



## **COUNTRY OF ORIGIN OF BEEF IN THE FOOD SERVICE SECTOR DRAFT RESPONSE ON BEHALF OF ABERDEENSHIRE COUNCIL**

### **Introduction**

Aberdeenshire Council is pleased to comment on the Scottish Executive consultation on the country of origin of beef in the food service sector. This draft response reflects the opinions of officers from Economic Development and Environmental Health in Aberdeenshire Council and will be subject to approval at the next meeting of the Council's Rural Affairs Working Group.

The food service sector is very important to the economy in Aberdeenshire and the Council seeks to promote best practice at every opportunity throughout this sector, either through procurement of local produce and subsequent reduction in food miles, or demonstrating the marketing advantage of premium meat and other food products originating from the area. The Council therefore supports the principle that provision of guidance to the consumer with clear, accurate, unambiguous information on the origin of food products is worthy of promotion.

### **Background**

The Beef Labelling regulations EC Reg No: 1760/2000 applies to unprocessed beef, which refers to fresh, chilled, frozen and chilled and also veal. Labelling information is applicable through the supply chain from abattoirs to retailers.

EC beef details the country of origin, rearing, slaughtering and processing. Non EC beef labels state "Origin Non EC" and "Slaughtered in Non EU." Therefore less detail is available on actual origin of the beef, if sourced from outwith the EU.

The current regulations do not require the food service sector to automatically provide information to customers on origin of beef, even although this information may be available through the supply chain.

Country of origin is not defined in the context of Food Labelling Regulations. Food sold in catering establishments comes within EC Food Labelling legislation. Some exemption is available, for example, in the UK, non pre-packed food or food pre-packed on the premises is exempt in the food service sector. This may lead to confusion in relation to origin.

With reference to the Trade Descriptions Act 1968, interpretation of the wording "substantial change" in relation to processing of food in a country can create ambiguity depending on interpretation. Catering establishments have a responsibility not to be ambiguous when providing origin of food products on menus.

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## Consultation Questions

**Q1. Do you consider that the current requirements provide adequate information to consumers of beef in the food service sector?**

A1. As it is not mandatory that the food service sector actively informs customers of the origin of beef, this can lead to confusion and ambiguity. Consumers may assume that the food service provider either does not have access to this information, or that the origin of the beef may be local.

The number of surveys carried out in relation to consumer awareness seems to indicate there is confusion as to origin of beef. However, the origin of the product is not a priority for all consumers. Other issues such as price, taste and quality of service are also important to the customer in the food service sector.

**Q2. Do you consider that the absence of country of origin information confuses consumers about the source of beef in the food service sector?**

A2. Yes. According to the MLC survey of 2004 referred to in the consultation paper, 81% of consumers believe the meat they are eating in the "out of home market" is British, when the actual percentage of home produced meat in this sector is only 40%, which means that the origin of 60% of the meat sold in the "out of home market" is from outwith the UK.

However, the discussion paper does not detail the percentage of home produced beef in the Scottish food service sector and as this proposal relates only to Scotland, the figure of 40% may not be accurate in a Scottish context.

**Q3. If you consider that the current requirements are not adequate, do you favour a voluntary or compulsory scheme to indicate country of origin of beef in the food service sector?**

A.3 It would be preferential if all food service providers were to provide accurate information on the origin of beef to their customers. However, if this were to become mandatory the costs, monitoring and evaluation in implementing such legislation would require full consideration.

The voluntary principle, such as the QMS "Scotch Beef Club" could be widened out throughout the food service sector. Those adopting this type of initiative would, in essence, be using this as a marketing tool. The greater the uptake, the greater the consumer awareness would develop in relation to origin of beef. Those service providers choosing not to adopt a voluntary policy indicating origin of beef would become obvious by their non-adoption of such a policy.

However, any voluntary quality assurance scheme in relation to origin of beef is only as good as the system that is implemented, in terms of accuracy towards monitoring and inspection etc. There would be a cost implication for both a voluntary or mandatory approach to providing information on the origin of beef in the food service sector. If it were voluntary, participants would require to contribute to the quality assurance scheme for origin of beef, in order to fund its administration. If mandatory, what resources would be required for enforcement and how would this be funded?

**In conclusion to questions 1 to 3, please note the following additional comments:**

- 1 Origin of beef in the food service sector – this requires a clearer definition than “restaurants, canteens, cafes and so on.” Should the food service sector include institutional canteens for example, schools, prisons, hospitals? If institutional establishments are included, there may be other issues that take precedence over origin of beef, for example food hygiene regulations, procurement policies, expenditure allowance etc.
- 2 We strongly support the principle of enabling the consumer to make an informed choice in relation to purchases. We also recognise and fully support marketing initiatives that promote quality local produce and as such, initiatives through QMS and VisitScotland are particularly welcome. However, we believe this type of initiative is directed at specific market segments in the catering and hospitality sectors and may not be applicable across the food service sector.
- 3 On this basis, we support the voluntary principle of accurate use of information on origin of beef in the food service sector, on the basis that a fully traceable quality assurance system is in place to enable efficient monitoring and evaluation of the scheme, with the capacity to take necessary action if non compliance is identified.
- 4 We are of the opinion that a mandatory approach to information of origin of beef in the food service sector, while acceptable in principle, would be counter-productive in practice, unless sufficient additional resources are forthcoming to implement such an initiative.

**Q4. Do you agree with the proposed approach? Please explain your reasons.**

- A4. We do not think that the approach is practicable in relation to institutional catering establishments, where menu choice may be limited compared to restaurants, fast food outlets and cafes. Also, in establishments where beef is purchased from more than one country of origin, ensuring compliance in relation to menus, poster or noticeboards etc. will be exceedingly complex to administer, if mandatory. We would support information on procurement

policy, which in itself is traceable. We also support promotion of local provenance produce with reduction of food miles.

Furthermore, if the proposal relates to dishes made from fresh, chilled or frozen beef, but not processed beef or products containing beef, then full marketing, educational, and promotional actions would be required explaining this to the general public, consumers and customers of the food service sector. If mandatory, how would this be funded?

**Q5. Do you consider that the requirement should be applied to veal as well as to beef?**

A6. As veal meat is bovine, then yes.

**Q6. Do you agree with the proposals for monitoring and enforcement?**

A7. As stated above, resources will be an issue. If the proposal is mandatory, then additional resources would be required. The discussion paper suggests monitoring and enforcement would not involve the establishment of any new programme of inspection visits. We do not agree with that statement in terms of resources and time implication.

**Q7. Do you agree that a civil action would be appropriate?**

A7. We do not support the proposal if mandatory, however if the proposal were to be established on the voluntary principle, we would recommend civil action appropriate for non-compliance.

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