

Humane World for Animals™

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Humane Society International

2026

Hidden Eggs:

Closing the farming method transparency gap in processed foods

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An assessment of egg production system disclosure on processed food packaging across eight EU countries

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Executive summary

The Hidden Eggs transparency gap

The European Union requires the farming method to be indicated for shell eggs sold directly to consumers, allowing consumers to distinguish between organic, free-range, barn and caged production systems.[1,2,3] However, no equivalent requirement applies when eggs are used as ingredients in processed foods. This regulatory gap means that information routinely available when purchasing shell eggs is not necessarily provided on labelling when eggs are incorporated into products, such as mayonnaise, dried egg pasta and biscuits. This is the **Hidden Eggs transparency gap.**

Closing this gap matters because egg production systems directly affect hen welfare. Approximately 399.8 million hens in the EU are kept for egg production, around 35.5% of which are still confined to cages.[4] Enriched cages restrict movement and prevent hens from expressing important behaviour, such as nesting, foraging, dust bathing and perching. In contrast, cage-free systems generally provide greater freedom of movement and allow hens to engage in more natural behaviour.

Cage-free welfare systems give hens freedom of movement for natural behaviour.

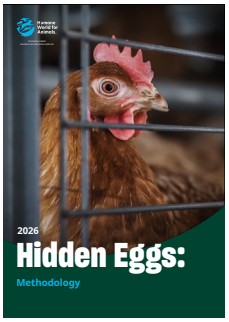


Public expectations support greater transparency. Across the EU, 91% of citizens consider it important to protect the welfare of farmed animals,[5] 72% believe packaging of animal products should disclose the production system used,[6] and 60% look for animal-friendly production labels when purchasing food.[7]

What the Hidden Eggs research found

Data were collected between November 2025 and February 2026. The assessment examined 476 processed food products, including mayonnaise, dried egg pasta and biscuits, from 99 food manufacturers across eight EU countries: Austria, France, Germany, Italy, the Netherlands, Poland, Romania and Spain. It assessed whether egg production systems were being disclosed on product packaging and, where relevant, online product listings, focusing on cage-free transparency, rather than actual sourcing practices.

To assess transparency consistently, products were grouped into 278 market contexts. Each market context represented a food manufacturer's presence within a specific country, product category and sales channel. Because some market contexts contained more than one disclosure outcome, the analysis included 304 disclosure data points. The "cage-free transparency index" measures the share of these data points that communicated free-range or barn egg production, rather than the share of individual products carrying a cage-free claim. Transparency index scores were grouped into ten bands ranging from ● **Band 1: Minimal transparency** to ● **Band 10: Excellent transparency**. Calculation details are provided in the accompanying methodology document.



The combined sample achieved a **cage-free transparency index of 54**, placing it in the report's ● **Band 6: Moderate transparency** category. This means that cage-free egg production systems were disclosed in just over half of the disclosure data points assessed, while production system information remained absent in many market contexts.

None of the products assessed explicitly disclosed that they contained eggs from hens confined in caged systems. Where no production system was communicated, the research could not determine whether eggs originated from cage-free or caged systems. Consumers and wholesale buyers therefore frequently lack the information they need to verify how eggs used as ingredients were produced.

The cage-free transparency gap at a glance

Overall sample

Cage-free production systems were communicated in just over half of the disclosure data points assessed.

	Moderate transparency	54

Product categories

Transparency varied substantially between product categories, with the highest transparency for mayonnaise and the lowest for biscuits.

Mayonnaise	High transparency	72
Egg pasta	Moderate transparency	56
Biscuits	Limited transparency	36

Sales channels

Cage-free egg production systems were communicated less often in wholesale than in retail market contexts.

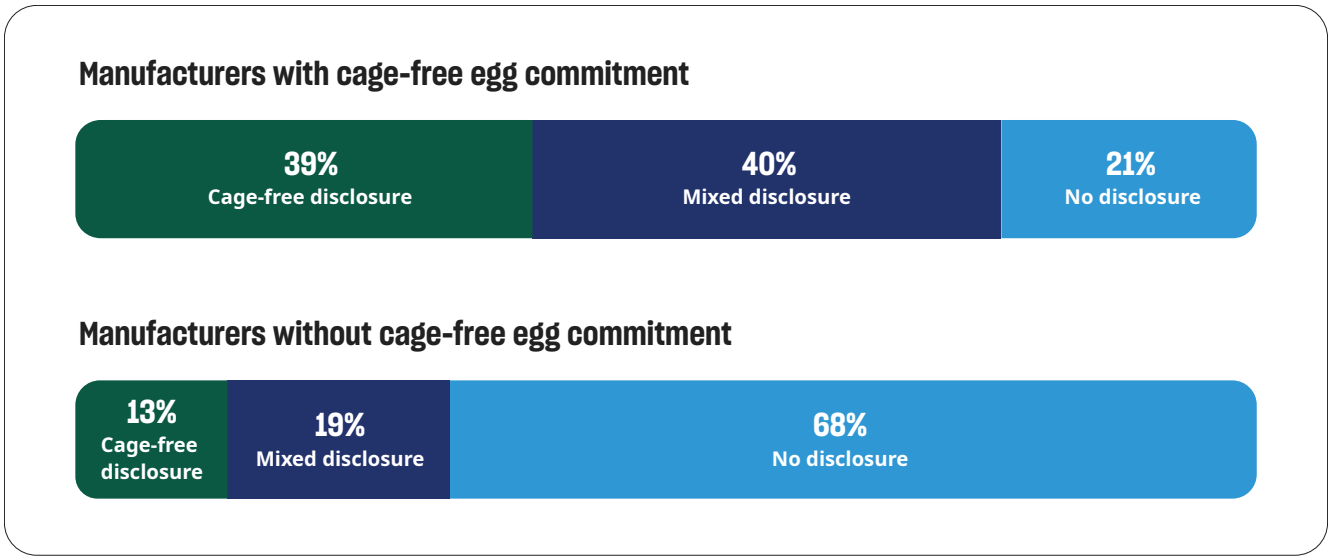
Grocery retail	Good transparency	64
Wholesale	Limited transparency	36

Transparency is achievable, but inconsistent

The findings reveal that disclosure is already being implemented across parts of the food industry. For example, food manufacturer Kraft Heinz and private-label brands from the Dutch retailers Plus and Jumbo consistently communicate cage-free sourcing across products, markets and sales channels. This demonstrates that transparent communication is both practical and achievable.

However, disclosure remains uneven. Disclosure varies depending on the country of sale, product category, sales channel and manufacturer. Even food manufacturers with public cage-free commitments frequently apply disclosure inconsistently. Among committed manufacturers, mixed disclosure was more common than consistent disclosure. The result is a patchwork of transparency rather than a common market standard.

Disclosure profile by cage-free egg commitment for mayonnaise, dried egg pasta and biscuits manufacturers



Food manufacturers were classified as having consistent cage-free disclosure, mixed disclosure or no disclosure based on the products assessed. Percentages represent the share of manufacturers within each commitment group that fell into each disclosure profile.

The research also shows that disclosure is not always easy to find. Egg production systems may appear in ingredient lists, product names, front-of-pack claims, certification labels or elsewhere on packaging. As a result, transparency not only depends on whether this information is provided, but also on how visible and accessible it is to consumers and wholesale buyers.

Policy recommendation

Close the regulatory gap by extending the EU's farming method labelling framework for shell eggs to include eggs used as ingredients in processed foods.

The findings indicate that voluntary disclosure does not provide a consistent transparency standard across the processed food industry. Extending the existing EU farming method labelling framework to ingredient eggs would provide comparable information for shell eggs and ingredient eggs, support informed purchasing decisions and help to close the Hidden Eggs transparency gap. Moreover, it could also help create more consistent market recognition for producers investing in higher welfare systems and complement broader efforts to transition to cage-free egg production systems.



Why egg production systems matter for hens

Nearly 400 million hens are used for egg production in the European Union

Approximately 399.8 million hens are kept in the EU for egg production, around 35.5% of which are still confined to cages.[8] The welfare of these hens is strongly shaped by the production systems in which they are kept. While some countries have moved away from caged confinement systems, the use of enriched cages remains legal in much of the EU and continues to restrict hens' ability to move freely and express their natural behaviours.

Enriched cages fail hens

Hens have complex behavioural needs, including nesting, foraging, dust bathing, perching and wing-flapping. When housing systems prevent hens from expressing these behavioural patterns, their welfare is compromised.

Enriched cages severely restrict movement because each bird has very limited space, preventing key activities, such as running, flying and fully stretching their wings. This has negative consequences for the birds' skeletal strength and physical health.

Cage-free production systems, including free-range and barn systems, generally provide more space and freedom of movement, allowing hens to express more natural behaviour. While cage-free systems are not without challenges, they significantly improve hen welfare because they allow the birds to engage in behavioural patterns that matter to them.

Given that production systems directly affect animal welfare, information about how eggs are produced is relevant to consumers, businesses and policymakers. This has been recognised in EU rules for shell eggs.

SABINA DIETHELM/WE ANIMALS

Cage-free welfare systems give hens freedom of movement for natural behaviour.



GRAPHIC 1: HEN WELFARE NEEDS

Further reading: ***Welfare issues with furnished cages for egg-laying hens***[9]

Hidden Eggs transparency gap

While farming method labelling is mandatory for shell eggs, equivalent information is frequently absent when eggs are used as ingredients in processed foods. This report examines this "Hidden Eggs transparency gap".

Public expectations support greater transparency

EU citizens are firm supporters of farm animal welfare and transparency in food production systems. Data from the Eurobarometer and research conducted by the consumer organisation BEUC suggest that access to information about how eggs are produced is important to consumers across Europe.

91% **of EU citizens consider it important to protect the welfare of farmed animals.**[10]

72% **believe packaging of animal products should disclose the production system.**[11]

60% **look for labels identifying products sourced from animal-friendly farming systems when purchasing food.**[12]

Nearly **1,500 European food companies** have committed to using cage-free eggs, demonstrating growing industry recognition of consumer expectations regarding animal welfare.[13]

The regulatory gap between shell eggs and ingredient eggs



Shell eggs are labelled. Ingredient eggs are not.

The current EU legislation (Council Directive 1999/74/EC) does not prohibit confinement of hens kept for egg production. While conventional battery cages were prohibited from 2012, enriched cages remained legal[14] and continue to be used across parts of the European egg industry. In July 2026, the European Commission announced a targeted revision of animal welfare legislation for laying hens as part of its EU Strategy on Livestock, including a focus on phasing out cages.[15] The first legislative proposals are anticipated by the end of 2026. This signals important progress, but a timeline for phasing out cages as well as the proposals themselves must still be approved by Member States and the European Parliament.

Several Member States have already gone beyond EU requirements by adopting legislation to restrict or prohibit cage systems for domestic egg production. Alongside these regulatory changes, parts of the egg industry have shifted voluntarily towards cage-free production, influenced by company commitments and changing market demand. However, even in countries that have moved away from cage production, eggs from caged hens may still reach consumers through imported shell eggs, egg ingredients and processed food products.

The EU regulatory gap

The European Union already recognises the importance of transparency for consumers. Under EU egg marketing standards, the farming method must be indicated for shell eggs sold directly to consumers, allowing consumers to distinguish between organic, free-range, barn and caged production systems through a numbering system.[16,17,18] The European Commission identifies shell eggs as the only EU-wide compulsory animal welfare labelling scheme currently in place.[19]

However, there is no equivalent requirement for eggs used as ingredients in processed foods. As a result, information that is routinely available when purchasing shell eggs is often not provided when eggs are used in processed foods, such as mayonnaise, dried egg pasta and biscuits. This creates a transparency gap: consumers can identify how shell eggs were produced, but consumers and wholesale buyers frequently cannot do the same for the eggs used in processed foods.

Labelling alone does not end cage confinement, but it does add visibility about different production systems at the point of purchase.



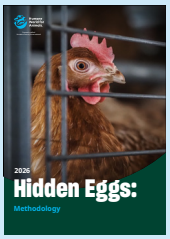
OLIVER STREWE/GETTY IMAGES

Cage-free transparency index

To assess the Hidden Eggs transparency gap, this report uses a cage-free transparency index to measure how transparently the food industry communicates the production systems used for eggs in processed foods. It examines the information available to buyers on food packaging and, where relevant, online product listings. The assessment focuses on disclosure, not sourcing. Where a production system is not disclosed, consumers and wholesale buyers are unable to verify which production system supplied the eggs at the point of sale.

Methodology

Full details of the methodology, calculations, limitations and underlying dataset are available in the document *Hidden Eggs 2026: Methodology*.



Dataset food manufacturers

Detailed lists of the grocery retailers, wholesalers, food manufacturers, brands and private labels assessed are provided in the document *Hidden Eggs 2026: Assessed outlets, food manufacturers and brands*.



The research sample

A total of 476 processed food products from 99 food manufacturers were collected between November 2025 and February 2026 from grocery retail and wholesale markets in Austria, France, Germany, Italy, The Netherlands, Poland, Romania and Spain using non-random convenience sampling. The product categories included in the research were mayonnaise, dried egg pasta and biscuits. Organic products were not included in the research sample.

The products were grouped into 278 market contexts, generating 304 disclosure data points used in the transparency analysis.

For reporting purposes, each product was assigned to an attributed food manufacturer, which may include brand owners, private-label retailers or other companies responsible for the product's market presence.

Products were assessed according to the information on the egg production system available on their packaging or, where relevant, in online product listings. Each product was classified as:

- Disclosing the use of free-range eggs;
- Disclosing the use of barn eggs;
- Not disclosing the egg production system.

These three classifications are referred to as "disclosure outcomes" throughout this report. For the purposes of this research, both free-range and barn systems were considered cage-free. None of the products assessed explicitly disclosed the use of eggs from caged systems.

Key terms

The analysis used four levels of information:

1. **Product:** An individual processed food item whose packaging or online listing was examined.
2. **Market context:** A combination of food manufacturer, country of sale, product category and sales channel. It represents a manufacturer's presence within a specific country, product category and sales channel.
3. **Disclosure data point:** Each distinct disclosure outcome observed within a market context: free-range, barn or no production system disclosure. A disclosure outcome was counted once per market context, even if it appeared on several products.
4. **Cage-free transparency index:** A score from 0-100 measuring the extent to which cage-free egg production systems were disclosed in the market contexts assessed. Higher scores indicate greater cage-free transparency. The index is based on disclosure data points rather than individual products.

To support interpretation of the results, index scores were grouped into ten bands, from minimal to excellent transparency (Table 1).

Band 10	Excellent transparency	90–100
Band 9	Very high transparency	80–89
Band 8	High transparency	70–79
Band 7	Good transparency	60–69
Band 6	Moderate transparency	50–59
Band 5	Emerging transparency	40–49
Band 4	Limited transparency	30–39
Band 3	Low transparency	20–29
Band 2	Very low transparency	10–19
Band 1	Minimal transparency	0–9

TABLE 1: CAGE-FREE TRANSPARENCY INDEX BANDS, DESCRIPTORS AND SCORE RANGES

Why products were grouped into market contexts

This analytical approach was used to assess how consistently production-system information was communicated across the different market situations encountered by consumers and wholesale buyers. Grouping products into market contexts reduced the influence of manufacturers or market situations from which more product variants were collected. Counting each distinct disclosure outcome within a market context once also retained genuine differences in disclosure between products in that context. The cage-free transparency index therefore measures disclosure across assessed combinations of manufacturer, country of sale, product category and sales channel, rather than simply the frequency of cage-free disclosure among individual products.

Example: How products contribute to the cage-free transparency index

Several mayonnaise products from Unilever were assessed in the French grocery retail market. Together, these products formed a single market context: *Unilever, France, mayonnaise, grocery retail.* Within this market context, Hellmann's mayonnaise disclosed the use of free-range eggs, while Amora and Maille mayonnaise did not disclose the egg production system. Given that two different disclosure outcomes were observed within the same market context, two disclosure data points were recorded: one free-range disclosure outcome and one no-disclosure outcome. These disclosure data points contributed to the cage-free transparency index. A complete example, including calculations, is available in the methodology document.

Interpretation of results and study limitations

The findings describe transparency within the selected sample and assess whether cage-free egg production systems were disclosed to buyers, not which production systems were actually used. Where no production system information was disclosed on packaging or online product listings, the research could not determine whether the eggs originated from cage-free or caged systems. Non-disclosure should therefore not be interpreted as evidence of either sourcing practice.

This research used a **non-random convenience sample** of selected mayonnaise, dried egg pasta and biscuit products collected in eight EU countries. The findings describe transparency within the products, manufacturers, countries of sale and sales channels that were assessed and should not be interpreted as a statistically representative estimate of the entire EU processed-food market. The research assessed information available at the point of purchase and did not verify sourcing practices beyond what was communicated on packaging and online product listings.



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Transparency results

In the processed food packaging sampled across eight EU countries, voluntary disclosure did not provide a consistent level of transparency for consumers and wholesale buyers. Transparency varied across markets, product categories, sales channels, food manufacturers and packaging. An overview of the sample can be found in the accompanying methodology document.

The voluntary approach produces uneven transparency

Overall cage-free transparency results

The combined eight-country sample across selected mayonnaise, dried egg pasta and biscuit products sold in Austria, France, Germany, Italy, the Netherlands, Poland, Romania and Spain achieved an overall **cage-free transparency index of 54**, placing it in ● **Band 6: Moderate transparency**.

This means that cage-free egg production systems were disclosed in just over half of the disclosure data points assessed, while production system information remained absent in many market contexts. The index measures the share of disclosure data points that communicate cage-free egg production systems across the market contexts assessed, rather than the share of individual products carrying a cage-free claim.

None of the products assessed explicitly disclosed the use of eggs from caged systems. Where no production system was communicated, the study could not determine from the packaging whether eggs came from cage or cage-free systems. Consumers and wholesale buyers therefore often lack the information needed to verify how eggs used as ingredients were produced.

The sample findings indicate a transparency gap. While many food manufacturers already communicate free-range or barn egg sourcing, disclosure remains voluntary and unevenly applied across the processed food industry.

Transparency varies across the EU internal market

The level of transparency varied substantially across the countries of sale assessed. The Netherlands and Austria achieved the highest cage-free transparency index scores, both falling within ● **Band 8: High transparency**. Italy followed with ● **Band 7: Good transparency**, while Germany and France fell within ● **Band 6: Moderate transparency**, close to the overall sample average. Poland achieved ● **Band 5: Emerging transparency**, while Romania and Spain recorded the lowest scores, falling within ● **Band 4: Limited transparency** and ● **Band 3: Low transparency** respectively.

These results suggest that consumers in the markets assessed have different access to information when purchasing processed foods. Within the sample, communication about egg production systems appeared more common in some markets than in others.

Overall cage-free transparency index of processed food products sold across eight European countries

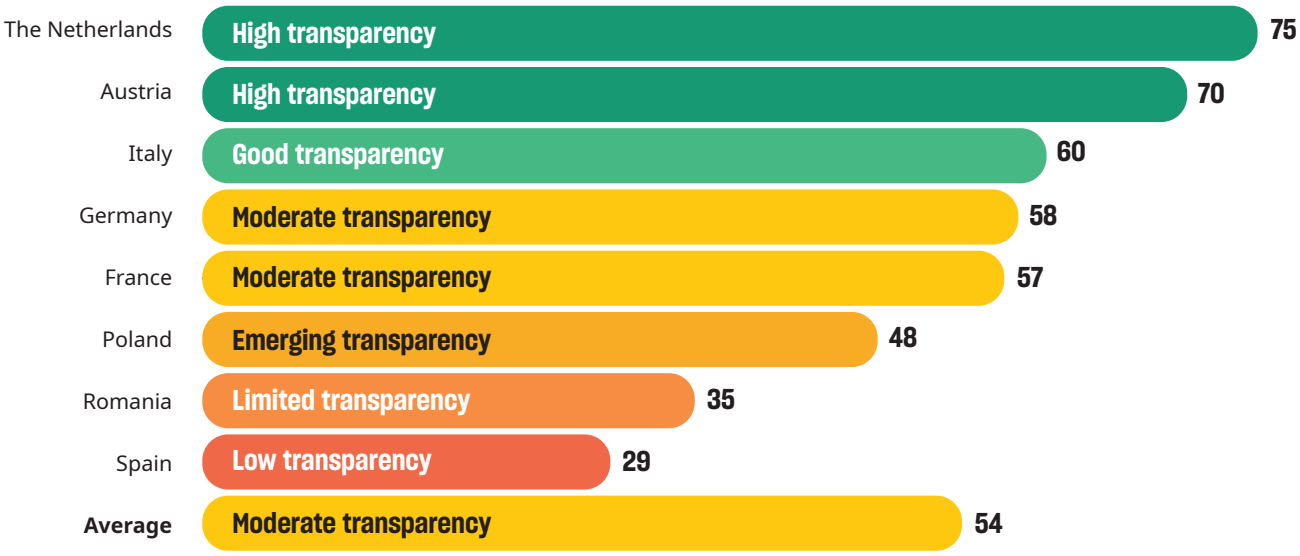

TABLE 2: OVERVIEW OF COUNTRIES BY CAGE-FREE TRANSPARENCY INDEX

Transparency varies by product category

Transparency also differed substantially between product categories. Of the three categories assessed, mayonnaise achieved the highest cage-free transparency index, falling within ● **Band 8: High transparency**. Dried egg pasta achieved ● **Band 6: Moderate transparency**, while biscuits were the least transparent category, falling within ● **Band 4: Limited transparency**.

These findings suggest that transparency is shaped not only by where a product is sold, but also by product-category disclosure norms and food manufacturer practices. Buyers of similar products may therefore receive very different levels of information about egg production systems depending on the product category.

Cage-free transparency index by product category (0-100)

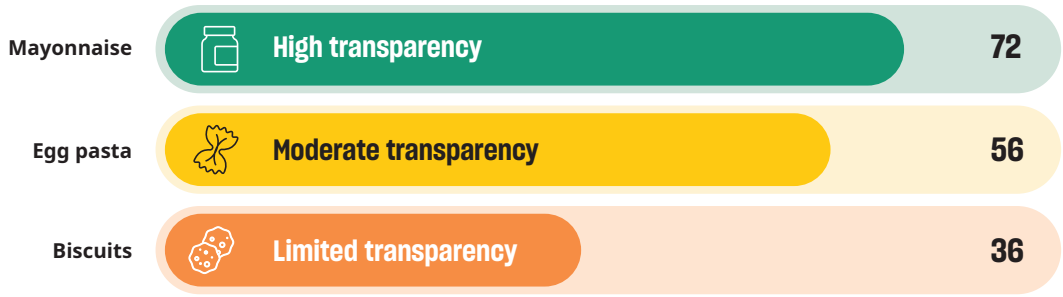

TABLE 3: CAGE-FREE TRANSPARENCY INDEX FOR MAYONNAISE, DRIED EGG PASTA AND BISCUITS

Wholesale buyers receive less information

Products were classified according to the sales channel in which they were identified. In the wholesale channel, mayonnaise was selected in bulk packaging, whereas dried egg pasta and biscuits were generally available in retail-sized packages, sometimes sold together as multipacks. Across the sample of mayonnaise, dried egg pasta and biscuit products, products identified at grocery retail achieved a substantially higher cage-free transparency index than products sold at wholesale markets. Retail market contexts achieved ● **Band 7: Good transparency**, compared with ● **Band 4: Limited transparency** for wholesale market contexts.

Cage-free transparency index for sales channels (0-100)

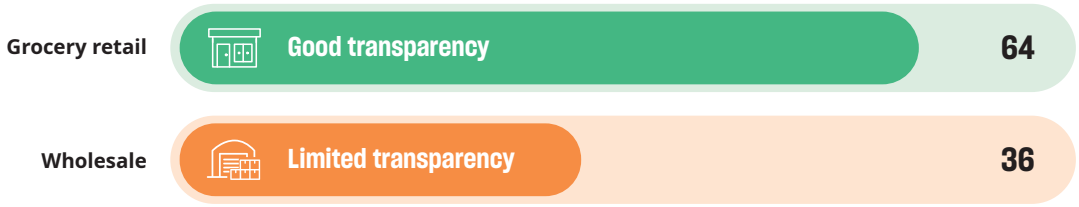

TABLE 4: CAGE-FREE TRANSPARENCY INDEX FOR GROCERY RETAIL AND WHOLESALE CHANNELS

This gap was visible across all three product categories assessed. Within the sample assessed, products sold at grocery retail communicated egg production systems more often than products sold through wholesale channels. As a result, restaurants, hotels, caterers and other food companies purchasing from wholesalers may seek cage-free products to meet customer expectations, but often cannot determine this from the packaging alone.

Case in point: Motyl mayonnaise

A practical example is provided by the Polish mayonnaise brand Motyl.

The grocery-retail version disclosed the use of barn eggs, while the corresponding wholesale 5 kg bulk product did not communicate any egg production system information. This illustrates how buyers purchasing similar products through different sales channels may receive different levels of transparency.

GROCERY RETAIL **Barn eggs**



WHOLESALE **No disclosure**



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Public cage-free commitments are not consistently reflected on packaging

Companies apply disclosure inconsistently

Several of the food manufacturers that were assessed communicated egg production systems on some products while omitting it on others. These differences occurred both within individual brands, and across sub-brands, wider manufacturer portfolios and sales channels.

Several brands showed different disclosure practices across national markets despite being marketed under a single brand identity. For example, Hellmann's mayonnaise products communicated cage-free egg sourcing in most of the markets assessed. However, Hellmann's Gran Mayonesa sold in Spain did not disclose the egg production system, while Hellmann's Real Mayonnaise sold in Austria communicated the use of free-range eggs. This demonstrates how consumers purchasing the same brand in different countries may receive different levels of information about egg sourcing.

SPAIN

Unilever's Hellmann's Gran Mayonesa

No disclosure



AUSTRIA

Unilever's Hellmann's Real Mayonnaise

Free-range eggs



GRAPHIC 2: UNILEVER'S HELLMANN'S INCONSISTENT EGG PRODUCTION SYSTEM DISCLOSURE ACROSS COUNTRIES OF SALE

A similar pattern was observed across product categories. Barilla consistently disclosed barn egg sourcing on dried egg pasta products assessed across multiple countries and sales channels. However, the Barilla biscuit products assessed did not disclose the egg production system.

These findings suggest that transparent communication in one product category does not necessarily translate into consistent disclosure across a food manufacturer's wider portfolio.

DRIED EGG PASTA

Barilla Fettucine Ricce Ruvide

Barn eggs



BISCUITS

Barilla's Mulino Bianco Spicchi di Sole

No disclosure



GRAPHIC 3: BARILLA'S INCONSISTENT EGG PRODUCTION SYSTEM DISCLOSURE ACROSS FOOD CATEGORIES

Taken together, these examples show that voluntary disclosure often remains selective. Transparency therefore remains a patchwork rather than a consistent industry standard.

Public cage-free egg commitments do not ensure consistent disclosure

Of the 99 food manufacturers assessed, 53% (n=52) had a public cage-free commitment covering processed eggs.[a]

Among food manufacturers with a public cage-free commitment, 39% consistently disclosed cage-free sourcing across all products assessed, compared with 13% of manufacturers without a public commitment. However, mixed disclosure was the most common profile among committed manufacturers (40%), indicating that commitments frequently translated into disclosure on some, but not all, products assessed.

Disclosure profile by cage-free egg commitment for mayonnaise, dried egg pasta and biscuits manufacturers

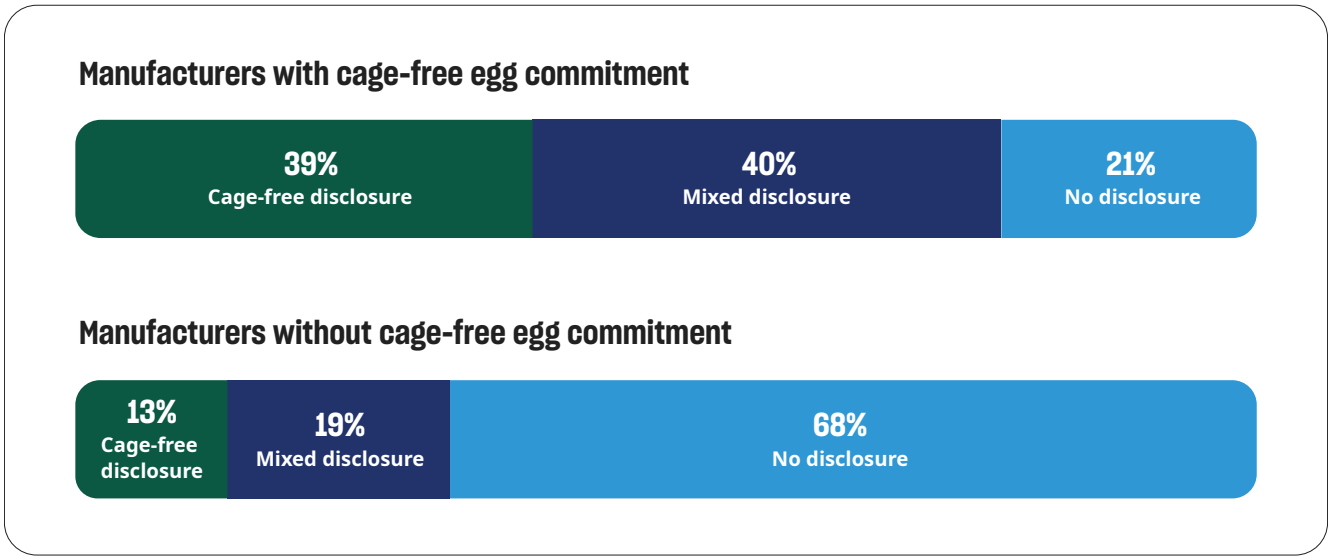


TABLE 5: PERCENTAGE OF MANUFACTURERS BY DISCLOSURE PROFILE AND CAGE-FREE COMMITMENT STATUS (MANUFACTURERS WITH COMMITMENTS, N=52; MANUFACTURERS WITHOUT COMMITMENT, N=47)

Examples ranged from food manufacturers such as Unilever, which disclosed cage-free egg sourcing on many assessed products, to manufacturers such as Mondelēz, where most assessed products did not communicate the egg production system despite a public cage-free commitment.

The findings in the sample assessed suggest that public commitments are associated with higher levels of transparency, but do not ensure that consumers and wholesale buyers consistently receive information about egg sourcing. As a result, voluntary commitments alone do not provide a reliable transparency standard across the processed food industry.

Consistent disclosure is achievable

While inconsistent disclosure remains common, the analysis also identified companies demonstrating that transparent communication is achievable across multiple products, markets and sales channels.

Among the food manufacturers assessed, global brand Kraft Heinz consistently disclosed free-range egg sourcing across its mayonnaise products. Several private-label portfolios, including those of Dutch retailers Jumbo and Plus, also consistently communicated cage-free egg production systems across the products assessed.

These examples show that the challenge is not whether disclosure is possible. Rather, the challenge is that transparent communication remains unevenly applied across the processed food industry.

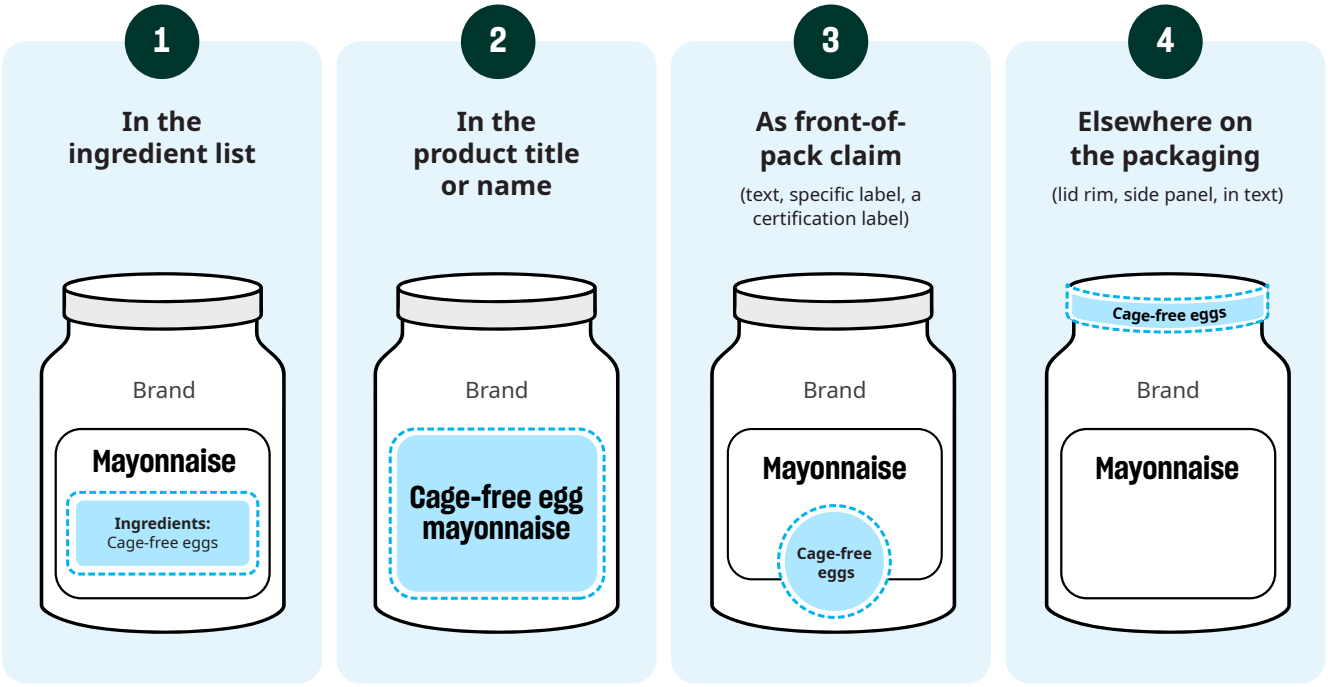
a. Public commitment refers to a publicly available company commitment that explicitly covered processed eggs at the time of assessment. Such commitments may be communicated through company websites, corporate reports, press releases or ChickenWatch.org.

Disclosure is communicated in different ways

Information is communicated through different disclosure approaches

The research sample assessed 183 unique packaging items, observed within market contexts where a cage-free egg production system was disclosed. Food manufacturers communicated this information in a variety of ways on packaging, including ingredient lists, product names, front-of-pack claims, certification labels and other statements.

Food manufacturers communicate cage-free egg production systems in different locations on the packaging



GRAPHIC 4: WAYS TO COMMUNICATE CAGE-FREE EGG PRODUCTION SYSTEMS

The ingredient list was the most common location for disclosing cage-free egg production systems across all three product categories assessed. It appeared on 88% of biscuit packages, 76% of dried egg pasta packages and 65% of mayonnaise packages where a cage-free egg production system was communicated.

Some food manufacturers relied exclusively on the ingredient list on the product package, while others combined ingredient-list disclosure with additional claims elsewhere on the packaging. This was particularly common in mayonnaise and dried egg pasta products, where manufacturers often reinforced disclosure through labels, front-of-pack claims or additional packaging statements. While ingredient-list disclosure was the dominant approach in dried egg pasta products, Barilla and De Cecco were notable exceptions. Rather than communicating egg production systems in the ingredient list, they provided this information elsewhere on the packaging. In several markets assessed, the disclosure appeared in Italian even when the products were sold outside Italy. As a result, production system information may be present on the packaging, but is not always easy for consumers and wholesale buyers to identify or interpret.

Information is not always easy to identify

The visibility of cage-free disclosure varied considerably between products. Some food manufacturers clearly

ANDREW SKOWRON/WE ANIMALS

highlighted egg production systems on the front of the packaging, making the information immediately visible to consumers and wholesale buyers. In other cases, the information appeared only in ingredient lists, footnotes or less prominent parts of the package.

As a result, cage-free egg production system information was not always easy to identify and could require careful examination of the packaging to locate. Transparency therefore depends not only on whether information is provided, but also on how visible and accessible that information is to buyers.

Example of highly visible disclosure

Remia mayonnaise (Netherlands)
The Dutch food manufacturer Remia provides an example of highly visible communication about egg sourcing. A 10-litre mayonnaise bucket assessed during the research prominently communicated the use of free-range eggs on the front of the packaging and in the ingredients list.





Key findings and recommendations

Key findings

1. **Voluntary disclosure does not provide a consistent transparency standard**

   The Hidden Eggs research sample found that information about egg production systems remains inconsistent across the processed food industry. Transparency varied between countries of sale, product categories, sales channels and food manufacturer portfolios. As a result, consumers and wholesale buyers may receive very different levels of information when purchasing similar products.

2. **Public commitments improve transparency but do not ensure it**

   Food manufacturers with public cage-free commitments were generally more transparent than manufacturers without commitments. However, mixed disclosure remained common, showing that commitments do not consistently translate into information on product packaging.

3. **Disclosure is not communicated consistently or visibly**

   Where cage-free egg production system information was disclosed, food manufacturers communicated it in different ways and with varying levels of visibility on their product packaging. Some disclosures appeared prominently on packaging, while others could only be found through careful examination of ingredient lists or less visible package locations.

Recommendations

Primary recommendation

Close the regulatory gap by extending the EU's farming method labelling framework for shell eggs to include eggs used as ingredients in processed foods.

The European Union already requires the farming method to be indicated for shell eggs sold directly to consumers. Equivalent information should also be available when eggs are used as ingredients in processed foods, allowing consumers and wholesale buyers to distinguish between organic, free-range, barn and caged production systems.

In practice, an extended farming method disclosure framework should cover egg and egg ingredients used in processed foods, use harmonised farming method terminology, place information in a standard and readily visible location, and apply equivalent requirements to relevant imported products.

The Commission should also examine whether comparable transparency gaps like those seen with ingredient eggs exist for other egg products such as liquid and powdered egg outside the shell-egg marketing framework.

Supporting recommendations

- **Establish a harmonised disclosure approach.** Egg production system information should be visible, easy to identify and communicated consistently across products, food manufacturers and Member States.
- **Ensure equivalent transparency for imported egg ingredients and processed foods.** Consumers and businesses should receive the same egg production system information regardless of whether products are produced within or outside the European Union. This would support informed choice and could support fair competition for European producers investing in higher welfare standards.
- **Continue supporting the transition towards cage-free egg production systems.** Transparency should complement ongoing efforts to phase out cage confinement and improve welfare standards for hens.

RONALD WITTEK/GETTY IMAGES

Closing the Hidden Eggs transparency gap

Farming method information is considered important enough to be required on shell egg; therefore, the same transparency should apply when those eggs are used as ingredients in processed foods. Information should not disappear simply because eggs enter the processed food supply chain.

The Hidden Eggs research highlights a **regulatory gap** in EU labelling requirements: farming method disclosure is required for shell eggs, but not for eggs used as ingredients in processed foods. This regulatory gap creates the **Hidden Eggs transparency gap**, leaving consumers and wholesale buyers frequently unable to determine how ingredient eggs were produced.

Extending harmonised farming method disclosure requirements to ingredient eggs would close this transparency gap and support informed purchasing decisions. It could also help create more consistent market recognition for producers investing in higher welfare systems and complement broader policy efforts to transition towards cage-free egg production.

The Commission should also examine whether comparable transparency gaps exist for other egg products outside the shell-egg marketing framework.

Support

Humane World for Animals assists companies in enhancing animal welfare within their supply chains. This support benefits the animals and prepares businesses for shifting consumer demands and legislation. Additionally, we offer lawmakers knowledge and expertise on farm animal welfare policy. Learn more: *www.humaneworld.org*

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Our mission

Together, we tackle the root causes of animal cruelty and suffering to create permanent change.

With millions of supporters and work happening in over 50 countries, Humane World for Animals—formerly called Humane Society International—addresses the most deeply entrenched forms of animal cruelty and suffering. As the leading voice in the animal protection space, we work to end the cruellest practices, care for animals in crisis and build a stronger animal protection movement. Driving toward the greatest global impact, we aim to achieve the vision behind our name: a more humane world.

Humane World for Animals™

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