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AGRICULTURE AND RURAL DEVELOPMENT**

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

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Study Report

Part B – Minor Meats

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ABBREVIATIONS

CA	Competent authorities
CRPA	Centro Ricerche Produzioni Animali
DG	Directorate General
DG AGRI	Directorate General for Agriculture and Rural Development
DG SANCO	Directorate General for Health and Consumers
DLO	Stichting Dienst Landbouwkundig Onderzoek (DLO foundation)
EC	European Commission
EU	European Union
FIC	Food Information to Consumers
FVO	Food and Veterinary Office
IDELE	Institut de l' Elevage
IERIGZ	Instytut Ekonomiki Rolnictwa i Gospodarki Żywnościowej
IT	Information Technology
ITAVI	Institut Technique de l'Aviculture
LEI	Stichting Dienst Landbouwkundig Onderzoek (DLO foundation), Research Institute LEI (Agricultural Economics Research Institute)
MCM	Multi-Criteria Mapping
MPI	Market Performance Indicator
MS	Member State
PDO	Protected Designation of Origin
PGI	Protected Geographical Indication
SME	Small or medium-sized enterprise
TC-ASCR	Technology Center Academy of Sciences of Czech Republic
WP	Work Package
WTP	Willingness to pay
WUR	Wageningen University and Research Centre

DEFINITIONS

Country of origin is defined in Regulation (EU) No 1169/2011, which refers to the definition as determined in Council Regulation (EEC) No 2913/1992 establishing the Community Customs Code. Goods originating in a country shall be those wholly obtained or produced in that country. However, goods whose production involved more than one country shall be deemed to originate in the country where they underwent their last, substantial, economically justified processing or working in an undertaking equipped for that purpose and resulting in the manufacture of a new product or representing an important stage of manufacture.

EU quality schemes for agricultural products and foodstuffs

The EU quality schemes, Protected Designation of Origin (PDO), Protected Geographical Indication (PGI) and Traditional Speciality Guaranteed (TSG) identify products and foodstuffs farmed and produced to exacting quality standards.

PDO and PGI schemes are linked to specific geographical areas. They are quality indicators.

Regulation (EU) No 1151/2012 describes a scheme for protected designations of origin and protected geographical indications of products linked to a geographical area by particular quality or other value-adding characteristics or attributes. The schemes help consumers by providing information concerning the specific character of the products.

The TSG scheme is based on the specific and traditional character of a product and does not certify that the protected food product has a link to a specific geographical area.

Regulation (EU) No 1169/2011, Article 26 on country of origin or place of provenance applies without prejudice to labelling requirements for PDO, PGI and TSG schemes.

Minor meats (or '**other meats**') means fresh and frozen meat including minced meat and cuts of domestic solipeds (mammals having a single hoof such as horses and donkeys); lagomorphs (rabbits, hares and rodents); small wild game birds and lagomorphs living freely in the wild or farmed; and large wild game and mammals living freely in the wild or farmed. See for further details Regulation (EC) No 853/2004, Annex I, Point 1.

Recently, specific rules have been established in Commission Implementing Regulation (EU) No 1337/2013 on the indication of the country of origin or place of provenance on the label of fresh, chilled and frozen meat of swine, meat of sheep or goats and meat of poultry.

Place of provenance is defined in Regulation (EU) No 1169/2011 on the provision of food information to consumers as any place where a food is indicated to come from, and that is not the 'country of origin'.

Pre-packed food is defined in Regulation (EU) No 1169/2011 as any single item of presentation as such to the final consumer and to mass caterers, consisting of a food and the packaging into which it was put before being offered for sale, whether such packaging encloses the food completely or partially, but in any event in such a way that the contents cannot be altered without opening or changing the packaging. It does not cover foods packed on the sales premises at the consumer's request or pre-packed for direct sale.

Traceability is defined in Regulation (EC) No 178/2002 as the ability to trace and follow a food, feed, food-producing animal or substance intended to be, or expected to be incorporated into a food or feed, through all stages of production, processing and distribution. Food or feed which is placed on the market or is likely to be placed on the market in the Community shall be adequately labelled or

identified to facilitate its traceability, through relevant documentation or information in accordance with the relevant requirements of more specific provisions.

‘Wild game’ is defined in Annex I to Regulation (EC) No 853/2004 as: “wild ungulates and lagomorphs, as well as other land mammals that are hunted for human consumption and are considered to be wild under the applicable law in the Member State concerned, including mammals living in enclosed territory under conditions of freedom similar to those of wild game”; and, ‘wild birds that are hunted for human consumption’

1 INTRODUCTION TO THE STUDY

1.1 Background

The preamble to Regulation (EU) No 1169/2011 on the provision of food information to consumers (the FIC Regulation) explains that mandatory origin provisions have been developed for some foods including honey, fruit and vegetables, fish, beef and beef products, and olive oil. More recently pig, poultry, sheep and goat meat have been added.

The Regulation identifies the need to explore the possibility to extend mandatory origin labelling for other foods. Article 26 paragraph 5 of the Regulation requires the European Commission to submit reports by 13 December 2014 to the European Parliament and Council regarding the mandatory indication of country of origin or place of provenance for the following foods:

- types of meat other than beef, poultry, pig, and sheep and goat meat;
- milk;
- milk used as an ingredient in dairy products;
- unprocessed foods;
- single ingredient products;
- ingredients that represent more than 50% of a food.

This particular study concerns the first three categories of food listed above: milk¹; milk used as an ingredient in dairy products², and; types of meat other than beef, poultry, pig and sheep and goat meat.

The study concerns unprocessed meat and is limited to pre-packed foods.

Article 26 paragraph 7 of the Regulation requires that the reports referred to in paragraph 5 shall take into account:

- the need for the consumer to be informed;
- the feasibility of providing the mandatory indication of the country of origin or place of provenance, and;
- an analysis of the costs and benefits of the introduction of such measures, including the legal impact on the internal market and the impact on international trade.

The Commission may accompany these reports with proposals to modify the relevant Union provisions.

This study is needed to inform the Commission regarding the mandatory indication of the country of origin or place of provenance for: types of meat other than beef, pig, poultry, sheep and goat meat; milk and; milk used as an ingredient in dairy products.

The information to be provided by the study therefore has two elements:

1. An assessment of the need to inform the consumer regarding the origin of the following pre-packed food categories:
 - milk;

¹ Milk as defined in Regulation (EU) No 1308/2013, Annex VII, Part III, 1

² See sub-section 2.2.3 for an explanation of the term dairy products

- milk used as an ingredient in dairy products;
- types of meat other than beef, poultry, pig, and sheep and goat meat (referred to as 'minor meats');

2. An examination of the feasibility of providing mandatory indication of country of origin or place of provenance for each of the above categories with an analysis of the costs and benefits of introducing such measures including the legal impact on the internal market and the impacts on international trade. With respect to feasibility the link to existing traceability systems will be taken into account.

The impact of possible origin labelling will be assessed for each category in terms of: consumer behaviour; the economic effects on the food supply chain; the competitiveness of enterprises; the effects on internal trade and trade with third countries; and the administrative burden on economic operators and national authorities.

This study is presented in two parts:

Part A – Milk and milk used as an ingredient in dairy products

Part B – Minor meats

Part B is presented in this report and an accompanying annex.

1.2 Minor meats within the scope of the study

For the purposes of this study minor meats means fresh and frozen meat including minced meat and cuts of domestic solipeds (mammals having a single hoof such as horses and donkeys); lagomorphs (rabbits, hares and rodents); small wild game birds and lagomorphs living freely in the wild or farmed; and large wild game and mammals living freely in the wild or farmed.

The study includes meat from animals covered in Regulation (EC) No 853/2004, Annex I, points 1.2 – 1.8, but excluding bovine (including the species *Bubalus bubalus* and *Bison bison*), porcine, ovine and caprine animals (under point 1.2), and domestic poultry under point 1.3.

Meat from the following categories in Annex I to Regulation (EC) No 853/2004 is therefore covered by the study:

1.2. domestic solipeds;

1.3. birds that are not considered as domestic but which are farmed as domestic animals;

1.4. lagomorphs: rabbits, hares and rodents;

1.5. wild game:

- wild ungulates and lagomorphs, as well as other land mammals that are hunted for human consumption and are considered to be wild game under the applicable law in the Member State concerned, including mammals living in enclosed territory under conditions of freedom similar to those of wild game; and
- wild birds that are hunted for human consumption.

1.6. farmed game: farmed ratites and farmed land mammals other than those referred to in point 1.2. of the Regulation;

1.7. small wild game: wild game birds and lagomorphs living freely in the wild.

1.8. large wild game: wild land mammals living freely in the wild that do not fall within the definition of small wild game.

Farmed small game birds fall in category 1.3: 'birds that are not considered as domestic but which are farmed as domestic animals'.

Category 1.5 includes deer and wild boar living in the wild.

Category 1.6 includes farmed deer and farmed wild boar.

Case studies of the sectors for horse meat, rabbit meat and game meat were carried out in France, Italy in Spain. Reindeer meat production was investigated in Finland and Sweden; and venison production was investigated in the UK.

2 OVERVIEW OF SUPPLY CHAINS FOR MINOR MEATS

The overview of the supply chains for minor meats was based on data collection and analysis, literature review, and case study investigations of selected species in selected Member States. The study focused broadly on supply chains in Italy, France and Spain. These investigations covered horse meat, rabbit meat and wild and farmed game in each country. To provide a broader picture, the investigations also included reindeer meat in Finland and Sweden, and deer in UK.

The supply chains for minor meats are presented on a species basis. Note that comprehensive data are not available at EU level and there are some gaps and inconsistencies in the different sources of data and the information that is available.

2.1 Horse meat production

2.1.1 EU legislation

The EU traceability legislation aims primarily at ensuring food safety and is established in Regulation (EU) No 178/2002. Food and feed traceability is the ability to track any food, feed, food producing animal or substance that may be destined for human consumption through all stages of production, processing and distribution of foods.

Article 18 of Regulation (EC) No 178/2002 requires food business operators to identify their suppliers as well as the businesses to which their products are supplied. This requirement is known as the 'one step back - one step forward' approach.

Regulation (EU) No 931/2011 requires additional information to be provided for food of animal origin to ensure the correct application of the traceability requirements set out in Article 18 of Regulation (EC) No 178/2002.

However, the traceability requirements were not prepared specifically for the provision of origin information. Therefore, cumulative traceability for the purposes of origin labelling is not currently required under existing traceability legislation.³

Equidae (horses, donkeys, zebras and their crossings) have to be accompanied by an identification document (passport) during their movements. This provision has been compulsory for all equidae within the European Union since 1 July 2000 in accordance with Commission Decision 2000/68/EC amending Commission Decision 93/623/EEC. The passport enables the identification of the country of origin and all subsequent movements to other countries.

The current EU rules for the identification of equidae are laid down in Commission Regulation (EC) No 504/2008.

2.1.2 EU production

The latest complete figures for EU slaughter of equidae date from 2007 as shown in Table 1:

³ Origin labelling for meat used as an ingredient: consumers' attitude, feasibility of possible scenarios and impacts. SWD(2013) 437 final, European Commission.

Table 1. EU slaughter of equidae, 2007

EU slaughter of equidae, 2007				
2007		%	Head	Tonnes carcass weight
European Union	EU28	100%	214 900	55 600
Italy	IT	47%	100 000	25 200
Poland	PL	18%	39 600	11 900
Spain	ES	12%	26 200	5 200
France	FR	8%	17 700	5 100
Belgium	BE	5%	10 200	3 100
Germany	DE	5%	9 700	2 600
Sweden	SE	1%	3 000	900
Netherlands	NL	1%	2 700	600
Slovenia	SI	1%	1 400	300
Portugal	PT	1%	1 300	200
Other EU28		1%	3 200	600

Source: Eurostat [apro_mt_pann]

Eurostat figures show that in 2007 almost half (47%) of all equidae were slaughtered in Italy. Italy is the largest producer, importer and consumer of horsemeat.

Other countries slaughtering significant numbers of equidae are Poland, Spain, France, Belgium and Germany.

Smaller numbers of equidae are slaughtered in Sweden, the Netherlands, Slovenia and Portugal; each country representing less than 1% of EU slaughter.

Italy is the largest intra-EU importer of live equidae for slaughter, importing 55 000 animals in 2007, although this number has since declined to 32 000 in 2013. The main suppliers of live horses for intra-EU trade are the Netherlands, Poland, France, Spain, Slovakia and Romania.

For comparison purposes, the table below shows FAO data for the slaughter of horses in some EU Member States in 2007, 2011 and 2012:

Table 2. EU slaughter of horses (FAO data)

EU numbers of horses slaughtered*, 2007, 2011, 2012				
		2007	2011	2012
Italy	IT	98 921	62 237	72 387
Poland	PL	39 608	41 729	38 196
Spain	ES	24 900	*32 000	*34 400
France	FR	17 800	17 000	*18 900
Belgium	BE	10 466	9 613	*10 000
Germany	DE	9 726	11 812	11 923
Sweden	SE	2 996	4 330	*4 330
Netherlands	NL	2 656	*1 600	*1 600
Slovenia	SI	1 379	1 689	1 721
Portugal	PT	n.a		

*Figures are estimated by FAO

Source: FAO

The FAO figures for 2007 are broadly comparable with the EU figures given in the preceding table. The FAO figures show that the total number of horses slaughtered in these Member States fell from 208 452 in 2007 to 193 457 in 2012 (a fall of 7%). However there were variations between Member States.

The numbers slaughtered in Italy fell by 27% from 98 921 in 2007 to 72 387 in 2013, which is consistent with declining per capita consumption. The numbers slaughtered in Spain rose from 24 900 in 2007 to an estimated 34 400 in 2013, a rise of 38%. The rise in Spain is attributed primarily to the economic crisis and increased slaughter of recreational horses.

2.1.3 EU imports

In addition to EU slaughter, there are significant third country imports of horse meat into the EU. The major exporting countries are in North and South America as shown in the following table:

Table 3. EU-27 imports of meat of equidae from major exporters

EU-27 imports of meat of equidae from major exporters				
	Tonnes			% change
	2009	2012	2013	2009 - 2013
Canada	10 170	9 591	5 711	-44%
Argentina	11 921	6 035	6 700	-44%
Mexico	7 037	5 870	5 481	-22%
Uruguay	3 033	2 456	1 701	-44%
USA	0	2 738	4 532	+
Brazil	8 473	1 954	1 352	-84%
Australia	0	170	241	+
New Zealand	0	120	139	+
Total EU-27 imports	42 098	28 938	25 857	-39%

Source: Eurostat annual data

Note that data is presented for EU-27 as Croatia became a Member State in July 2013.

Note that the slaughter statistics in Tables 1 and 2 are and the import statistics in Table 3 are not for exactly the same reporting years.

Overall imports of horse meat have declined by 40% from 42 000 tonnes in 2009 to 26 000 tonnes in 2013, perhaps reflecting the overall decline in horse meat consumption. EU-27 imports from Canada, Argentina, Mexico, Uruguay and Brazil all fell, whilst imports from the USA, Australia and New Zealand increased from zero in 2009.

Table 4. Extra-EU imports of horse meat by importing Member State, 2013

Extra-EU imports of horse meat 2013	
Importing Member State	Total extra EU imports (tonnes)
BE	15 898
DE	1
ES	62
FI	728
FR	3 653
IT	1 871
LU	1 659
NL	1 986
Total imports from 3rd countries	25 858

Source: Eurostat annual data

Table 4 shows that Belgium had the greatest volume of extra-EU imports of horse meat in 2013.

2.1.4 Intra-EU trade

The following table shows the trend in intra-EU trade in horse meat from 2009 – 2011.

Table 5. Intra-EU trade in horse meat, 2009 – 2013

Intra -EU trade in horse meat, 2009 - 2013	
Year	Tonnes of horse meat
2009	66 175
2010	63 342
2011	67 995
2012	68 093
2013	55 670

Source: Eurostat Annual Data

Intra-EU trade in horse meat rose from 2009-10 to 2011-12 before falling sharply in 2013. Trade is affected by both supply and demand factors. The case study investigations found that overall demand for horse meat is declining, but there was an increase in the slaughter of recreational horses in Spain for economic reasons, which peaked in 2012.

The following table shows intra-EU trade in horse meat by Member State in 2013:

Table 6. Intra-EU trade in horse meat, 2013

Intra-EU trade in horse meat 2013																										
Importing Member State	Exporting Member State (tonnes of horse meat)																								Total intra EU imports	
	AT	BE	BG	CZ	DE	DK	EE	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	UK		
AT		80												69					4							153
BE					133	38		3		2 422			765	139		7		1 782			1 324	47			28	6 688
BG		20										246		11							1 574					1 851
CY								6																		6
CZ		48						5		17			44	17				5			134					270
DE		1 250						1		5			211	43		2		29	131		25					1 697
DK		2			1								53	39												95
EE		46			1				2	4					1							9				63
EL			5						81									46								132
ES																				12						12
FI		1 085					53			3								52				8				1 201
FR		6 684			100			23					777	7		1 579		1 019			21			1 025		11 235
HU		44						65						413												522
HR																										
IE		6												40										7		53
IT		2 921				227		5 431		1 489	15		170		354			920	11 012	253	979		5			23 776
LT							1	6									9		1							17
LU		106								30								7	4							147
LV												42			14											56
MT		43												1												44
NL		6 798			6			9		25				61					2		97					6 998
PL														69							187	11				267
PT																										0
RO		17																								17
SE		197			3		6		1	1			20					11			13					252
SI	2	7												4												13
SK				4										6					1							11
UK		6								1			92													99
Total intra EU exports	2 19 357		5	4	244	265	59	5 632	5	3991	15	288	2 133	918	369	1588	9	3 871	11 156	265	4 354	75	5	1 060		55 670

Source: Eurostat annual data

In 2013 the largest intra-EU importers of horse meat were Italy (23 800 tonnes), France (11 200 tonnes), Netherlands (7 000 tonnes) and Belgium (6 700 tonnes). The largest Intra-EU exporters were Belgium (19 400 tonnes), Poland (11 200 tonnes), Spain (5 600 tonnes) and Romania (4 400 tonnes).

2.1.5 Voluntary origin labelling

A 2012 retail study into the availability of horse meat in Belgium, France and the Netherlands⁴ found that the majority of fresh, chilled horse meat was explicitly labelled with information concerning the country the animal was born, raised and slaughtered, and where the meat was further processed and packaged.

The study found that most of the vacuum-packed fresh horse meat found in Belgium and France originated from Argentina; the remainder came from Canada, Uruguay and Romania. The labelling also suggested that the horse meat was imported into the EU (excepting that from Romania) as whole or quartered carcasses, and then cut and packaged for retail in Europe.

The study further found that the detailed origin information was only available for fresh pre-packed horse meat.⁵

2.1.6 Key points on information collected from case studies

1. Volume of live animals and meat traded

Not only large volumes of horse meat but also a significant number of live animals are involved in intra-EU trade. Significant volumes of horse meat are also imported into the EU, although these are less than the volume of intra-EU trade.

Although EU slaughter statistics are not available since 2007, it appears that the total volume of intra-EU trade in horse meat may be of a comparable size to the total volume of EU horse meat production.

Within the EU Italy is the largest importer of live horses, and producer and importer of horse meat. Italy is a net importer of live horses and horse meat.

Poland is the second Member State for horse slaughter, and Poland is also a major participant in intra-EU trade in live horses. Trade of horse meat from Poland has fallen as horse meat consumption in the EU is decreasing. There is also a trend towards intra-EU exports of horse meat rather than live animals due to welfare issues. Poland is a net exporter of live horses and horse meat.

Spain is the third largest producer of horse meat in the EU. Although Eurostat data are lacking, other data sources (ITSAT, DataComex⁶) show that Spain imports significant numbers of live horses from France and exports live horses and horse meat to Italy. Horse meat consumption is low in Spain and Spain is a net exporter of horse meat.

2. Knowledge of the origin labelling legal framework (Article 26 of Regulation (EC) 1169/2011)

Knowledge of the requirements was found to be variable between businesses. The study found that some operators in Italy are aware of the legislation in the light of the horse meat food fraud

⁴ An investigation into the availability of horse meat in Belgium, France and the Netherlands, Humane Society International, 2012 http://www.hsi.org/assets/pdfs/horses_EU_horse_meat_retail_investigation_Oct2012.pdf

⁵ Horse meat sold over the counter (without pre-packing) and horse meat used in processed products did not have an indication of country of origin of the meat – only the country of processing (usually an EU Member State) could be detected from the EU establishment code.

⁶ <http://datacomex.comercio.es/>

scandal⁷. Whilst the European Commission has stated that country of origin labelling is not the tool to prevent fraud⁸, some operators gave their opinion that origin labelling is necessary to reassure consumers in the light of the horse meat scandal.

Most specialist horse meat producers in Poland report having horse passports that provide information on place of birth, rearing and slaughter.

3. Existing origin labelling

A 2012 study found the majority of pre-packed horse meat sold in Belgium, France and the Netherlands to be labelled with full origin details⁴. Most of the pre-packed meat examined was found to be imported into the EU or from Romania.

4. Possible implications of mandatory origin labelling

In Italy, food business operators reported that the horse meat scandal had alerted the meat supply chain industry to the need to provide origin information to consumers for purposes of reassurance. Some operators felt that since labelling of the place where an animal was born, reared and slaughtered has been introduced for beef and the place where an animal is reared and slaughtered has been introduced for other main meats it is logical that some kind of origin labelling should also apply to horse meats. However there was also a feeling that, whilst this information might reassure customers it would not stimulate demand.

Horse meat is a specialised product with a limited market, and it is already more expensive than other meats. In the main consumption market of the EU, Italy, the consumption is declining in the last decade and origin labelling is unlikely to affect this trend.

5. Volumes through different sales channels

Approximately 60% by weight of horse meat sold in Italy passes through large-scale distributors, and 40% through specialist horse butchers. Approximately 34% is sold pre-packaged. Sales are highly regionalised in Italy. Some regions, such as Apulia have relatively high consumption levels and others have almost no consumption of horse meat.

Horse meat consumption in Spain is low and is consumed in some households and some speciality restaurants. Horse meat is generally purchased unpackaged from specialised horse meat butchers.

Consumption of horse meat has shown a downward trend in France for many years. Consumption has fallen from 85 000 tonnes in 1981 to 20 000 tonnes in 2012.⁹

6. Required adaptations by companies

The costs for companies would be mainly managerial, administrative and IT related and may increase management costs by a few percentage points. It will be necessary to provide links between computer systems of different companies.

7. Ability to make use of existing traceability systems

A horse identification document or passport has applied to all horses in the EU since 2000 in accordance with Commission Decision 2000/68/EC and more recently according to Commission

⁷ The 2013 horse meat scandal was an issue of fraudulent labelling that the European Commission is taking steps to address: http://ec.europa.eu/food/food/horsemeat/index_en.htm

⁸ http://ec.europa.eu/food/food/horsemeat/index_en.htm

⁹ http://www.haras-nationaux.fr/uploads/tx_vm19docsbase/DIP_ECO_03_HORSEMEAT_01.pdf,
<http://www.lefigaro.fr/conso/2013/02/11/05007-20130211ARTFIG00487-viande-de-cheval-une-consommation-marginale.php>

Regulation (EC) No 504/2008 (see 2.1.1 above). This system enables the provision of information on the origin and movements of horses for origin labelling purposes.

With reference to section 2.1.1 above, the passport cannot ensure traceability on where a horse has been raised and only in certain circumstances where it was born. However the implementation of the legislation has been uneven and the horse meat scandal has exposed inadequacies in the system. The European Commission is taking action to enforce EU rules on the horse passport system and the identification of horses¹⁰ but it is likely to be a long time before full origin information can be provided for all horses, due to the difficulties of providing such information retrospectively.

In general traceability systems are more likely to be in place for horses raised especially for meat production than for horses reared for other purposes.

Operators in Italy consider that current traceability systems are not adequate to provide information on where horses were born, reared and slaughtered. A particular problem is the length and complexity of a horse's life cycle. In Italy there is hardly any specialist production of horse meat and most horses are reared primarily for other purposes. The horse passport system currently operating is inadequate to provide reliable information on origin and movements.

Specialist horse meat producers in Poland consider the horse passport system provides information on place of birth, rearing and slaughter.

Little specific information was found in Spain but the fact that most horses are reared for other purposes and not specialist meat production suggests that it may be difficult to provide full origin information.

In France, since 2008 all horses have to be identified obligatorily by an electronic system (transponder) or alternative with ear tags at eight days after birth. The horse keeper has to decide if the horses will eventually be destined for human consumption and then apply the traceability system. If the traceability document is absent the meat of the horse cannot be used for human consumption¹¹.

2.2 Rabbit meat

2.2.1 EU legislation

As explained in section 2.1.1 concerning horse meat, traceability in the EU aims primarily at ensuring food safety. Regulation (EC) No 178/2002, Article 18 requires that the traceability of food and food producing animals and any other substance intended to be incorporated into a food shall be established at all stages of production, processing and distribution.

With regard to food of animal origin, Regulation (EU) No 931/2011 specifies additional information to be provided to ensure the traceability requirements set out in Article 18 of Regulation (EC) No 178/2002.

However, as with horse meat, traceability requirements for rabbit meat are based on the 'one step back - one step forward' approach and cumulative traceability for the purposes of origin labelling is not required under existing traceability legislation.

¹⁰ http://ec.europa.eu/food/food/horsemeat/timeline_en.htm

¹¹ <http://www.la-viande.fr/securite-sanitaire/tracabilite-viandes/tracabilite-viande-chevaline>

Food and feed operators are required to have in place systems and procedures to ensure the traceability of their products. However EU legislation does not require all movements of rabbits to be recorded on national databases, which can make it more difficult to access origin information.

Small-scale producers are not subject to official hygiene controls and can be exempted. Mandatory origin labelling would therefore apply only to commercial rabbit meat sales and not to rabbit meat used for home consumption, or to small quantities supplied directly to the final consumer or to local retail establishments. In any case it is perhaps unlikely that small quantities would be pre-packed and therefore subject to origin labelling rules.

2.2.2 EU production

The most complete Eurostat data on EU rabbit meat production dates from 2007 and 2008.

Table 7. EU slaughter of rabbits 2007 & 2008

EU slaughter of rabbits 2007 & 2008							
		2007			2008		
		%	1 000 head	1 000 tonnes carcass weight	%	1 000 head	1 000 tonnes carcass weight
	EU28	100.0%	138 979.9	192.0	100.0%	131 154.8	172.5
Spain	ES	44.5%	61 847.9	74.7	41.5%	57 618.3	68.7
France	FR	28.2%	39 198.0	54.0	26.8%	37 199.0	51.3
Italy	IT	16.8%	23 407.0	43.5	18.9%	26 324.0	39.1
Portugal	PT	4.8%	6 630.3	8.1	4.7%	6 514.0	8.4
Hungary	HU	3.6%	4 995.4	6.7	1.5%	2 044.8	2.8
Poland	PL	1.4%	2 013.9	3.3	1.0%	1 349.2	2.0
Finland	FI	0.5%	754.5	1.6			
Other EU		0.1%	132.8		0.1%	105.5	

Source: Eurostat [apro_mt_pann]

Based on 2007-08 data Spain is the largest producer of rabbit meat in the EU, followed by France and Italy. Together these three countries account for around 85% - 90% of EU production. Portugal, Hungary and Poland each produce between 1% and 5% of total EU production.

Rabbit meat has been in overall decline in the three major countries in recent years although the decline has stabilised in Spain.

A comparison with FAO data shows broad similarities in most countries with the major exception of Italy, where FAO estimates production of 157 983 thousand head in 2007 and 159 985 thousand head in 2008. It would appear that different bases for the Eurostat and FAO figures were used for Italy. Interestingly, the FAO overall data shows a slight increasing trend (about 4% from 2007 – 2012).

Spain

Rabbit meat production in Spain accounts for a little over 1% of total meat production. Production has halved since the 1990s and is now relatively stable at about 63 000 tonnes in recent years. This is equivalent to an annual per capita consumption of 1.3kg of rabbit meat. Recent data on rabbit meat production in Spain is available from DataComex¹².

The fall in production reflects a change in the industry structure away from small-scale producers towards larger operators. Rabbit meat is relatively low priced and favoured for its low fat content.

¹² <http://datacomex.comercio.es/>

Spain has a positive trade balance in rabbit meat (net exporter). Intra-EU trade in live animals is low and variable.

Rabbit meat is exported to Portugal (48% in 2013), France, Italy and Belgium. Total rabbit meat exports amount to some 6 000 tonnes, or about 10% of total production.

According to the annual survey of household consumption from the Ministry of Agriculture, 55% of rabbit meat purchases are made in supermarkets, 30% in butchers and small shops, 9% is self-consumption and the rest is made in other channels.

Most of the meat is sold in whole pieces by slaughterhouses and only 10% is cut into pieces. In recent years “flow packaging” in inert or controlled atmosphere has been introduced to extend the shelf life of refrigerated meat. At least 50% of sales from large-scale producers go to large retailers.

Large scale operators are members of Intercun, an organisation representing producers, slaughterhouses and distributors of rabbit meat.

France

Since 2000 rabbit production in France has consolidated from small-scale to large-scale with a consequent reduction in the number of producers. Production has declined from an estimated 84 000 tonnes carcass weight in 2000 to 63 000 tonnes in 2010 and about 58 000 tonnes in 2013.

France has a positive trade balance in rabbit meat (net exporter) with exports accounting for around 10% of production. Exports¹³ are almost exclusively intra-EU and mainly to Italy (35% in 2013), Belgium (14%), Germany (13%) and to a lesser extent Spain and the United Kingdom.

Intra-EU imports⁹ come from Spain (37%) and Belgium (27%), but China is also a major supplier (33%) [note that this data on imports - from the French *Direction Générale des Douanes* - does not correspond precisely with Eurostat data in Table 9 below]. Rabbit meat from China is used exclusively in catering.

France exports live rabbits for slaughter to Belgium. These animals are slaughtered mostly near to the border. Note that Table 8 below does not distinguish between live animal trade for slaughter and for breeding or other purposes. Based on investigations by the study of the value of the live rabbits exported it is likely that exports to Italy and the Netherlands are a mix of breeding and slaughter animals, whilst the smaller numbers exported to Germany, Spain and Hungary (as shown in Table 8) are more likely to be breeding animals.

Just over 90% of rabbit meat consumers eat rabbit at home. A majority of rabbit meat consumers have indicated a preference for rabbit meat of French origin. French origin was found to be important to 77% of consumers in one survey. Estimated annual per capita consumption is around 0.85 kg in 2013 compared to 1.42 kg in 2000.

Italy

In 2007 there were just over 30 000 farms in Italy breeding rabbits under intensive or extensive conditions¹⁴. According to AVITALIA (the Italian National Union of Poultry and Rabbit Breeders) in 2007 there were 8 000 intensive rabbit farms in Italy with a total population of some 1.2 million breeding females in production.

¹³ Direction Générale des Douanes

¹⁴ Italian National Statistics Unit

Rabbit farms in Italy are virtually all closed cycle farms and therefore traceability of domestic production can be fully assured at the production stage. Adaptation required at the distribution stage is considered to be modest.

Annual per capita consumption of rabbit meat in Italy has declined from 0.73 kg in 2007 to 0.59 kg in 2013. Production has declined from a peak of 43 500 tonnes in 2007 to 33 100 tonnes in 2013. Domestic production accounts for over 90% of consumption.

Italy is a net importer of rabbit meat; mainly from France (55%), followed by Hungary and Spain. Extra-EU imports to Italy were 92 tonnes in 2013.

Reasons given by stakeholder for the falling consumption of rabbit meat are:

- general reduction in meat consumption;
- lack of time to prepare rabbit meat at home;
- increased feeling that rabbits are affectionate animals, particularly among young people;
- increased cost of rearing rabbits since the use of crates has become unacceptable.

The distribution of rabbit meat in Italy is broken down as follows:

- | | | |
|---|------------------------|-----|
| - | Supermarkets | 46% |
| - | Butchers | 35% |
| - | Wholesale and industry | 11% |
| - | Restaurants | 4% |
| - | Exports | 4% |

Rabbit meat is widely sold throughout Italy, in contrast to horse meat which has more localised regional sales.

Food business operators indicated that they are in favour of mandatory origin labelling of rabbit meat including the country of birth, rearing and slaughter. The reason given was that consumers have a preference for national meat and therefore should be adequately informed about the country origin.

Mandatory origin labelling costs would be mainly administrative and IT in nature. Likely cost increases are considered to be modest.

2.2.3 Intra-EU trade

Intra-EU trade in live rabbits is shown below:

Table 8. Intra-EU trade in live rabbits, 2013

Intra-EU trade in live rabbits 2013 (number)													
Importing Member State	Exporting Member State												Total intra EU imports
	CZ	ES	FR	HU	LT	LU	NL	PL	PT	SE	SK	UK	
BE	731		369 110			167	528 135	152 660					1 050 803
CZ								82 771			154 318		237 089
DE	5 259		670										5 929
DK										1290			1 290
EE					182								182
ES			468						1 213 623				1 214 091
FI										6256			6 256
FR	2 546												2 546
HU			768								5 920		6 688
IE												1 218	1 218
IT			56 235										56 235
NL			4 201										4 201
PT		615 745											615 745
SK				370									370
Total intra EU exports	8 598	615 745	431 452	370	210	167	541 168	235 431	1 213 623	7 546	160 238	1 218	3 202 643

Source: Eurostat annual data

The table shows the major intra-EU exporters of live rabbits to be Portugal (exporting to Spain), Spain (exporting to Portugal), the Netherlands (to Belgium) and France (mainly to Belgium and Italy).

The main intra-EU importers of live rabbits are Spain, Belgium and Portugal.

The trade in live rabbits includes both those for breeding and those for slaughter.

The following table shows intra-EU trade and EU imports of rabbit meat:

Table 9. Intra-EU trade and imports of rabbit meat, 2013

Intra-EU trade in rabbit meat and total extra-EU imports, 2013																									
Importing Member State	Exporting Member State (tonnes of rabbit meat)																								
	AT	BE	CZ	DE	EE	EL	ES	FI	FR	HU	IE	IT	LT	LU	LV	NL	PL	PT	RO	SE	SI	SK	UK	Total intra EU imports	Total extra EU imports
AT		1		36					25	89		13				8								172	
BE	1		8	64			373		760	79		19		5		755							95	2 159	3 352
BG		8		1			195		5															209	
CY		1		1			24		2							2								30	
CZ				169			149		54	16						15								403	704
DE	8	988	55				244		714	1 085		374		3		812		3						4 286	2 908
DK									19	1						3							17	40	
EE		6		3			5		1	19			57			3	2							96	
EL		5					10		215			201												431	
ES		55		41					405	34						2		237					2	776	31
FI		1							8							7				8				24	
FR	6 2	634		40			989			21		45		2		259							252	4 248	128
HU	4			65								1				1						199		270	
HR																									
IE				1					17			18				2							1	39	
IT		6	31	16		1	563		1 856	718						129					3		14	3 337	92
LT		42	6						6	43														99	
LU		173		1					123							3		6						306	
LV				11	1								19											31	
MT		8	9						72	25		215												329	
NL	1 1	282		204			27		127	106		29											130	1 906	1 290
PL		27	111	29			283		145	66						60								721	
PT							2 876		32															2 908	
RO			2				42			58														102	
SE		6						1	4	8						9								28	
SI	1									37		25				8								71	
SK	2		225						64	54							1							346	
UK		271					60		216		2	13				28		4						594	
Total intra EU exports	23	5 516	447	706	1	21	5 840	1	4 867	2 458	2	958	77	11	2	2 106	3	250		8	4	199	511	24 011	8 505

Source: Eurostat annual data

The above table shows most Member States participating in low volumes of intra-EU trade in rabbit meat. Spain is the largest intra-EU exporter with 5 800 tonnes in 2013.

2.2.4 Voluntary origin labelling

The FCEC (2013) presented a few voluntary schemes promoting the regional origin of the product for unprocessed rabbit meat in France. These included:

- a private origin label in the Poitou region;
- an initiative by three slaughterhouses in the North of France to develop their own brand which indirectly refers to origin (Lapin du Ch'ti); and,
- a scheme set up by the Nord-Pas-de-Calais region "Saveurs en Or" to which all regional rabbit meat producers can adhere.

In addition, it should be noted that the nation-wide quality scheme Label Rouge has difficulty to extend its scheme to rabbit meat due to technical issues and a high price.

2.2.5 Key points on information collected in cases studies

1. Volume of meat traded

Rabbit meat production is highly concentrated in three Member States and trade represents about 10% of production in each. The volume of meat traded is therefore low.

2. Knowledge of Article 26 of Regulation (EC) 1169/2011

There is general widespread knowledge of the Regulation within the industry in Italy. Origin has been found to be important to French consumers and this is recognised by the industry although consumer willingness to pay is low. Specific information on Regulation (EC) 1169/2011 was not available from the Spain case study but operators have a general knowledge and awareness of the need for origin labelling.

3. Existing origin labelling

Various types of logos have been or are used in France, where French origin is important. However willingness to pay is low and there is currently little widespread use of origin labelling.

4. Possible implications of mandatory origin labelling

The general trend in rabbit production is towards larger more consolidated operations with 'closed cycle' production systems. Origin labelling of production is therefore straightforward when production takes place on one farm and most rabbit meat is consumed in the country of production.

Spanish operators require origin labelling to identify rabbit meat or portions imported from third countries. The predominant preference from the industry is for labelling the origin of the animal at the EU/non-EU level. Mandatory origin labelling would incur costs for labelling changes. Major operators who were consulted have traceability systems in place.

France receives intra-EU imports of live rabbits from Belgium and the Netherlands, and mandatory origin labelling may have implications for this trade. France imports rabbit meat from China but this is used exclusively in catering.

Italian operators call also for mandatory origin labelling to label imported rabbit meat of uncertain origin.

5. Volumes through different sales channels

Volumes traded through supermarkets are estimated in recent years at about 55% in Spain, 90% in France and 46% in Italy. Overall, less than 10% of sales appear to go to the catering sector.

6. Required adaptations by companies

Systems currently operating in Spain allow the identification of the country of origin. There will be costs of new labelling, possibly requiring new equipment.

Little adaptation will be required in Italy where rabbit meat is largely of domestic origin and produced in closed cycle rabbit farms where origin and traceability can be guaranteed. Costs will be mostly administrative and IT in nature and will be modest.

7. Ability to make use of existing traceability systems

Existing traceability systems at the production level are suitable for providing origin information in Spain and Italy. Large scale industrialised operators with closed loop production systems pose few traceability problems.

2.3 Game

2.3.1 EU legislation

As stated above with respect to horse meat and rabbit meat, traceability in the EU aims primarily at ensuring food safety. Traceability rules for game fall under Article 18 of Regulation (EC) No 178/2002, which requires that the traceability of food and food producing animals and any other substance intended to be incorporated into a food shall be established at all stages of production, processing and distribution. Regulation (EU) No 931/2011 requires additional information to be provided for food of animal origin.

The 'one step back - one step forward' approach applies to the traceability of game and cumulative traceability for the purposes of origin labelling of game meat is not required under current legislation.

Traceability of wild game is only feasible from the place of hunting as the place of birth (or hatching) may not be known (although some wild game is born and reared in captivity before release into the wild).

Game covers a wide range of species including land mammals and birds, which may be farmed, herded, kept in enclosures or caught in the wild. Farming and hunting practices vary between Member States.

2.3.2 EU production

Comprehensive figures on EU production of game meat are not available. The methodology for studying the supply chains for game meat has therefore concentrated on supply chains for particular categories and species of game in a few selected Member States, as described in the following sub-sections:

2.3.2.1 Wild game - France

In France game meat production comes mainly from hunting. Game meat for slaughter represents a very small part of French production, especially for small game.

Game reared for release in hunting grounds is categorised as wild game. The SNPGC (National syndicate of the game producers) includes 500 to 600 producers and claims to represent 70 % of the French production, as follows:

- 14 million pheasants
- 5 million partridges
- 1 million mallards
- 120 000 hares
- 10 000 cottontail rabbits
- 500 tonnes of deer meat
- 170 tonnes of boar meat

Around 80 % of this production is sold to (professional) groups of hunters and released in hunting grounds. A large part of this game is not commercialised but shared at the end of the game hunting.

There are an estimated 1.3 million hunters in France. Consumption is highly seasonal, concentrated during winter and particularly Christmas time.

The FNC (National Federation of Hunters) estimates that around 15 000 tonnes of game meat is sold in France every year through “classical” channels: retailers, butchers, markets and catering.

There are around 30 slaughterhouses and/or processing units that have the authorisation to produce game meat. They represent a very small part of the French production, especially for small game (pheasants, partridges, hares and rabbits).

Table 10. Game slaughters in France in 2013

	Controlled slaughter (tonnes)	Controlled slaughter (heads)	Average weight (kg)
Deer meat	131.7	3 334	39.51
Boar meat	18.9	525	35.93
Ostrich, emu	11.8	197	59.73
Pheasant	86.0	60 000	1.43

Source : Service des Statistiques et de la Prospective, Ministère de l'Agriculture

Clearly all game meat released in hunting grounds will be born, reared and killed or slaughtered in France. About half of game meat processors promote a 'Game from French Hunters' brand, which requires assurance of traceability.

The game meat balance is in deficit: France imports around 6 000 tonnes of game meat every year and exports around 2 600 tonnes. The exchanges occur mainly between EU-members (77 % of the imports and 91 % of the exports in 2013). The type of imported meat depends on the country: Australia and New Zealand sell mainly deer, while pheasant comes from the United Kingdom and partridge from Spain.

According to the FNC, French consumption of game meat is around 0.6 kg per capita annually, but this includes only the purchased game meat (retailers, butchers, markets). Most of the game meat is consumed by the hunters and their families (around 30 kg/hunter/year and 1.3 million hunters).

2.3.2.2 Wild game – Spain

As in France, game hunting is an important economic activity. Hunting is divided into small wild game (including rabbit, hare, partridge and quail) and large wild game (wild boar and deer species).

Quantitative information on the supply chain of hunting meat is scarce. Construction of national supply balance sheets are not always possible with the available information.

Table 11. Live weight of catches by type of hunting, 2007-2010 (Source MAGRAMA, 2013)

(Tonnes)	2007	2008	2009	2010
large game	13 950	9 793	17 160	19 513
small game mammals	7 442	7 302	9 178	8 980
small game bird	3 786	3 661	3 576	3 950
total	25 178	20 756	29 914	32 443

Imports and exports of game meat per country of origin and destination

Imports and exports are given for all game meat.

Imports of hunting meats are minimal (100 tonnes in recent years). Exports reached 2 750 tonnes in 2013, after several years of strong growth and account for about 8% of production.

Table 12. Evolution of import and exports of hunting meats (2007 to 2013)

Tonnes of meat	2007	2008	2009	2010	2011	2012	2013
Import	174	81	83	113	60	80	107
Export	991	647	847	1 728	1 728	2 310	2 746
Export surplus	817	566	764	1 615	1 668	2 230	2 639

Source: Datacomex, 2014

Exports are almost entirely to the EU (99% in 2013); Germany and France are the main destinations (40 and 23%, respectively, in 2013).

Table 13. Evolution of exports of hunting meats by main destinations (2007 to 2013)

Export, Tonnes	2007	2008	2009	2010	2011	2012	2013
EU-28	989	610	822	1 694	1 698	2 291	2 727
Germany	447	234	458	584	528	964	1.114
France	202	153	107	489	612	449	623
Rest of EU-28	340	223	257	620	557	877	991
Third countries	1	37	24	34	30	19	19

Source: Datacomex, 2014

Wild game birds

Production of meat from small wild game birds was stable for the period 2007-10 at 3 700 – 4 000 tonnes.

Table 14. Evolution of catches, total live weight, and value, 2005-2010 (Source MAGRAMA, 2013)

Wild game birds	2007	2008	2009	2010
Catches (1 000 animals)	10 556	9 339	11 885	12 870
Total live weight (tonnes)	3 786	3 661	3 576	3 950
Total Value (1 000 €)	24 546	25 267	28 640	14 400
Mean value (€/Kg)	6.5	6.9	8.0	3.6

Partridge is the main species (varying between 35 to 50% in the catches). The rest is composed of several species including pigeons, fieldfare (*Turdus ssp*), turtledove (*Streptopelia turtur*) and quail.

Farmed game birds

There is little available information on farmed game birds. Only since 2009 does statistical information of poultry meat appear separately for broilers, chickens, turkeys and ducks. The other species appear under the single heading of 'other birds', which may also include geese and guinea fowls.

In 2012, the production of other birds reached 11 290 tonnes, which is equivalent to 0.8% of the 1 384 242 tons of all birds slaughtered in Spain during the year

There are 1 080 registered partridge farms, 524 pheasant farms, 660 quail farms and 802 dove farms. All these species are often farmed as artisan activities rather than on strict commercial lines.

Large wild game

In 2010 estimated catches were some 313 000 animals, with a total weight of 19 500 tonnes; boar and deer are the major species, with 50 and 43% in the weight of the catches.

Table 15. Estimation of catches, large game hunting, 2010 (Source: MAGRAMA. 2013)

Species	Number of animals (1 000)	Live weight (tonnes)	Value (1 000 EUR)
Wild boar	161.1	9 696	9 977
Deer	104.7	8 375	16 392
Roe deer	16.4	343	654
Other species	31.3	1 099	1 288
Total	313.5	19 513	28 311

Preparation and distribution of meat per market channel

The meat obtained from these catches follows a path of preparation, processing and marketing, which is in part coincident with the meat industry, although with some specific characteristics.

The initial part of the process is carried out in the hunting area collecting and transporting the animals to the meat industry. There are 31 "collection centres for wild game", which are the only facilities authorized to eviscerate the animals, proceed to its health inspection and approve its suitability for consumption. Once verified, the meat is marked with a health mark and identified and carried into any of the 85 "cutting plants and processing of wild animals" where meat is cut in pieces prepared, packed and labelled for marketing.

Statistics are not available but most small game bird catches are destined for self-consumption by hunters and only about a third is marketed (source: Asicaza - Interbranch Association of Hunting and two processors).

According to ASICAZA there are three marketing paths for large game: 50% is sold in carcasses and half-carcasses to wholesalers for domestic trade (catering and food distribution); 25% is processed into meat products (chorizo sausage, ready meals, etc.) and other 25% is cut into different pieces and is mostly exported. Meat is sold refrigerated during the hunting season and is kept frozen the rest of the year.

Interviews with stakeholders

Interviews with processors and ASICASA (Interbranch Association of Wild Hunting) give different views. Some want the origin labelling EU-non EU and others are in favour of labelling by individual Member States.

The establishment of the labelling would not cause a significant increase in costs because almost all meat comes from Spain and it is already established the traceability of the meat processed.

The main competition in the European market comes from New Zealand imports of farm-raised deer. For this reason they are in favour of a specific labelling of meat from wild game, which are not bred in captivity.

2.3.2.3 Game meat – Italy

According to the largest multiple retailer in Italy, less than 5% of the total sales of game meat is covered by supermarkets and over 90% of game meat is of domestic origin.

One large importer of game meat in Italy markets 626 tons of meat comprising deer (19%), wild boar (45%), rabbit (17%), pheasants (2%) and quail (15%). Origin labelling is applied on all this meat therefore the introduction of a origin traceability systems does not generate extra costs. This company is selling only imported game meat. The main countries of origin are Hungary, Austria, Poland, Slovenia, Germany, Spain, United Kingdom and New Zealand.

The large majority of game meat in Italy is sold to restaurants and butchers. Only 5% is sold by supermarkets. The following distribution by market channel has been given by this large importer:

1. Supermarkets	5 %
2. Restaurants	22 %
3. Butchers (through wholesalers)	73 %

2.3.2.4 Deer

Deer farming in Europe

The Federation of Deer Farmers Associations¹⁵ (FEDFA) has members in 20 European countries. It represents over 10 000 deer farmers with over 280 000 farmed deer. The total number of farmed deer is broken down into 75 000 red deer and 205 000 fallow deer. Farmed deer are kept in fenced areas where the animals are slaughtered and not hunted.

Member States with the greatest numbers of red deer are UK, Germany, Latvia, Sweden, Norway, Austria, France and Spain. Those with the greatest numbers of fallow deer are Germany, Austria, Denmark, Poland and Sweden.

Approximately 90% of slaughter takes place on farm. On farm slaughter is practised in all countries except Poland and Slovakia, where deer are slaughtered in abattoirs. Some abattoir slaughter is practised in Belgium, Denmark, France, UK and Italy. Many small farms sell direct to consumers from farm shops.

Deer farmers must follow the same rules for husbandry, health control and slaughter as other livestock farmers with some specific exceptions. Deer farming is generally small scale although the biggest farms keep about 1 000 deer. The EU average farm size is 15 ha and the average number of animals per farm is 27. Germany has the highest number of farms (4 600 with an average size of 2.5 ha) followed by Austria with 1 600 farms and an average size of 3.5 ha.¹⁶

There are no EU legislative requirements for tagging of farmed game (including deer and also wild boar) and no specific traceability requirements linked to origin of farmed game beyond the general

¹⁵ www.fedfa.org/

¹⁶ EFSA, 2012, Event Report: Technical hearing on the hazards to be covered by inspection of meat from farmed game.

requirements of Regulation (EC) No 178/2002 relating to all food and the requirements of Regulation (EU) No 931/2011 relating to food of animal origin.

Some deer farmers would like to produce and label their deer products as organic, but there are no current EU provisions to label deer meat (venison) as organic.

More than 90% of all farmed deer in the EU are killed on the fenced pasture with a rifle. Some animals may be killed on-farm by restraining and use of a captive bolt pistol.

Farmed deer are routinely transported by road to slaughter (and also for movements between farms)¹⁷. Deer are transported for slaughter in specialised slaughterhouses in only a few countries (UK and the Netherlands). Transport to slaughter is done without anaesthesia.

UK – wild and farmed deer

Accurate figures on UK deer and venison production are difficult to find. A number of different sources have been used to provide the figures reported in this section and there are inevitably a number of inconsistencies. The information provided can therefore be considered as providing general indications rather than specific findings.

The UK produces some 5 000 tonnes of venison annually from deer farms and wild deer. Venison consumption is increasing in the UK, mostly through supermarket sales and local production is supplemented by the import of up to 30 000 farmed deer carcasses per annum from New Zealand (footnote 15). Small quantities of venison are also imported from EU Member States including Poland and Spain.

The number of farmed deer in UK has grown to about 31 000. The number of park deer is estimated at about 40 000 and the number of wild deer over two million with an annual cull of 300 000 (footnote 15). The number of wild red deer is about 360 000¹⁸. About 500 tonnes of farmed venison is produced each year.¹⁹

Demand for venison in UK exceeds supply and approximately 1 000 tonnes of venison are imported each year²⁰, mainly from New Zealand, but also from EU Member States:

¹⁷ Opinion on the welfare of farmed and park deer, Farm Animal Welfare Committee, July 2013
www.defra.gov.uk/fawc

¹⁸ Game and Wildlife Conservation Trust, UK, <http://www.gwct.org.uk>

¹⁹ <http://www.thedeerinitiative.co.uk/uploads/docs/29.pdf>

²⁰ <http://www.theguardian.com/uk/2011/aug/25/scottish-deer-farms>

Table 16. Estimated UK deer population, production and imports

	Deer population (head)	Annual venison production (tonnes)
Wild deer: of which red deer	2 000 000 360 000	4 500
Park deer	40 000	500
Farmed deer	31 000	
Total	2 071 000	5 000
Imports of venison		1 000

The figures in this table are a summary of those presented in this section.

Note that most of the figures are estimates and are therefore not reliable.

Farmed deer in UK must be uniquely identified by an ear tag when they leave the farm of origin and their movements must be recorded. Park deer may be considered as farmed or wild depending on the level of contact with the animals.

Farmed deer may be killed on the farm or transported to a slaughterhouse for slaughter. Total consumption of farmed venison is estimated at 750 tonnes per year of which around 550 tonnes is home produced.

The British Deer Farmers Association has created a quality assurance scheme for farmed deer and also one for park deer.

2.3.2.5 Herded reindeer - Finland and Sweden

Herded reindeer fall into the category of farmed game. Reindeer husbandry is highly organised in both Finland and Sweden although the systems are not the same. Each animal must have an earmark identifying it to the registered owner.

In Finland the maximum number of reindeer in the husbandry area is 203 700 animals²¹. In 2012/13 domestic supply of 91 000 animals sent for slaughter fell short of demand in Finland and animals were imported from Russia. Intra-EU imports of reindeer meat were 634 tonnes in 2013.

In Finland, reindeer owners usually sell live reindeer to a slaughterhouse. There are two groups of reindeer meat processing companies. Large processors process most of the reindeer meat and market it to retail chains across Finland. Small-scale processors focus on the local market or niche markets and are often combined with primary production, own retail stores, catering or tourist activities. Small-scale processors with their own supplies have a competitive advantage due to the scarcity of supply compared to demand.

About 50% of reindeer meat produced in Finland is sold through the retail sector in a range of different frozen and fresh products. About 15% is sold direct to customers and the remainder goes to catering, further processing or wholesaling.

In Sweden the number of reindeer fluctuates; in 2013 it was 248 000 and production of reindeer meat was 1 400 tonnes²². The organisation of the reindeer sector is different in Sweden than in Finland but all reindeer must be marked and identified to the owner. Most reindeer are slaughtered in commercial slaughterhouses.

The intra-EU trade volume is equivalent to approximately 40% of production in 2013/14:

²¹ www.paliskunnat.fi

²² Yearbook of Farm Statistics 2012 (Jordbruksstatistisk arbok 2012)

Intra-EU trade in reindeer meat

Table 17. Intra-EU trade in reindeer meat for the years 2010 – 2013

Intra-EU trade in reindeer meat (tonnes)				
	Import volumes from EU-27 Member States			
	2010	2011	2012	2013
AT		1	1	1
BE	89	85	100	54
DE	1		2	
DK	6	12	1	2
EL		1		
FI	142	522	583	634
FR	9	4	15	13
IE			2	4
IT	7	17	21	48
LT	5		3	
LU	3	1	1	2
MT		1	1	3
NL	23	57	11	4
PT		6	19	3
SE	485	537	586	556
UK	9	16	31	87

Source: Eurostat annual data

Note that the figures refer to EU-27 as Croatia did not become an EU Member State until July 2013.

The table indicates that the majority of the intra-EU trade occurs between Finland and Sweden.

2.3.3 Key points on information collected

Due to the range of species involved, the contrast between hunting and farming, and the lack of comprehensive data compared to major meats, it is difficult to identify common key points for the different types of game meat.

1. Volume of meat traded

There is minimal trade in live game animals for consumption.

France imports about 6 000 tonnes of game meat, of which about 77% from the EU. This is equivalent to about one third of game meat sold through retail and catering outlets. The imports are necessary to make up the shortfall in domestic production, particularly out of season sales.

Intra-EU exports of wild game from Spain are equivalent to less than 10% of production. Imports are minimal.

Intra-EU trade in reindeer meat is equivalent to approximately 40% of production in 2013/14.

2. Knowledge of Article 26 of Regulation (EC) 1169/2011

A large proportion of small wild game is consumed by the hunters and does not enter the commercial food supply chain. In this case the requirements of the Regulation are not relevant.

3. Existing origin labelling

Most wild small game meat is consumed locally and origin labelling in these circumstances is of little relevant. France promotes a 'Game from French Hunters' brand for commercial sales. This indicates the place of hunting but not the place of birth or rearing.

It is a common practice to hatch and rear small game before releasing into the wild to be hunted. It is not clear how much of the quantities hatched and reared are destined for slaughter rather than being shot as wild animals. Slaughtered animals would be classified as farmed game, whereas hunted animals would be classified as wild game, although the hatching and rearing practices may be similar.

4. Possible implications of mandatory origin labelling

Mandatory origin labelling would only affect the small proportion of small game meat that is sold pre-packaged through commercial retail outlets. Large game will be more affected as significant quantities are sold pre-packed through supermarkets.

5. Volumes through different sales channels

Small wild game in particular is consumed mainly by hunters and locally. Large game distribution varies between large-scale processors and retailers, and small-scale butchers and local outlets.

6. Required adaptations by companies

There is no clear overall picture of adaptations required by companies. However, as most game meat supply chains are short and there is minimal trade in live animals, it is unlikely that most plants will have to make major adaptations to the production process and required changes will be limited to management and IT systems, and labelling equipment and consumables.

7. Ability to make use of existing traceability systems

There is minimal trade in live farm game for consumption and therefore virtually all slaughter takes place in the country of birth.

The characteristics of production with short supply chains and existing traceability systems indicate that it may be possible to use existing traceability systems in many cases.

With regard to wild game, traceability starts from the point when the animal has been shot and killed.

3 ANALYSIS OF LABELLING OPTIONS

3.1 Labelling options for minor meats

Various options were considered for the mandatory origin labelling of the different categories of minor meats taking into account:

- the need for the consumer to be informed;
- the feasibility of providing the mandatory indication of the country of origin or place of provenance, and;
- an analysis of the costs and benefits of the introduction of such measures, including the legal impact on the internal market and the impact on international trade.

Option 0 – no mandatory labelling

If it is found that the consumer has no need to be informed through mandatory origin labelling of minor meats, then no action is required (Option 0).

Option 1 – labelling of countries of birth, rearing and slaughter

The requirements for compulsory beef labelling may be considered as an option (Option 1) for minor meats for reasons of consistency and because of the expectations raised.

Beef labelling rules are described in Regulations (EC) No 1760/2000 and (EC) No 1825/2000. The following indications must be shown on the label:

- Member State or third country of birth;
- Member State or third country of rearing;
- Member State or third country of slaughter;
- Member State or third country of cutting.

Simplifications are permitted when more than one stage takes place in a single country, where animals spend less than 30 days in the country of birth and/or country of slaughter, and when full origin information is unavailable for imported beef although the third country of slaughter should be indicated and the animal should generally have been kept for a minimum six months in the country of slaughter.

For horses other than those used for specialist meat production the country of rearing may have to be re-defined or modified to take into account the possible long lives of horses. The horse passport system enables the provision of information on all the countries where a horse has been kept, but it may not be practical or even desirable to provide all this information on the food label.

Option 2- labelling of countries of rearing and slaughter

Another potential option (Option 2) may be considered based on Commission Implementing Regulation (EU) No 1337/2013 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. The Implementing Regulation requires indication of the place of rearing and place of slaughter of the meat, but not the place of birth.

The option for origin labelling of pig, poultry and sheep and goat meat specified in Commission Implementing Regulation (EU) No 1337/2013 is based on:

- last rearing place depending of the slaughtering age or the rearing period length;
- the Member State or third country in which the slaughter took place.

Specifically this option does not include the place of birth of the animal.

Option 3 - labelling of country of hunting

A further option (Option 3) has to be considered for wild game meat. Traceability of wild game (game that is hunted) starts at the place where the animal was hunted as the places of birth and rearing may not be known (although in some circumstances they will be known).

It is therefore proposed that the option for mandatory origin labelling of wild game requires the indication of the place of hunting.

Farmed game would have mandatory origin labelling indicating the place of birth (under option 1 only), place of rearing and place of slaughter.

3.2 Scope of impacts of the labelling options

The case study investigations and data search have indicated possible impacts to be analysed for origin labelling of the three main categories of minor meats being considered (horse meat, rabbit meat and game meat). These possible impacts are explained below and assessed in section 4. Administrative costs for control authorities are considered only in chapter 4.

3.2.1 Horse meat

Possible cost increases

Possible cost increases to be analysed for origin labelling of horse meat include:

- Cost to food business operators of putting in place traceability systems as a means of providing origin information. However as traceability is a requirement for food safety purposes, it cannot be considered purely as a cost of origin labelling (The European Commission has made clear that country of origin labelling cannot be considered as the tool to prevent fraudulent practices²³). As well as the costs of the system, the feasibility of obtaining information on existing horses with long life spans and movement histories has to be considered. As explained in section 2.1.1, the EU horse passport system is the proper mechanism to provide origin information and therefore would be the basis of the traceability system that is considered.
- Cost to food business operators of reorganisation to shorten supply chains and source horse meat from dedicated horse meat producers and others that can guarantee traceability. This may have price implications as prices may be higher for horses reared specifically for meat production compared to surplus horses previously used for other purposes.
- Equipment, storage, printing, managerial, administrative and IT costs incurred by operators to separate batches and carry out labelling.

The price of horse meat may rise to reflect the extra costs as well as the restricted supply of horses previously used for other purposes (some of which may not have been fit for human consumption).

3.2.2 Rabbit meat

Possible cost increases

Where rabbit meat production takes place within a single country, and particularly within closed cycle operations, there would in most cases be no impact to be considered with regard to providing traceability at the production stage.

Impacts to be analysed would be mainly managerial, IT and labelling related costs for food business operators in slaughterhouses and processing/packing plants.

Cost increases would only apply to commercial operators supplying pre-packed rabbit meat. It is possible that small-scale producers may be exempted from origin labelling requirements.

In cases where processing companies slaughter both imported and domestic rabbit meat, there may be extra costs of batch separation or internal tracking methods to be analysed.

²³ http://ec.europa.eu/food/food/horsemeat/index_en.htm

Pre-packaged rabbit products may be a growth area due to the need to find new markets for rabbit meat, so possible increases in the volume sold pre-packed may need to be considered.

3.2.3 Game

Possible cost increases

Origin labelling of wild game is only feasible from the point of killing. Origin labelling will only apply to commercial sales and not to home consumption. Possibly small quantities of wild game meat supplied directly to the consumer or to local retail establishments may also be exempted.

Tracing of farmed game follows similar methods to comparable domestic animals. Producers who complete the production cycle on one farm will not incur traceability costs and the impacts to be analysed will be limited to labelling costs as well as management and IT costs.

Large game meat imported from third countries may come in the form of whole carcasses, which then have to be cut and packed. Factories processing both domestic and traded or imported meat may incur additional costs for batch separation or otherwise reorganising the production flow. There may also be increases in storage costs to be analysed.

Additional managerial and IT costs and the costs of label production will have to be analysed for food business operators.

3.3 Classification/typology of the supply chain and labelling options

To assist the analysis of labelling options a typology of the main characteristics of the various supply chains has been prepared.

As the production of minor meats is highly specific to individual Member States, it is not feasible to extrapolate the findings to EU level.

Instead the typology will be used to classify three different categories of minor meats to enable analysis of the likely impacts of mandatory origin labelling. The criteria to be used in preparing the typologies are as follows:

- Length of supply chain
- Scale and nature of businesses
- Intra-EU and third party trade
- Separation of supply chains
- Market channels for meat
- Market differentiation (high value/commodity)
- Traceability systems
- Degree of voluntary origin labelling

3.4 Summaries of relevant typology information for analysing the impacts

The following relevant typology information for the impact analysis emerged from the case studies and information gathering stage:

Table 18. Relevant information for analysing the impact of mandatory origin labelling of horse meat

Relevant information for analysing the impact of mandatory origin labelling of horse meat	
Typology criteria	Relevant information
Length of supply chain	Horses from specialist horse meat producers: - Supply chains may be variable in length. Horses used for other purposes: - Long and complicated live animal supply chain, particularly for older animals. - Long meat supply chain with many intermediaries.
Scale and nature of businesses	- There are two distinct types of business: specialist horse meat producers, and; processors and traders buying surplus or spent horses used for other purposes.
Intra-EU and third party trade	- Large volumes of trade in live animals and horse meat, including importation of horse meat into the EU.
Separation of supply chains	- Mixing of supply chains is likely due to the complexity of supply and high level of trading, however specialist importers operate dedicated supply chains.
Market channels for horse meat	- Variable: - Large-scale distributors with pre-packaging, specialist butchers in Italy. - In Spain horse meat for home consumption is purchased from butchers and speciality restaurants.
Market differentiation (high value/commodity)	- Horse meat is a high value specialist product. - Some horse meat from specialist producers is sold pre-packed with full origin information. - Horse meat sold through butchers, caterers and other channels is less like to be accompanied by origin information.
Traceability systems	- The horse passport that must accompany all animals since 2000 is designed to provide information on the country of origin and all subsequent movements. However irregularities in the application of the wider traceability and meat labelling system (including fraudulent practices) have meant that it is necessary to improve controls to strengthen traceability and enable the provision of more robust information in all circumstances. Such improvements are primarily to ensure food safety. - Effective traceability systems are in place from specialist horse meat producers, including third country suppliers from specialist horse meat producing countries (largely in North and South America). This traceable meat is widely used in pre-packs.
Degree of voluntary origin labelling	- Voluntary origin labelling is widely used by specialist horse meat producers, including from third countries, where country of birth, rearing and slaughter is indicated.

Table 19. Relevant information for analysing the impact of mandatory origin labelling of rabbit meat

Relevant information for analysing the impact of mandatory origin labelling of rabbit meat	
Typology criteria	Relevant information
Length of supply chain	- Short supply chains. - EU production is concentrated in Spain, France and Italy. - Virtually all production is within a single country.
Scale and nature of businesses	- Many closed cycle producers. - Trend towards large-scale operators.
Intra-EU and third party trade	- Trade in rabbit meat represents about 10% of production for the main producing countries.
Separation of supply chains	- Closed cycle separated supply chains.
Market channels for rabbit meat	- Volumes traded through supermarkets are estimated at 55% in Spain, 90% in France and 46% in Italy.
Market differentiation (high value/commodity)	- Rabbit meat is difficult to cook compared to other meats although it is valued for its low fat content. Consumption is either stable or in decline in the major producer countries. - Home country producers wish to differentiate their product from cheaper imports.
Traceability systems	- Effective traceability systems are in place in Spain and Italy and traceability should not be difficult to achieve due to the high extent of home production and short supply chains. Several local supply chains (Terrena, CCP) have traceability systems in place and an EU system can build on these.
Degree of voluntary origin labelling	- Spain is self-sufficient and therefore all meat is home produced. - France had a 'Lapin de France' logo until 2008.

Table 20. Relevant information for analysing the impact of mandatory origin labelling of game meat

Relevant information for analysing the impact of mandatory origin labelling of game meat (including reindeer)	
Typology criteria	Relevant information
Length of supply chain	- Short supply chains. - Almost all production of game meat is within a single country.
Scale and nature of businesses	- Game meat, including meat from small game birds, may be from wild or farmed animals. - Most game meat in France, Spain and Italy comes from hunting (wild game). Wild game animals and birds may be hatched and reared in captivity for release into the wild for hunting. - Reindeer production (classed as farmed game) is highly organised. - Most meat from large game mammals is wild game from hunting although the Federation of Deer Farmers Associations has over 10 000 members farming over 280 000 deer in 20 Member States
Intra-EU and third party trade	- Minimal trade in live animals.

	- Minimal meat imports to Spain. - Significant meat imports to France for out of season sale. - Intra-EU trade in large game meat (venison and wild boar) and imports into the EU (particularly venison). - Reindeer production and consumption is concentrated in Scandinavian countries.
Separation of supply chains	- Separate for most species. - May be mixed for venison from different origins. - Separate for reindeer.
Market channels for game meat	- Most small wild game is consumed by the hunters. Only a small proportion is sold pre-packed. - Small and large game is marketed through different outlets.
Market differentiation (high value/commodity)	- The market tends to be differentiated between wild (hunted) game and farmed game. Consumers may have preferences for either wild game or farmed game. - The market for farmed venison may differentiate domestic and imported (intra-EU or third country) origin.
Traceability systems	- Traceability systems are in place for large farmed game and reindeer. - For wild game (by definition) traceability starts from the place of hunting, although some wild game is hatched and reared for release into the wild for hunting.
Degree of voluntary origin labelling	- France has a 'Game from French Hunters Brand' which specifies the place of hunting (France) but not the place of birth or rearing.

4 IMPACT OF LABELLING OPTIONS

4.1 Consumers

A recent Eurobarometer survey²⁴ indicated that 'a large majority of EU consumers think it necessary to be able to identify the origin of these "other types of meat"²⁵: 88% share this view (against 11% who do not), 60% of whom believe that this traceability is "totally necessary"'.

Knowing the origin of the other types of meat is regarded as necessary by a large majority of respondents in all EU Member States. However, there are important differences between Member States.

Respondents who said it was necessary to have information about the origin of types of meat which are not covered by existing rules were then asked to specify what type of information they expected:

- the place where the animal was raised is the most necessary information (83%);
- this is followed by the place where the animal was slaughtered (62%);

²⁴ Special Eurobarometer 410, Europeans, Agriculture and the Common Agricultural Policy, European Commission, 2014. http://ec.europa.eu/public_opinion/archives/ebs/ebs_410_en.pdf.

²⁵ Respondents were told that "there are already rules on compulsory labelling on place of origin in the EU for some types of unprocessed prepacked meat, such as beef, poultry, pork, lamb/mutton and goat. The EU is planning to extend this compulsory labelling on place of origin to other types of meat, such as rabbit and game".

- lastly, the place where the animal was born appears less important, although it was still cited by almost half the respondents (47%).

When asked what level of detail about the origin of these other types of meat they believe is necessary, respondents first mentioned the country of origin (75%), followed by the region of origin (52%). Knowing if the meat came from within or outside the European Union was mentioned much less (37%).

Although consumers may not base their purchase of meat on the origin information as such, the absence of origin information can be seen as a potential reason for mistrust in the meat supply chain²⁶. For fresh meat in general, a number of consumers tend to associate a local origin with freshness²⁷. There is therefore an association made in consumers' minds between the origin information of meat and a perceived level of food safety.

Despite the interest in origin information, willingness to pay for it is low for minor meats, as for meat of the main species. According to the findings of the Eurobarometer 410 survey, just over half of consumers (53%, against 42%) declare they would be willing to pay 1% - 2% more to see information on place of origin appear on the labels of other types of meat²⁸.

Based on our literature review, we assessed the need for the consumer to be informed for the origin of minor meats: our findings are presented in Table 21 below:

Table 21. Summary of the need for consumers to be informed on the origin of minor meats

Theme	Conclusion	Evidence
Consumer interest	1. Three literature sources bring evidence that is specific to the examined types of meat (one for the EU; two for France only) and concludes that consumer interest is strong. 2. In general, interest in origin labelling is comparatively higher for meat than for other foods, thus other studies generally support the finding of the above sources that interest is strong.	1. Special Eurobarometer 410 (2014); IFOP (2010, FR); Segments (2007, FR); 2. DG SANCO study on voluntary labelling (2013); LEI, GfK and Capgemini Consulting (2012); LEI (2013); FCEC (2013)

²⁶ LEI Agricultural Economics Research Institute, Wageningen UR (2013). Study on mandatory origin labelling for pig, poultry and sheep & goat meat (AGRI-2012-EVAL-01)

²⁷ European Commission (2013). The study of the functioning of the meat market for consumers in the EU, DG SANCO. 2013

²⁸ The Eurobarometer survey question was whether consumers are willing to pay 1-2% more on the labels of milk and dairy products and of other types of meat (Special Eurobarometer 410, 2014).

Theme	Conclusion	Evidence
Understanding of 'origin'	Most EU consumers (83%) indicated that the place where the animal was raised was the most necessary information although 62% consider the place where the animal was slaughtered to be necessary information and 47% the place where the animal was born. There were substantial variations between Member States. Consumers preferred origin at the country level. As for the motivations, consumers relate the origin indication with a perceived level of food safety.	Special Eurobarometer 410 (2014); LEI (2013); LEI, GfK and Capgemini Consulting (2012).
Willingness to pay (WTP)	Interest in origin is not necessarily reflected in consumers' WTP, while there are substantial variations between Member States. Examples: - On average across the EU 53% of consumers are willing to pay 1-2% more for origin labelling, whereas 42% consumers are not willing to pay more. WTP differs substantially between Member States: majority of consumers in 16 Member States willing to pay 1-2% more, majority of consumers in 11 Member States not willing to pay more. (Eurobarometer 410). - All existing studies indicate that the price is a more important factor for the consumer when buying food products ranking it at a higher order than geographical origin (with price, appearance, quality, use by date, brand, generally indicated by consumers as the most relevant aspects affecting their purchasing decisions).	- Special Eurobarometer 410 (2014); - DG SANCO study on voluntary labelling (2013); FCEC survey (2013); BEUC study (2013); LEI (2012); various evidence from consumer organisations' surveys
Consumers' attitudes	There is a ' <i>paradox</i> ' in consumer attitudes, in terms of the fact that consumers' strong interest in the origin of food is not necessarily reflected in their willingness to pay for this information.	
Extent of voluntary origin labelling	The presence of voluntary origin schemes is generally higher in the meat sector than in other product groups. Where they exist, such schemes tend to form part of a wider quality initiative.	LEI, GfK and Capgemini Consulting (2012); DG AGRI (2010); FCEC (2013);); DG SANCO study on voluntary labelling (2013)
EU quality schemes	Meat products and fresh meat are, respectively, the third and fourth largest categories in terms of the number of registered PDO/PGI denominations, accounting for 10% of sales value in the meat/meat products sector. Most schemes in this sector tend to be PGIs, i.e. not providing information on the origin of the raw material.	FCEC (2013); DG SANCO study on voluntary labelling (2013); DOOR database (2014)

As seen above, consumers tend to associate origin labelling of meat more generally (meat of any species) with a perception of food safety and trust. Consumers use origin information as a proxy indicator to provide trust or confidence where other information is lacking. For rabbit meat, origin labelling has been shown to provide more trust than other food quality labels in France²⁹. Generally speaking, origin labels are considered easy to understand.

Horse meat is a distinct category within the minor meats as some horses are reared for purposes other than primarily for human consumption (e.g. sport horses). This creates scope for fraud which could involve substantial food safety risks.

No information has been found regarding the attitude of horse meat consumers to origin labelling. Nevertheless retailers recognise the value of origin labelling as they ensure that horse meat of known origin is used in pre-packed horse meat products. Some operators feel that providing origin information on the country of birth, rearing and slaughter of horses would help to reassure consumers, whose trust in the meat sector in general has been on a declining trend since 2012.

The Consumer Market Scoreboards^{30,31} monitor how the single market is performing for EU consumers and warn of potential problems in the performance of specific consumer markets. Among other Market Performance Indicators, it measures consumer 'trust' on a scale from 0 to 10³², that is to say the extent to which consumers trust businesses to respect consumer protection rules.

The 2014 Consumer Market Scoreboard finds that in general consumer trust is lowest in those markets where the asymmetry of information between the trader and the consumer is the most acute. The market for meat and meat products has seen its trust score drop by 0.5 points between 2012 and 2014. The drop was the highest in the UK (-1.9) and Ireland (-1.6), two of the countries most affected by the horsemeat scandal.

Previous evidence from the 2013 Consumer Conditions Scoreboard³³ showed that about a quarter (24.6 %) of consumers thought that a significant number of food products were unsafe, slightly up from 2011.

Key findings from the literature review indicate that the majority of EU consumers have a particular interest in the origin of unprocessed meat in general. However, consumers are not necessarily willing to pay for origin information. Findings are similar for the minor meats sectors.

4.2 Supply chain operators

4.2.1 Cost increases under Option 1 - Countries of birth, rearing and slaughter

Expected cost increases for the different other meat types have been considered firstly for Option 1 (origin information on the place of birth, rearing and slaughter).

This option excludes wild game as the indications are not appropriate.

Expected cost increases for food business operators under Option 1 have been broken down as follows:

²⁹ Survey carried out by Segments, 2007 : Comportement et motivations d'achat du lapin en GMS

³⁰ European Commission (2013): The Consumer Conditions Scoreboard, 9th edition – July 2013

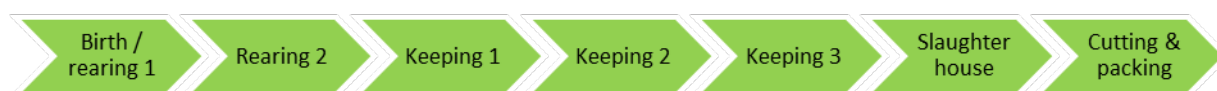
³¹ European Commission (2014): Consumer Markets Scoreboard Making markets work for consumers 10th edition - COMMISSION STAFF WORKING DOCUMENT, SWD(2014) 212 final. June 2014

³² "On a scale from 0 to 10, to what extent do you trust <suppliers/retailers> to respect the rules and regulations protecting consumers?"

³³ European Commission (2013): The Consumer Conditions Scoreboard, 9th edition – July 2013

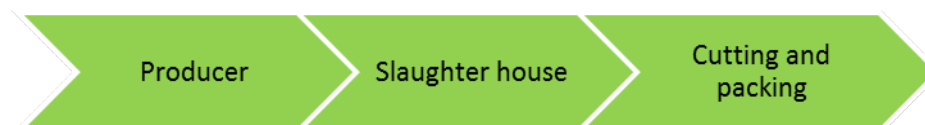
Traceability: The costs of registering origin information and passing it on from suppliers to customers, or accessing such information where it is already traced. Traceability costs are likely to involve also IT systems and managerial costs (which are not counted under this category but only as a Managerial/IT cost). Traceability costs vary with the length and complexity of the supply chain and depend on whether suitable traceability systems are already in place and information is readily available for other purposes (e.g. food safety). Traceability costs will vary for the different operators along the supply chain according to the structure of the supply chain (integrated/non-integrated), the number of sources of supply and the presence of existing systems. In some situations, such as when all production, processing and packing takes place at one location, the traceability costs may be virtually zero.

a) Long supply chain – high traceability costs



Horse meat from horses previously used for other purposes may have very long supply chains as horses may live for many years and be kept as adults in a number of countries. For many of these horses the place of birth and some places of rearing and keeping may not be officially recorded.

b) Short supply chain – low traceability costs



Short supply chains are typical for specialist horse meat, rabbit meat and game meat. In these minor meats sectors two or three operations may take place at the same location.

For these minor meats, all operations will generally take place within one country, except for some rabbit production where live rabbits are traded to another Member State for slaughter, and large game meat where carcasses are traded within the EU and imported into the EU before cutting and packing. Traceability is therefore straightforward and costs are low.

Restructuring: Restructuring costs concern the reorganisation of the supply chain to ensure separation between meats of different origin. This may involve costs such as changing sources, adjusting buying patterns, separating batches. There may be collateral costs such as increased transport or storage costs.

Equipment: Equipment costs refer to the cost of making physical changes in a factory (excluding IT equipment). Equipment costs may include additional storage, changes to production lines to separate batches, printing and labelling equipment. Equipment costs cover both installation and running costs for new equipment.

Managerial/IT: Managerial and IT costs may include changes to traceability and process control systems as well as to the printing and labelling operations.

The expected cost increases for Option 1 are summarised in Table 22.

Costs are categorised as:

Low – less than 1% cost increase at the wholesale price level;

Medium – 1% - 3% cost increase at the wholesale price level;

High – more than 3% cost increase at the wholesale price level.

Table 22. Expected cost increases in the supply chain (Option 1)

Meat type	Cost increases to supply chain operators from mandatory origin labelling of place of birth, rearing and slaughter			
	Traceability	Restructuring	Equipment	Managerial/ IT
Horse meat: from other uses from specialist meat producers	High Low	High Low	Variable Low	High Low
Rabbit meat	Low	Medium	Medium	Low
Farmed game: farmed small game birds farmed venison and wild boar reindeer	Low Low Low	Low Medium Low	Low Medium Low	Low Low Low

Option 1 – labelling of place of birth, rearing and slaughter

Horse meat

For horse meat from animals used for purposes other than specialist meat production, the cost increases are expected to be high. This is because horses used for other purposes are likely to have long lives and complex supply chains and origin information may not be readily available. Traceability systems may be inadequate and costly to set up. Food business operators may have to change their sourcing practices to ensure that the origin of all horses is known. Equipment costs could vary according to the volume of production and state of existing equipment. Managerial and IT costs are likely to be high to undertake and adapt to all the changes.

At the present time, the full origin history of many existing horses previously used for other purposes, particularly older horses, may not be known and full origin labelling may be practically impossible. Whilst it may be feasible to establish a system for full origin labelling of all horses from a future date, it has to be considered how to treat existing horses during the transition period until full details are known for all horses.

Regarding dedicated horse meat production, the case studies found that traceability and origin labelling systems are widely used. Specialist horse meat is a high value product and the costs of providing origin information are generally low.

Rabbit meat

The costs of full origin labelling of rabbit meat are expected to be low to medium. Traceability costs are generally low due to short supply chains using closed loop systems, and virtually all production of individual rabbits taking place within a single country.

In some cases where food business operators participate in trade of live rabbits or rabbit meat, they may incur costs for restructuring or re-equipping their factories. Managerial and IT costs are estimated to be generally low as many operators are already able to identify origin information.

Farmed game

The costs of origin labelling of farmed game are likely to be generally low for small game birds and reindeer. Almost all production of game meat is within a single country. Therefore origin labelling is generally straightforward. Reindeer production is highly organised and origin information is already available.

For farmed venison the costs are likely to be low to medium. However the intra-EU and third country trade in venison means that carcasses of different origin may have to be separated in some cutting and packing plants, which could incur higher costs for restructuring or additional equipment.

4.2.2 Cost increases under Option 2 - Countries of rearing and slaughter

With the notable exception of horse meat, the production of most minor meat animals and birds involves short supply chains and generally takes place in the same country. There is little intra-EU live animal trade for the minor meat species and traceability systems are widely in place. Under these circumstances the additional cost of providing place of birth information is likely to be zero or minimal in most circumstances.

As for Option 1, this option excludes wild game as the indications are not appropriate. If Option 2 is selected for farmed game, the label should include the indication that it is 'Farmed game' in order to distinguish it from wild game.

For horses, the proper application of the horse passport system should provide information on the country of birth of a horse as well as its subsequent movements. In this case the cost of providing country of birth information is no greater than providing the place or places of rearing.

However, past irregularities in the application of the horse passport and traceability system mean that country of origin information, including place of birth, may not be available in practice for many horses.

Origin information, including place of birth, is required on the horse passport primarily for food safety purposes and it would be wrong if it was considered as an additional cost for providing country of origin information on the label.

4.2.3 Cost increases under Option 3 – Country of hunting of wild game

Option 1 (labelling of places of birth, rearing and slaughter) and Option 2 (labelling of places of rearing and slaughter) are not appropriate for wild game, which is hunted in the wild.

Option 3 is appropriate for wild game as it indicates the place of hunting.

Table 23. Expected cost increases in the supply chain (Option 3)

Meat type	Supply chain cost increases from mandatory origin labelling			
	Traceability	Restructuring	Equipment	Managerial/ IT
Large wild game	Low	Medium	Medium	Low
Small wild game	Low	Low	Low	Low

Option 3 – Place of hunting of wild game

It is expected that cost increases for traceability, management and IT will be low due to short supply chains.

As there is intra-EU trade in large game meat, it may be that some food business operators incur costs for restructuring and equipment to ensure separation of different sources.

One possibility may be to apply an exemption for small quantities sold direct to consumers or to local retail establishments. This would be consistent with food hygiene regulations as such quantities are exempt from official hygiene controls. In any case small quantities are unlikely to be sold in pre-packs and so origin labelling rules may not apply.

4.2.4 Administration burden for food business operators

4.2.4.1 Horse meat

The administrative burden for food business operators producing horse meat from other uses (i.e. from other than specialist horse meat producers) are likely to be high as major administrative changes will be required to establish traceability and IT systems and set up procedures. The costs can be expected to increase with the length of the supply chain as each step in the chain will need to be recorded, which may involve data from a number of countries.

In practice it may not be feasible to obtain full origin information for all horses used for other purposes unless national databases are set up in all Member States. In this case horse meat buyers may minimise administration costs by selecting only those animals with shorter supply chains and full information available.

When full origin information is already provided on a horse passport for food safety reasons, the additional costs that can be attributed to origin labelling will be limited to internal systems for the provision of information on labels.

The difference in the administrative cost for providing origin information under Option 1 (place of birth, rearing and slaughter) and Option 2 (place of rearing and place of slaughter) will be negligible.

4.2.4.2 Other minor meats

The administrative burden for food business operators involved with rabbit meat, farmed game, large wild game and small wild game is expected to be low as these companies generally already have traceability and IT systems in place.

The difference in the administrative cost for providing origin information under Option 1 (place of birth, rearing and slaughter), Option 2 (place of rearing and place of slaughter) and Option 3 (place of hunting of wild game) is also expected to be low.

4.3 Trade impacts

4.3.1 Horse meat

For the purposes of origin labelling there are two categories of horse meat:

- that produced from specialist horse meat producers, and;
- that obtained from animals that were previously used for other purposes (such as leisure or sport) providing that they meet the necessary veterinary requirements.

Although it has not been possible to distinguish the numbers of horses slaughtered for human consumption from each category, the study research has established that much of the horse meat imported from outside the EU appears to come from specialist producers.

Some food business operators have indicated that they source only horse meat from specialist producers in order to be able to guarantee traceability and country of origin. Retail research in Belgium, France and the Netherlands confirmed that most pre-packed horse meat found in retail outlets was labelled with the country (or countries) of birth, rearing and slaughter; as well as the country of processing.

Stakeholders consulted during the study did not expect that mandatory origin labelling would stimulate consumption of horse meat consumption in the EU, although it would provide reassurance to consumers.

Possible trade effects from mandatory origin labelling are:

- fall in demand for existing horses without origin records (e.g. some horses previously used for other purposes but approved for human consumption). It will not be feasible to provide origin information for existing horses and they will be sold through other outlets where origin information is not required (restaurants, unpacked meat, catering, further processing) ;
- preference and increased demand for horse meat from specialist producers where full origin information is available (including imported horses);
- possible shortening of the supply chain as retailers seek greater control over their suppliers.

4.3.2 Minor meats other than horse meat

Generally minor trade impacts are anticipated for minor meats other than horse meat. Expected cost increases are low to medium and major changes to supply chains are not expected.

Large game meat is widely traded and origin labelling can be expected to result in some increase demand for home country production with corresponding falls in demand for intra-EU and international supplies. Impacts may be limited however as most large game meat is wild rather than farmed and it may not be easy to increase production or off-take from wild herds. Seasonal effects also mean that domestic production may not be in direct competition with imports.

Businesses will incur some extra costs in providing origin information, some of which will be passed onto producers and therefore result in decreased demand.

4.4 Administrative costs and burden for Member State Competent Authorities

This section has been drafted on the basis of evidence collected by Agra CEAS Consulting in a consultation of Member State Competent Authorities carried out as part of the present and other studies on food origin labelling conducted for the European Commission in 2013 and 2014³⁴.

At the level of Member State Competent Authorities, the aim has been to establish the cost implications from the introduction of new origin labelling rules on a mandatory basis for enforcement authorities. In accordance with the European Commission guidelines³⁵, the assessment of administrative burden distinguishes between administrative burden and the substantive compliance costs which are incurred by the implementation of the legislation as such (i.e. the cost of controls):

³⁴ Including the 2014 DG SANCO study on the application of rules on mandatory country of origin labelling or place of provenance of unprocessed foods, single ingredient products and ingredients that represent more than 50% of a food, conducted by the Food Chain Evaluation Consortium (FCEC) and led by Agra CEAS Consulting. In addition, evidence has been supplemented with and checked against the conclusions of the similar consultations with MS Competent Authorities conducted in 2013 by Agra CEAS Consulting (FCEC) for the DG SANCO study on the mandatory indication of origin or place of provenance of meat used as an ingredient.

³⁵ EU Commission's Impact Assessment Guidelines (European Commission, 2009):

http://ec.europa.eu/governance/impact/commission_guidelines/commission_guidelines_en.htm

- The term 'administrative burden' refers to the costs of the information collection and reporting obligations, such as the obligations to notify, to submit a report, to register, to label etc. Information obligations that may arise from the new origin labelling rules have implications in terms of staff time needed, the qualification of staff needed, staff unit costs, all of which contribute to the costs of tasks to be delivered.
- The term 'compliance costs' refers to the costs of operational obligations, such as import inspections or inspections at places of production and the implementation of labelling rules. These refer to additional controls that may need to be carried out by enforcement authorities compared to the current average levels of controls/costs in Member State. It is noted that costs borne by the enforcement authorities may be transferred to stakeholders through fees charged.

In terms of **administrative burden**, the consultation with Member State Competent Authorities has indicated that the main impacts are expected for the familiarisation with the information obligations/training and data inputs/record keeping related to inspections and audits (verification checks). In terms of the Options, it was noted that the higher the level of detail of the information to be provided, the more significant impacts are expected, although it has not been possible to quantify this. It is noted that it has been difficult for Member State Competent Authorities to distinguish the costs of staff time associated to these actions, from the more general costs of staff time associated to the inspections; therefore, the discussion on additional control costs provided below include administrative burden.

In terms of **compliance costs**, the following two observations of key relevance to calculating these costs which were made by Member State Competent Authorities in the previous studies on origin labelling remain valid, based on the updated evidence collected:

- a. Status quo (baseline):** currently, the controls carried out to verify the compliance of operators to the provisions of the EU food labelling rules form part of the wider national inspection plans of verification controls targeted at food business operators. These plans are: generally drawn on an annual basis; risk-based (targeting specific products/sectors and food business operators, on the basis of regularly updated risk assessments); and, extend over the entire food safety and hygiene policy area for which enforcement controls are performed by the Competent Authority. In this context, it has been very difficult for the Member State Competent Authorities to separate the time currently spent, if any, in verifying origin labelling claims during these inspections, from the time spent on other items covered during the inspection visit. In view of the anticipated difficulties, Member State Competent Authorities have been asked to identify as a proxy the additional time spent and costs of controls stemming from the introduction of other comparable rules (e.g. mandatory origin labelling for beef), but this has proven equally difficult in most cases.

The horse meat scandal has had implications for Competent Authorities in terms of increased surveillance and controls. However these controls are for reasons of traceability, food safety and preventing fraud, and not to establish/verify origin labelling (which currently is not a mandatory requirement for minor meats).

- b. New rules:** as a general principle, Member State Competent Authorities noted that the higher the level of precision of the declaration on the origin of the foods/ingredient/s, the higher the control costs involved to enforce the new rules. It was also noted that, generally, an increase of controls and administrative burden is expected upfront, i.e. immediately after the introduction of the new rules, but after the first implementation period, costs might somewhat be reduced once:

- i. The traceability system of food business operators has been put in place or adapted to the new rules;
- ii. The required databases at the level of the control authorities for monitoring traceability have been set up or adapted to the new rules; and,
- iii. Official inspectors are becoming more familiar with the new rules.

Although the above difficulties inhibit the estimation of costs likely to be borne by Member State Competent Authorities, the general observation drawn from nearly all Member State Competent Authorities that commented on the administrative costs and burden (18 Member States) is that an increase in control costs in terms mainly of the required increase in staff/staff time, is expected in all cases.

In principle, the greater the level of detail required by the origin labelling rules, the higher the increase in the control costs. This implies that Option 1 will have a greater impact than Option 2. The increase in control costs is due to the increase in the volume/complexity of the documentation that requires verification to establish the origin of the products.

It is noted that the increase in control costs is mainly in terms of the number of staff needed. This increase in staff will be necessary to allow the required increase in the time needed for controls if mandatory origin labelling is included in the list of legal provisions that are checked during current inspection visits.

This cost will be mitigated by the existing traceability systems in place as highlighted in bullet point i. above. In this context, the presence of mandatory traceability information and electronic record-keeping at the level of food business operators are important factors to take into account. It implies that some origin information is readily available at least in the primary steps of the supply chain and this could mitigate costs to the extent that this information is transferred further down the supply chain.

A report from the Commission to the European Parliament and Council regarding the mandatory indication of country of origin or place of provenance for meat used as an ingredient³⁶ (meat of all species) has established that existing traceability systems in the EU are not adequate to pass origin information along the food chain. Consequently “cumulative traceability for origin determination purposes” is not currently required at EU level. Any requirement for mandatory origin labelling will therefore enable cumulative traceability along the relevant supply chain, which will have the additional benefit of readily demonstrating traceability to competent authorities; and possibly reducing the time spent monitoring traceability systems for other purposes.

However, as demonstrated elsewhere in this report, many of the minor meat supply chains are relatively short and mainly serving domestic consumption in the producing countries. Traceability may therefore be a lesser constraint for most of the minor meats, except in the case of horses.

Some data on the additional costs of controls were provided during the 2013 Member State Competent Authority consultation in the context of the FCEC study on the mandatory origin labelling of meat as an ingredient³⁷. Most Member State Competent Authorities that had provided some quantitative estimate of the scale of the anticipated additional costs in that study, had indicated that they expect, in principle, a 10-30 % increase in control costs in terms of verification checks carried

³⁶ European Commission, COM(2013) 755 final

³⁷ FCEC, 2013. 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. Brussels, 10 July 2013.

out at food business operator point, including administrative burden (for options which can broadly be considered equivalent to Options 1 and 2)³⁸.

The additional costs of controls for the minor meats supply chains, may be lower than these previous estimates of costs in the case of meat products as shorter supply chains and limited trade/production volumes are generally expected to be involved in the case of unprocessed minor meats (with the exception of horse meat, for which trade is more significant).

³⁸ The options covered in the FCEC 2013 study were similar but not exactly the same as those covered in the present study.

5 CONCLUSIONS AND RECOMMENDATIONS

5.1 Conclusions

The minor meats were divided into three main categories for the purposes of investigating the possibilities for mandatory origin labelling in the EU. The categories were horse meat, rabbit meat and game meat.

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

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

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

The study findings indicate that there are considerable differences between Member States for all indicators of the 'need' for EU consumers to be informed on the origin of minor meats (in terms of interest, understanding/awareness, willingness to pay, and the extent of voluntary origin labelling).

There are a number of other factors concerning the minor meats that may affect the level of interest in origin information, as follows:

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

5.1.2 Feasibility and costs and benefits of providing mandatory origin labelling

Option 1 – Places of birth, rearing and slaughter

Horse meat

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

In contrast, voluntary systems are already in place for many horses that are reared specifically for meat production. Such systems provide full information on a horse's place of birth, rearing and slaughter. Such voluntary systems are used by dedicated horse meat producers exporting to the EU

from North and South America, as well as by dedicated horse meat producers in several EU Member States.

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

Rabbit meat

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

Farmed game meat

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

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

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

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

Option 2 – Places of rearing and slaughter

Horse meat

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

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

Rabbit meat and farmed game

In the majority of cases rabbits and farmed game for meat production are born and reared in the same country. There is little intra-EU live animal trade for the minor meat species and traceability systems are widely in place.

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

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

Option 3 – Place of hunting of wild game

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

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

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

5.2 Recommendations

1. It is recommended to introduce mandatory country of origin labelling for unprocessed pre-packed minor meats if the cost is within the consumers' range of willingness to pay.
2. Implement mandatory origin labelling to indicate country of birth, country/ies of rearing and country of slaughter in pre-packed unprocessed horse meat. However, labelling rules can only be set up following the strengthening of the current horse identification and traceability system that is being carried out for purposes of food safety and prevention of fraud. A specific period of rearing may have to be defined in order to avoid excessive information on many places of rearing being presented on the label. An interim measure would be necessary for living horses where origin information cannot be provided retrospectively; for example by providing information on locations where a horse has been kept from a specified date. However, it might take many years to achieve full implementation due to the long lives of many existing horses, which currently do not have full origin records.
3. Implement mandatory origin labelling to indicate country of birth, rearing and slaughter in pre-packed unprocessed rabbit meat and farmed game. Consider exemptions for small-scale producers and small quantities sold locally or sold direct to consumers. To indicate only country of rearing and country of slaughter (omitting country of birth) would be equally feasible and would be consistent with Commission Implementing Regulation (EU) No 1337/2013. However this second option offers no cost saving and provides less origin information to the consumer.
4. Implement mandatory origin labelling to indicate country of hunting for pre-packed unprocessed wild game meat. Consider exemptions for small quantities sold locally or sold direct to consumers, particularly when the meat is exempt from official food hygiene controls.