



2016

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Position Paper

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EDA Position Statement against mandatory origin labelling

In light of the current discussions in the European Parliament and some member states on the mandatory country of origin labelling for milk and dairy products EDA would like to reiterate its position that only voluntary origin labelling is an option for milk and dairy products.

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Mandatory origin labelling suggests false advantages

- 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.
- The Food Information to Consumers Regulation (EU) No 1169/2011 provides that labelling should not be misleading.
- Mandatory origin labelling could encourage protectionist behaviour of consumer, since it erroneously suggests that foodstuff of different origins have different 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).
- The same applies to traceability which has been mandatory and ensured for years under EU legislation, independent from origin labelling (General Food Lw (EC) 178/2002).
- Traditional products of specific origin characteristics are covered by the EU quality schemes such as Protected Geographical Indications (PGI) or Protected Designation of Origin (PDO).
- The added value and special characteristics of the final products are only due to the manufacturing process and the know-how of the companies. The companies should continue to be free in choosing their raw materials and ingredients. Origin labelling should remain to be a voluntary option [<back to TOP>](#)

Origin labelling is not the key factor for the consumer purchase decision

- In the range of dairy products available to the consumer, products of a specific origin are already offered, although for a higher price. The current wide product range is based on a positive voluntary business model without burdensome mandatory legislation.
- Several surveys, including one of BEUC¹ (a European consumer organisation) show that origin labelling is less important in comparison to factors such as taste, price, convenience, etc. Consumers rather ask for further enhancement in product quality and products improving health. The protectionist attitude of some member states will only lead to a reduced product range without any expected health or safety benefits [<back to TOP>](#)

¹ Where does my food come from ? BEUC Consumer survey on origin labelling on food, January 2013 [link](#)



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Additional labelling obligations will result in higher cost of products impacting producers, consumers and farmers

- Providing mandatory origin labelling will have an added cost, which 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.
- Mandatory origin labelling causes extra costs not only for more processed foods but also for drinking milk and 'lightly processed' products – these extra costs would not be compensated. This might result in lower milk prices for farmers which in the current milk market situation cannot be justified.
- In particular small countries with companies collecting milk across member state borders would be affected [<back to TOP>](#)

Mandatory origin labelling is not feasible for dairy products

- Each dairy product is different and no dairy product has the exact same composition as the milk leaving the cow. 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 [<back to TOP>](#)

Mandatory origin labelling would have a negative impact on international trade as well as on free movement of goods within the EU

- 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 [<back to TOP>](#)



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Mandatory origin labelling would have negative environmental impact

- Recent information shows that mandatory origin labelling would have a negative impact on the environment due to increased levels of food wastage and water and energy usage. 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 [<back to TOP>](#)

The European Commission report³ concludes that voluntary origin labelling is the best option for milk and dairy products

- In 2015 the European Commission prepared a detailed analysis of different options for mandatory origin for milk and milk products and concluded that in spite of a consumers' interest for the origin of milk consumers' overall willingness to pay for this information appears to be modest.
- The Commission report acknowledged that the mandatory origin labelling of milk used as an ingredient in dairy products can result in adverse economic impacts, further traceability requirements and would be burdensome for milk and dairy products.
- EDA position is fully aligned with the conclusions of the Commission's report that voluntary rules for origin labelling are the most feasible option for milk and dairy.
- The European Commission is currently working on the voluntary origin labelling implementing act which aims to harmonise the rules on origin labelling in the EU. [<back to TOP>](#)

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

³ Report from the European Commission to the European Parliament and the Council of 20 May 2015 regarding the mandatory indication of the country of origin or place of provenance for milk, milk used as an ingredient in dairy products and types of meat other than beef, swine, sheep, goat and poultry meat [COM\(2015\) 205 final](#)