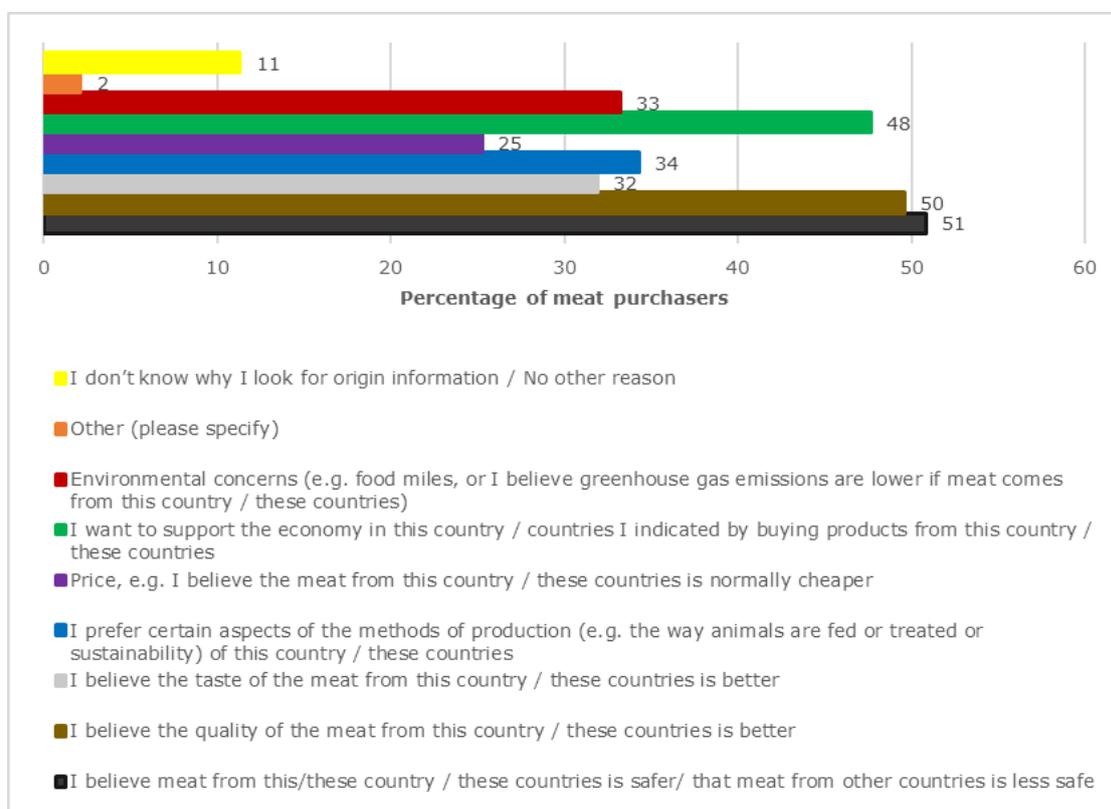
**Figure 3: Meat origin sought after to inform a purchase (N=5 927)**



Source: Consumer survey carried out as part of the evaluation support study.

Consumers who said they used origin labelling to inform their purchase decision were mainly motivated by the desire for greater food safety and quality. These consumers also considered it important to support the economy of their own country and to protect the environment (see also figure 4).

**Figure 4: Reasons for preferring meat of a certain origin (N=6 250 )**



Source: Consumer survey carried out as part of the evaluation support study.

Further disruptions in trade might also be linked with other consumer preferences, such as a preference for meat from some countries over meat from other countries; a preference for meat from the EU over meat labelled non-EU and a preference for simple rather than complex products (i.e. meat from one country of origin over meat reared in one country and slaughtered in another).

On the practices and behaviour of retailers, the literature review suggests that European retailers might seek to reduce the risk of mislabelling by simplifying their supply chains, notably by limiting the number of suppliers of their meat. In particular, market adjustments in the trade in live pigs observed in some Member States (Germany and Poland) were consistent with seeking to avoid labelling swine meat as ‘reared in X’ but ‘slaughtered in Y’. The evidence collected would also suggest there has been some renationalisation in the sheep and goat meat sectors, but not in the poultry sector.

The analysis of intra-EU trade data suggested some marginal renationalisation of the market for trade in live animals and fresh meat<sup>34</sup>. Although no substantial renationalisation of intra-EU trade occurred because of the implementation of the Regulation, some sourcing consolidation took place for a limited number of operators and this could have led to a reduction in sourcing from other Member States for the operators concerned.

The case studies highlighted that trade flows in the concerned meat sectors are mainly determined by market forces (notably slaughterhouse availability, prices, and – for the swine sector - transport distances), which cannot be isolated from country-of-origin labelling. Assessment of the existing qualitative evidence<sup>35</sup> does not allow for clear conclusions to be drawn on the magnitude of the impact of origin labelling on intra-EU trade.

### **5.1.3. Impact of mandatory origin labelling on food-chain actors**

The supply-chain survey organised in November 2019 provided evidence that slaughterhouses in the swine meat sector were those most impacted by mandatory origin labelling. The main issue that slaughterhouses had to address was the possible mixing of animals and products from different Member States (this was the case for slaughterhouses in Germany and Spain). Other issues reported by the sector were the need to store and incorporate information from the ‘primary’ sector (i.e. those rearing the animals) and transfer this information down the supply chain.

Impacts on poultry slaughterhouses were smaller. Nevertheless, operators processing poultry from more than one Member State had to ensure batch segregation (this was the case in Germany, Spain and the Netherlands). For Ireland, a small number of supply lines

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<sup>34</sup> A confirmation of the marginal renationalisation effect of the mandatory labelling rules is the fact that only 3% of the respondents to the supply-chain survey said they had significantly changed their sourcing practices after the entry into force of the Regulation. 66% of the supply-chain-survey respondents did not change their sourcing practices, and 31% only changed their practices a little or moderately. Among operators sourcing from multiple countries, most (58%) kept their initial sourcing practices.

<sup>35</sup> In particular: (i) the expectations for intra-EU trade following the implementation of the Regulation and based on a review of consumer perceptions of the origin of meat; (ii) evidence from the introduction of country-of-origin labelling in the beef sector; (iii) the Commission’s impact assessment of 2013; and (iv) intra-EU trade data.

had to change to ensure correct labelling of production according to the Regulation's rules. In the sheep and goat meat sectors, importing live animals for slaughter would require measures to keep the animals separate from domestic animals. This has been achieved by processing the live animals on different days, and survey respondents said that the impact of this on their operations had not been significant (Spain and Ireland).

The activities carried out in cutting plants (where meat is cut off animal carcasses) are usually integrated into slaughterhouses. It was therefore not possible to analyse these cutting activities separately in the supply-chain survey. Nevertheless, the evidence from the case studies makes it possible to draw some conclusions. In some Member States (notably Germany and Poland), the Regulation has made the operations at the cutting stage more complex in order to guarantee that information on the identity and provenance of each animal could be preserved. As a result, companies operating in multiple countries sometimes needed to increase batch segregation to comply with the Regulation. Some operators (in Denmark) reported that this had an impact on economies of scale that led to an increase in costs. In any case, these costs were considered less onerous when compared to requirements imposed by retailers or the requirements needed to comply with food-safety rules.

At retail level, the impacts of the Regulation were considered negligible, and related to the set up of the operating systems and the labelling requirements. Retailers were already sourcing fresh swine meat and poultry meat mainly from domestic suppliers before Regulation (EU) No 1337/2013 came into force.

Although farmers were not directly targeted in the survey of supply-chain stakeholders, the case studies found that the Regulation had no impact for swine, sheep and goat farmers. However, it did have a small impact on poultry farmers by making domestic poultry meat more visible at retailers.

No evidence could be found that consumer prices changed because of the implementation of Regulation (EU) No 1337/2013 in any of the meat sectors. Additional costs were minimal and were usually absorbed in the cost of implementing the traceability systems. Therefore, three quarters (75%) of respondents to the supply-chain survey indicated that the Regulation had either led to no additional costs (60% of respondents), or to only a small additional cost (15%) being passed along the supply chain.

#### **5.1.4. Impact of mandatory origin-labelling rules**

##### ***Impact of the Regulation on traceability systems***

Respondents to the supply-chain survey were asked whether their traceability systems changed specifically because of the entry into force of Regulation (EU) No 1337/2013. A slim majority (60%, N= 73) declared there had been no changes to their traceability systems. The case studies also confirmed that operators mostly did not need to make any changes to their traceability systems. Among the respondents who did make changes, 72% said that their traceability systems had changed to either a 'great extent' or a 'moderate extent', and 28% said their systems had changed to a 'small extent'. Less than half of respondents who made changes to their traceability systems (43%) said that their internal operational practices had changed to a great extent, and more than half (57%) declared that their practices had changed to either a moderate extent or a small extent.

The main changes related to: (i) internal traceability in the supply chain (link between incoming and outgoing products); (ii) registration of departures and arrivals of products; (iii) product segregation; and to a lesser extent (iv) animal segregation.

The only additional requirement of the Regulation for traceability systems was that these systems must be able to: (i) pass on information relevant for the country-of-origin designation to the next stage of the supply chain; and (ii) trace this information back to the previous stages in the supply chain. The replies to the supply-chain survey suggested that the industry found this additional requirement straightforward. The case studies showed that the information needed for correct origin labelling has been already communicated along all the stages of the supply chain, as a part of the 'traceability system required under Regulation (EC) No 178/2002 and the requirements of Regulation (EC) No 853/2004 on the hygiene of foods of animal origin<sup>36</sup>.

For swine meat Regulation (EC) No 853/2004 (Annex II, section III: Food Chain Information) states that the documents that must accompany batches of swine meat from farm to slaughterhouse and to cutting plant include those that identify the holding from which the animals originated. The slaughterhouse then combines the numbered carcasses into batches (made up of pigs from one or more suppliers) and assigns each batch a batch number. Therefore, it is known which individual holdings are represented in the batch. The batch number accompanies the carcasses into the cutting room where carcasses are divided into meat cuts to which the proper origin labelling can be assigned.

In the poultry industry, the high degree of integration reduces the requirement to pass information through different organisations in the supply chain. Typically, slaughterhouses receive live birds and send pre-packaged meat directly to the retailer.

In the sheep and goat sector, animals are identified at individual level, and the information passed along the chain is usually more detailed: it includes full information on place of birth, dates spent on specific holdings, and dates of movements.

This passing on of information for all the concerned species is increasingly done automatically via electronic systems. In some cases, respondents to the supply-chain survey reported that their traceability system does not allow the next stage to proceed without the submission of the required information.

No respondents to the supply-chain survey said that they had encountered instances where information was missing. The respondents confirmed that when the information was not sent automatically it was always available on request. Almost two thirds of respondents to the supply-chain survey (64%) found that existing traceability systems in place for ensuring compliance with the Regulation have been fully effective, while 32% considered the systems to be moderately effective. No respondents said that the systems are ineffective, thus confirming previous evidence that only minimal changes to traceability systems were required. In addition, 81% of respondents said that they had never encountered – or were not aware of – any problems with compliance with the Regulation due to the traceability systems in place.

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<sup>36</sup> Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin, [OJ L139, 30/04/2004, p. 55](#).

### ***Effectiveness and impact of rearing specifications***

The evaluation assessed: (i) to what extent the rearing specifications laid down in Article 5(1)(a) of Regulation (EU) No 1337/2013 for different species have been effective; and (ii) what the impact of these specifications has been on prices, consumer information and administrative burden.

As mentioned before, only a quarter of consumers surveyed were able to correctly interpret the term 'reared in', while most consumers understood the term 'reared in' as meaning that the animal lived all its life in the country indicated. However, 42% of consumers understood and accepted the concept behind the term 'reared in', i.e. that the animal was born and may have spent a short period of time in a country different to that indicated on the label as the rearing country.

Although overall consumer satisfaction with the information provided on the label on country of origin has been good (only 7% of surveyed consumers considered themselves unsatisfied), poor or incomplete understanding of the terms related to labelling origin could undermine the effectiveness of the Regulation.

The degree of information on rearing periods passed through the supply chain can vary: in some cases, all information is passed on, whereas in others only simplified information related to the correct labelling is passed on.

For the swine meat sector, the level of passing on of information depends on the size of trade in live animals. In Member States where there are few or no imports of live pigs, time spent in a country is generally irrelevant (this is the case in France, Ireland and Spain). Therefore, this information is not needed for labelling purposes, although it remains available to operators for traceability purposes. In Member States that export live pigs, such as Denmark, national databases record birth dates, movement dates, and places of rearing, and this information is passed along with the pig, ultimately to the slaughterhouses.

Information on rearing periods in the poultry meat sector is not generally relevant. This is because birds are either slaughtered in the country of rearing or are traded live to another country for slaughter, in which case the exporting country is the country of rearing although this information still has to be collected and passed through the supply chain. The high degree of vertical integration means that the slaughterhouse is responsible for receiving information from the 'primary' sector (i.e. the sector that rears the birds) and representing this information on the label of the pre-packed meat that is usually supplied straight to retailers. Typically, flocks are sent to the slaughterhouse along with information on country of origin, including: (i) the farm of the parent flock; (ii) the hatchery that supplied the eggs; (iii) the rearing farm (including barn number, flock number and country); and (iv) dates and locations of movements.

Information on rearing periods in the sheep and goat meat sectors can be quite sophisticated in Member States where there is an electronic identification system in place (this is the case in France and Ireland). In these cases, full information on animals' movements can be retrieved with a scanning system at the slaughterhouse. Whether there is an electronic system or not, the slaughterhouse passes on information to allow the correct labelling to be used, i.e. abbreviated information stating the country of rearing (this occurs in Greece, Ireland and Romania).

Most (70%) of the national competent authorities responding to the survey stated that they never had problems in checking the information on rearing periods or that they had difficulties only on a few occasions. 24% of them reported having difficulties ‘sometimes’, and only one national competent authority reported frequent difficulties. The main difficulties reported were: (i) unclear or non-verifiable information for animals imported for slaughter; (ii) a lack of information on rearing periods; (iii) the inability to pass on information to the next link in the chain; and (iv) incomplete information. There were also some stages of the chain where difficulties in verifying information provided were apparent. For example, at slaughtering, cutting-plant, packing and farm levels these problems occurred frequently or very frequently. Problems were generally less frequent the closer one moved to the retail end of the supply chain.

### ***Impact of batch requirements***

Respondents to the supply chain survey generally did not expect the batch requirements in Regulation (EU) No 1337/2013 to result in changes to sourcing, traceability or operational practices. This was confirmed by evidence: most respondents to the supply-chain survey declared that they did not make changes to their sourcing practices because of the batch requirements. The changes that were made tended to be small or moderate, and the role the batch requirements played in driving those changes was also modest. There is some evidence to suggest that changes and associated costs were more likely to be incurred in slaughterhouses and cutting plants that sourced from multiple Member States. The minimal costs incurred due to the batch requirements have been absorbed in the processing stage of the supply chain and have therefore not been passed on to consumers.

## **5.2. Efficiency**

### ***Impact of the Regulation rules and conditions on costs and administrative burdens of the supply chain***

Most respondents considered the traceability rules of Regulation (EU) 1337/2013 to be efficient and appropriate to provide the necessary information for proper origin labelling for the concerned meats. This is because these rules were based on the information already available and required under Regulation (EC) No 172/2002. The majority of respondents to the supply chain survey (60%, N=73) did not make changes to traceability systems. Among those that did make changes, more than three-quarters noted one-off costs and increased ongoing costs.

The supply-chain survey showed no appreciable differences between an operator’s position in the supply chain and the costs they bore because of changes in traceability systems. Operators active in processing only and operators carrying out both processing and retail activities were more likely to have experienced both one-off and ongoing costs to provide information on rearing periods. The costs imposed on most operators have been small, and those imposed on operators dealing with imported and domestic animals have been affordable. Most of the costs have been incurred in the processing stage, and it has been possible to pass these costs through the supply chain.

On costs arising from changes to internal practices by operators, these costs were very difficult to identify as they were minimal and difficult to define. The expected cost increases related to technical adjustments in the production units and in logistics. However, the last time these costs were quantified was in 2013 in the impact assessment

carried out by the European Commission<sup>37</sup>. According to that impact assessment, additional costs were small for each species at 1.5% in the swine meat sector, 1.0% in the poultry meat sector and just 0.3% in the sheep and goat meat sectors. The cost increases were usually not passed along the supply chain (69% of the cases) or were passed along only partially. Only 10% of respondents passed more than one third of the cost increase to the next step of the chain.

One EU-level organisation that was interviewed said the total extent of additional operating costs for internal processes and sourcing arrangements was in the order of 1.5% to 3.0% of the final product price in the swine meat, sheep meat and goat meat sectors. Around half of these costs were related to technical changes and the other half to market changes (loss of flexibility in purchasing).

On cost increases due to changes in sourcing practices, only six respondents to the supply-chain survey were able to provide information on the magnitude of ongoing cost increases (these were national organisations mainly representing processors). One organisation noted that the cost increase was very small; three respondents indicated that it amounted to 1.5%; another respondent stated that the increase in ongoing costs was 5%; and the final respondent stated that the increase in costs was greater than 15%. Given the small number of quantifications provided by most respondents (among which were no operators in the industry), it is reasonable to assume that the additional ongoing costs were not considered significant.

Results of the survey of supply-chain stakeholders showed that the batch requirements had an impact in only a minority of cases: 22% of the respondents (N=73) said they made changes to traceability systems, internal-operating practices and sourcing strategies as a result of the batch requirements. As regards change in costs, resulting from changes made due to the batch requirements, a fifth of all respondents reported one-off costs (estimated at around 2%) and an increase in ongoing costs (19% and 22% respectively).

### ***Tangible and intangible benefits arising from the Regulation***

The Regulation aims to have three tangible benefits for operators: (i) price benefits (stability or increase of prices for the sold products) (ii) market growth; and (iii) reduction of production cost. The survey of supply-chain operators found little evidence of any of these three benefits: almost half of respondents to the supply-chain survey (N= 70) reported no tangible benefits. A further 41% reported only low or moderate tangible benefits, and only 11% reported benefits to a 'great extent'. Although some tangible benefits can be identified, those have been generally limited in all concerned meat sectors. The replies to the survey also seemed to be mainly influenced by the respondent's position in the supply chain: some operators considered the support for local production over imports to be a benefit, while other operators complained that the Regulation had resulted in a renationalisation of trade and therefore ran counter to the objectives of the EU single market.

Case studies make it possible to identify some concrete examples of the benefits perceived by suppliers. A summary of different case studies is presented in the bullet points below.

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<sup>37</sup> See footnote 6.

- **Swine meat sector:**
  - the fact that there was no appreciable adjustment of trade within the EU, meaning that there was no change in the swine meat offering for consumers (Spain);
  - the fact that consumers can now more easily identify the origin of the meat they buy (Denmark);
  - a reorientation towards domestic swine meat which more closely aligns with consumer demand (Germany).
- **Poultry meat sector:**
  - greater use of domestic poultry in the food-service and catering sector to meet increased consumer demand and thus an opportunity for market growth (Ireland);
  - greater market access for domestic producers (Greece).
- **Sheep and goat meat sector:**
  - some increased protection for domestic producers (Greece);
  - better identification of domestic and imported products which compete with domestic production (Spain).

Respondents to the supply chain survey were more positive when speaking about intangible benefits, such as better information and better product differentiation. Half of the respondents (N=71) reported those benefits to a ‘great extent’ and to a ‘moderate extent’. A further 20% reported intangible benefits to a ‘small extent’, while 30% did not report any intangible benefits. Respondents pointed to the following examples of intangible benefit: (i) a marketing advantage conferred by being able to identify meat as national/local rather than simply from the EU; (ii) harmonisation at the EU level, which simplifies trade; (iii) meeting consumer demand for information on the origin of the meat.

The opinion of national competent authorities on the benefits for operators was more positive overall: more than half of the surveyed authorities identified tangible and intangible benefits for operators to a ‘great extent’. Several competent authorities cited increased sales and greater market stability as tangible benefits; as well as increased consumer confidence as an intangible benefit.

Evidence on tangible and intangible benefits for competent authorities is mixed: more than half of competent authorities perceived tangible and intangible benefits to a great or moderate extent. However, at least a third of them identified no or few benefits. The benefits cited by national authorities included: (i) greater traceability, which can be helpful in the event of food scandals or in the prevention of epidemic diseases; (ii) satisfying consumer expectations on transparency allows consumers to make a more informed purchase decision; and (iii) simplified monitoring.

Some competent authorities that responded to the survey also identified disadvantages, notably a loss of flexibility in supply (since it was no longer possible to switch suppliers in times of shortage because labels were already pre-printed).

### ***Unintended side effects and ‘deadweight’ of the Regulation***

On the potential unintended side effects of the Regulation, some supply-chain stakeholders hinted at changes in sourcing and operating practices, such as reinforcing country-specific assumptions made by consumers on the quality and safety of meat. The mentioned changes were in any case minor and restricted to certain types of operator

(these cases mainly occurred in the poultry meat sector among processors in Ireland and retailers in Spain). Despite the perceptions of some stakeholders, the assessment did not reveal concrete evidence of a conflict between Regulation (EU) No 1337/2013 and the objectives and rules of the EU single market.

Findings from desk research lead to the conclusion that neither national provisions nor voluntary schemes could have achieved the same EU-wide objectives of Regulation (EU) No 1337/2013. This is especially because: (i) there are no international schemes covering origin indication for the products of interest; (ii) the voluntary schemes are present in some Member States only, and often have a regional/local dimension; and (iii) the uptake of those schemes is limited. Interviews with EU-level organisations (notably organisations representing the interests of retailers) also confirmed that a proliferation of different voluntary schemes covering origin indication, in the absence of harmonised EU legislation, could create barriers to trade and confusion among consumers. In that sense, no significant ‘deadweight’ could be related to the Regulation.

### 5.3. Coherence

#### *Coherence of Regulation (EU) No 1337/2013 with other EU rules and regulations*

The key objectives of Regulation (EU) No 1337/2013 (see also Figure 1) are the same as those pursued by Regulation (EC) No 1760/2000<sup>38</sup> for the beef sector, and relate to the objectives laid down by the FIC Regulation. A high degree of perceived consistency was also revealed among stakeholders who participated in the surveys. A large proportion of respondents to the supply-chain survey (80%, N=73) and national competent authorities (93%, N=15) identified no inconsistencies or conflicts between the objectives of Regulation (EU) No 1337/2013 and the objectives of other pieces of EU legislation.

Very few stakeholders (12% of respondents to the supply-chain survey and one national competent authority) identified potential conflicts between the objectives of the Regulation and those of other pieces of relevant EU legislation. There are two types of inconsistencies perceived by the stakeholders:

- **Inconsistency with the rules in the beef sector:** country-of-origin labelling for beef includes a requirement to state the animals country of birth, a requirement which is missing from Regulation (EU) No 1337/2013 except implicitly where the ‘origin’ designation is used. The potential conflict related to the different treatment of country of birth was also pointed out by the national competent authority.
- **Inconsistency between mandatory country-of-origin labelling and the objective of ensuring the smooth functioning of the EU single market:** this was an issue raised by the EU-level organisation representing the interests of traders of live animals and meat<sup>39</sup>.

On the definitions/specifications used in Regulation (EU) No 1337/2013, these are the same as – or consistent with – those used in other pieces of relevant EU legislation. Very

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<sup>38</sup> [OJ L 204, 11.08.2000, p. 1.](#)

<sup>39</sup> However, it should be noted that analysis of the effectiveness criterion under Section 5.1 concluded that there is no clear evidence that the Regulation has had an impact on intra-EU trade patterns, although some adjustments to specific trade flows appear to have occurred. In other words, there is no clear evidence that the Regulation has stimulated or hindered the smooth functioning of the EU’s single market.

few of the consulted stakeholders<sup>40</sup> perceived potential conflicts or inconsistencies. The few potential conflicts or inconsistencies that were identified related to: (i) definitions in Regulation (EC) No 1760/2000 that are different from definitions in Regulation (EU) No 1337/2013; (ii) the lack of an obligation in Regulation (EU) No 1337/2013 to always indicate the country of birth of animals (see above); and (iii) the fact that Regulation (EU) No 1337/2013 does not cover ‘loose’ retail sales in bulk (non-prepacked meat).

In general terms, the traceability requirements in Regulation (EU) No 1337/2013 are non-conflicting and coherent with those in other pieces of relevant EU legislation. It should be noted that the general traceability requirements for food and feed set out in Article 18 of the General Food Law (Regulation (EC) No 178/2002<sup>41</sup>) were already in force at the time of drafting of Regulation (EU) No 1337/2013. The General Food Law imposed an additional obligation to make country-of-origin information derived from traceability systems available in such a way as to allow labelling of final products. A large majority of the stakeholders consulted said there were no inconsistencies or conflicts between the traceability requirements of Regulation (EU) No 1337/2013 and those of other pieces of relevant EU legislation (91% out of N=61 from supply-chain operators, 97% out of N=15 national competent authorities, and all the interviewed EU-level organisations).

Very few consulted stakeholders identified potential conflicts or inconsistencies. The stakeholders that did identify potential conflicts or inconsistencies were mostly those that represented consumers. One consumer organisation pointed out that traceability in the swine and poultry sectors is on a batch basis, rather than on an individual basis, as is the case in the beef, sheep meat and goat meat sectors. Other inconsistencies perceived by stakeholders related to the two areas where the specifications of Regulation (EU) No 1337/2013 differ from those in Regulation (EC) No 1760/2000: the treatment of country of birth and coverage of ‘loose’ retail sales in bulk. The provisions on rearing periods under Regulation (EU) No 1337/2013 lead to more simplified origin labelling for swine, poultry and sheep/goat meat than for beef<sup>42</sup> where rearing took place in multiple Member States and non-EU countries.

On the derogations provided by Regulation (EU) No 1337/2013, the evidence from stakeholders identified no major conflicts or inconsistencies between the derogations provided by Regulation (EU) No 1337/2013 and derogations in other pieces of relevant EU legislation. However, it cannot be excluded that the favourable views of industry operators and representative organisations have been influenced by the significant contribution provided by the derogations in Regulation (EU) No 1337/2013 that simplify compliance and reduce burden. A few supply-chain stakeholders<sup>43</sup> and the organisations

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<sup>40</sup> 7% (N=61) respondents from the supply-chain survey, one EU-level organisation, and one national competent authority.

<sup>41</sup> [OJ L31, 01/02/2002, p.1.](#)

<sup>42</sup> Amended Regulation (EC) No 1760/2000; amended Regulation (EC) No 1825/2000; Commission Regulation of 25 August 2000 laying down detailed rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products, [OJ L 216, 26/08/2000, p.8.](#)

<sup>43</sup> A fifth of respondents to the supply-chain survey (N=67) identified potential conflicts between the derogations provided in Regulation (EU) No 1337/2013 and the derogations in other relevant EU legislation. The highest proportion of respondents identifying potential conflicts was recorded among consumer organisations (64% out of N=11 respondents).

representing consumers identified some potential gaps in information to consumers due to the derogations for minced meat and trimmings, and the derogations for meat imported from non-EU countries (there is a lack of information about which non-EU country non-EU meat comes from, especially if there are country-specific issues or concerns). However, these arguments focused more on the relevance of the derogation than its coherence.

On the derogation provided by Article 6 of Regulation (EU) No 1337/2013 for meat imported from non-EU countries<sup>44</sup>, an interviewed EU-level consumer organisation observed that consumers might want to know exactly which non-EU country non-EU meat comes from, especially when there are issues with animal welfare, environmental impact, or food safety in specific countries. However, this argument has more to do with the relevance of the derogation than with its consistency with similar derogations laid down by other relevant EU legislation.

On the derogation provided by Article 7 of Regulation (EU) No 1337/2013<sup>45</sup>, the stakeholders' consultation revealed wide consensus on the coherence of Regulation (EU) No 1337/2013 with other pieces of relevant EU legislation introducing mandatory origin labelling, notably for beef, honey, fresh fruit and vegetables, extra-virgin olive oils and virgin olive oils. As is the case with Regulation (EU) No 1337/2013, those other relevant pieces of EU legislation do not provide for the extension of the simplified 'EU/non-EU' origin indication to the entire range of products that they cover.

However, consumer organisations disagreed. They voiced their concern that the use of a simplified 'EU/non-EU' origin indication would prove an obstacle to the possible extension of mandatory origin labelling to processed products using minced meat and trimmings of swine, poultry, sheep and goat meat as an ingredient. Although the arguments made by consumer organisations on the matter concern a hypothetical regulatory framework (as there is currently no harmonised EU legislation on mandatory origin labelling for processed food products), the conflict between specificities of identification could preclude the use of anything other than an 'EU/non-EU' designation under the EU legislation applying from April 2020<sup>46</sup>.

Some business stakeholders and national competent authorities also identified a partial inconsistency between the Article 7 derogation and the analogous derogation under Article 14 of Regulation (EC) No 1760/2000 for beef, since the latter requires minced beef to be labelled with the specific Member State or non-EU country of origin, rather than simply 'EU/non-EU'.

The analysis of the coherence of Regulation (EU) No 1337/2013 has also identified a potential internal inconsistency between the approach taken for origin indication for

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<sup>44</sup> This article provides for a situation where the non-EU country of rearing for imported meat is not available. In this case, the label must contain the indication: 'Reared in: non-EU' and 'Slaughtered in: (Name of the non-EU country where the animal was slaughtered)'.

<sup>45</sup> Article 7 of Regulation (EU) No 1337/2013 introduced the derogation to apply the 'EU/non-EU' designation to minced meat and trimmings only and not to the meats covered by the Regulation in general (i.e. fresh, chilled and frozen meat of swine, sheep, goats and poultry).

<sup>46</sup> Reference to Commission Implementing Regulation (EU) 2018/775 of 28 May 2018 laying down rules for the application of Article 26(3) 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 rules for indicating the country of origin or place of provenance of the primary ingredient of a food, [OJ L131, 29.05.2018, p.8.](#)

minced meat and trimmings on the one hand and the approach taken for packs of several pieces of meat of different origins on the other hand. In fact, under the Article 7 derogation, the use of the simplified ‘EU/non-EU’ origin indication for minced meat and trimmings is allowed, whereas for packs of meats of different origin under Article 5(3), the detailed list of the relevant Member States or non-EU countries must be provided on labels.

### ***Coherence between Regulation (EU) No 1337/2013 and national rules and legislation***<sup>47</sup>

Regulation (EU) No 1337/2013 applied directly across the EU. Some Member States enacted national laws providing for a monitoring regime (Denmark, Ireland and Italy), and others amended existing national laws to ensure compliance with the Regulation (France, Greece, Poland and Romania). In one Member State (Spain), the pre-existing national legislation was repealed to avoid conflicts with the Regulation.

The evaluation has identified several Member States with additional national rules going beyond the scope of Regulation (EU) No 1337/2013<sup>48</sup>. Two Member States (Finland and France) have issued additional national rules on origin labelling for meat used as an ingredient in processed products and meat provided to mass caterers. Although mandatory, these rules were set to be limited in time. Two other Member States (Greece and Poland) extended the scope of the Regulation in their national implementing legislation to encompass meat sold ‘loose’ to final consumers.

The rationale for Member States developing additional national rules was:

- to inform consumers about the origin of meat used as an ingredient in food to increase the market share of domestically produced meat in the catering sector and in the processed-meat industry (in Finland and France);
- to protect consumers from potentially being misled on the origin of the meat sold ‘loose’ at retail given the importance of this type of meat in national markets in Greece and Poland).

The case studies and stakeholder consultation did not identify any conflicts or inconsistencies between Regulation (EU) No 1337/2013 and national legislation. Most of the respondents in the online public consultation (79%, N=115) were strongly or moderately positive about the consistency between the EU origin-labelling rules and other EU interventions.

In addition to national legislation, national voluntary schemes concerning origin (often as part of wider quality schemes) have been developed in at least eight Member States: Czechia, Denmark, France, Germany, Ireland, Italy, Poland and Spain. Some of those schemes have been used as an informal requirement for business-to-business sales of meat, others were directly linked to national traditional practices (quality schemes such as the *Label Rouge* in France), thus providing an indication of origin even if this was not the expressed main intention. Some other national initiatives have also been developed

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<sup>47</sup> For inventory of existing national rules concerning country of origin, see also Annex 3.

<sup>48</sup> Some possibility to set up additional, complying, and non-contradictory rules on origin labelling is allowed in Article 8 of Regulation (EU) 1337/2013, Articles 9 and 45 of the FIC Regulation.

that are focused on quality or greater animal welfare, but without specific mention of origin<sup>49</sup>.

#### **5.4. Relevance**

The evaluation also analysed the relevance of EU Regulation (EU) No 1337/2013 and more concretely the extent to which the objectives, scope, rules and conditions stated in the Regulation: (i) correspond to the current needs and context; (ii) are relevant; and (iii) are fit for purpose.

##### ***Extent to which original objectives of the Regulation are still relevant***

The surveyed supply-chain stakeholders, consumers and competent national authorities reported that the objective of ‘providing clear, accurate and meaningful information to consumers’ remains highly relevant. Notably, the vast majority of consumers and consumer organisations (83%, N=6,250), as well as two-thirds (65%, N=17) of the surveyed national competent authorities stated that the first objective of the Regulation has remained ‘fully’ relevant. There were no stakeholders who felt that this objective was no longer relevant. All interviewed EU-level organisations stated that origin information is increasing in importance for consumers of all types of meat. The stakeholders also found relevant the second objective of the Regulation i.e. ‘ensuring that information is reliable and can be checked by enforcement authorities’. The distribution of opinions about the second objective was similar to the first objective, i.e. consumer organisations and national competent authorities (69%) were the most likely to find this objective to still be ‘fully’ relevant. The third objective of the Regulation i.e. ‘to avoid unnecessary burdens on operators, trade, administration and the environment’ was considered by survey respondents to be less relevant than the other two objectives, although interviewed EU organisations pointed out that unnecessary burdens should be avoided. All interviewed EU organisations agreed that it remained relevant to ensure that the information provided be reliable and can be checked. No differences in views were reported between respondents about how relevant the three objectives were for different meat species.

In the public consultation, the stakeholders were either very or moderately positive about the relevance of the EU origin-labelling rules for current stakeholder needs (positive opinions ranging from 55% of national authorities, 66% of respondents to the supply-chain survey, and 80% for consumers). Negative responses were rather low, between 10% and 16% in each group of stakeholders.

##### ***Emergence of new needs to cover in the Regulation***

The evidence from the survey also revealed a perception among all groups of stakeholders that the scope of Regulation (EU) No 1337/2013 could be extended to encompass: (i) meat sold ‘loose’ at retail (i.e. not pre-packed); (ii) meat used in processed products; (iii) meat sold in food-service and catering outlets; and (iv) meat of other species. Some supply-chain organisations suggested there was a need to allow ‘EU/non-EU’ labelling beyond the derogation provided under Article 7 of the

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<sup>49</sup> Examples include IKB (*Integrale Keten Beheersing/Integrated Quality Control*) and *Beter Leven* in the Netherlands; QS in Germany; and, *Label Rouge* in France. These schemes can be considered to provide information on origin by default as they are mainly used nationally.

Regulation. National competent authorities also felt that extending the scope of the derogation provided under Article 7 would be relevant, but to a much lower extent. Besides, many respondents (86%, N=99) in the public consultation agreed that origin labelling ought to be extended to processed meat or to meat that was to be exported.

The case studies also identified several needs, suggesting that the scope of the Regulation is not sufficient in the national context, in particular:

- the need to indicate the country of birth beyond the implicit designation of origin (identified as a need in Denmark, Greece, Poland and Spain);
- the need to label the origin of non-prepacked meat, i.e. meat sold ‘loose’ at the retail stage (identified in Greece, Ireland, Poland and Spain);
- the need to label the origin of meat sold by caterers (an important issue identified in several Member States – France and Greece have considered national legislation to cover this need);
- the need to label the origin of meat used as an ingredient in processed products with relation to the demarcation between fresh and processed meat and taking into account Regulation (EU) 2018/775 (identified as a need in Denmark, France and Germany).

### ***Extent to which rules of the Regulation are still relevant for the current context***

Most of the national competent authorities and respondents to the supply chain survey found that the context in which Regulation (EU) No 1337/2013 operates has evolved since its entry into force in 2015. There have been two main changes: (i) the discussion around labelling; and (ii) consumer habits and interests. EU-level organisations agreed with these views by noting the increased consumer interest in origin labelling. This greater consumer interest in origin labelling is also evidenced by the use of temporary national measures on origin under Regulation (EU) No 1169/2011<sup>50</sup>. Despite an identified change in context, most respondents felt that the Regulation remained either ‘fully’ relevant or relevant to a ‘great extent’. The results of the supply chain survey showed that traceability rules have been ‘fully’ followed by more than half of respondents (56%) and rules relating to batching/groups of animals by 44% of respondents. The same survey showed also that the rules on labelling/rearing periods and derogations for minced meat/trimmings have not been followed so completely. More than a fifth (23%) of respondents said they did not follow the Regulation’s derogations for non-EU countries.

Supply-chain operators have tended to follow a standard operating procedure to ensure the application of: (i) food-and-feed law; (ii) rules on animal health and welfare; (iii) and rules on plant health and plant-protection products. These operators have typically followed this procedure regardless of the final destination of the meat (whether it is sold as fresh/frozen and then subject to origin-labelling obligations or used for meat preparations).

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<sup>50</sup> According to Article 39(2) of this Regulation, Member States may introduce measures concerning the mandatory indication of the country of origin or place of provenance of foods only where there is a proven link between certain qualities of the food and its origin or provenance. When notifying such measures to the Commission, Member States must provide evidence that the majority of consumers attach significant value to the provision of that information.

There is evidence that origin labelling is used on products that fall outside the scope of Regulation (EU) No 1337/2013, both under mandatory national legislation and under voluntary schemes<sup>51</sup>. However, there is only mixed evidence on the extent to which there are fully segregated supply chains serving markets other than the EU's fresh/frozen market<sup>52</sup>. Although it is clear that there are different market channels, there is no compelling evidence of supply chains that are entirely segregated to serve these channels<sup>53</sup>. According to the supply-chain survey, just over 80% of the other supply chains are fully or partially mixed with supply chains serving the EU fresh/frozen market. Only 15% of supply chains are said to be 'separate' and 3% are said to not serve the EU fresh/frozen market at all.

## 5.5. EU added value

### *Extent to which Member States would have acted to introduce national rules if Regulation (EU) No 1337/2013 did not exist*

The positions of the Member States expressed in the survey of the competent national authorities were balanced between those that would have wished to legislate at national level in the absence of the Regulation and those that would not. At least 6 national competent authorities out of 17 considered their introduction of national legislation in the absence of the Regulation to be 'unlikely'. However, the same proportion thought that the introduction of national rules in the absence of the Regulation would be 'likely'. Three of the Member States had a 'neutral' opinion on this eventuality. None thought that introducing such rules would be 'entirely feasible', but a third of Member States felt it would be 'quite feasible', another third had a 'neutral' opinion, and a quarter felt the introduction of such rules would be 'quite unfeasible'.

The Member States that introduced national rules before the implementation of Regulation (EU) No 1337/2013 said they would have continued to apply these national rules in the absence of the EU rules. This includes: (i) the supply chain for swine meat and poultry meat in Poland; (ii) the supply chain for swine meat in Italy; and (iii) the supply chain for poultry, sheep and goat meat in Greece. In these three countries, competent authorities, supply-chain organisations and consumer organisations agreed on labelling the origin of meat.

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<sup>51</sup> It was also noted that origin labelling is often required by end markets on a voluntary basis for products that are out of the scope of Regulation (EU) No 1337/2013.

<sup>52</sup> Half of the respondents to the supply-chain survey (53%) said that they or their members are involved in supply chains for meat that is not sold as frozen or fresh in the EU (N=73). None of the operators processing all three species (poultry, pigmeat, and sheep/goat meat) are involved in frozen or non-fresh or EU supply chains (N=8). Two-thirds (68%) of operators processing only poultry meat are also not involved in frozen or non-fresh supply chains (N=19). However, two-thirds (67%) of operators processing only pigmeat are involved in supply chains for fresh and frozen meat beyond the EU market (N=9). A large majority of the national competent authorities (88% out of N=17) indicated that they are not aware of supply chains entirely separate from meat sold as fresh or frozen.

<sup>53</sup> There is a suggestion in the literature ([merger procedure between a Danish and a German processor](#)) that the cull sow market is segregated from the general swine meat market, with sow meat used in the processing sector. However, some sow meat is used in the fresh meat market and sows are not slaughtered in facilities that do not also process standard finisher pigs. There is some evidence for a segregated supply chain in the poultry sector in France, where whole birds are exported to the Middle East, but this has declined in importance over time.

Conversely, some of the Member States that do not have national rules said they would not have introduced any rules specifically on origin labelling in the absence of the EU Regulation. Those Member States (like Denmark, Germany and the Netherlands, have nevertheless developed national voluntary schemes that have addressed the origin-labelling needs for a large part of the meat sold at retail level. In some other Member States (Spain and Romania), the competent authorities did not express any opinion on the matter, but national professional organisations felt that the introduction of such rules would be unlikely in the absence of Regulation (EU) No 1337/2013.

### ***Potential impact of the non-harmonised system (absence of the EU Regulation)***

Almost half of the surveyed competent authorities were of the opinion that national rules could fulfil the objectives of the Regulation (EU) No 1337/2013 only to a ‘moderate extent’. More than one third of competent authorities considered that national rules would not have met the same objectives (notably Germany, the Netherlands, Romania and Spain), while three competent authorities considered that national rules would have met the same objectives (Greece, Italy and Poland).

## **6. CONCLUSIONS**

Since 2011, general rules on food information to consumers have been in place in the EU that aim at helping consumers to make informed decisions. These rules require certain information to appear on a food label, such as the country of origin or place of provenance for certain types of food. Through Regulation (EU) No 1337/2013 (‘the Regulation’), in force since 2015, the fresh, chilled and frozen meat of swine, sheep, goats and poultry are required to indicate their origin (i.e. a place where the animals were reared or slaughtered) with a label. The evaluation analysed to what extent the mandatory origin-labelling rules for swine, sheep, goat and poultry meats were enabling the EU to achieve the objectives set in the legislation. The evaluation also analysed whether these rules have been useful and sufficient, and whether they have remained relevant for the concerned stakeholders, i.e. consumers, meat supply-chain operators, and Member-State competent authorities.

### **6.1. Conclusions on effectiveness**

Consumers consider country-of-origin labelling to be important information at the point of purchase. There is no doubt that the accuracy of the information currently given on labels is in line with the labelling definitions set out in the legislation. Nevertheless, consumer understanding of these definitions is poor and there are therefore doubts over consumer interpretation. As a result, it was not possible to conclude that the information is fully clear and useful to consumers.

There is evidence that the information on the origin of swine, poultry, sheep and goat meats provided to consumers according to the Regulation was considered to be reliable, accurate and verifiable by national competent authorities. Although no systemic issues have been reported in the ability of national competent authorities to verify and check the information, differences in the robustness of monitoring have been apparent between Member States. In particular, case studies revealed that monitoring has been facilitated where live imports did not take place, or at least where live imports were not a major feature of the market.

The evidence showed that the existing traceability systems set up in accordance with the EU legislation allow all operators to receive systematically the information required for compliance with the Regulation (i.e. a link is made and maintained between the meat product and the animal of origin). The Regulation specification on rearing periods did not pose challenges to operators and did not create specific costs and burden. The batch requirements did not result in changes to sourcing, traceability or operational practices. Although the impact was minimal overall, some evidence suggested that the processing stage (in slaughtering and cutting plants) was the most affected by the Regulation in several Member States – those operators had to adjust their operational practices.

Although the stakeholder consultation and case studies identified some limited ‘renationalisation’. However, the broader evidence gathered in the evaluation did not show significant and clear impacts of the Regulation on intra-EU trade, and so it can be concluded that Regulation did not hamper the development of intra-EU trade in live animals and in fresh meat, and thus did not disrupt the functioning of the EU’s single market.

Case studies pointed to some suggestions/hypotheses that the implementation of the Regulation might have a positive or negative environmental impact, depending on the nature of the change induced (e.g. change in trade flows and transport), but no evidence for these suggestions/hypotheses could be provided. Overall, the evaluation did not detect a clear and direct relationship between the Regulation and the environment.

## **6.2. Conclusions on efficiency**

The evidence suggests that the Regulation achieved its main objective i.e. consumers have received meaningful and verifiable information, with a minimal negative impact (increase of cost) on operators and national authorities. The evaluation found no evidence that consumer prices increased due to implementation of the Regulation. However, it should be noted that stakeholders were more positive about the Regulation’s intangible benefits (e.g. better information, product differentiation) than its tangible benefits (e.g. higher sales prices for their products, price stability, market growth, and cost reduction).

The Regulation has been judged to be efficient in limiting cost and administrative burdens on operators. Costs have been successfully minimised because it was mostly possible to meet the Regulation’s provisions using existing traceability systems that were already in place. The reported additional cost incurred in passing on information (notably on rearing) and in adapting the already existing systems was minimal, absorbed in the supply chain (mainly at the processing stage), and not passed on to consumers. The swine meat sector is more likely to have faced additional costs than other meat sectors.

Monitoring costs for national competent authorities have been small, as they have been integrated within the context of the broader mandatory monitoring under Regulation (EU) 2017/625<sup>54</sup>. Some Member States raised concerns about the limited resources they were able to allocate to monitoring the Regulation’s implementation.

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<sup>54</sup> Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant-protection products (‘Official Controls Regulation’), [OJ L 95, 7/04/2017, p.1.](#)

### **6.3. Conclusions on coherence**

The analysis also made it possible to conclude that the mandatory origin-labelling rules for the concerned types of meat were coherent. The collected evidence demonstrated that the objectives, definitions and traceability requirements of the implementing EU regulation are consistent with those of other pieces of relevant EU legislation. However, some stakeholders (mainly supply-chain stakeholders and national competent authorities) identified a partial lack of coherence within the approach applied to mixed meat in packs (Article 5 of the Regulation) and to minced meat and trimmings (Article 7).

The same groups of stakeholders have also suggested that there is a possible lack of consistency between the mandatory origin-labelling rules for beef and those for swine, sheep, goat and poultry meats. However, it should be highlighted that derogations used in the Regulation for swine, sheep, goat and poultry meats remain consistent with the approach taken in many other food sectors, notably for blends of honeys and olive oils, and mixtures of fresh fruit and vegetables.

The evaluation did not identify any inconsistencies between the EU rules and the national legislation of Member States (both the pre-existing national legislation and additional national rules introduced after entry into force of the Regulation). There is no evidence that the Regulation had significant unintended side effects or that it was subject to significant ‘deadweight’.

### **6.4. Conclusions on relevance**

All stakeholders (consumers, supply-chain operators, competent national authorities, and general public) across the concerned meat sectors said that the three main objectives of the Regulation remain ‘fully’ relevant or relevant to a ‘great extent’. This was despite the fact that most of the supply-chain operators and national competent authorities found that the context in which the Regulation operates has changed since its entry into force in 2015. The three most significant changes pointed out are: (i) an increase in the discussion around labelling; (ii) a change in consumer habits and interests; and (iii) increased use of temporary national measures on origin indication for certain products.

Among the three main objectives of the Regulation, the third objective i.e. ‘to avoid unnecessary burdens on operators, trade, administration and the environment’ was considered by stakeholders to be less relevant than the other two objectives. However, stakeholders, and interviewed EU organisations in particular, stressed that unnecessary burdens should be avoided.

Although many stakeholders, including national competent authorities, did not identify concrete new needs to extend the scope of the Regulation with regard to fresh, chilled and frozen meat of swine, sheep, goats and poultry, there is substantial interest and support in the following aspects: country of birth, food service and catering sector, meat sold loose at retail and processed meat products in which meat is a primary ingredient. To some extent, those needs have been addressed in a few Member States.

### **6.5. Conclusions on EU added value**

National competent authorities, professional organisations and consumer organisations confirmed that the absence of EU legislation on origin labelling would lead to potentially significant negative impacts. Stakeholders in the public consultation judged the EU added value of the Regulation to be good.

In the absence of the Regulation, a significant proportion of Member States would have maintained or adopted mandatory national rules to address country origin labelling. It is unlikely that national rules would have been introduced in those Member States which have net meat exporting positions among their supply chain and/or which have developed voluntary national schemes.

The stakeholder consultation also revealed wide consensus on the potential risks of the non-harmonised approach at EU level i.e. widespread adoption of national rules: hampering smooth operation of the EU single market, increasing difficulties for companies to navigate rules, unequal information provided to consumers.

The existing national compulsory rules on country of origin going beyond the scope of the Regulation are rare and form time-limited pilot projects. Conversely, voluntary quality schemes covering origin labelling (implicitly or explicitly) are widespread in some Member States. Those schemes are designed to meet similar objectives as the Regulation (i.e. consumer demand for information on concrete type of product), but were further adapted to address specific national needs and extract a competitive advantage.

## **6.6. Lessons learned**

Consumers consider country-of-origin labelling to be important at the time of purchase, because they also perceive origin as information about quality and safety attributes, that are not, however directly linked with origin<sup>55</sup>.

Although the accuracy of the information given on meat labels is in line with the Regulation, there are doubts over consumer interpretation of origin-labelling rules. For this reason, it was not possible to conclude that the information provided when applying the Regulation is fully clear and useful to consumers, notably on consumer understanding of the concrete specifications (terms and definitions).

The evidence clearly showed that origin-labelling provisions for the concerned meats were implemented without unnecessary burdens on the meat supply chain and on national administrations. Moreover, the derogations for minced meat, trimmings and imported meat have facilitated the implementation of the new rules. While there is no doubt about the usefulness of those derogations, their coherence and potential harmonisation with other meats and foods could be further analysed.

Despite proven small changes to trade flows, the Commission assessed the overall effect of the origin-labelling provisions for the concerned meats on market dynamics and trade dynamics to be marginal. It is nevertheless important to continue monitoring the Regulation's policy impact on the EU single market, notably via the different instruments currently available, such as: (i) the meat-market observatory; (ii) civil-dialogue groups; and (iii) the Committee for the Common organisation of the agricultural markets.

The increasing societal interest in – and growing environmental case for – food labelling make it important for the Commission to continue its efforts to better understand the environmental impact of the origin-labelling provisions.

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<sup>55</sup> It should be noted that food-safety rules are fully harmonised in the EU single market. Therefore, food business operators in all Member States must comply with the same legal obligations with regard to food safety.

Information on the meat's origin/provenance (notably on rearing periods) that is passed on according to the EU regulation is sufficient to ensure correct labelling and can be generally verified by Member States' competent authorities. However, no data are available on the number or nature of 'non-conformities' (when meat does not meet the requirements of the Regulation). This is because non-conformities are addressed in the broader context of national food legislation. Further exchanges and collection of good practices on checks in this specific area could help to address gaps in information.

The objectives of the Regulation have remained relevant, despite the evolving context in which it has operated. In particular, there is a perceived increase in consumer interest in country-of-origin information across all meat products and market segments, especially for types of meat not covered by the current scope of the Regulation such as meat sold loose at retail (i.e. not pre-packed), and meat sold through food-service/catering. Additional mandatory rules and voluntary initiatives in origin labelling set up at national level have already partially addressed the emerging needs of consumers. However, these national initiatives may negatively influence stakeholders' perception of the added value and importance of the EU rules and provisions. The experience gained from the implementation of the Regulation could contribute to a broader assessment of origin labelling for meats and meat products on the EU single market.

## ANNEX 1. PROCEDURAL INFORMATION

### 1. Lead DG, Decide Planning/CWP references

The evaluation was approved in the European Commission planned programme of legal initiatives<sup>56</sup> in 2018 as a thematic assessment of common agricultural policy. The evaluation was organised and conducted by the Directorate-General for Agriculture and Rural Development (DG AGRI), according to its evaluation and studies plan.

### 2. Organisation and timing

The evaluation was conducted through an evaluation support study, in conformity with the DG AGRI procedure for organising and managing policy evaluations by external contractors. The work was supervised under the technical and contractual management of the DG AGRI unit in charge of monitoring and evaluation.

For the purpose of the evaluation, the Commission set up an inter-services steering group to provide expert opinion on the evaluation at all stages: from defining the evaluation's scope of the evaluation (its roadmap), by the procurement procedure and delivery of the evaluation support study, to the dissemination of the evaluation results (staff working document). The inter-services steering group was composed of DG AGRI and other Commission DGs with responsibility for this area: the Directorate-General for Competition (DG COMP); the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW); the Directorate-General for Health and Food Safety (DG SANTE); and the Secretariat-General of the Commission (SG). The inter-services steering group started its work in June 2018 and held several meetings throughout the evaluation process.

The overall evaluation began in September 2018 with a roadmap<sup>57</sup> setting out the context, objective and scope of the exercise. Then, the Commission commissioned an evaluation support study, which was carried out by the external contractor from August 2019 to August 2020, and published on the Europa website in September 2020<sup>58</sup>. In the meantime, the Commission organised an online public consultation supporting the evidence gathering under the evaluation.

### 3. Exceptions to the 'better regulation' guidelines

The evaluation followed the European Commission's 'better regulation' guidelines<sup>59</sup> without exceptions. The evaluation was not selected for scrutiny by the Regulatory Scrutiny Board (RSB)<sup>60</sup>.

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<sup>56</sup> Internal reference in Decide: PLAN/2018/3006.

<sup>57</sup> See footnote 25 for link to the evaluation roadmap.

<sup>58</sup> See footnote 10 for link to the evaluation support study, its executive summary, leaflet and presentation.

<sup>59</sup> [https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox\\_en](https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en)

<sup>60</sup> The RSB is an independent body that advises the College of Commissioners and provides central quality control and support for Commission impact assessments and evaluations at early stages of the legislative process. For more information on its role, composition, rules and works see the dedicated page on Europa, [https://ec.europa.eu/info/law/law-making-process/regulatory-scrutiny-board\\_en](https://ec.europa.eu/info/law/law-making-process/regulatory-scrutiny-board_en).

#### **4. Evidence, sources and quality**

Relevant data and information were gathered in the evaluation support study and in the stakeholder-consultation activities to build an evidence base for the staff working document. The evaluation approach combined the following three main types of evidence: (i) EU-level data and information gathering, review and analysis; (ii) case studies in selected Member States; and (iii) qualitative and quantitative analysis of trade data (see also Section 4 METHOD).

## ANNEX 2. STAKEHOLDER CONSULTATION

The evaluation provided for a range of consultations to collect information and views from relevant stakeholders and the public, to be used as input for preparing the staff working document.

The consultations carried out during the evaluation can be grouped as follows: (i) consultation activities carried out by the external contractor in charge of the evaluation support study; and (ii) consultation activities carried out by the European Commission.

### **Consultation activities carried out by the external evaluator<sup>61</sup>**

The external contractor carried out a series of consultation activities: case studies, a consumer survey, a supply-chain survey, a survey of national competent authorities, and interviews with EU-level organisations. The consultation activities targeted the following main stakeholders: (i) relevant public authorities in EU Member States; (ii) consumer organisations; (iii) operators and other actors in the food chain; (iv) farmers and farmers' organisations; (v) academia and experts; and (vi) relevant NGOs.

### **Consultation activities carried out by the European Commission**

#### Roadmap feedback

In September 2018, the Commission organised a four-week, an online consultation to hear the opinion of the general public on the roadmap of the evaluation. The Commission received some contributions from this that have not changed the initial scope of the evaluation. Nevertheless, these contributions were taken into account in designing the evaluation questions.

#### Open public consultation

From December 2019 to March 2020, the Commission conducted an online public consultation in all official EU languages except Irish. The public consultation was organised using EUSurvey and published on the Europa website<sup>62</sup>. Its aim was to gather the views of public authorities, stakeholders and members of the public. Overall, the public consultation provided a significant amount of input on the different sectors, especially through the position papers that respondents to the consultation provided in addition to the EUSurvey questionnaire. Respondents to the public consultation from the meat sector came from different backgrounds: the most represented meat categories were respondents from the swine meat sector (19% of respondents to the consultation) and the poultry meat sector (19%), followed by the sheep meat sector (14%) and goat meat sector (11%). Altogether, the meat industry represented 63% of respondents, while 37% declared their affiliation as 'none in particular'.

The results of the public consultation were summarised in the factual report<sup>63</sup>, which provides an overview of responses to the questions and gives information about the

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<sup>61</sup> For more details on those activities, see the evaluation support study.

<sup>62</sup> <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/1892-Evaluation-of-mandatory-country-of-origin-labelling-for-certain-meats/public-consultation>

<sup>63</sup> The factual summary report from the public consultation can be consulted on Europa (see footnote above for link).

respondents by country of origin and stakeholder category. In addition to replies to the closed questions, some public-consultation respondents gave their opinions to the open questions on the efficiency and relevance of the EU policy. A brief summary of those opinions is presented in Table 2. Finally, the public consultation was supplemented by position papers provided by 9% (N=146) of respondents. A list of respondents who provided position papers (broken down by stakeholder category) is presented in Table 3. All position papers can be consulted in the original/source language on the Europa page dedicated to the public consultation, and their main subjects are outlined in Table 4.

#### Other targeted consultation activities

The evaluation was presented to DG Agriculture and Rural Development's civil-dialogue groups: the swine meat-sector civil-dialogue group and the quality and promotion civil-dialogue group<sup>64</sup>.

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<sup>64</sup> Agricultural civil-dialogue groups on the Europa website: [https://ec.europa.eu/info/food-farming-fisheries/key-policies/committees-and-advisory-councils/civil-dialogue-groups/animal-products\\_en](https://ec.europa.eu/info/food-farming-fisheries/key-policies/committees-and-advisory-councils/civil-dialogue-groups/animal-products_en).

**Table 2. Summary of main opinions to the public-consultation open questions (per stakeholder category)**

<b>Stakeholder</b>	<b>Summary of main positions</b>
<b>Academic/research institution</b>	Recommended labelling: within EU-sourced products, ‘sourced from EU’, and for outside countries, ‘sourced outside of EU from country X’.
<b>Business associations</b>	<ul style="list-style-type: none"> <li>- On the EU added value, the labelling rules should be left to EU law. If any company finds it worthwhile to implement an origin-information scheme on a voluntary basis, that would be acceptable but the company would have to prove the viability of this scheme on the market. If the consumer does not pay for it, then it is not worth providing the information.</li> <li>- Fear of a possible extension of the scope of Regulation (EU) No 1337/2013 to introduce mandatory labelling of all products containing poultry meat (including processed meat) with the reference ‘EU’ or ‘non-EU’. This would be a discriminatory measure, as it would differentiate between EU products and non-EU producers.</li> <li>- On Regulation (EU) No 1337/2013, in addition to the place of rearing and slaughtering, support for mandatory indication of the place of birth at Member-State level. The term ‘origin’ should be reserved for meat obtained from animals born, reared and slaughtered – and therefore wholly produced – in a single Member State or non-EU country, as currently stated in the legislation. The minimum font size of the three places of origin, as required by the current legislation, should be increased to be more easily available to consumers. In addition, there should be a mandatory requirement to show the three places of birth, rearing and slaughtering, or the ‘origin’ not only on fresh, chilled and frozen meat, but also on processed products, minced meat, trimmings, and food offered to consumers by catering services and online retailers. Advertisers should not be exempt from displaying such important information.</li> </ul>
<b>Company/business organisations</b>	Inclusion of rabbit meat. Possibility and need to extend the mandatory country-of-origin label to types of meat other than beef, swine meat, sheep meat, goat meat and poultry meat. Figures on the size of the rabbit-meat sector and need for transparency to consumers.
<b>EU citizens</b>	No inclusion of beef in the survey and the negative environmental impacts of the beef production model.
<b>NGOs</b>	<p>Increasing information for consumers on the products, including on the place where animals were born, raised and slaughtered. Origin labelling should also be extended beyond fresh, chilled and frozen meat, to include all preparations including meat, even meat served in restaurants or in the catering sector. EU animal-welfare label.</p> <ul style="list-style-type: none"> <li>- Inclusion of horse meat. Possibility and need to extend the mandatory country-of-origin label to types of meat other than beef, swine meat, sheep meat, goat meat and poultry meat.</li> </ul>

Source: European Commission based on the public consultation’s results.

**Table 3. List of respondents who provided position papers to the public consultation (per stakeholder category).**

	Country	Name	Main subject covered by position paper
<b>Academic/research institution</b>			
1	The United Kingdom	University of Southampton	Labelling, EU/non-EU
<b>Business associations</b>			
2	Belgium	Copa Cogeca	Place of origin, processed meat
3	Brazil	The Brazilian Animal Protein Association (ABPA)	Processed meat, EU/non-EU
4	Germany	Bundesverband des Deutschen Lebensmittelhandels e. V.	Simplification, minced meat
5	Germany	Verband der Fleischwirtschaft e.V.	General/EU added value
<b>Company/business organisation</b>			
6	Finland	Atria Suomi Oy (slaughterhouse operator and processor)	EU/non-EU labelling
7	Finland	Snellmans Köttförädling Ab, (slaughterhouse operator and processor)	Origin labelling for processed and raw meat products
8	France	Business organisation in rabbit-meat sector	Rabbit meat
<b>Citizens (EU)</b>			
9	Portugal	EU citizen	Beef
<b>NGOs</b>			
10	Austria	Four Paws	Place of origin, processed meat
11	Belgium	Eurogroup for Animals	Terminology of 'origin'; labelling of horse meat
12	Belgium	SAFE – Safe Food Advocacy Europe ASBL	Animal's place of birth; Minced meat and trimmings; Origin labelling for meat used as an ingredient in pre-packed food; Minor types of meat.
13	The United Kingdom	World Horse Welfare	Horse meat

Source: European Commission based on the public consultation's results.

**Table 4. Summary of position papers provided as part of the public consultation (per stakeholder category).**

<b>Academic/research institution</b>
For trade within the EU, ‘sourced from EU’ labels only. For outside countries, the labelling should be ‘sourced outside of EU from COUNTRY X’.
<b>Business associations</b>
<ul style="list-style-type: none"> <li>- Mandatory origin labelling to be extended to rabbit meat.</li> <li>- Mandatory origin labelling should be as simple as possible; only unavoidable amendments should be pursued. Maintain current rules for minced meat. Rules must be set at EU level, not Member-State level. Only information about the fattening/rearing of the animal is relevant; consumers have no interest in the place of slaughtering, the place of birth of the animal, or the place the meat was cut. Practice shows that consumers do not actually pay more for meat that carries this information. Originally, origin labelling was introduced due to the BSE crises in the beef sector, there is no crisis like this currently in other meat sectors, so there is no need to copy the beef-labelling rules for other sectors.</li> <li>- The labelling rules should be regulated at EU level not at Member-State level and voluntary rules would be enough.</li> <li>- ‘EU’ or ‘non-EU’ labels would be discriminatory labels, as they would mislead European consumers into assuming that all non-EU products are of lower quality. Extending the current rules to processed meat products would imply high economic costs for food-business operators.</li> <li>- Any mandatory indication of the place of birth of the animal should be decided at Member-State level. The term ‘origin’ should be reserved for meat obtained from animals born, reared and slaughtered – and therefore wholly produced – in one single Member State or non-EU country. The minimum font size of the three places of origin should be increased, and it should be mandatory to indicate the places of birth, rearing and slaughtering (or the ‘origin’) not only on fresh, chilled and frozen meat, but also on processed products (including foie gras), minced meat, trimmings, and food offered to consumers by catering services and online retailers. Advertisers (operating physically or digitally) should not be exempt from displaying such important information.</li> </ul>
<b>Company/business</b>
<ul style="list-style-type: none"> <li>- Origin labelling should be based on individual countries, within and outside of the EU; the labels ‘EU’ and ‘non-EU’ are too vague.</li> <li>- There is no need to further complicate the rules, but indicating the country of origin should be mandatory; simply indicating that the product came from within or outside of the EU is not enough. All meat products should be regulated in the same way, raw and processed products alike.</li> </ul>
<b>Citizens (EU)</b>
<ul style="list-style-type: none"> <li>- It is vitally important to identify the origin of beef and ensure that this information reaches consumers.</li> </ul>
<b>NGOs</b>
<ul style="list-style-type: none"> <li>- Current EU rules for all types of meat (including horsemeat) should be extended beyond fresh, chilled and frozen meat, and should also include all meat preparations. Country-of-origin labels should indicate the places where the animal was born, raised and slaughtered.</li> <li>- Place of birth should be a mandatory indication, and the same rules should be applied to all types of fresh meat, including minced meat and trimmings. All types of meat, including meat used as an ingredient in pre-packed food as well as minor types of meat, should be subject to mandatory origin labelling comprising the place of birth, the place of rearing, and the place of slaughter.</li> <li>- Include horsemeat. Promote consumer information and help consumers to make better choices based on animal-welfare criteria. Conduct further research on the impact of mandatory country-of-origin labelling of equine meat on operating costs and the live trade of animals.</li> <li>- Fully include horsemeat. Rebuild consumer confidence in the wake of the horse meat scandal and other food-fraud cases. Promote consumer information and help consumers to make better choices. Improve horsemeat identification systems across the EU, enable the authorities in Member States to access these systems across borders, and introduce retrospective microchipping, so that horses can be traced through their passports, monitoring the implementation and enforcement of EU rules. Ensure better communication between Member States’ central databases. Conduct further research on the impact of mandatory country-of-origin labelling of equine meat on operating costs and the live trade of animals. Promote better transparency and shorter chains of food supply.</li> </ul>

Source: European Commission based on the public consultation’s results.

### ANNEX 3. IMPLEMENTATION OF THE MANDATORY INDICATION OF MEAT ORIGIN IN MEMBER STATES

**Table 5. Implementation choices in selected Member States**

Member State	National implementation	National schemes and specificities covering country of origin
<b>Denmark</b>	<p>Regulation (EU) No 1337/2013 and the FIC Regulation are in force.</p> <p>In addition, a Danish national law is in force.</p> <p>There is also a guidance document on food labelling from 14 June 2014 covering the implementation and enforcement of Regulation (EU) No 1337/2013.</p>	<p>National legislation allows for the voluntary use of the Danish flag to indicate meat reared and slaughtered in Denmark. The Danish flag can also be used:</p> <ul style="list-style-type: none"> <li>- where an animal was reared in Denmark and slaughtered elsewhere as long as information about the place of slaughter is provided;</li> <li>- on processed products as long as most ingredients are Danish (e.g. a sausage made with Danish meat);</li> <li>- and on processed products with imported ingredients, but manufactured in Denmark as long as the country of origin of the ingredients is specified.</li> </ul> <p>Specificities per meat sector</p> <ul style="list-style-type: none"> <li>- Swine meat: one of the main operators uses a label ‘100% Dansk svinekød’ (‘100% Danish pork’) for cuts destined for the retail market in Denmark.</li> <li>- Poultry meat: since 2019, five poultry operators have used the voluntary label ‘Dansk Kylling’ (‘Danish chicken’) for poultry of Danish origin, generating a standard that must be followed in order to use this label. According to operators in the meat supply chain, the lack of an obligation to provide information about country of origin for poultry in the food-service market is a problem; it is estimated that 60-80% of poultry meat used in food services and catering is of non-Danish origin.</li> </ul>
<b>France</b>	<p>Regulation (EU) No 1337/2013 is in force. Monitoring is included in the multiannual national monitoring plan in accordance with the Official Controls Regulation (EU) No 2017/625.</p>	<p>There are extensive national schemes for origin labelling of fresh meat and a pilot scheme for meat as an ingredient.</p> <p>The country of origin or the place of provenance of a primary ingredient must be given when this is not the same as the given country of origin or the given place of provenance of the food containing the primary ingredient.</p> <p>National schemes covering country of origin; other specificities</p> <ul style="list-style-type: none"> <li>- Swine meat: ‘Le Porc Français’ (‘French swine meat’) covers 98% of national pig slaughtering.</li> <li>- Poultry meat: ‘Volaille française’ (‘French poultry’) is based on an inter-branch agreement supported by the Association of French Poultry Producers.</li> <li>- Sheep/goat meat: schemes by type of meat are developed by inter-industry organisations for sheep meat, lamb, goat meat and kid meat (‘Viande ovine française’; ‘Viande d’agneau française’; ‘Viande de chèvre française’; and ‘Viande de chevreau français’).</li> <li>- Processed products: French Decree No 2016-1137 of 19 August 2016 is a time-limited pilot scheme which makes it mandatory for operators to indicate the origin of the meat (all types) used as an ingredient in a processed, pre-packaged product containing more than 8% meat irrespective of whether it is exported to non-EU countries or sold in the French market.</li> <li>- Catering sector: the French government has proposed to require indicating the origin of fresh</li> </ul>

		meat for all species sold in all restaurants; this is an extension to a French decree that has existed for bovine meat since 2002. Since 2017, all French food products containing at least 85% swine meat can indicate their origin, as may fresh swine meat products (including also offal and prepared meats) with at least 94% swine meat content.
<b>Germany</b>	Regulation (EU) No 1337/2013 is in force. There is a national food information implementing regulation that lays down the sanctions and legal aspects of Regulation (EU) No 1337/2013.	There are more than 300 voluntary schemes that have an origin component for pig and poultry meat in Germany. Individual federal states in Germany also have their own origin-labelling schemes. Examples include Bavaria, Schleswig-Holstein and North Rhine Westphalia. Furthermore, according to consumer organisations, the lack of an obligation to indicate the country of birth for pigs, or country of origin for caterers and for meat as an ingredient poses problems for consumer understanding. For example, the light processing of meat (thus making it possible to indicate a German origin for mostly non-German meat) is said to be a common practice by operators to circumvent enforcement of the Regulation.
<b>Greece</b>	National provisions on the labelling of country of origin for fresh, chilled, frozen and minced meat have been in place since the 2000s in Greece, and were consolidated in Joint Ministerial Decision No. 412/8932/2012. The latter was replaced in March 2018 by Joint Ministerial Decision No. 1384/41923/2018 fully and formally aligning national legislation to Regulation (EU) No 1337/2013. There are also specific national rules for the compulsory labelling and traceability of meat sold at butchers and butchery departments of food retailers (Article 9 of Law 4492/2017).	- Poultry meat: Larger operators use voluntary labelling to guarantee that fresh/chilled/frozen poultry meat comes from a vertically-integrated, closed production system and is therefore of Greek origin, or even originates from a specific region in Greece. There are also examples of voluntary origin labelling for poultry meat preparations/processed products, sold direct to final consumers and destined for the catering sector. Given strong consumer demand in home-grown – and often locally grown – meat, there is concern that consumers may be misled as to the origin of meat destined for catering/processing (e.g. meat contained in traditional meat preparations sold in fast-food premises), and as to the country of birth of sheep/goats. These gaps also pose problems for ensuring a level-playing field across operators.
<b>Ireland</b>	Regulation (EU) No 1337/2013 is in force. National legislation provides for enforcement procedures and penalties relating to the Regulation.	The Bord Bia Quality Mark, operated by the Irish Food Board, is a voluntary quality-assurance scheme which includes requirements on origin labelling. The scheme is applicable to a range of food sectors including pig, poultry and sheep/goat meat. The scheme also covers the food-manufacturing sector for products where the meat content exceeds a certain threshold. Concerns over misrepresentation of swine meat as Irish, predominantly in the butchery and processed food sectors, led the Irish Farmers' Association to introduce a DNA testing system to verify Irish swine meat. This system has found high levels of compliance with Bord Bia Quality Mark products at retail level. However, products from food-service establishments have shown high levels of non-compliance (despite voluntary origin claims made by food-service operators). Although this testing refers to origin labelling that is outside the scope of the Regulation (i.e. non-pre-packed meat and the catering sector), the potential for consumers to be misled was considered sufficiently serious for the competent authority to launch a consultation into extending country-of-origin labelling to the non-pre-packed-meat market in 2015. However, to date no further action has been taken.
<b>Italy</b>	Regulation (EU) No 1337/2013 is in force. The monitoring system is set out in Legislative Decree No 231 of 15 December 2017, which entered into force on 9 May 2018.	There is no additional national legislation specifically concerning origin labelling other than Regulation (EU) No 1337/2013 for fresh, chilled and frozen swine meat in Italy. There have been several attempts to set up voluntary labelling schemes for unprocessed swine meat, but

	Article 13 of the Decree laid down specific sanctions for non-compliance with the provisions under Article 26 of Regulation (EU) No 1169/2011 and the related implementing acts including Regulation (EU) No 1337/2013.	these have not been successful. Ongoing initiatives remain in the developmental stage.
<b>Netherlands</b>	Regulation (EU) No 1337/2013 is in force.	There are no national schemes covering the origin for poultry meat other than Regulation (EU) No 1337/2013 in the Netherlands. There are examples of voluntary quality schemes that cover a variety of production concerns (with animal welfare a key component). These do not specifically cover origin, although quality is implied in that these are schemes operating in the Netherlands.
<b>Poland</b>	Regulation (EU) No 1337/2013 is in force. In addition, there is the Law of 7 November 2014, which amended the Law on trade quality of agricultural and food commodities and on food and nutrition safety and the Rule of the Ministry of Agriculture and Rural Development of 23 December 2014 on labelling foodstuffs.	There is a voluntary national labelling scheme, 'Polish product', which can be used in the swine meat and poultry meat sectors (Law of 4 December 2016). 'Polish Product' can be used for both fresh meat, where it corresponds to the use of the label 'Origin: Poland' under Regulation (EU) No 1337/2013, and meat products which are beyond the scope of the Regulation. Meat products must also be processed in Poland to carry the 'Polish product' label. Other ingredients used must also be of Polish origin unless any cannot be replaced for technical reasons; in this case, these ingredients must not exceed 25% of the final product by weight. Non-pre-packed fresh, chilled or frozen meat sold by weight should be origin labelled under national law (Rule of the Ministry of Agriculture and Rural Development of 1 April 2018). The rules are complementary to Regulation (EU) No 1337/2013.
<b>Romania</b>	National law ref.150/2016 on retail amended the existing legislation to be in line with Regulation (EU) No 1337/2013. Government Decision 106/2002 was amended to include the necessary monitoring framework.	There are no additional national schemes in place other than Regulation (EU) No 1337/2013 on country-of-origin labelling for pig, poultry or sheep/goat meat.
<b>Spain</b>	Regulation (EU) No 1337/2013 is in application. All national legislation in force relating to meat labelling was assessed and amended as necessary to ensure consistency with the Regulation.	' <i>Alimentos de España</i> ' ('Food from Spain') is a voluntary Spanish origin label for pig, poultry and sheep/goat meat. Under this initiative, 10 autonomous communities identify products from their own region, using regional labelling. Operators comply with those voluntary schemes to pursue product-differentiation strategies. According to the industry, excluding processed swine meat from the scope of the Regulation poses problems, because a substantial volume of swine meat products marketed in Spain are only minimally processed (usually through addition of salt or spices). The incomplete origin labelling of non-pre-packed meat (sheep/goat meat) at retail level is also a problem, both for consumer understanding and for ensuring a level-playing field for operators. Finally, some labelling practices were identified in which consumers were led to believe meat comes from suckling lambs born and reared in Spain, when this is not in fact the case.

Source: Evaluation support study.

**Table 6. Inventory of existing national rules on country of origin**

Member State	National regulation	National quality certification	National origin certification
<b>Czechia*</b>			Voluntary scheme applying to all food to identify Czech origin by a Czech food logo (state-owned trademark), 2016.
<b>Denmark</b>	Statutory Order on Food Labelling no. 1355 of 27 November 2015	Danish Agriculture & Food Council	Voluntary labelling of meat with Danish flag, for meat of Danish origin, 2014. Danish Crown ‘100% Dansk svinekød’ (‘100% Danish pork-meat’); ‘Dansk Kylling’ (‘Danish chicken’), 2019.
<b>France</b>	Decree No 2016-1137 on labelling of the origin of meat used as ingredients in processed products. Upcoming regulation on labelling of the origin of meat in out-of-home catering (going beyond Regulation (EU) No 1337/2013).	Label Rouge	French origin for all types of meat ‘Viande de France’ (English: ‘Meat from France’), 2014
<b>Finland*</b>	Decree of the Ministry of Agriculture and Forestry 218/2017 on indicating the origin of meat used as an ingredient in non-pre-packed food delivered by mass caterers and prepacked foods intended for a final consumer or mass caterers and manufactured in Finland (going beyond Regulation (EU) No 1337/2013)		
<b>Germany</b>	Food Information Implementation Ordinance	QS	More than 300 origin and quality schemes for meat, e.g. ‘Regionalfenster’, 2014; or schemes of a federal state
<b>Greece</b>	Joint Ministerial Decision No. 1384/41923/2018		
<b>Ireland</b>	Statutory Instrument No. 113 of 2015	Bord Bia Quality Mark	Bord Bia Quality Mark, 1994
<b>Italy</b>	Legislative Decree No 231 of 15 December 2017		Different regional initiatives on pork-meat: <i>Gran Suino Italiano</i> ; <i>Consorzio di Garazia del Suino Italiano</i> ; <i>Italico</i>
<b>Netherlands</b>	Food Commodities Act Decree on food labelling	Beter Leven, IKB ( <i>Integrale Keten Beheersing</i> /Integrated Quality Control)	
<b>Poland</b>	Rule of the Ministry of Agriculture and Rural Development of 1st April 2018		‘Polish product’ (state-owned trademark), 2017
<b>Romania</b>	Law 150/2016 on Retail		
<b>Spain</b>			National label ‘ <i>Alimentos de España</i> ’ (‘Food of Spain’), 2015 (10 labels introduced by autonomous communities to identify products coming from the region); voluntary label ‘ <i>Raza autóctona</i> ’ ( <i>Indigenous livestock breeds</i> ), 2013

\* Those Member States were not covered by case studies. The information presented here is based on their feedback to the surveys and on findings from desk research.

Source: Evaluation support study