



28 February 2006

Our Ref:

Mrs Elizabeth Baird
Head of Food Marketing and Policy Branch
Scottish Executive
Country of Origin Consultation
Mail Point R259
Pentland House
47 Robb's Loan
Edinburgh
EH14 1TY

Dear Mrs Baird

Consultation paper: Country of Origin of Beef in the Food Service Sector.

Thank you for providing us with the opportunity to comment on the consultation paper; Country of Origin of Beef in the Food Service Sector. I wish to formally respond to the paper on behalf of the Meat and Livestock Commission (MLC).

The Meat and Livestock Commission (MLC) is an executive Non Departmental Public Body set up under the Agriculture Act 1967. Its remit is to work with the British meat and livestock industry (cattle, sheep and pigs) to improve its efficiency and competitive position, and to maintain and stimulate markets for red meat at home and British meat abroad, with due regard for the consumer. A statutory levy on all animals slaughtered funds MLC's activities.

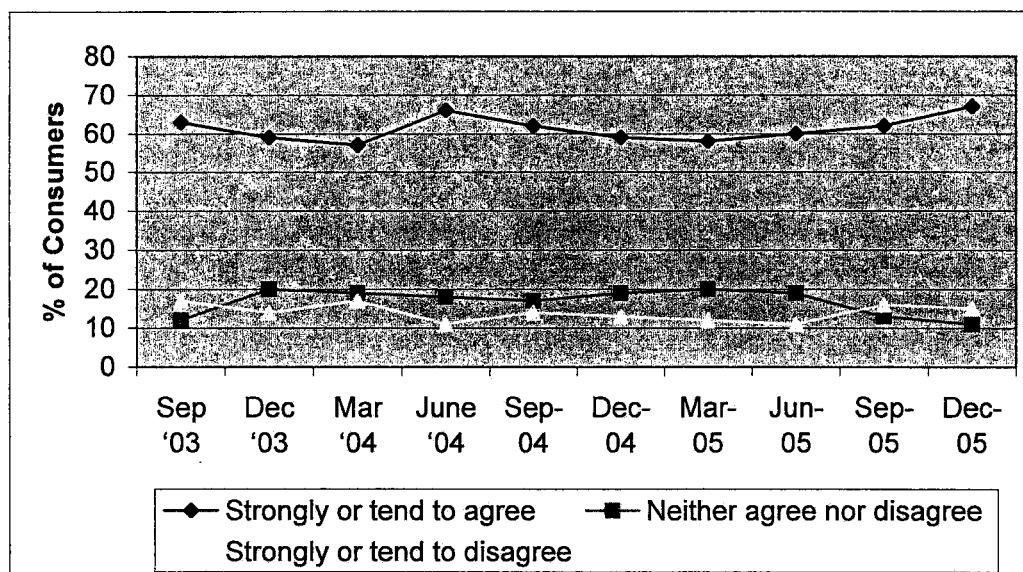
Execution of many of MLC's statutory functions is done by MLC's Devolved Bodies, which operate in a fully federal structure created in 2003. MLC has transferred its functions to Quality Meat Scotland in respect of the Scottish industry, and QMS is fully accountable to Scottish Ministers for the use of levies raised in Scotland.

In 2002 the MLC undertook a one-year consultation with the foodservice industry to ascertain the feasibility of extending beef labelling into the food service market. This consultation resulted in the launch and publication of our Best Practice Guidelines for Menu Transparency in 2003 to cover origin labelling for all red meats.

The consultation paper refers to our work and in particular the consumer market research we have undertaken on origin labelling in the food service sector. This research has shown a growing interest year by year in the provenance of meat served on menus.

We continue to monitor consumers' views by means of quarterly research (conducted by FMCG in association with MORI) with a changing sample of 1000 consumers aged 16+ demographically spread across the UK, all of whom have eaten out of the home during the previous two weeks.

The question asked is 'To what extent do you agree or disagree that meat served in restaurants and other public eating establishments should have its country of origin displayed at the point of purchase?' and the tracked research shows the following pattern: -



Source: FMCG/Mori Quickbite.

The research shows that over the last 10 phases of research an average of 61.3% of consumers either "strongly agree" or "tend to agree" with the question posed, with the last quarter's figure peaking at 67% and clearly on an upward trend.

Questions

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

The MLC believes that all consumers should have access to information relating to the origin of meat purchased in order that an informed decision can be made at the point of purchase. It is important to note that consumers have access to origin information on beef in a retail environment which they are denied when eating out.

Within the foodservice market, Beef Labelling Regulations on beef and veal are legally required on wholesale deliveries up to the kitchen door and therefore information as to the origin of beef and veal exists within the foodservice supply chain up to the catering outlet. As such, should a customer ask the origin of the beef served then caterers should be able to provide this information.

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

The MLC's own research, referred to in the consultation paper indicates that in the absence of origin information consumers believe the meat served in food service outlets to be British. In reality, figures from the Red Meat Industry Forum (RMIF) and MLC Economics show that an estimated 45% of beef served in the catering sector is of UK origin and 55% is imported.

Clearer labelling, ideally printed on the menu or at least available to consumers at the point of purchase would ensure that consumers were neither confused nor misled, be it intentionally or unintentionally, as to the origin of the beef being served.

3. 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?

The MLC has campaigned for the last 3 years for a UK wide voluntary code of practice to indicate the origin of *all* red meats served in the food service market. We support the compulsory extension of the Beef Labelling regulations to the foodservice sector; but hope that the industry can be persuaded to adopt further origin labelling for all red meats on a voluntary basis.

We realise that within Scotland, both agriculture and tourism contribute significantly to the Scottish economy. We also know from research from Institute of Grocery Distribution (IGD March 2005) that in excess of 70% of tourists wish to eat locally produced food and, by ensuring that the origin of beef is clearly labelled, consumers can make more informed choices.

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

The MLC believe that the 'not declared' option will not satisfy consumers' very real desire to know the country of origin of meat served, and that one likely informed decision that would occur where 'not declared' is stated would be not to select that item from the menu. Should the 'not declared' option be allowed to be used this may become the most commonly used menu declaration and the initiative to provide origin information in order that consumers can make more informed choices will be lost.

We believe that the Country of Origin in terms of where the beef has been born, reared and slaughtered should be the information given. In the case of Scotch Beef, this enjoys Protected Geographical Indication (PGI) status under EU regulations and as such the definition used for Scotch Beef, namely that it is born, reared and slaughtered in Scotland should be used as the benchmark for all origin descriptors on menus.

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

The current beef labelling regulations in place for retail customers already require that veal is also labelled with country of origin details. Most of the veal consumed in the UK is imported, much of which has been produced in farming systems which are prohibited under UK legislation. As such the requirement should be applied to veal in order that consumers can again make an informed choice.

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

The use of Environmental Health Officers for enforcement may detract from their more important work, namely that of ensuring appropriate food hygiene and as such the MLC believes that enforcement should be the responsibility of the local authorities trading standards officers. They already have regulatory powers as regards menu descriptions such as the use of re-formed chicken and fish products and as such their scope should be extended to cover beef labelling.

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

At the outset if country of origin labelling becomes mandatory food service operators must be informed of the legislation and that failure to comply will result in a civil action. Should there be a mass failure to comply then more punitive enforcement action may be required.

Other Comments

The MLC does have some concerns over compulsory labelling of beef throughout the food service market. In the case of the NHS it would be impractical to have origin information stated on tray liners or, in the case of schools, to have the information available to consumers who may not attach any real significance to the information. As such we believe that some cost sector caterers may consider compulsory beef labelling to be too much of a 'headache' and choose not to serve beef dishes on their menus as a way of avoiding their obligations. This would have the effect of removing a significant source of protein, iron and zinc from the diets of 'vulnerable' client groups who would almost certainly benefit from popular red meats such as beef in their diets.

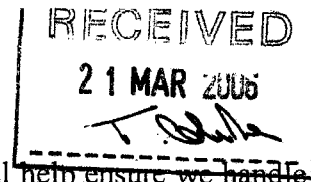
The MLC welcomes the Scottish Executive's initiative on Country of Origin Labelling. It has opened up the debate throughout the UK and in particular branded operations (such as those owned by Spirit Group, Mitchells & Butlers, Whitbread, McDonalds etc) may need to consider their labelling obligations across the whole of their UK estates, given that they will have to comply with new regulations in Scotland. Additionally consumers may well be more inclined to encourage them to adopt voluntary origin labelling in England and Wales.

Yours faithfully



Richard Lowe
CONSUMER AFFAIRS DIRECTOR

**COUNTRY OF ORIGIN OF BEEF IN THE FOOD SERVICE
RESPONDEE INFORMATION FORM**



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

Name: RICHARD LOWE (CONSUMER AFFAIRS DIRECTOR)

Postal Address: MEAT & LIVESTOCK COMMISSION, PO BOX 44
WINTERHILL HOUSE, SNOWDON DRIVE, WINTERHILL, MILTON KEYNES
Consultation title: Country of Origin of Beef in the Food Service Sector MK6 1AX

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

