Position Paper on Digital Labelling

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Feed and Food

copa cogeca
european farmers european agri-cooperatives

Introduction

The COVID-19 pandemic brought about major shifts in the role, perception, and use of digitalisation for the provision of food information to consumers, thereby accelerating pre-existing trends. During this period, QR or barcodes that redirect the user to online sources where the information of the label is stored were widely used for accessing services in the public and private domains and especially in the HoReCa sector. As a result, the number of industries accessed digitally rose from 81% to 95% in 2020, whereas the gap in between individual countries fell by 32%. In 2023, 4 out of 5 EU citizens possessed a smartphone[1]. It is estimated that by 2028, 85% of the EU population will possess a smartphone[2].

The wine and spirit sectors are the frontrunners in providing information to consumers digitally[3]. The opportunity offered by digital tools was acknowledged by Regulation (EU) No 2021/2117 which gives the option to wine producers to limit the contents of the nutrition declaration on the package, or on a label attached to it, to only the energy value. It also offers the opportunity of making the full nutrition declaration and the list of ingredients available by electronic means. In the same vein, the recently agreed regulation for digital labelling of EU fertilising products encourages the wider use of digital labelling while including measures to provide physical labels when they are most needed. Similar initiatives exist in the feed sector and at the national level. Most notably, the implementing act on veterinary medicines establishes a list of abbreviations and pictograms to be used in labelling.

With the requirements for mandatory and voluntary labelling increasing and available space for on-label communication diminishing, more sectors are exploring the potential to use digital tools to provide information to consumers and other customers.

1 This development alludes to an improvement of digital literacy among social groups and ages.
2 https://www.statista.com/topics/3341/smartphone-market-in-europe/
3 Under Regulation (EU) No 1169/2011, alcoholic beverages with alcohol strength above 1.2% are exempted from providing a list of ingredients and nutrition declaration.

Benefits of digital labelling for food and feed

At present, off-label (digital) tools are an option used by producers to provide information, inter alia, on the origin of certain foods, the manufacturing process, and the sustainability practices employed for their production. Often, they may direct to audio and video sources or to interactive and personalised content. The use of digital solutions for food information provision presents the following advantages:

- For some categories of consumers, QR or barcodes may be **more convenient** than print labels whose **readability** can prove challenging (i.e., visually impaired people or those for whom the font on labels may be too small).
- They ensure that consumers can access the information in their **own language** irrespective of their location, thereby empowering them to comprehend complex information and make informed choices.
- Digital technologies substantially **minimise the cost of labelling** and offer flexibility and adaptability (easier to update content and respond to emergency situations). In particular, they reduce the operational burden on small producers related to communication and translation requirements.
- Digital tools allow for product information to be put into a **broader context** (information on the supply chain, steps, and story) and/or personalised.
- By reducing the use of paper for printed labels, especially when back-of-the pack labels do not exist, they contribute to sustainability goals (**reduction of packaging waste**).

Policy proposals

Off-label communication represents a forward-looking means for providing information to consumers and other customers. Not only does it exploit the opportunities offered by new technologies to provide relevant information, but it also reflects the consumption behaviour trends of the past two decades exacerbated by the COVID-19 pandemic (increased literacy acceptance and use).

In light of this, **Copa-Cogeca believes that digital labelling is a complementary means for providing voluntary product information for foodstuffs** and underlines the following:

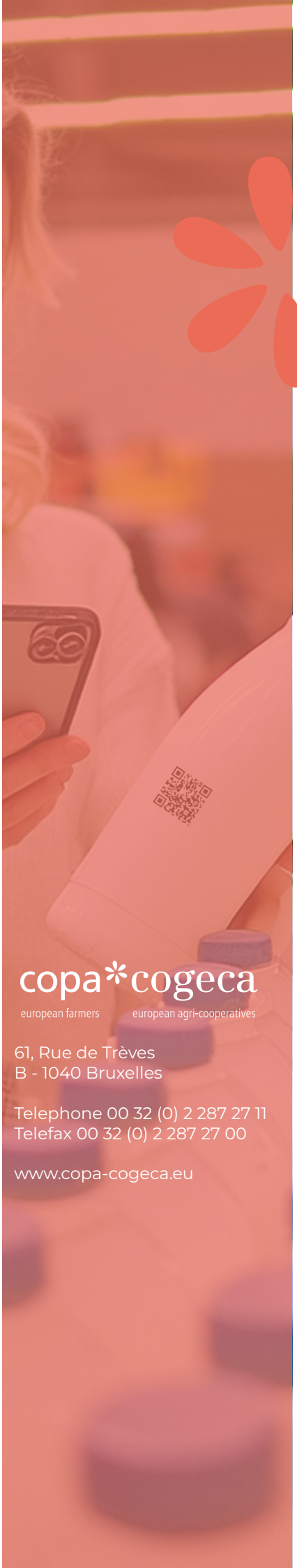
- Producers must be able to decide whether or not to communicate voluntary information on-label or off-label;
- Regardless of the place of communication (on-label or off-label), the list of substances causing allergies or intolerances should be communicated on-label;
- Be it on-label or off-label, it should be possible for certain pieces of information to be provided via internationally recognised pictograms.
- Producers should ensure that digital labels are searchable, accessible, free of charge and capable of meeting the needs of all consumers and especially of vulnerable groups.

Governed by a B2B relationship, feedingstuffs should be allowed to use digital means in a complimentary manner for providing both mandatory and voluntary information.

- Farmers who wish to do so, should be able to access mandatory information for the use of feed also digitally (in addition to the physical label), whereas voluntary information could be provided only digitally. This will allow farmers to easily retrieve, use and store the data when wishing to adjust their feeding plan.

Conclusion

Amid increasing labelling requirements for food products, be they mandatory or voluntary, and diminishing space, digital technologies offer opportunities for providing access to information as well as for contextualising it. They make sure that the information on the products purchased is clear, readable, and consumer-friendly, while reducing costs for operators. The use of such digital tools is readily available and increasingly used by producers and consumers of food and drink products, as well as by farmers when it comes to feed. In order to further develop this approach and ensure that consumers and other customers are provided with truthful, accurate and reliable information, it is necessary that the European Commission puts forwards policy guidance for national authorities and operators to ensure harmonisation, coherence, and transparency in the provision of off-label information. In parallel with the development of digital labelling, it is important that efforts are made with a view to increasing telephone and internet signal coverage, in particular in remote rural areas, as well as digital literacy among EU citizens,



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Copa and Cogeca are the united voice of farmers and agri-cooperatives in the EU.

Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 22 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives. They have 66 member organisations from the EU member states.