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*consumer.org.uk*

*Dear Ms. Baird,*

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

The Scottish Consumer Council (SCC) welcomes the opportunity to comment on the above Consultation. The purpose of the SCC is to make all consumers in Scotland matter. We do this by putting forward the consumer interest, particularly that of disadvantaged groups in society, by working with those people who can make a difference to achieve beneficial change.

The SCC has been involved in food policy for many years and the Scottish Community Diet Project (SCDP) and the Scottish Healthy Choices Award Scheme (which is under development) are located within the SCC office.

Our Council will discuss the attached draft on 10 March. Please treat this response as a draft, and I will confirm Council's approval and any changes as soon as possible after the meeting.

SCC is of the view that country of origin of beef labelling in the food service sector (restaurants etc) is more of a marketing issue being pushed by some sections of the Scottish beef and dairy industry rather than consumer demand for additional labelling.

There is clearly no issue of food safety involved, as all beef sold in Scotland has to conform to EU food safety standards whatever the country of origin.

However there is a genuine concern that consumers may assume they eating quality assured Scottish beef when beef is a labelled by breed on the menu (e.g. Aberdeen Angus). Our view is that the proposal for country of origin labelling (COOL) is disproportionate to the potential consumer detriment and also its introduction may result in additional consumer detriment by

undermining consumer trust in an established Scottish beef quality assurance scheme. A MORI poll for the FSA indicated that "a significant number (of consumers) associate country of origin labelling with food quality"(1).

Country of origin labelling in restaurants would give consumers no clear information on the quality of the product or animal welfare standards. Quality Meat Scotland (QMS) has developed assurance standards for the industry, which are widely credited with upholding high production standards allowing Scottish quality assured beef to be marketed as a premium product. Labelling beef as 'Scottish' may give it a spurious association with quality assured Scottish beef. As a result consumers would be misled.

An additional concern is that "over 30 month (OTM)" cattle are now allowed into the food chain. While there are no general food safety issues with "cow meat" from dairy herds, it is not eligible for the Quality Meat Scotland assurance scheme. This "cow meat" is significantly cheaper than quality assured beef but would be eligible to be labelled "Scottish". Once again consumers may be misled over the quality of the meat served if it is labelled "Scottish" with no additional information.

There is increasing interest in local food and calls for information allowing consumers to make choices to eat locally produced food. The SCC is not convinced that "Scottish" is local. There are moves to create Scottish regional brands across a range of local products. The SCC supports these so long as they have clear traceability regimes and are linked to clear standards.

In response to specific questions;

## **WHY CHANGE?**

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

Our view is that the current requirements are satisfactory. Food businesses have access to information on the origins of meat supplied to them through the traceability requirements of EC Regulation 178/2002. If a business then advertises beef as being "Scottish" when it is not, they can be prosecuted under Section 15 of the Food Safety Act 1990, which covers falsely describing, advertising or labelling food. If consumers want to eat quality assured Scottish beef they have the QMS label to follow. QMS spends a considerable amount of money each year promoting beef assured through its scheme and report high levels of consumer recognition of its labelling scheme.

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

The consumer may be more confused if there was an attempt to link all beef labelled "Scottish" to quality assured Scottish beef. If the label was to be

meaningful then what choice, based on what information, do the proposers see for the consumer reading a country of origin label in a restaurant?

**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 foods service sector?**

Restaurants etc using QMS assured beef might want to consider with QMS how best to further market their premium products to consumers.

## **NATURE OF THE PROPOSAL**

**Do you agree with the proposed approach?**

See above.

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

See above.

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

There is a cost to all regulation. It is hard to see what benefit consumer would derive for the costs (which would be passed on to them as either consumers or tax payers) from a non-assured labelling scheme for beef.

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

Falsely describing food under Section 15 of the Food Safety Act is a criminal offence and should remain so.

I hope the above is useful and if you would like any further information then please do not hesitate to contact me.

*Yours sincerely*

*Martyn Evans*

Martyn Evans  
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: *Martyr Eward*

Postal Address: *Scottish Consumer Council, Royal Exchange House  
100 Queen St, Glasgow G1 3DN*

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