



Statement

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EDA STATEMENT ON FACTS VERSUS MYTHS ON MANDATORY ORIGIN LABELLING

The [Food Information Regulation](#)¹, requires the European Commission to examine the feasibility of mandatory origin labelling for milk and milk used as an ingredient in dairy products and for certain other categories of food.

It requires specifically to verify the need for the consumer to be informed, the feasibility of the introduction of such measures and an analysis of the costs and benefits, including the legal impact on the internal market and the impact on international trade.

This paper illustrates the facts versus the myths in advance of the report due by the European Commission.



› What are the differences and advantages of voluntary versus mandatory origin labelling?

Origin labelling on a voluntary basis is often used as a marketing tool for dairy products. Such labelling is done where appropriate, feasible and easy to prove within the normal systems of controls. Already the Food Information Regulation provides that labelling should not be misleading. A mandatory provision on the origin of the ingredients could be misleading by suggesting that the foodstuff possesses special characteristics when all similar foodstuffs possess such characteristics.

In fact, the basic requirements for milk safety and quality are the same all over Europe without any link to origin. EU rules are applied to both internal and imported foodstuffs (Hygiene Regulations (EC) 852, 853 and 854/2004). As such food safety is guaranteed, and mandatory origin labelling does not add to this. Products that have special characteristics due to origin exist under the Protected Geographical Indications or Protected Designation of Origin Schemes.

Giving the possibility to dairy producers to choose the best quality-price relation for raw materials and dairy ingredients, the manufacturing process and the know-how determine the added value and characteristics of the final products.



› Why not give the consumer a choice?

The choice already exists, although for higher cost products. This is based on a positive business model without burdensome legislation. Mandatory origin labelling would only give information which would be deemed exhaustive by many consumers.

› What does the consumer want?

Consumers want further enhancements in product quality and products that help improving their personal health. Several surveys, including one of BEUC (a European consumer organisation) show that others aspects are more relevant - origin labelling is not important in comparison to factors such as taste, price, convenience, etc. There is a risk of a protectionist attitude in some member states that will potentially reduce consumer's product selection range, without providing any health or safety benefit.

¹ Regulation (EU) No. 1169/2011, see Article 26.5 (b), (c) and 26.7 (linked above)



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› Who will pay the cost of such additional labelling obligation?

Providing mandatory origin labelling will have an added cost, which will depend on the level of precision of the provenance required for the components of the food. These additional costs will have consequences at different levels of the chain, limit the range of ingredients available to the processing industry. At the end, these additional costs will have an impact on the cost of food for consumers, or will reduce the farmer's revenues.

› Why will the approach used for meat not work for dairy?



Each dairy product is different and no dairy product has the exact same composition as the milk leaving the cow. A piece of meat originates from one detectable animal whereas a carton of milk contains milk from several cows from various farms, potentially in different geographical areas, and processed in bulk batches.

Raw milk and dairy ingredients can be either used in the originating member state for producing final consumer products, or further transformed in this member state into another dairy ingredient and then transported to (an)other member state(s). The information to be provided will be very complex and not always feasible. The relevance of such information to the consumer can thus be questioned.

› What are the trade impacts?

An obligatory indication of origin would have an impact on trade for imported products from third countries. A mandatory origin labelling regulation in the EU could result in the discrimination of third countries and reduce flexibility in the choice of ingredients. Also on EU level, mandatory origin labelling will result in the protection of national interests, and as such counteract one of the cornerstones of the EU's internal market: the principle of the free movement of goods.

› Can traceability and food safety be ensured if origin labelling is not feasible?

Assuring traceability and food safety has been mandatory and ensured for years under EU legislation, independent from origin labelling.

› Would mandatory origin labelling help reduce the environmental impact of dairy products?

Origin labelling does not contain any information on the environmental performance of a product. Recent information actually shows that mandatory origin labelling would have a negative impact on the environment due to increased levels of food wastage. For example, the additional cleaning processes which dairy processors would have to carry out on their production lines between milk of different origins would have an adverse effect on the environment. The complexity of many more specific packaging materials also increases costs and reduces the efficient use of resources. Production lines will have to undergo major modifications to meet new labelling requirements, but new milk containers will also have to be placed to keep milk from different origins separated. All this will have an adverse environmental impact.



EDA is currently undertaking a project to develop a joint methodology of the environmental footprint of dairy products, under the heading of the European Commission (the "PEF" = Product Environmental Footprint ²). This then will be able to give methodically approved information on the impact of different stages and processes of the chain on the environment.

² [EDA factsheet on Dairy PEF pilot](#)