



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

Please ask for: Mr A Yates
Direct Dial: (01463) 702532
Your Ref:
Our Ref: AY/02/06
Date: 23 February 2006

Dear Sir/Madam

Consultation Paper – Country of Origin of Beef in the Food Service Sector

I refer to the papers issued in November 2005 seeking views on the above consultation. My comments are detailed below.

I hope you find the comments useful. If you require any further explanation or information please do not hesitate to contact me at the above number.

Yours sincerely



Alan Yates
Principal Food Safety Officer

General Comments

Responding as a proposed enforcement authority, we do not have strong opinions on the need to introduce the proposals. We acknowledge the evidence produced in the document on the interest consumers have expressed on the subject and the possible benefits that would result from a mandatory scheme. But we also recognize the additional workload that will be placed on our staff and the additional burden that the food service sector in our area will have to address. Considering all these matters, we are in favour of the compulsory approach.

Questions

Q1. Do you consider that the current requirements provide adequate information to consumers of beef in the food service sector?

Highland Council comments: We don't believe the current requirements provide adequate information to consumers. This is based on the information supplied in the document.

Q2. *Do you consider that the absence of country of origin information confuses consumers about the source of beef in the food service sector?*

Highland Council comments: We believe that the evidence in the document is sufficient to show that consumers are confused about the source of beef.

Q3. *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?*

Highland Council comments: As stated in the general comments above, we do not have a strong opinion on the introduction of any scheme. If a scheme was to be introduced we would favour it being compulsory as this would ensure that the apparent problems are addressed consistently across the country. .

Q4. *Do you agree with the proposed approach?*

Highland Council comments: We note the approach as detailed below.

4.17 In summary we propose that

- *the requirement, if introduced, would apply to dishes made from fresh, chilled or frozen beef, but not to the use of beef supplied to the food service sector in the form of processed beef or products containing beef;*
- *the requirement would apply to all food service sector outlets;*
- *if the beef came from animals which were born, reared and slaughtered in one country, that country should be stated as the origin;*
- *if the label codes indicated that the beef was Scotch or Scottish this information should be given to the consumer rather than a statement that the beef was of UK origin, but we invite views on whether this should be mandatory or voluntary;*
- *if the beef came from animals which had moved through a number of countries or the establishment used beef from a variety of source countries, the origin would be indicated as: a list of named countries; EC; non EC; or mixed EC/non EC; as appropriate;*
- *the information would be conveyed by the means preferred by the outlet (eg menu, poster or blackboard) provided that it was clearly visible to the customer.*

We have no objection to the proposals. If a scheme is to be introduced we would favour the provision of the Scottish information be made mandatory.

Q5. *Do you consider that the requirement should be applied to veal as well as to beef?*

Highland Council comments: For consistency we would favour the regulations applying to all beef meat including veal.

Q6. *Do you agree with the proposals for monitoring and enforcement?*

Highland Council comments: We would agree with the approach proposed i.e. food safety officers employed by environmental health would address the matter during routing food standards inspections. All other work would be reactive based on complaints or concerns being raised over individual establishments.

Q7. Do you agree that a civil action would be appropriate?

Highland Council comments: We object to this proposal. The current statutory provisions on labelling are widely understood and practiced and any proposed scheme should use these provisions. A lot of the current labelling requirements do not have a food safety or public health justification – they have been introduced to inform the consumer. These proposals are no different and the same penalties should apply. As usual, officers would enforce the proposals in a proportionate manner with prosecution only being considered as a final sanction. Introducing a civil action system would require further training for officers and additional work to alter current policies, procedures and guidance.

Partial Regulatory Impact Assessment

Highland Council Comments: Highland Council has estimated the costs associated with the implementation and enforcement of the new regulations as follows:

	Total
Year 1	£10,055
Year 2	£8,042
Year 3	£5,975
Year 4	£5,975
Year 5	£5,975
Year 6 and future years	£4,208

Detailed breakdown of these figures are provided in the attached documents.

HIGHLAND COUNCIL - ENVIRONMENTAL HEALTH

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

ESTIMATE OF COSTS

It must be recognised that it is difficult to provide precise costs associated with the implementation and enforcement of the above consultation. There are a number of variables that makes prediction difficult such as the response by businesses and the future level of compliance.

However, Highland Council have made an estimate of the average extra work that will be required to implement and enforce the proposals. The detail and calculation of the estimates are shown in Sheets 2, 3 and 4 attached.

In summary, the costs for Highland Council to implement and enforce the proposals over the next 6 years are shown in the table below.

Table 1 - Total Estimated Costs

	Total
Year 1	£10,055
Year 2	£8,042
Year 3	£5,975
Year 4	£5,975
Year 5	£5,975
Year 6 and future years	£4,208

It should be noted that the costs do not take account of possible future demands such as new businesses, nor increasing staff costs.

HIGHLAND COUNCIL - ENVIRONMENTAL HEALTH

Total Estimated Costs

Table 1 - Internal Training

To cover structure and understanding of new regulations, new enforcement techniques, practical implications and consistency

	No. of officers	Hourly rate	No. of hours training		Cost yr1	Cost per yr (yrs 2-6)
			yr1	per yr (yrs 2-6)		
EHO	21	£26.05	3.5	0.5	£1,914.75	£273.54
TO (FS)	5	£21.70	3.5	0.5	£379.66	£54.24
					£2,294.41	£327.77

Table 2 - Implementation

Proportionate hourly rate of officers	£25.21
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Extra work required

yr	hours	Costs
Yr 1	308	£7,761
Yr 2	306	£7,714
Yr 3	224	£5,647
Yr 4	224	£5,647
Yr 5	224	£5,647
Yr 6	154	£3,880

Table 3 - Total Costs

	Training	Implementation	Total
Yr 1	£2,294	£7,761	£10,055
Yr 2	£328	£7,714	£8,042
Yr 3	£328	£5,647	£5,975
Yr 4	£328	£5,647	£5,975
Yr 5	£328	£5,647	£5,975
Yr 6	£328	£3,880	£4,208

HIGHLAND COUNCIL - ENVIRONMENTAL HEALTH

ESTIMATED COSTS LINKED TO NUMBERS OF FOOD BUSINESSES

Table 1 - Total Numbers

	Primary Producers	Slaughter-houses	Manufacture Processors	Packers	Importers Exporters	Distributors Transporters	Retailers	Restaurants & Caterers	Materials & Articles...	Manufacture mainly selling by retail	Total
No. of premises rated A	0	0	13	0	0	0	5	11	0	3	32
No. of premises rated B	12	0	71	2	0	10	222	984	0	29	1330
No. of premises rated C	101	0	135	3	2	54	521	2102	5	14	2937
TOTALS	113	0	219	5	2	64	748	3097	5	46	4299

Table 2 - Average extra work required per business (minutes)

This table estimates total extra work required including extra time during inspections, administrative work and enforcement

	Primary Producers	Slaughter-houses	Manufacture Processors	Packers	Importers Exporters	Distributors Transporters	Retailers	Restaurants & Caterers	Materials & Articles...	Manufacture mainly selling by retail
first inspection	0	0	0	0	0	0	0	20	0	0
subsequent inspections	0	0	0	0	0	0	0	10	0	0

Table 3 - Year 1 extra hours

This table calculates extra hours based on an inspection programme carried out in accordance with the FSA Code of Practice i.e. 100% of A premises being inspected for the first time, 50% of B premises being inspected for the first time and 20% of C premises being inspected for the first time

	Primary Producers	Slaughter-houses	Manufacture Processors	Packers	Importers Exporters	Distributors Transporters	Retailers	Restaurants & Caterers	Materials & Articles...	Manufacture mainly selling by retail	Total
No. of premises rated A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.7	0.0	0.0	3.7
No. of premises rated B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	164.0	0.0	0.0	164.0
No. of premises rated C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	140.1	0.0	0.0	140.1
TOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	307.8	0.0	0.0	307.8

Table 4 - Year 2 extra hours

This table calculates extra hours based on an inspection programme carried out in accordance with the FSA Code of Practice i.e. all A premises have had their initial inspections, 50% of B premises being inspected for the first time and 20% of C premises being inspected for the first time

	Primary Producers	Slaughter-houses	Manufacture Processors	Packers	Importers Exporters	Distributors Transporters	Retailers	Restaurants & Caterers	Materials & Articles...	Manufacture mainly selling by retail	Total
No. of premises rated A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.8	0.0	0.0	1.8
No. of premises rated B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	164.0	0.0	0.0	164.0
No. of premises rated C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	140.1	0.0	0.0	140.1
TOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	306.0	0.0	0.0	306.0

Table 5 - Year 3 extra hours

This table calculates extra hours based on an inspection programme carried out in accordance with the FSA Code of Practice i.e. all A and B premises have had their initial inspections, 20% of C premises being inspected for the first time

	Primary Producers	Slaughter-houses	Manufacture Processors	Packers	Importers Exporters	Distributors Transporters	Retailers	Restaurants & Caterers	Materials & Articles...	Manufacture mainly selling by retail	Total
No. of premises rated A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.8	0.0	0.0	1.8
No. of premises rated B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	82.0	0.0	0.0	82.0
No. of premises rated C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	140.1	0.0	0.0	140.1
TOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	224.0	0.0	0.0	224.0

Table 6 - Year 4 extra hours

This table calculates extra hours based on an inspection programme carried out in accordance with the FSA Code of Practice i.e. all A and B premises have had their initial inspections, 20% of C premises being inspected for the first time

	Primary Producers	Slaughter-houses	Manufacture Processors	Packers	Importers Exporters	Distributors Transporters	Retailers	Restaurants & Caterers	Materials & Articles...	Manufacture mainly selling by retail	Total
No. of premises rated A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.8	0.0	0.0	1.8
No. of premises rated B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	82.0	0.0	0.0	82.0
No. of premises rated C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	140.1	0.0	0.0	140.1
TOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	224.0	0.0	0.0	224.0

Table 7 - Year 5 extra hours

This table calculates extra hours based on an inspection programme carried out in accordance with the FSA Code of Practice i.e. all A and B premises have had their initial inspections, 20% of C premises being inspected for the first time

	Primary Producers	Slaughter-houses	Manufacture Processors	Packers	Importers Exporters	Distributors Transporters	Retailers	Restaurants & Caterers	Materials & Articles...	Manufacture mainly selling by retail	Total
No. of premises rated A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.8	0.0	0.0	1.8
No. of premises rated B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	82.0	0.0	0.0	82.0
No. of premises rated C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	140.1	0.0	0.0	140.1
TOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	224.0	0.0	0.0	224.0

Table 8 - Year 6 (and future years) extra hours

This table calculates extra hours based on an inspection programme carried out in accordance with the FSA Code of Practice i.e. in year 6, all A, B, and C premises have had their initial inspections

	Primary Producers	Slaughter-houses	Manufacture Processors	Packers	Importers Exporters	Distributors Transporters	Retailers	Restaurants & Caterers	Materials & Articles...	Manufacture mainly selling by retail	Total
No. of premises rated A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.8	0.0	0.0	1.8
No. of premises rated B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	82.0	0.0	0.0	82.0
No. of premises rated C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	70.1	0.0	0.0	70.1
TOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	153.9	0.0	0.0	153.9

HIGHLAND COUNCIL - ENVIRONMENTAL HEALTH

ESTIMATED STAFF COSTS

Table 1 - PAYROLL COSTS

		BASIC	NATIONAL			
		SALARY	INSURANCE	SUPER	TOTAL	HOURLY
TO (FS)	AP4 SCALE	£23,034	£1,701	£3,179	£27,914	£17.64
EHO	P04 SCALE	£28,632	£2,221	£3,951	£34,805	£22.00

NOTE

HOURLY RATE CALCULATED AS FOLLOWS

TOTAL DAYS(52*5)	260
HOLIDAYS(20+14)	34
NET	226

Table 2 - FULL COSTS FOR NEW OFFICER

		Total Salary	Mileage	Subsistence	Relocation	Protective Clothing	Mobile Phone	IT	Misc equipment	TOTAL	HOURLY
TO (FS)	AP4 SCALE	£27,914	£4,500	£1,000	£5,000	£100	£120	£688	£150	£39,472	£24.95
EHO	P04 SCALE	£34,805	£4,500	£1,000	£5,000	£100	£120	£688	£150	£46,363	£29.31

Table 3 - FULL COSTS FOR EXISTING OFFICER

		Total Salary	Mileage	Subsistence	Relocation	Protective Clothing	Mobile Phone	IT	Misc equipment	TOTAL	HOURLY
TO (FS)	AP4 SCALE	£27,914	£4,500	£1,000	£0	£50	£120	£688	£50	£34,322	£21.70
EHO	P04 SCALE	£34,805	£4,500	£1,000	£0	£50	£120	£688	£50	£41,213	£26.05

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: ALAN YATES

Postal Address: ENVIRONMENTAL HEALTH, HIGHLAND COUNCIL
GLENQUHART ROAD, INVERNESS. IV3 5NX.

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 respondents *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