



Mr Olivér Várhelyi
Commissioner of Agriculture
Rue de la Loi 200
1040 Brussels Belgium

Brussels, 19th December 2023

Re: Call for improved labelling of origin labelling for poultry and rabbit products, and eggs.

Dear Commissioner Várhelyi,

On behalf of AVEC, Copa Cogeca, EFFAB, ERA, ERPA and EUWEP, organisations stakeholders of the Civil Dialogue Group on Poultry and Eggs, we wish to warmly congratulate you on your recent appointment as Commissioner. Your new role marks an important step for European agricultural policy, and we are confident that your tenure will lead to meaningful advancements for farmers and consumers alike.

We are writing to you regarding the critical issue of origin labelling for poultry and rabbit products, and eggs. The existing regulations have contributed significantly to consumer transparency and producer accountability. However, we believe there is an urgent need to improve these frameworks to reflect contemporary consumer expectations and to support EU farmers more effectively.

Origin labelling is equally important, both consumers and producers. A study conducted by the JRC in 2022¹ underscored that consumers value origin information for two primary reasons. Firstly, they associate detailed origin labelling with higher quality, safety, and environmental standards, recognising that some regions are known for superior production. Secondly, consumers express a strong desire to support local or domestic farmers and industries, and clear labelling enables them to make informed choices in this regard.

Additionally, the European Court of Auditors recently published a report² emphasising the lack of harmonisation in food labelling systems across the European Union. The report emphasised that information on labels can be confusing or misleading, and that the understanding of labels is not systematically tracked by the EU authorities. This is why the recommendations of the report call for addressing these gaps by 2027, and the Commission has rightly committed to implementing these recommendations. We welcome this commitment and strongly encourage further efforts to strengthen the EU's framework for origin labelling for poultry and rabbit products, and eggs.

¹ Thøgersen, J. and Nohlen, H., Consumer understanding of origin labelling on food packaging and its impact on consumer product evaluation and choices: A systematic literature review., Ciriolo, E. editor(s), EUR 31208 EN, Publications Office of the European Union, Luxembourg, 2022, ISBN 978-92-76-56613-7, doi:10.2760/336778, JRC126893.

<https://publications.jrc.ec.europa.eu/repository/handle/JRC126893>

² Special report 23/2024: Food labelling in the EU – Consumers can get lost in the maze of labels
<https://www.eca.europa.eu/en/publications/SR-2024-23>

We call on the Commission to introduce **mandatory inclusion of place of birth, rearing, and slaughter for poultry and rabbit products coming originating from non-EU countries**. This information should be required not only for fresh, chilled, and frozen products but also for **processed items, minced meat, and trimmings**. We believe that **catering services and online platforms** should also adhere to these same requirements to ensure consistency.

We believe that enhancing origin labelling for these products would reinforce the EU's ability to achieve greater reciprocity in its trade agreements, notably vis-à-vis trade partners that cause concerns for the stakeholders along the chain. **Products with lower production standards than those mandated within the EU must explicitly indicate this on their labels**. For example, fresh eggs from hens raised in battery cages prohibited in the EU should clearly state that they do not comply with EU standards. Such information, especially when not compliant with EU production standards, **should be prominently displayed on the front of the packaging with easily readable font sizes**.

Furthermore, **mandatory origin or provenance indications on the labels and the packaging should be extended to include rabbit meat and products**, which are currently outside of the scope of the Commission Implementing Regulation (EU) No 1337/2013.

Finally, we insist that improving the origin labelling rules for our sectors is essential to prevent unfair competition and ensure equal treatment for all farmers and producers within the EU. The revised legislation must aim to safeguard the integrity of the internal market while upholding the highest standards for consumer information and producer recognition.

We trust that your leadership will prioritise these necessary improvements to the EU's origin labelling framework. We remain at your disposal to contribute to this initiative and to collaborate on its implementation.

Yours sincerely,

On behalf of the following associations:

AVEC: Association of Poultry Processors and Poultry Trade in the EU countries <https://avec-poultry.eu/>

Copa Cogeca: The united voice of farmers and their cooperatives in the European Union. <https://copa-cogeca.eu/>

EFFAB: The European Forum of Farm Animal Breeders is the association that represents the animal breeding and reproduction organisations and companies in Europe. Members of EFFAB are involved in the genetic improvement of different farm animal species and represent a wide diversity of farming systems. <https://www.effab.info/>

ERA: the European Rabbit Association brings together national associations and federations of professionals from the main rabbit meat producing countries of the European Union. ERA represents the whole production chain (production, processing and marketing of rabbit meat). <https://www.european-rabbit-association.eu/>

ERPA: Created in 2007, ERPA aims notably at preserving and developing the production of rural poultry in Europe (colored birds from rustic slow-growing strains), in particular organic poultry and eggs, and at promoting its specificities. Further information is available on: <https://erpa-ruralpoultry.wixsite.com/erpa-en>

EUWEP is the umbrella organization, representing the interests of both EEPTA (Egg traders) and EEPA (Egg processors). <https://www.euwep.org/>

For information, this letter has been sent also to Commissioner Christophe Hansen.