

ERPA's POSITION on the European Commission's proposal for delegated and implementing acts:

More ambitious poultry marketing standards for a more sustainable food system



The European Rural Poultry Association (ERPA) fully supports the European Commission's objective of making the food system more sustainable and is convinced that marketing standards for agricultural products are an essential tool to this end.

Marketing standards for [poultry meat](#) and [eggs](#) play a fundamental role for the rural poultry sector as well as for European consumers. In particular, they have allowed for:

- Greater **visibility** of alternative livestock production methods, including extensive production with access to open-air runs, which would not have developed without these standards. ERPA stresses that these farming methods are fully in line with the ambitions of the European Green Deal and the “Farm to Fork” Strategy and can therefore be important pillars of the sustainable **transition of the European food system**.

- The existence of a European **reference** on farming methods for producers, thus ensuring a level playing field and allowing the identification of poultry systems present in Europe as well as a **control** of the reality of farming methods on farms (for meat).
- **Clear and uniform information for consumers in Europe**, with the guarantee of precise definitions of farming methods, without risk of confusion.

In other words, ERPA points out that the development of alternative poultry production over the past 30 years has been mainly due to the current marketing standards. For this reason, ERPA supports the establishment of more ambitious rules in the ongoing EU revision of marketing standards for poultry.

MAINTAINING MARKETING STANDARDS TO PROMOTE RURAL POULTRY AND PROTECT CONSUMERS

Marketing standards are of great importance to the rural poultry sector. They have made it possible for this quality production to become better known to consumers and to find a place on the market.

More specifically, as rural poultry products are 1.5 to 3 times more expensive, these standards are necessary to make consumers aware of the specificities of this production, and thus understand a higher price level. In addition, they offer guarantees to consumers regarding the quality of the products they buy. **Therefore, ERPA calls for the maintenance of the current rules on farming methods.**

- **Maintenance in their entirety of all the rules and definitions relating to the indication of the different farming methods¹ for both poultry meat and eggs**

ERPA is strongly opposed to the deletion of the exclusive use of farming methods as proposed by the European Commission in its draft delegated act for poultry meat. Indeed, such a deletion would mean that operators could now write whatever they want on their products without any controls being carried out. This would create a jungle of labels, resulting in:

- A dilution of virtuous farming methods;
- A threat to the sustainability of the alternative sector;
- Consumer confusion and increased risk of deception.

On the contrary, ERPA strongly calls for maintaining the current rules with the system of voluntary labelling of farming methods. The rules and definitions for these farming systems

¹ These are: "fed with ... % of ..."; "extensive indoor"; "free range"; "traditional free range"; "free range – total freedom."

should not be changed, or only slightly, to better reflect the reality of the production. For example, ERPA opposes the reduction of the open-air runs surface or the increase of stocking densities but proposes a marginal change in the density of young birds to allow for better sustainability.

For eggs, ERPA supports the European Commission's proposal to maintain the compulsory labelling system with the code from 0 to 3 and the criteria that apply to each farming method. This provides clear segmentation and good information to consumers.



- **Maintaining the control obligation of farming methods for poultry meat, with defined frequencies**

ERPA supports the draft implementing act which maintains the obligation of specific and independent controls of all stages of production, with a frequency, in case of use of optional indications of farming methods. These controls are necessary, useful and important to verify the correct application of the Regulation and to give confidence to consumers. **However, ERPA is opposed to the total absence of controls for the new indications that could appear if the exclusive use of farming methods was abolished.** This would mean that an operator could use any terms, without authorisation from the European authorities, without European rules and definitions, and without controls, which would create unacceptable unfair competition among European operators and a significant risk of consumer deception.

- **Maintaining the possibility to define additional national rules to specify farming methods for poultry meat**

ERPA opposes the deletion of article 11 paragraph 3 of regulation 543/2008, which allows some countries to define in their legislation additional national rules concerning the indication of farming methods (e.g. in France, link to the official quality signs). This allows for greater use and protection of farming methods, adapted to each country. It is important to preserve this

possibility in order not to jeopardise the productions which have been developed on this basis and which could then no longer exist.

STRENGTHENING THE LEGISLATION ON MARKETING STANDARDS FOR AGRICULTURAL PRODUCTS TO ACHIEVE EU'S SUSTAINABILITY AMBITIONS

- **Marketing standards as an essential tool for consumer protection and information**
 - ✓ **Addition of an annual control for all alternative farming methods for eggs (codes 1 and 2) to verify the correct application of the criteria established in the marketing standards**



ERPA calls for the new draft delegated act on eggs to require, as with the [organic farming regulation](#) and the marketing standards for poultry meat, an annual control of farms to verify the correct application of the criteria for all alternative farming systems: free-range eggs and barn eggs (codes 1 and 2)². These controls should include verification of daily and not occasional use of open-air runs for free-range laying hens.

It is important to add this requirement in the future text of the marketing standards, and not to refer it to the regulation on official controls with a simple risk analysis which would prevent a good homogeneity of application between Member States.

- ✓ **Addition of marking of eggs on the farm, or at the first packing centre if the Member State allows it**

The risk of fraud is very high in some Member States concerning the indication of the code on the egg shell. In order to ensure full traceability, **ERPA welcomes the European Commission's proposal to impose the marking of eggs on the farm** or at the first packing centre if the Member State allows it and thus, in compliance with the traceability conditions set by the authorities.

- ✓ **Removal of the 16-week limit**

ERPA supports the removal of the 16-week limit as proposed by the European Commission. When confinement measures will be imposed on the basis of the EU legislation, for example to fight avian influenza outbreaks, this will allow eggs to continue to be marketed as free-

² The control of organic production (code 0) is already defined in the organic farming regulation.

range eggs notwithstanding confinement measures and henceforth without a time limit. This is important for the breeders concerned since, on the one hand, their production very often provides additional guarantees to consumers and, on the other hand, they have made significant investments in free-range systems. Consequently, they cannot bear the changes in the code and therefore, in their income because of a sanitary situation they are not responsible for.

- **Marketing standards as an essential tool for a more environmentally friendly European food system**
 - ✓ **Authorisation of solar panels on outdoor runs for laying hens**

ERPA supports the European Commission's proposal to allow solar panels on free-range areas for laying hens, as it is already the case for broilers, within a reasonable proportion. By reasonable proportion, ERPA means that the poultry activity must remain predominant over the energy production. In order to avoid any risk of drift, ERPA is in favour of establishing a maximum percentage of the free-range surface that could be used for energy production. The idea of this initiative would be both to give to breeders a sustainable additional source of income and to allow them to contribute to the production of sustainable energy in Europe. Furthermore, solar panels do not have the same advantages as trees that provide shade for animals. ERPA considers that the majority of the land should remain grassy and wooded.

The problem of greenwashing

Although ERPA advocates the possibility for farmers to install solar panels on their free-range areas, the sector is opposed to a statement on the front of the packaging such as "*environmental poultry*". The sector considers that such indications would be greenwashing insofar as the introduction of solar panels, whether on outdoor runs or on farm buildings, cannot alone justify the sustainability of a production. Such claims would mislead consumers and slow down the change of consumption habits towards truly sustainable products.

- ✓ **For 'traditional free-range' and 'free-range' poultry for meat production, authorisation of a common building for young animals up to 4 weeks**

The current marketing standards for poultry meat provide for the use of the terms 'free-range' and 'traditional free-range' with maximum indoor densities and stocking levels. **ERPA calls for a change in these standards for the start-up period of young poultry, which lasts up to 4 weeks**. This period is very gas intensive in order to maintain an optimal temperature for the young birds growing inside the buildings. With the objective of saving this source of energy and improving the sustainability of this production, ERPA requests to have the possibility to

double-start 2 batches of poultry in one building. This means to double the number of birds and the density in number of birds up to a maximum of 4 weeks in one building, while the other building on the same farm will be empty and will house half of the batch after a maximum period of 4 weeks. This is a common practice in other farming systems, especially in organic production, and does not affect the welfare of the animals since birds are young and the stocking rate in kg/m² is respected³.

For this part, ERPA proposes written amendments to the regulation: see annex.

- ✓ **For “free-range” eggs, maintenance of prior authorisation for grazing by the Member State**

For free-range eggs, ERPA opposes the European Commission's proposed deletion of the requirement for the prior authorisation for grazing by the Member State. The rural poultry sector calls for the maintenance of the provision of the current 2008 Regulation which lays down that the open-air runs accessible to the hens must be mostly covered with vegetation and cannot be used for other purposes, except for grazing, provided that this is authorised by the competent authorities. Maintaining such a provision would allow Member States who wish to do so, to keep prohibiting grazing, which is important for sanitary reasons.



³ Example: the 25 kg/m² is respected since the 6-week-old chickens weigh 0.6 kg (0.6 * 24 = 14.4 kg/m²).

As an actor committed to economic sustainability in rural areas, local quality products, environment, animal health and welfare, ERPA strongly believes that marketing standards are a vital tool for the maintenance and development of alternative poultry production. The European rural poultry sector therefore calls on the European authorities to maintain and even raise the level of ambition of the current marketing standards so that they fully meet the objective set by the “Farm to Fork” Strategy: "making the food system more efficient and sustainable".



Created in 2007, ERPA aims notably at preserving and developing the production of rural poultry in Europe (colored birds from rustic slow-growing strains) and at promoting its specificities as well as at defending free range, extensive, and family-based methods of farming. Further information is available on: <https://erpa-ruralpoultry.wixsite.com/erpa-en>