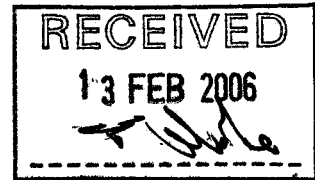


Clarke A (Tony)

From: Lisa Avis [lisaa@eblex.org.uk]
Sent: 13 February 2006 14:00
To: Country of Origin of Beef
Subject: Country of Origin of Beef in the Food Service Sector



This email has been received from an external party and has been swept for the presence of computer viruses.

Please find attached EBLEX's response to the above.

If you require any further information, please do not hesitate to contact me.

Regards

Richard Ali

Richard Ali
Chief Executive
EBLEX

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Web: www.eblex.org.uk

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The information contained in this e-mail is private and confidential. It is intended for the stated addressee(s) only. Unauthorised use, copying or disclosure of any of it is prohibited and may be unlawful.  
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PLEASE NOTE: THE ABOVE MESSAGE WAS RECEIVED FROM THE INTERNET.

On entering the GSi, this email was scanned for viruses by the Government Secure Intranet (GSi) virus scanning service supplied exclusively by Cable & Wireless in partnership with MessageLabs.

Please see <http://www.gsi.gov.uk/main/notices/information/gsi-003-2002.pdf> for further details.

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English Beef and Lamb Executive's Response to the Scottish Executive Environment and Rural Affairs Department Consultation paper: Country of Origin of Beef in the Food Service Sector

The English Beef and Lamb Executive was established in October 2002 to represent the interests of English beef and lamb levy payers by boosting the competitiveness and sustainability of the beef and lamb industries. It has a staff of 27 and has its central office in Huntingdon. As part of the Meat and Livestock Commission's federal structure, the English Beef and Lamb Executive is funded by the statutory levies raised on cattle and sheep slaughtered for human consumption in England or exported live.

1. The English Beef and Lamb Executive supports the provision of honest, meaningful and clear information to afford customers with the ability to exercise informed choice.
2. Consumers' purchasing decisions are often based on more than one factor, with primary, secondary and tertiary characteristics affecting any final choice. While the majority might be interested in price, taste and quality¹, there are others who do not share this view. The growth of the organic sector, the introduction of 'local foods', and the development of healthy eating alternatives all provide testimony to the different types of information modern consumers are looking for. In some cases the characteristics sought by shoppers may be will be nutritional, production-related or ethical. Origin is only one component of consumers' decision-making rationale.
3. The food industry has responded to the concerns of a majority of consumers by introducing assurance schemes. Assurance schemes establish certain production standards (e.g. animal welfare, food safety, environmental requirements, organic, free range, etc) and enable the transmission of the particular characteristics through the food chain. Many assurance schemes will link a number of characteristics together and thus provide consumers with "food context." The Scotch Beef scheme is cited in the consultation, but there are others such as those run by the Soil Association and Freedom Foods. The English Beef and Lamb Executive's Quality Standard Mark incorporates farm and processor assurance, eating quality requirements and transparent provenance.

¹ FOOD CONCERNS OMNIBUS SURVEY Prepared for Food Standards Agency by COI Communications, 27th September 2001

4. We believe that, for consumers to exercise informed choice they should be provided with the information on the characteristics that are important to them. Clearly this will involve the communication of a number of characteristics in a meaningful form. However, we also believe it is vital that consumer preferences and how changes to price can influence real purchases are fully understood and appreciated. To ignore consumer requirements, or to think for consumers risks adding cost, instead of adding value. This is from where we start.

Questions

Q1. Do you consider that the current requirements provide adequate information to consumers of beef 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?

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?

5. It is clear from the evidence cited in the consultation document that current requirements at foodservice do not necessarily provide adequate information for all consumers all of the time and that the absence of information may be a source of confusion to some consumers. It is also clear from the consultation that the absence of more prescriptive rules does not prevent the foodservice sector providing information and context on a voluntary basis in response to consumer demand.

6. The question therefore becomes one of whether *on balance* market failure exists because consumers are failing to exercise choice due to inertia or some other reason, or whether market failure does not exist and consumers' needs are being fully met by the market place.

7. It is our analysis that *on balance* market failure exists but that this failure is due to a number of factors, which may or may not be in the control of foodservice operators, especially small and medium sized operators, to remedy. For example, foodservice operators can only provide information to consumers in a meaningful and straightforward manner when this has been provided to them in a meaningful and straightforward manner.

8. We believe the origin and assurance status of all fresh and frozen beef and lamb should be required to be provided to foodservice operators on delivery notes / purchase orders in a transparent manner. This would enable the transmission of meaningful information to consumers. It would also assist

in auditing claims either on behalf of assurance schemes or enforcement authorities. The transmission of such information should not be particularly onerous, but it is unlikely that a voluntary scheme could correct market failure given the structures in place within the foodservice sector.

Questions

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

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

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

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

9. While the proposed approach would provide consumers with the ability to check the country of origin of beef (as defined in the Beef Labelling Regulations), it would not provide the additional information the majority of consumers see as a higher priority than purely origin.

10. We therefore recommend that consideration is given to extending the proposed approach to require foodservice operators to provide information on not only country of origin but whether the beef is produced / processed / marketed under an assured scheme (exceeding legal requirements). Where no scheme exists this could, for example, be stated as 'none declared.' This approach would assist consumers make positive and informed choices, as more information, in addition to meal price and country of origin, would be communicated in a straightforward and meaningful manner.

11. This approach would allow the Scotch Beef and Lamb PGIs to fit easily within the proposal. While Scottish consumers may understand the origin-specific nature of the 'Scotch' PGIs, they would not necessarily know which country other PGIs for fresh beef originated in. For example, Carne Barrosã and Carne de Ávila².

12. We appreciate any approach would have to be agreed by the EU Commission to ensure it is non-discriminatory.

² Carne Barrosã originates in Portugal and Carne de Ávila originates in Spain. The former is a PDO and the latter a PGI. Other examples can be found at http://europa.eu.int/comm/agriculture/qual/en/pgi_05en.htm

Example Presentation of Information

Country of Origin: Scotland	Quality or Assurance Scheme: Scotch Beef
Country of Origin: Scotland	Quality or Assurance Scheme: None Declared
Country of Origin: Scotland	Quality or Assurance Scheme: Orkney Beef
Country of Origin: France	Quality or Assurance Scheme: Taureau de Camargue

13. We can see no reason why this approach should not be extended to veal, or indeed lamb, as it would provide consumers with an improved degree of "food context."

14. Mechanisms for monitoring and enforcement already exist for the Food Labelling Regulations as do prescribed penalties. It is our view that the foodservice sector should be treated in the same way as the retail sector for any failure to comply with Regulation.

13 February 2006

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COUNTRY OF ORIGIN OF BEEF IN THE FOOD SERVICE SECTOR

RESPONDEE INFORMATION FORM

Please complete the details below and attach it with your response. This will help ensure we handle your response appropriately:

Name: *ENGLISH BEEF AND LAMB EXECUTIVE*

Postal Address: *GRAPHIC HOUSE, FERRARS RD, HUNTINGDON, PE29 3EE*

Consultation title: **Country of Origin of Beef in the Food Service Sector**

1. Are you responding as: (please tick one box)

- (a) an individual (go to 2a/b)
 (b) **on behalf** of a group or organisation (go to 2c)

2a. **INDIVIDUALS:**

Do you agree to your response being made available to the public (in SE library and/or on SE website)?

- Yes (go to 2b below)
 No, not at all

2b. *Where confidentiality is not requested*, we will make your response available to the public on the following basis (**please tick one** of the following boxes)

- Yes, make my response, name and address all available
 Yes, make my response available, but not my name or address
 Yes, make my response and name available, but not my address

2c **ON BEHALF OF GROUPS OR ORGANISATIONS:**

Your name and address as respondees *will be* made available to the public (in the SE library and/or on SE website). Are you content for your response to be made available also?

- Yes
 No

SHARING RESPONSES/FUTURE ENGAGEMENT

3. We will share your response internally with other SE policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future in relation to this consultation response?

- Yes No

