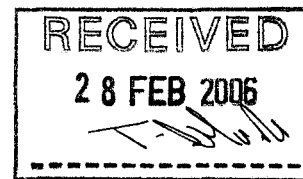


Clarke A (Tony)

From: Susan Kinniburgh [SKinniburgh@qmscotland.co.uk]
Sent: 27 February 2006 16:43
To: Country of Origin of Beef
Cc: Andrew Ovens; Gordon Sloan
Subject: Consultation Response



Please find attached the QMS response to your Country of Origin Labelling consultation.

Kind regards

Susan Kinniburgh
PA to Chairman and Chief Executive
Quality Meat Scotland

Tel: 0131 472 4044

<<Feb 28 Country of Origin Labelling Response.doc>>

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28/02/2006

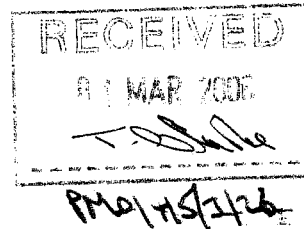
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February 28, 2006

Elizabeth Baird
Head of Food Marketing and Policy Branch
Scottish Executive
Country of Origin Consultation
Mail Point R259
Pentland House
47 Robb's Loan
Edinburgh
EH14 1TY



Dear Mrs Baird

**Quality Meat Scotland's Submission on Country of Origin Labelling for Beef
in the Food Service Sector.**

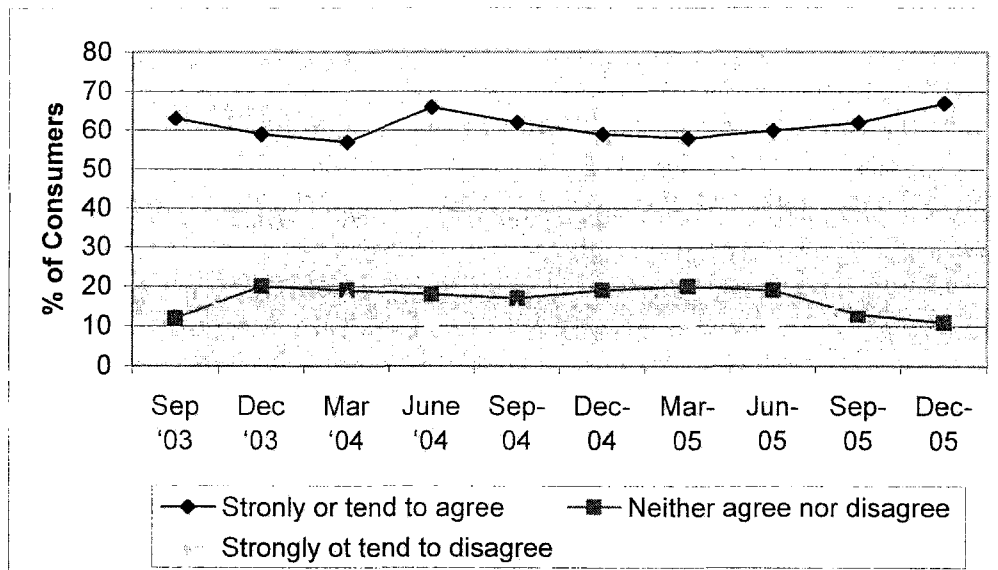
Thank you for providing us with the opportunity to comment on the consultation paper; Country of Origin of Beef in the Food Service Sector. I wish to formally respond to the paper on behalf of Quality Meat Scotland.

Consumer research undertaken by the Meat and Livestock Commission, on behalf of the devolved meat bodies since 2002, has shown a growing interest in the provenance of meat served on menus.

The results are based on a quarterly research conducted by FMCG in association with MORI with 1011 consumers aged 16+ demographically spread across the UK who have eaten out of the home during the previous two weeks.

The question asked is 'To what extent do you agree or disagree that meat served in restaurants and other public eating establishments should have its country of origin displayed at the point of purchase?' and the tracked research shows the following pattern: -





Source: FMCG/Mori Quickbite.

The research shows that an average of 61.3% of consumers either strongly or tend to agree with the question posed with the last quarter's figure peaking at 67% and is clearly on an upward trend.

More directly in answer to the questions raised in the consultation, please find our thoughts detailed below.

Questions and Answers

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

A1. No, QMS believes and research confirms that consumers assume that the beef they purchase in foodservice establishments is of domestic origin when in fact a large percentage is not. We believe it is inequitable that consumers purchasing beef or veal from retail establishments are provided with information on country of origin as a legal obligation while foodservices establishments are under no similar obligation.

Within the foodservice market, Beef Labelling Regulations on beef and veal are legally required on deliveries up to the kitchen door and as such the information as to the origin of beef and veal exists within the foodservice outlet. As such, should a customer ask the origin of the beef served they should easily be able to be provided with this information.

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

A2. Yes, the consumer research detailed above shows that consumers believe the beef they consume in foodservice establishments is of a domestic origin. They are unaware of the high percentage of imported beef used by the foodservice sector. The percentage of imported beef used in the food service sector is estimated by the Red Meat Industry Forum (RMIF) and the MLC Economics team to be 55%.

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?

A3. QMS believe that only a compulsory scheme will be adequate. Without compulsion there will be opportunities for unscrupulous proprietors to utilise the existing consumer confusion to mislead consumers into believing that the beef they are consuming is of domestic origin when it is not.

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

A4. QMS believe that the 'not declared' option will not satisfy consumers very real desire to know the country of origin of meat served and that the only likely informed decision that would occur where 'not declared' is stated would be one of not selecting that item from the menu. Should the 'not declared' option be allowed to be used this will almost certainly become the most commonly used menu declaration and the initiative to provide origin information in order that consumers can make more informed choices will be lost.

We believe that the Country of Origin in terms of where the beef has been born, reared and slaughtered should be the information given. In the case of Scotch Beef, this enjoys Protected Geographical Indication (PGI) status under EU regulations and as such the definition used for Scotch Beef, namely that it is born, reared and slaughtered in Scotland should be used as the benchmark for all origin descriptors on menus.

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

A5. Yes, The current beef labelling regulations in place for retail customers already requires that veal is also labelled with its country of origin details. As most of the veal consumed in the UK is imported and much of which has been produced in farming systems which are prohibited under UK legislation. As such the requirement should be applied to veal in order that consumers can again make an informed choice.

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

A6. The use of Environmental Health Officer's for enforcement may detract from their more important work namely that of ensuring food hygiene and as such the QMS believes that enforcement should be the responsibility of the local authorities trading standards officers. They already have regulatory powers as regards menu

descriptions such as the use of re-formed chicken and fish products and as such their scope should be extended to cover beef labelling.

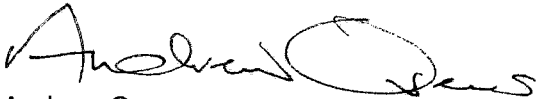
Q7. Do you agree that a civil action would be appropriate?

A7. At the outset if country of origin labelling becomes mandatory food service operators must be informed of the legislation and that failure to comply will result in a civil action. Should there be a mass failure to comply then more punitive enforcement action may be required.

QMS does have some concerns over compulsorily labelling of beef throughout the food service market. In the case of the NHS Scotland it would be impractical to have origin information stated on tray liners or, in the case of schools to have the information available to children who would not attach any real significance to the information. As such we believe that some caterers may consider compulsory beef labelling may be thought to be too much of a 'headache' and choose not to serve beef dishes on their menus. This would have the effect of removing a significant source of protein, iron and zinc from the diets of 'vulnerable' client groups who would almost certainly benefit from popular red meats such as beef in their diets.

QMS welcome's the Scottish Executive's move on Country of Origin Labelling.

Yours Sincerely,



Andrew Ovens
Marketing Controller

Name: QUALITY MEAT SCOTLAND

Postal Address: RURAL CENTRE, 106 GILCHRIST STREET, NEWBURN, NORTH Ayrshire G71 2B 5ML

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