

Pro/4/2/3/5

**Clarke A (Tony)**

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**Sent:** 21 February 2006 12:33

**To:** Clarke A (Tony)

**Subject:** Beef Country of Origin Consultation

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Please find attached the response by the West of Scotland Food Liaison Group. The Group is happy for our response to be made available to the public. We are also happy for you to contact us again in relation to this response.

For the West of Scotland Food Liaison Group  
*Craig M Brown*

Craig M Brown  
Divisional EHO  
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## **Consultation paper: Country of Origin of Beef in the Food Service Sector**

### **Response by the West of Scotland Food Liaison Group.**

#### **Section 3 - WHY CHANGE?**

##### **Questions**

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

The traceability requirements of EC Regulation 178/2002 applies to all food businesses and will allow FBO's to receive information on the origins of the meat supplied to them. It is also an offence to falsely describe food and action can be taken by the food authority when this offence is committed.

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

The Group does not think this is a pressing issue for the majority of consumers. If a consumer purchases meat on the basis that it is advertised as being "Scottish" beef and it is not, the FBO will be committing an offence in terms of Section 15 of the Food Safety Act 1990 and could result in a report being sent to the Procurator Fiscal.

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?

Current arrangements are adequate. If a scheme is to be introduced it should be a voluntary one as there are adequate arrangements in place to deal with food which is falsely described.

#### **Section 4 - NATURE OF PROPOSAL**

##### **Question**

Q4. Do you agree with the proposed approach? Please explain your reasons.

The Group does not think things need to change, but if they are introduced the proposed approach seems okay. This approach should minimise the increased burden for FBO's and avoids the onerous task of labelling dishes made from meat products. It also allows flexibility on how the information is to be presented.

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

Again, if this is to be introduced it should be for all beef.

### **How should the requirement be monitored and enforced?**

This section demonstrates a lack of awareness of food standards enforcement in Scotland and of the requirements of the Food Safety Act 1990.

#### **Question**

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

This is already within the enforcement remit of EHO's and therefore there is no change or increased burden.

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

It is already a criminal offence to falsely describe food in terms of Section 15 of the Food Safety Act 1990, so these proposed regulations are not necessary. The fact that it is being considered as a civil offence sends out the message that it is not important and will also create a criminal and civil offence for essentially the same offence.