

**Clarke A (Tony)**

**From:** Jane McLaughlan [jane.mclaughlan@fsb.org.uk]  
**Sent:** 28 February 2006 16:02  
**To:** Country of Origin of Beef  
**Subject:** Beef Country of Origin Response



*MS/45/2/31*

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Country of Origin Consultation

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Pentland House

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Dear Sirs

**Beef Country of Origin Consultation**

**Thank you for giving us the opportunity to give our views on the above.**

**I have enclosed comments on the Federation's views and hope you find them useful.**

**If you wish to further discuss any of the comments please contact Susan Love our  
Scottish Policy Development Officer on telephone: 0141-221-0775 or by e-mail  
[Scotland.policy@fsb.org.uk](mailto:Scotland.policy@fsb.org.uk).**

**Yours sincerely**

A handwritten signature in black ink, appearing to be "Andy Willox". The signature is written in a cursive, somewhat stylized font.

**Andy Willox  
FSB Scottish Policy Convener**

Enc.

28/02/2006

## RESPONDEE INFORMATION FORM

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

Name: ANDY WILLOX

Postal Address: FEDERATION OF SMALL BUSINESSES  
74 BERKELEY STREET  
GLASGOW G3 7DS

Consultation title:

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

- (a) an individual  (go to 2)  
(b) on behalf of a group or organisation  (go to 3)

2. If responding as an INDIVIDUAL:

(a) 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

(b) 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

3. IF RESPONDING 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

4. 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 for consultation or research purposes?

- Yes   
No



## Country of Origin of Beef in the Food Service Sector Consultation

### Response from the Federation of Small Businesses in Scotland

#### Introduction

The Federation of Small Businesses is Scotland's largest direct member business organisation, representing 19,000 members in Scotland, and campaigns for a social, economic and political environment in which small businesses can grow and prosper.

Around 11% of FSB members in Scotland are hospitality businesses and so we welcome this opportunity to comment on extending the current beef labelling requirements to the food service sector.

#### Question 1

It is difficult to respond to this question as different customers might regard different amounts of information as adequate. We believe that there is growing consumer interest in the origins of food (though at present this is by no means widespread) but we have yet to see any evidence that there is a lack of available information available specifically about beef.

#### Question 2

It is perhaps a case of lack of awareness, as opposed to confusion. Again, there is relatively little evidence to support the claim that consumers are confused on the basis of current information requirements. Perhaps more importantly, there is little evidence that the majority of consumers are concerned about this lack of awareness. Many of our businesses responded that they are already perfectly happy to inform a customer if asked about the origin of beef served.

#### Question 3

We have carefully considered the introduction of new information requirements for beef in the food service sector and have received a wide range of responses from our members. A number of points were raised in discussion of this issue and these are highlighted below.

##### *General Support for Consumer Information*

In general terms there was a relatively high degree of support for businesses informing customers about the origin of ingredients – many felt it was increasingly important to ensure full traceability in food.

##### *Why Beef?*

Many members saw little logic in applying new regulations to only un-processed beef, as opposed to processed food – surely the origin of processed food is just as important (and perhaps more of a concern) to the consumer? Some felt that at the very least requirements ought to extend to pork and lamb, while some felt that it was only logical to extend this to all foodstuffs.

We understand that the proposal is based around the existing availability of information on beef (not as readily available on other foods) and that any further extension would represent a major challenge in legislative terms (not to mention upheaval for manufacturers and retailers) however we have to agree that regulations for beef alone do appear to be of limited value.

#### *A Selling Point*

A number of businesses already advertise the origin of their ingredients – for most this is a unique selling point and a marketing tool that sets them apart from competitors. It was pointed out that if everyone displayed information about beef this selling point may be lost. Conversely some clearly welcomed the opportunity for competitor businesses to be forced to 'admit' that they did not use Scottish beef.

#### *Information Overload and More Regulation*

A number of businesses pointed out that they are already trying to display a number of pieces of information on menus (e.g. GM free, organic, nut allergy info) and this may actually end up confusing the customer. Understandably some businesses also felt that this was yet another regulation for small businesses to cope with; one business described it as another "minor nuisance".

#### *Definitions*

Perhaps of greater concern to some businesses was the definition of 'Scottish' or 'Scotch' beef. Many felt that the current rules were too flexible and that the Scottish Executive should focus on ensuring that beef currently labelled as Scotch beef is not simply beef packaged in Scotland but that it is born, reared and slaughtered in Scotland. As a result of this, businesses were clearly keen to see the use of a 'Scotch' or 'Scottish' beef definition, as opposed to a UK definition.

Having considered these points the Federation accepts that many businesses are willing to provide more information to consumers (many already do) however in general they question the logic of this applying only to beef.

In the absence of any public health concerns, we are not yet convinced that the proposed scheme should be mandatory, since we believe that decisions on which produce to use and which information to display are decisions for the individual business to take based on consumer demand and what they feel is appropriate for their business (however much we may all wish to encourage the use of local suppliers). Governments must consider carefully whether or not to regulate and we do not think that the Scottish Executive has yet identified a significant problem which would be solved by the proposed regulations. Ultimately, if there is a problem regarding traceability and information on the origin of food, it goes much, much further than the issues outlined in the consultation paper. We would be concerned, however, about a piecemeal approach by the Scottish Executive – ongoing changes to regulations for different foodstuffs would surely prove confusing to both businesses and consumer alike.

#### **Question 4**

In broad terms we agree with the approach outlined, though we have already mentioned concerns about the definition of 'Scottish'. There is also concern about the impact of different standards for animals bred and slaughtered outwith the UK (and less understanding about standards across the EC) – it would make sense to look to the effectiveness of what has been proposed by France and Ireland.

In terms of displaying the information the approach outlined seems reasonable though we foresee that it will be more difficult/less practical for some caterers than others; for example, we think that the card on the tray approach for hospitals might not be particularly practical.

**Question 5**

The requirement should be applied to veal but as outlined above many feel it should be extended to all types of meat.

**Question 6**

We agree with the proportionate approach outlined i.e. that it should be incorporated as part of general Environmental Health visits to the business, as opposed to new visits. If new regulations were to be introduced there would have to be a significant awareness-raising campaign to businesses.

**Question 7**

Yes, a civil action would be appropriate.

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For further information on any of the points raised in this submission, please contact Susan Love, Policy Development Officer, on [scotpu.policy@fsb.org.uk](mailto:scotpu.policy@fsb.org.uk) or 01259 723713