

countryoforigin@scotland.gsi.gov.uk

February 2006

Dear Sir / Madam,

Further to the publication of your consultation paper on Country of Origin of Beef in the Foodservice Sector, please find enclosed feedback from Whitbread Plc.

Whitbread Plc is the UK's leading hospitality company, managing the number one brands in hotels, restaurants and fitness clubs, including Premier Travel Inn, Brewers Fayre, Beefeater, Costa, T.G.I. Friday's and David Lloyd Leisure, and a strategic investment in Pizza Hut (UK).

### The Proposal

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

Yes.

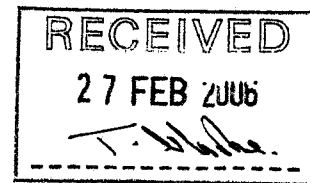
The current EU wide Beef Labelling Requirements mean that throughout our supply chain we must have accessibility to sourcing information from farm, abattoir, processor, agent, primary supplier and into our restaurant or hotel environment. If a guest is minded to purchase based on country of origin then we have this information available & are happy to provide it upon request.

In our experience the demand for this information is limited within the branded restaurant and hotel market in which we operate.

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

No. When dining in our restaurants or hotels, guests typically do not prioritise country of origin of beef in their purchasing decision hierarchy. In our experience their priorities are based around the availability, quality, presentation of the food on offer, as well as the restaurant environment and service they receive. For those guests who are minded to purchase based on country of origin then we have this information available & are happy to provide it upon request.

Also, we would support the view that it would be odd to require the foodservice sector to single out beef from other foods in terms of providing country of origin information. Were the proposal to be implemented in its current form, we believe that it would create confusion that does not currently exist.



We would also express concern that the market research studies used in the production of the consultation paper are primarily focused towards the retail market, where in our experience the consumer has a different mindset in making purchasing decisions.

**Q3. Not Applicable.**

### **The Nature of the Proposal**

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

No.

The proposed approach would add cost to our business, that the customer would not recognise as adding value based on their known purchasing priorities. Ultimately this cost would be passed on to the consumer. As a branded restaurant and hotel business we generally communicate to the guest via printed menus that typically change annually.

Within the duration of any menu, we will purchase from a number of origins to ensure we consistently deliver 100% availability, to the appropriate quality at a commercially viable price.

Recent outbreaks of foot & mouth disease have influenced our purchasing patterns and we continue to explore new sources of supply. To reflect this in a menu would add significant cost.

As the menu is our primary tool for communicating our offer to the guest, the use of other media such as blackboards, leaflets or point of sale materials would add significant additional cost as they are not consistently used across our business currently. Whitbread operates over 1500 outlets, therefore any change in information communicated would quickly add significant cost.

The proposal suggests that to remove such additional cost it might be appropriate to use terms such as "We obtain our beef from a number of sources, EC and Non EC". In our view this gives the consumer no more information than they currently have and as a consequence if they were minded to ask, then as previously indicated, we would provide the information relevant to that purchase.

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

We would support the view that it would be odd to require the foodservice sector to single out beef from other foods in terms of providing country of origin information.

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

Notwithstanding that we do not support the introduction of any compulsory scheme, it would not be unreasonable to add this requirement to the inspection protocols of local enforcement officers. Additionally, if as

suggested this would not require additional visits, then this also would seem a fair approach as it would not routinely increase management costs associated with hosting visits.

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

Notwithstanding that we do not support the introduction of any compulsory scheme, it would not be unreasonable to view any breach as significantly less serious than food safety and public health matters.

**Respondee Information**

Nick Martell-Bundock  
Category Manager,  
Fresh & Prepared Food.  
Whitbread Supply Chain.  
07747 766912

**1) sent on behalf of:**

Whitbread Plc  
Whitbread Court  
Houghton Hall Office Park  
Porz Avenue  
Dunstable  
LU5 5XE

**2c) We are content for our name, address and response to be made available in the SE library / website.**

**3) We are content for the Scottish Executive to contact us again in the future in relation to this consultation response.**

## 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: NICK MARTELL - BUNDOOK, WHITBREAD PLC

Postal Address: WHITHEAD COURT, HOUGHTON HALL OFFICE PK, POLLS AVE, AUNSTABLE

Consultation title: Country of Origin of Beef in the Food Service Sector LUS SXE .

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