

KMO/4/1/3/33

SCOTTISH FEDERATION OF MEAT TRADERS ASSOCIATIONS



pdf: 31

28 February 2006

Elizabeth Baird
Country of Origin Consultation
R259 Pentland House
47 Robb's Loan
Edinburgh
EH14 1TY

Dear Madam

Country of Origin of Beef in the Food Service Sector

Many members of the Scottish Federation of Meat Traders supply beef into the foodservice sector. This is a particularly price sensitive sector and in many cases country of origin is of no interest to the food business operator. This tends not to be the case when it comes to the consumer of this beef but since there is no requirement to reveal the country of origin to the ultimate consumer they are kept blissfully in the dark over what they are eating.

Visitors to any country or region are usually interested in eating local produce. Visitors to Scotland certainly cannot be sure that they are doing that when they are eating out. Members of SFMTA supply Scotch or Scottish beef to their food service customers but when they are asked for cheaper solutions will supply e.g. Irish, Brazilian, Argentine, Uruguayan, Botswana Namibia.

If this proposal is carried the menu in a food service establishment might well, in the future, have many references to countries of origin other than Scotch or Scottish.

In answer to your questions:-

- 1 We do **not** consider that the current requirements provide adequate information to consumers of beef in the food service sector.
- 2 We consider that the absence of country of origin information confuses consumers about the source of beef in the food service sector.
- 3 We would favour a compulsory scheme to indicate country of origin in the food service sector.

In response to Q4, we **agree** with the proposed approach since as a consequence of Beef Labelling legislation, information on country of origin is available and has to be included on beef and veal supplied by butchers to food service. It would be a perfectly logical extension of this requirement for the food service business to pass this information on to its customers. There should be no additional administration on the supply side and minimal on the part of the food service business.

Since meat products are not covered by the beef labelling legislation it would not be possible to include any processed beef under this requirement.

We agree Country of Origin labelling should apply to all food service outlets. It is relatively simple to label beef that has been born, reared and slaughtered in one country. If an animal was born in Northern Ireland, reared in Scotland and slaughtered in England we would feel that a UK label would be appropriate. If the country of birth was Republic of Ireland and not Northern Ireland, then EC origin would be the only possible designation.

Information on country of origin in some cases only refers to UK plant numbers. This creates a need to decode labels to determine whether Scotch or Scottish. Information given to butchers by wholesalers does not always indicate country of birth within the UK and may not be available. To ascertain where in the UK an animal has been born the food service business' supplier would require sight of the animal's passport or a change to EU Beef Labelling legislation.

The differentiation between Scotch and Scottish is quality assurance. This is difficult to communicate to a consumer who in most cases will understand one to include the other. If consumers are to understand the difference here there is an educational role requiring to be addressed by Quality Meat Scotland.

Q5, **Veal** is included in the beef labelling legislation and so should be included in any extension of this information in the food service sector.

Q6. **Yes** and whilst accepting that enforcement must be proportionate to the issues involved. Minor breaches should be resolved by EHOs but do not see a role here for Quality Meat Scotland. We believe policing beef description by Country of Origin will be extremely difficult.

Can food service businesses prove what they claim on their menus? Yes. Can enforcement agencies prove that what is claimed is wrong? No. It is likely that where a food service sector business wants to mask the truth it will and it will be very difficult for EHOs to prove otherwise.

UK will not mean Scotch but proving that UK is not Scotch is also going to be difficult. Cost of enforcing this legislation in 13,322 food service sector establishments is going to be significant if policed rigorously.

Q7 Ultimate sanction should be civil action.

Summary:- SFMTA is of the opinion that Country of Origin labelling is worth doing because some food service sector businesses will comply. It will stop the misleading terms such as 'produced in Scotland', 'cut in Scotland' or reference by 'plant number' which tells consumers nothing.

It is of greater relevance perhaps for consumers to be informed if the beef they are eating is cow beef since that would give greater indication of the likely eating quality but that is not addressed in any labelling legislation.

We have no detailed comment to offer on the Partial Regulatory Impact Assessment other than to support Option 2

Yours faithfully



Douglas Scott, Chief Executive

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

21 MAR 2006
T. Blain

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

Name: **DOUGLAS SCOTT SCOTTISH FEDERATION OF MEAT TRADERS ASSOCIATIONS**

Postal Address: **8 NEEDLES ROAD, PERTH PH2 0JW**

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)

1. 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:

our 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

