

Our ref: **CRES CON 1132**  
27 February 2009

Dear Sir/Madam

## **REFORM OF THE EC MARKETING STANDARDS FOR FRESH FRUIT AND VEGETABLES**

I am writing to seek your comments on the Scottish Government's proposals to introduce the provisions of a European Regulation which reforms the current marketing standards for fresh fruit and vegetables. A copy of the consultation paper setting out further information is attached. A similar exercise is being undertaken for England and Wales by Defra. You will see that a Partial Regulatory Assessment has not been produced as we have concluded that the implementation of the reformed marketing standards regulation will be cost neutral for the trade. We would welcome your views and comments on this aspect in particular.

Responses are required by **24 April** and should be sent together with the completed Respondent Information Form to:

Room 251  
Pentland House  
47 Robb's Loan  
Edinburgh  
EH14 1HY - or by e-mail to: [php@scotland.gsi.gov.uk](mailto:php@scotland.gsi.gov.uk)

If you have any queries about this consultation, please contact me on 0131 244 6339. We would be grateful if you could clearly indicate in your response which questions of the consultation paper you are responding to.

This consultation and all other consultations exercises can be viewed online on the consultation web pages of the Scottish Government website at <http://www.scotland.gov.uk/consultations>. You can telephone Freephone 0800 77 1234 to find out where your nearest public internet access point is.

The Scottish Government now has an email alert system for consultations, SEconsult, which can be found at <http://www.scotland.gov.uk/consultations/seconsult.aspx>. This system allows stakeholders, individuals and organisations to register and receive a weekly email containing details of all new consultations (including web links). SEconsult complements but in no way replaces SG distribution lists, and is designed to allow stakeholders to keep up to date with all SG consultation activity, and therefore be alerted at the earliest opportunity to those of most interest. We would encourage you to register.

## Handling your response

We need to know how you wish your response to be handled and in particular whether you are happy for your response to be made public. **Please complete and return the Respondent Information Form attached to this letter**, as this will ensure that we treat your response appropriately. If you ask for your response not to be published we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

## Next steps in the process

Where respondents have given permission for their response to be made public and after we have checked that they contain no potentially defamatory material, responses will be made available to the public in the Scottish Government Library (see the attached Respondent Information Form); these will be made available to the public in the Scottish Government Library. You can make arrangements to view responses by contacting the SG library on 0131 244 4552. Responses can be copied and sent to you, but a charge may be made for this service.

## Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to:

John Speirs  
Scottish Government – Rural Directorate  
Plants, Horticulture and Potatoes  
Pentland House  
47 Robb's Loan  
Edinburgh  
EH14 1TY  
Tel: 0131 244 6343  
e-mail: [john.speirs@scotland.gsi.gov.uk](mailto:john.speirs@scotland.gsi.gov.uk)

Yours sincerely

**Mrs Caroline Boyd**  
Plants, Horticulture and Potatoes



# Summary of the current regime for the EC Marketing Standards for fresh fruit and vegetables

## Background

1.1 Council Regulation (EC) No 1234/2007 established a common organisation of agricultural markets which includes specific rules as regards the marketing of fruit and vegetable products. Commission Regulation (EC) No 1580/2007 lays down implementation rules for the use of marketing standards within the fruit and vegetable sector.

1.2 EC Marketing Standards for fresh fruit and vegetables exist for a wide range of products. There are currently 36 separate standards. Subject to certain exceptions, they apply to all stages of the distribution chain – from the packhouse or point of import, through the wholesale and distribution systems to retail outlets.

1.3 The primary purpose of the standards is to remove products of unsatisfactory quality from the market place, bring production in line with consumer requirements and to facilitate trade based on fair competition. The standards have ensured that produce is graded and packed to a uniform standard, and is labelled accurately. More recently the standards have been developed to take into account the maturity of a product and consideration has been given to organoleptic qualities. However, the market has been subject to rapid change over recent years and in particular supermarket retailers have been using their own more exacting standards.

1.4 The current rules applying to the fruit and vegetable sector include the following provisions:

- Marketing standards for 36 specified products. These standards contain criteria in relation to quality, sizing, labelling, packaging, presentation and uniformity. There are two main quality classes, Classes I and II. Some products may also have an Extra Class. The three classes can be summarised as:
  - Extra Class – superior quality produce which is uniformly regular in shape and appearance, with only very slight superficial defects;
  - Class I – good quality produce with only a few minor defects; and
  - Class II – reasonable quality produce which may show one or more defects.
- Specific exemptions from the standards, for example products sent for processing or animal feed.
- Rules in relation to competent bodies and the set up of a trader database.
- Rules on conformity checks made by enforcement bodies at all stages of marketing.
- An approved trader scheme.
- Rules in relation to approval of checks performed by Third Countries prior to import.
- Special arrangements for retailers and retail packages.

## **History**

1.5 Statutory grading for fresh fruit and vegetables applicable to Scottish/UK producers was originally conceived in the 1920s. It is a common misconception that the use of standards has only come about because of the UK's membership of the European Union. However, the present system has been developed in close co-operation with our European partners and with consultation with all sectors of the food chain. The marketing standards also reflect developments on the wider global stage, such as the United Nations Economic Commission for Europe (UNECE), and are a well established, important and accepted part of international trade.

## **Benefits to the consumer**

1.6 The standards are mainly designed to facilitate trade. Nevertheless, they also provide a degree of consumer protection in a sector where most products are highly perishable in nature and where serious defects can develop rapidly. They also ensure that the consumer is offered produce which is labelled accurately, and of a quality and maturity which is acceptable.

## **Enforcement of the standards**

1.7 The standards are directly applicable in all EU Member States. The legislative provisions for the standards are contained in the following:

- Agriculture & Horticulture Act 1964;
- The Grading of Horticultural Produce (Amendment) Regulations 1973;
- The Grading of Horticultural Produce (Forms of Labels) Regulations 1982;
- The Grading of Horticultural Produce (Amendment) Regulations 1983; and the
- Horticultural Produce Act 1986

In Scotland, the EC Marketing Standards are enforced by the Scottish Government's Horticultural Marketing Officers. Their powers are contained in the Agriculture and Horticulture Act 1964. The Act requires a trader in fresh fruit and/or vegetables to comply with the EC Marketing Standards. This means that any regulated produce displayed for sale, sold, offered for sale, delivered or marketed in any other way, must be labelled correctly and packed in accordance with the rules set down in the appropriate standard. Failure to do so will give rise to a criminal offence. Although the Scottish Government will endeavour to assist a trader to comply with the law, cases involving blatant and persistent disregard of the legislation may lead to investigation and consideration for prosecution.

# The new EC Regulation on revising the Marketing Standards for fresh fruit and vegetables

## Background

2.1 Commission Regulation (EC) No 1221/2008 updates and amends Commission Regulation (EC) No 1580/2007 laying down implementing rules of Council Regulations (EC) No. 2200/96, (EC) No 2201/96 and (EC) No 1182/2008 in the fruit and vegetable sector. The Regulation has been driven by the Commission's reform of the sector in 2007. The aims of the new regulation are to harmonise, consolidate, simplify and deregulate the rules relating to fresh fruit and vegetables, whilst ensuring that produce traded is 'sound, fair and marketable'. The implementation date for the regulation is 1 July 2009.

2.2 The key features of the new regulation are:

- The introduction of two types of marketing standards to be applied at all stages of the distribution chain:
  - Specific Marketing Standards (SMS) for 10 products; and
  - General Marketing Standard (GMS) to apply to all fruit and vegetables unless excluded (see Annex B for list of products).
- Special arrangements for labelling and derogations at retail, and the marketing of packages of 5 kg or less.
- The removal of the requirement to notify and certify consignments for processing.
- The extension of powers to distance selling by the internet or other means.
- A requirement to undertake conformity checks by the Member State using risk analysis.
- An approved trader scheme.
- The use of approved inspection services in Third Countries to certify their own exports into the EU.

## What is no longer part of the system

2.3 The following are no longer part of the regulatory requirements:

- The repeal of 26 specific marketing standards for the following products:

Apricots	Artichokes	Asparagus
Aubergines	Avocados	Beans
Brussels sprouts	Carrots	Cauliflowers
Cherries	Courgettes	Cucumbers
Cultivated mushrooms	Garlic	Hazelnuts in shell
Headed cabbages	Leeks	Melons
Onions	Peas	Plums
Ribbed celery	Spinach	Walnuts in shell
Watermelons	Witloof chicory	

- Notification and certification of all imported produce for processing.
- With the abolition of certain aid schemes in the 2007 reforms, references made to minimum quality criteria for products intended for industrial processing are deleted.

## What has been retained from the current arrangements?

2.4 The following elements are retained in the new Regulation:

- Retention of 10 SMS for:
  - Apples;
  - Citrus Fruits;
  - Kiwi-fruit;
  - Lettuces, Curled Leaved and Broad-Leaved Endives;
  - Peaches and Nectarines;
  - Pears;
  - Strawberries;
  - Sweet Peppers;
  - Table Grapes and;
  - Tomatoes.
- Significant core of official controls to remain.
- Inspection and enforcement required at all stages of the marketing chain.
- Import notification.
- Approved Inspection Services (AIS) for selected Third Countries.
- Risk based approach to enforcement.
- Removal of rotten/soiled/pest affected produce.

2.5 It should be noted that the 10 SMSs were chosen as they are the top 10 most traded produce lines within the EU - both imported and intra-EU trade. The specific standards account for 50% of all traded produce.

## What is new?

2.6 The following are the new requirements brought in by this Regulation:

- A generic GMS for all produce covered by the regime (as detailed in Annex B). This standard will be legally binding on all traders and is to deliver the requirement that fruit and vegetables covered by it are 'sound, fair and marketable'.
- The country of origin must be indicated on products covered by both the GMS and the SMSs. Exceptions are in place for mixed packages of a net weight of 5kg or less, where reference to the country of origin can be replaced by:
  - Mix of EC fruit and vegetables;
  - Mix of non-EC fruit and vegetables; and
  - Mix of EC and non-EC fruit and vegetables.
- Conformity in relation to products subject to the GMS may be shown if the applicable standard adopted by the UNECE is met.
- Distance and virtual sales are brought into the scope of the regulation where information particulars required by the standards should be available to consumers before purchase.
- The definition of a trader is widened to ensure all those operating within the marketing chain are covered by the regulation.
- An exemption is given to the marketing standards for certain products which have undergone trimming and cutting making them 'ready to eat' or 'kitchen ready'.
- To reflect the trend of selling larger packs of fruit and vegetables, mixes of 5kg or less are allowed provided that they are of uniform quality and each product within it complies with the relevant SMS, or where this does not apply, the GMS.
- Member States may allow an exemption for the 10 products covered by the SMSs if they are presented for retail sale to the consumer for their own personal use and labelled 'product intended for processing', or by using words of equivalent meaning. In such cases produce must comply with the GMS.

## Benefits to the consumer

2.7 The new regulation introduces greater focus on consumer protection by providing:

- The GMS sets a minimum standard below which traders should have no interest in selling fruit and vegetables. Selling such produce would be to the detriment of the consumer.
- Products not previously checked for quality are now covered by the GMS. This enables official checks to be made to a much wider range of products instead of just being limited to 36 specific standards
- The requirement to display a country of origin on all regulated fruit and vegetables will allow the purchaser to make an informed choice.
- To prevent the consumer being misled and the risk of fraud, information particulars required by the standards should be made available before purchase for distant selling and internet sales.

- At retail outlets, the possibility for the consumer to buy appropriately labelled and specifically marketed produce for home processing, i.e. for use in the making of jams, pickles or juicing, etc. This is limited to the 10 products covered by the SMSs and the quality must meet the minimum set by the GMS.
- The existing benefits of marketing standards will also remain by:
  - Removing poor quality produce from the market place;
  - Bringing production in line with consumer requirements;
  - Providing clear and transparent standards, and
  - Facilitating trade based on fair competition.

## Implementation of the new Regulation in Scotland

3.1 The provisions of Commission Regulation (EC) No 1221/2008 are directly applicable in UK law. Our current domestic legislation defines the offences and penalties to ensure we are able to enforce the EC Marketing Standards. We do not envisage changing any of the sanctions, but may make some changes to reflect the new regulation – for example to allow for a derogation from SMSs for products sold at retail to consumers labelled as ‘intended for processing’.

3.2 Whilst we are legally obliged to implement this new regulation, there are some areas where we do have choices to make and the paragraphs below describe both areas and how we propose to implement them. They also include some specific questions on which we would welcome your views which will help us decide on the way forward.

### SMS

3.3 The 10 remaining standards, identified as being the most traded within the European Union, and currently representing approximately 50% of UK trade, are high risk products. Checks must be made on this produce at all stages of the marketing chain with frequency based on risk. We believe the existing measures using parameters like the size of the trader, the position in the marketing chain and findings from previous checks meet the requirements of the new regulation to ensure risk is at the heart of official controls.

Summary	Benefits
The 10 SMS to be enforced at all stages of marketing (including internet and other distance sales transactions) based on existing risk criteria.	<p><b>Trade:</b> Significant reduction to the burden placed on the trade by only having 10 SMS and removing the necessity to classify and fully label the other 26 products as at present.</p> <p><b>Scottish Government:</b> Seen as deregulatory because it reduces the need for classification and simplifies labelling for 26 crops.</p>

### GMS

3.4 This will apply to all fresh produce (detailed in Annex B) and will be legally binding on the trade. Similar to SMS, conformity checks must be made at all stages of distribution using a system of risk to determine frequency. The GMS is a deregulatory measure that simplifies the burden of responsibility for the trader by removing 26 products covered by a specific standard, whilst introducing a basic level of protection and information for customers. **The GMS is a new standard and we envisage that initial visits to traders will be advisory on these products before the use of compliance notices are brought in for non-conformity.**

3.5 Although the requirements of grading into different classes will be removed for GMS products, additional requests given to packers by supermarkets, or other customers, will not be affected by this change provided that the minimum requirements of the standard are met.

Summary	Benefits
<p>Apply GMS to all products at all stages of marketing (including internet and other distance sales). Data from checks undertaken will feed into the risk assessment system.</p>	<p><b>Trade:</b> Significant reduction in classification requirements, as need to meet minimum requirements only.</p> <p>Reduction in labelling requirement to country of origin only.</p> <p>Greater transparency across products not previously covered by any marketing standard.</p> <p>Application at import is the most cost effective way of controlling quality and labelling for the consumer.</p> <p><b>Scottish Government:</b> Significant benefits in consumer information and protection. i.e. in removing unacceptable product and providing country of origin information.</p> <p>Regulation will be transparent in that traders and consumers should have no interest in produce below the minimum requirements of the GMS.</p> <p>Helps to underpin the SMS and helps to contribute to the Scottish Government's commitment to a light touch enforcement process.</p> <p>Able to collect data for necessary database, and risk based system and hence compliance with regulation.</p>

#### Traders Database and Risk Assessment Systems

3.6 The Scottish Government already holds an extensive database of fresh fruit and vegetable traders and has comprehensive risk assessment systems in place.

3.7 Risk assessment is currently applied to visits made to packers, wholesalers, distributors and retailers. It provides a system which identifies those traders with a greater chance of having produce not conforming to the rules.

The criteria used includes:

- Position in marketing chain.
- Size of trader and type of business.
- Product range and volume handled.
- Findings made during checks carried out on previous visits.

3.8 With the introduction of the new regime, risk assessment will be applied to both SMS and GMS products. We believe that our existing system meets the requirements of the new regulation by reducing visits to traders with good levels of compliance and targeting resources to those who have a poor conformity record in an attempt to reverse the trend. For GMS products, Member States may also extend risk criteria by using product as a means of assessment.

3.9 Scotland receives very few direct imports from Third Countries. Apart from very small quantities of regulated produce, the aim has been to inspect 100% of all products entering Scotland. Importers and their agents are required to notify the Scottish Government’s Horticulture and Marketing Unit prior to the arrival by e-mail or fax using a Notice of Landing. Marketing Officers will then inspect the produce and issue a certificate of conformity. This has to be seen by Customs before the consignment can be released for free trade.

3.10 For Scottish traders importing produce via England and Wales, notification has to be made on the PEACH system. This assesses the risk of each application using a number of factors including past inspection history of similar consignments. After risk assessment, each consignment is given a risk category, i.e. red (high risk), amber (medium risk), or green (low risk). Red risk consignments will be inspected, amber consignments may be inspected and green consignments automatically have a conformity certificate for printing by the importer or their agent.

Summary	Benefits
<p>Risk-based systems to be extended to cover additional GMS products and businesses that trade with them.</p>	<p><b>Trade:</b> Only products and traders at higher risk are targeted for checks.</p> <p>Retaining existing risk based systems will ensure that trade witnesses a seamless transition to the new regime.</p> <p><b>Scottish Government:</b> The use of a risk based system will help to effectively target at-risk traders and products to comply with regulation.</p> <p>Retention of the existing risk based systems will be a saving on time and resources in developing an alternative.</p>

Q 1: Do you agree that we continue to use the existing risk assessment procedures? If not, why?

Q 2: Is it of benefit for products subject to the GMS to be checked for conformity at import? If not, why?

### **Approved Trader Scheme**

3.11 Traders classified as low risk and who provide special guarantees in relation to high conformity rates are able to use a specific label to indicate this. The scheme has run for a number of years in England but has received little interest from the trade in Scotland. With the new regulation, the scheme will be available for both SMS and GMS products. Member States will also have the option to extend its use to both importers and exporters.

3.12 Authorisation is granted for a one year period and the trader concerned must be approved by the Scottish Government. Regular audits will be received and the following conditions would have to be observed:

- Staff, who have received approved training, would have to be in place to carry out inspections.
- The use of suitable equipment for preparation and packing of the produce.
- Commit to carrying out conformity checks on crops dispatched and keep records of all checks carried out.

3.13 In addition to the above, there may be extra procedures for importers and exporters required by HM Revenue and Customs. This Scheme will also carry operational costs. The decision on whether it is worthwhile to commit to the financial investment and to seek approval lies entirely with the trader concerned.

<b>Summary</b>	<b>Benefits</b>
Current Approved Trader Scheme to be retained and extended.	<p><b>Trade:</b> To exporters of all products allowing them to issue conformity certificates.</p> <p>To a limited number of importers who can comply with requirements of Article 11, likely to be those registered with HM Revenue and Customs as having CFSP premises.</p> <p><b>Scottish Government:</b> Increased trader choice and reduction of direct inspections.</p>

Q 3: Would you be interested in participating in an Approved Trader Scheme?

### Exemptions

3.14 Member States may provide for a derogation from the SMSs for products sold at retail to consumers for personal use and labelled as 'intended for processing'. However, the products would still need to meet the GMS. This derogation would allow new opportunities for consumers to buy appropriately labelled and specifically marketed product at retail for home processing for use in jams, pickles, juicing, etc.

Summary	Benefits
Derogation to allow products covered by the SMS to be sold at retail outlets for the use of 'home processing'.	<p><b>Trade:</b> Allows lower quality produce covered by the SMS to be sold to the consumer at retail level.</p> <p><b>Scottish Government:</b> Increases consumer choice as well as providing the benefits of the GMS.</p>

Q 4: We are intending to allow the exemption from the SMS for products sold at retail etc by amending domestic legislation. Do you have any comments on this?

### Mixed packages of fruit and vegetables

3.15 The marketing of mixed packages of a net weight of 5kg or less will be allowed provided that the products are of uniform quality and comply with the relevant SMS or GMS. In addition, where the mixture of produce originates from more than one Member State or Third Country, the origin stated on the pack may be simplified to the following:

- 'Mix of EC fruit and vegetables';
- 'Mix of non-EC fruit and vegetables'; or
- 'Mix of EC and non-EC fruit and vegetables.'

Summary	Benefits
Mixed packages of up to 5kg will be permitted.	<p><b>Trade:</b> Allows for larger mixed packages to be sold as long as quality is uniform.</p> <p>Labelling relating to country of origin is simplified.</p> <p><b>Scottish Government:</b> Increases consumer choice and simplifies labelling requirements.</p>

## ANNEX A

### List of Questions

Q.1 Do you agree that we continue to use existing risk assessment procedures? If not, why?

Q2. Is it of benefit for products subject to the GMS to be checked for conformity at import? If not, why?

Q3. Would you be interested in participating in the Approved Trader Scheme?

Q4. We are intending to allow the exemption from the SMS for products sold at retail to the consumer for personal use and labelled 'intended for home processing' by amending domestic legislation. Do you have any comments to make this?

Produce subject to GMS<sup>1</sup>

CN Code <sup>2</sup> :	Description
0703	Onions, shallots, garlic, leeks and other alliaceous vegetables, fresh or chilled
0704	Brussels sprouts, cabbages, cauliflowers, headed broccoli, kohlrabi, kale and similar edible brassicas, fresh or chilled.
0705	Chicory, ( <i>Cichorium</i> spp.) fresh and chilled.
0706	Carrots, turnips, salad beetroot, salsify, celeriac, radishes, horseradish ( <i>Cochlearia armoracia</i> ) and similar edible roots, fresh or chilled.
0707 00	Cucumbers and gherkins, fresh or chilled.
0708	Beans, peas and other leguminous vegetables, shelled or unshelled, fresh or chilled.
0709	Other vegetables (asparagus, aubergines, cardoons, celery, chard or white beet, courgettes, fennel, globe artichokes, mushrooms (cultivated), other salad vegetables, spinach and truffles), fresh or chilled.
0802	Other nuts, (almonds excluding bitter almonds, hazelnuts or filberts ( <i>Corylus</i> spp), walnuts, chestnuts, pistachios, macadamia nuts), in shell, fresh or dried excluding areca (or betel) and cola nuts within subheading 0802 9020.
0803 00 11	Plantains, fresh
0804	Figs, fresh, pineapples, avocados, guavas, mangoes and mangosteens
0805	Grapefruit, including pomelos and limes, fresh
0807	Melons (including watermelons) and pawpaws (papayas), fresh
0808	Quinces, fresh
0809	Apricots, cherries, plums and sloes, fresh
0810	Other fruit fresh: (cranberries, bilberries and other fruits of the genus <i>Vaccinium</i> , durians, tamarinds, cashew apples, lychees, jackfruit, sapodilla plums, passion fruit, carambola, pitahaya, blackcurrants, whitecurrants or redcurrants, gooseberries, raspberries, blackberries, mulberries and loganberries), fresh.
0813 50 31 & 0813 50 39	Mixtures exclusively or dried nuts of headings 0801 and 0802.
0910	Thyme, fresh or chilled
1211 90 85	Basil, melissa, mint, <i>Origanum vulgare</i> , (oregano/wild marjoram), rosemary, sage, fresh or chilled
1212	Locust (or carob) beans

<sup>1</sup> List taken from Council Regulation (EC) No 1234/2007, Part IX: Fruit and Vegetables.

<sup>2</sup> Commission Regulation (EC) No 1031/2008, Chapters 7, 8, 9 and 12.

Range of Consultees

**(A full and detailed list of those consulted is attached to the hard copy of the consultation paper)**

Importers, Agencies and Authorities

Producers/Packers

General Trade Bodies

Wholesalers

Retailers

Mr Martin Beckenham  
Chief Executive  
Horticultural Development Company  
Bradbourne House  
East Malling  
KENT - ME 19 6DZ

Association of Convenience Stores Ltd  
Federation House  
17 Farnborough Street  
FARNBOROUGH  
GU14 8AG

British Retail Consortium  
2<sup>nd</sup> Floor, 21 Dartmouth Street  
Westminster  
LONDON  
SW1H 9BP

Federation of Wholesale Distributors  
1<sup>st</sup> Floor, 9 Gildredge Road  
EASTBOURNE  
BN21 4RB

Fresh Produce Consortium  
Minerva House  
Minerva Business Park  
Lynch Wood  
PETERBOROUGH  
PE2 6FT

National Association of British Market Authorities  
The Guildhall  
OSWESTRY  
SY11 1PZ

National Farmers Retail & Markets Association  
The Greenhouse  
PO Box 575  
SOUTHAMPTON  
SO15 7BZ

National Independent Supermarket Association  
Park Farm Road  
Foxhill Industrial Estate  
SCUNTHORPE  
DN15 8QP

Scottish Grocers Federation  
222 / 224 Queensferry Road  
EDINBURGH  
EH4 2BN

The Scottish Retail Consortium  
PO Box 13737  
GULLANE  
EH31 2WX

Arbuckle Smith & Co  
106 Abercorn Street  
PAISLEY  
PA3 4AY

Food Standards Agency  
Aviation House  
125 Kingsway  
LONDON  
WC2B 6NH

The Food Standards Agency (Scotland)  
6<sup>th</sup> Floor  
St Magnus House  
25 Guild Street  
Aberdeen  
AB11 6NJ

Kuehne + Nagel Ltd  
Unit C, Building 3  
Glasgow Airport Business Park  
Marchburn Drive  
PAISLEY  
PA3 2SJ

NFU Scotland  
Rural Centre, West Mains  
Ingliston  
NEWBRIDGE  
EH28 8L

HM Revenue & Customs  
Crownhill Court  
Tailyour Road  
PLYMOUTH  
PL6 5BZ

Abbey Fruit  
Kirkton Industrial Estate  
ARBROATH  
DD11 3LR

Albert Bartlett & Sons (Airdrie) Ltd  
New Monkland  
251 Stirling Road  
AIRDRIE  
ML6 7SP

Angus Soft Fruits Ltd  
East Seaton  
ARBROATH  
DD11 5SY

East Lothian Produce  
4 West Garleton  
HADDINGTON  
EH41 3SJ

East of Scotland Growers Ltd  
Prestonhall Industrial Estate  
CUPAR  
KY15 4RD

Kettle Produce Ltd  
Balmalcolm Farm  
Balmalcolm  
CUPAR  
KY15 7TJ

Moray Coast Produce Ltd  
6 Greshop Road  
Greshop Industrial Estate  
FORRES  
IV36 2RB

R & K Drysdale  
Old Cambus Quarry  
COCKBURNSPATH  
TD13 5YR

Scotherbs Ltd  
Longforgan  
Near DUNDEE  
DD2 5HU

Stewarts of Tayside Ltd  
Tofthill Farm  
Glencarse  
PERTH  
PH2 7LS

TIO Limited  
13 Greshop Road  
Greshop Industrial Estate  
FORRES  
IV36 2GU

The Really Garlicky Company  
Craggie Farm  
NAIRN  
IV12 5HY

Aldi Stores Ltd.  
Holly Lane  
ATHERSTONE  
CV9 2SQ

ASDA Stores Ltd  
Asda House  
Southbank  
Great Wilson Street  
LEEDS  
LS11 5AD

Co-operative Group (CWS) Ltd  
PO Box 53  
New Century House  
MANCHESTER  
M60 4ES

LIDL UK GmbH  
19 Worple Road  
WIMBLEDON  
SW19 4JS

Marks & Spencer PLC  
Waterside House  
35 North Wharf Road  
LONDON  
W2 1NW

Tesco Stores Ltd  
New Tesco House  
Delamare Road  
CHESHUNT  
EN8 9SL

Sainsbury's Supermarkets Ltd  
33 Holborn  
LONDON  
EC1N 2HT

Wm Morrison Supermarkets PLC  
Hillmore House  
Gain Lane  
BRADFORD  
BD3 7DL

Fyffes Redbridge Glasgow Ltd.  
Stance A 2 - 8  
Fruit Market,  
Blochairn Road,  
GLASGOW  
G21 2RV

Gallovidian Fresh Foods Ltd  
Units 3 & 4, Lochside Industrial Estate  
Irongray Road  
DUMFRIES  
DG2 0JE

Knowles Food Services  
17 Merkland Road East  
ABERDEEN  
AB24 5DT

Mark Murphy & Partner Ltd  
Unit 2, Newbridge Industrial Estate  
NEWBRIDGE  
EH28 8PJ

The Williamson Group Ltd  
5 Walker Road  
INVERNESS  
IV1 1TD

Glasgow Fruit & Vegetable Market Tenants' Ass.  
**C/O** James McKenzie & Son (Fruit Bazaar) Ltd  
Stance F4-5  
Fruit Market  
Blochairn Road  
GLASGOW - G21 2RT

W Knight Watson & Co Ltd  
Mandal House  
South Shore Road  
GRANGEMOUTH  
FK3 8AE