



By email only

1st May 2024

Dear Secretary of State,

We support the Fairer Food Labelling proposal for clearer country of origin labelling. However, as representatives of the farming industry at all stages of the supply chain, we are extremely concerned about the design of the method of production labelling proposed in the consultation.

We are independently submitting written evidence to this consultation, however after meeting with your department's officials, we feel compelled to share our concerns directly with you. We have identified a number of areas where these proposals threaten to put British food and farming at a further disadvantage at an already challenging time.

There are three clear issues with the proposals as drafted.

1. **Talking British food down** – As designed, the proposals in this consultation would place Red Tractor core standards as a four out of five – the second lowest and the same ranking as legal minimum, even though Red Tractor standards go significantly beyond legislation. In other words, these proposals would have the unintended consequence of talking down 90% of the poultry and pork produced in the UK.
2. **No incentive to improve** – The proposal will remove any incentive for farmers, producers and manufacturers to operate above the legal baseline or seek higher assurance from schemes such as Red Tractor. This is the exact opposite of what we believe government wants to achieve and removes UK farmers' competitive advantage against imports, at a time when thousands of UK farmers are losing their farms and livelihoods.
3. **Unhelpful to consumers** - Consumers want clarity and recognisable labels, not arbitrary rankings based on a sliding scale. Three quarters of UK consumers already see Red Tractor as a quality assurance mark they can trust. Method of production labelling will not trade consumers up and risks shaming consumers already under extreme cost of living pressures.

Red Tractor has been a key constituent in farmers meeting or exceeding UK welfare regulations since its launch 20 years ago, providing audit and assurance well above the legal baseline. It is recognised internationally by Codex Alimentarius and UNESCO as an exemplar voluntary farm and food assurance scheme. Red Tractor is trusted by three quarters of UK consumers. It is a signpost for safe, traceable, responsibly produced British food. 90% of poultry and pork in the UK are produced to Red Tractor standards. The proposal would rate this food as four out of five – relegating the majority of UK-produced pork and poultry to the second lowest ranking and the same as legal baseline.

However, the difference between Red Tractor standards and legal baseline for animal welfare is significant. Grouping Red Tractor standards in the same ranking as the legal baseline – at a time when farmers are under significant cost and environmental pressures – will remove any incentive for them to continue producing food to these high and established standards. It would move the majority of pork and poultry production to the legal minimum.

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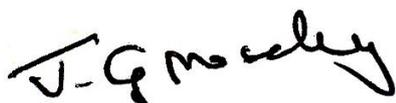
Registered in England No.4913846 Registered Office: C/O Chavereys, The Goods Shed, Jubilee Way, Faversham, Kent, ME13 8GB Assured Food Standards trading as "Red Tractor Assurance" is a company limited by guarantee.

The Red Tractor logo appears on over £16bn of UK produced food and drink, with 46,000 farmers certified across all areas of livestock and agriculture, from farms to fork. No other assurance scheme covers the same level of traceability or scale of assurance. These standards and the label certifying them are recognised by over three quarters of shoppers, and nearly 18 million people trust the Tractor when they see it on supermarket shelves.

Evidence suggests that method of production labelling systems do not change consumer purchasing behaviour or trade them up into higher welfare products. From Red Tractor's independent consumer research conducted amongst 14,000 UK shoppers we know that most don't read or aren't interested in detailed animal welfare labelling, and often see it negatively. Any solution must be clear and easy to understand. An arbitrary sliding scale that risks making people feel shame or guilt for not being able to afford the highest welfare is unfair. The Red Tractor label is already trusted by 18 million people when they see it on the supermarket shelves, making clear the product is British, safe and farmed with care.

We will submit a more detailed analysis in our response to the consultation. We would welcome the opportunity to meet with you to discuss these challenges in person in the coming weeks. It is vital that the voice of the majority of the food production industry, and those of 32.7 million shoppers, are heard and reflected before this policy progresses any further.

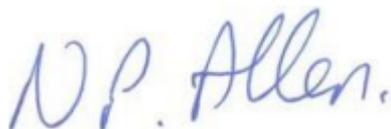
Yours sincerely,



Jim Moseley
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Lizzie Wilson
Chief Executive Officer, National Pig Association



Nick Allen
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Association



Richard Griffiths
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