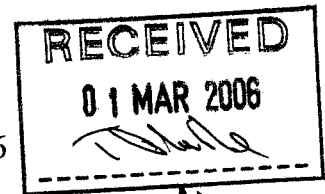




Country of Origin Consultation
Mail Point R259
Pentland House
47 Robb's Loan
EDINBURGH
EH14 1TY

27th February 2006



Dear Sir / Madam

SCOTTISH COUNTRYSIDE ALLIANCE (SCA)
COUNTRY OF ORIGIN OF BEEF IN THE FOOD SERVICE SECTOR CONSULTATION
RESPONSE

The Scottish Countryside Alliance is grateful for the opportunity to respond to the *Country Of Origin Of Beef In The Food Service Sector* consultation. As an organisation we aim to reflect our members interests in food related matters, and have for the past three years successfully organised and promoted the *Scottish Food Fortnight* campaign to highlight the importance of local food for local people.

Bringing the food service sector in line with retailers with regard to COI labelling is a welcome step forward. We hope that the proposed new legislation, and campaigns like Scottish Food Fortnight, will help to educate consumers to make informed COI purchasing decisions when buying beef in the food service sector.

Yours faithfully

TONY ANDREWS
Chief Executive, Scottish Countryside Alliance

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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: ROSS MONTAGUS

Postal Address: SCOTTISH COUNTRYSIDE ALLIANCE WEST MAINS COTTAGE
RHS INGLISTON, EDINBURGH, EH28 8NF

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



Scottish Countryside Alliance (SCA)

Response to: *Country of Origin of Beef in the Food Service Sector* consultation.

27th February 2006

QUESTION 1

No. We do not consider that current beef labelling requirements provide enough information to consumers of beef in the food service sector. There is enough anecdotal evidence available to suggest that consumers are making more informed decisions over food purchases, particularly in relation to food miles, and consumers should also be able to make such decisions when purchasing beef from the food service sector.

QUESTION 2

Yes. The SCA does feel that the absence of country of origin information confuses consumers in the food service sector. Given that COI information is statutory in the retail food sector, and that it is clearly a criteria which influences purchasing decisions, it almost certainly confuses consumers when the same information is not visibly highlighted by the food service sector. The success of Aberdeen Angus cattle as a major breed of cattle in worldwide beef production is a case in point. Consumers who buy beef labelled as Aberdeen Angus in a food service sector outlet may be confused into believing that the beef is from Scotland, when in fact it could be from anywhere in the world.

QUESTION 3

Compulsory. The SCA favours a compulsory scheme to indicate country of origin of beef in the food service sector. This will ensure that consumers can make like for like decisions across the food service sector. COI information is already known to the wholesale suppliers of beef, and this information should be presented in an easily interpreted manner to the food service sector. The Scottish Executive must however ensure that the proposed scheme is not prohibitively expensive to smaller food service businesses.

NOTES ON PARAGRAPH 4.5

Discerning consumers will quickly note that when they purchase, for example, a pie from an outlet which makes its own pies, the country of origin information will be available. Consumers may then look for this information on all pies, and thus outlets that buy in ready made pies (and thus will not have to display COI) may find that consumer demand encourages them to display COI in order to compete in the market. This could in turn lead to increased traceability throughout the processed beef chain.

NOTES ON PARAGRAPH 4.6

For reasons of consistency it makes sense to make compulsory COI information available to consumers who purchase both beef and / or veal from the food service sector.

NOTE ON RECOMMENDATION 4.7

Whilst the proposed regulations would only apply to the unprocessed beef used in food service businesses, (for reasons outlined above, 4.5) increased COI labelling of processed beef may follow. It will be important to make sure that this (non compulsory) labelling is not misleading. It may be important to define "meal" in the proposed legislation to make it clear that it includes snacks, sandwiches etc.

NOTE ON RECOMMENDATION 4.11

In order to ensure a level playing field for all outlets in the food service sector, display of COI information should be compulsory for all.

NOTES ON PARAGRAPH 4.14.1

Where beef has been born, raised, slaughtered and butchered in one particular country then that country should be stated as the country of origin. If the beef is sourced from outside the EC, and has passed through a number of countries it should be sold as "beef of non EC origin".

NOTES ON PARAGRAPH 4.14.2

If it is legal for the Scottish Executive to pass legislation which insists on "Scotch / Scottish" beef being differentiated from "UK" beef, then it should be compulsory for food service outlets to state "Scotch / Scottish" rather than simply "UK" when providing COI information to consumers. In practice, many food service sector outlets will want to state whether their beef is "Scotch" or "Scottish" rather than simply "UK." This may lead to pressure on the beef wholesale sector to supply service sector outlets with beef which has COI clearly stated in words as many food service sector outlets may not wish to spend time deciphering COI codes on each batch of beef.

It is beneficial to the environment and local economies if food service outlets source ingredients from within their local area. When producing guidance notes to accompany the proposed new legislation, the Executive should consider encouraging food service sector outlets to purchase beef from within their local area and to publicise this fact in addition to COI.

NOTES ON PARAGRAPH 4.14.4

In order to avoid confusion as to COI, and possibly mislead consumers, it may be better if food service sector outlets serving beef from a variety of sources, were forced to at least

loosely *quantify* the COI of their beef. In practice this could mean stating "The *majority* of beef served in this restaurant is Scotch, unless otherwise stated."

NOTES ON RECOMMENDATION 4.16

We agree that individual outlets should be free to decide how they display information as long as it is clearly visible to consumers. It is however imperative, as discussed above, that individual outlets are given clear guidance as to what terminology / statements they should make regarding COI of beef.

QUESTION 4

The SCA is largely in agreement with the proposed approach. Please refer to our notes (above) on the individual discussion points and recommendations raised in the consultation paper.

QUESTION 5

Yes. The requirements should apply to veal as well as to beef.

QUESTION 6

To ensure any new COI labelling regulations are taken seriously, a degree of enforcement will be required. It is important that whichever enforcement agency is appointed, it has adequate resources to "police" the legislation.

QUESTION 7

No. Further discussion is required regarding the mislabelling of beef being a criminal or merely a civil offence. The SCA is not qualified to comment on this matter, suffice to say that it is important to ensure that the legislation is taken seriously by the food service sector.