

FOOD STANDARDS AGENCY CONSULTATION

Title: Amendments to traceability requirements for food of animal origin

CONSULTATION SUMMARY PAGE

Date consultation launched:	Closing date for responses:
15 August 2012	23 November 2012

Who will this consultation be of most interest to?
Enforcement Officers and Food Business Operators (FBOs) producing food of animal origin.

What is the subject of this consultation?
Two subjects:

- Regulation (EU) No 931/2011 provides clarification for FBOs producing food of animal origin on the information they are required to keep to demonstrate compliance with the traceability requirements contained in Regulation (EC) No 178/2002.
- The format in which Guidance is offered to Food Business Operators and to Enforcement Officers to assist in compliance with the legislation.

What is the purpose of this consultation?

- to ask stakeholders to comment on the FSA's assessment of the impact of the new European Commission Regulation relating to clarification of traceability requirements.
- to raise awareness among stakeholders about the new European legislation and how it will be introduced into the UK.
- to provide an opportunity for stakeholders to comment on the type of guidance that is needed.

Responses to this consultation should be sent to:

Name Liz Stretton Division/Branch Hygiene & Microbiology FOOD STANDARDS AGENCY Tel: 0207 238 8357 Fax: 0207 238 8910	Postal address: Room 3C, Aviation House, 125 Kingsway, London, WC2B 6NH Email: liz.stretton@foodstandards.gsi.gov.uk
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Is an Impact Assessment included with this consultation?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> See Annex A for reason.
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Regulation (EU) No 931/2011 on the traceability of food of animal origin

Introduction

1. EU food safety¹ and food hygiene² Regulations apply directly in the UK, so it is necessary to ensure that national measures are in place to enable full effectiveness of the EU Regulation (i.e. to provide for the enforcement of the new requirements of the EU Regulation).
2. It will not be necessary to introduce new national measures (i.e. through a Statutory Instrument (SI)) in this case because Regulation (EU) No 931/2011 clarifies the traceability information required by Regulation (EC) No 178/2002 which is enforced in Great Britain via the General Food Regulations 2004. We plan to facilitate implementation of Regulation (EU) No 931/2011 through targeted guidance to assist FBOs and Enforcement Officers understanding and compliance with the requirements of the new legislation. A draft of the proposed guidance is provided as part of this consultation.
3. This consultation is being undertaken on a Great Britain basis. A separate but similar consultation is being undertaken in Northern Ireland.
4. The Food Standards Agency (FSA) is obliged (except in cases of emergency) to consult interested parties on all changes to food law, both EU and national. Where there is any likelihood that the impacts of changes to laws may be significant, the FSA will prepare an IA formally setting out its considered views on the costs and/or benefits of these changes. IAs are usually started at the early stage of the life of a piece of proposed EU legislation and updated as the proposal is negotiated and information is gathered on the impact of the proposal. A formal consultation is often issued when the proposals are agreed and a draft IA is prepared. Although we envisage that there is no need to amend the General Food Regulations 2004 in Great Britain, FBOs are still required to adhere to the enhanced traceability requirements which is why the IA and draft guidance have been developed.

Background

Key issue:

- **Clarification of documentation required by FBOs to demonstrate traceability for food of animal origin as required by Regulation (EU) No 931/2011**

5. [Regulation \(EU\) No 931/2011](#) sets out the information FBOs are required to keep to demonstrate traceability. This includes:
 - a description of the food;
 - the quantity;
 - the name and address of the FBO who dispatched the food;

¹ Regulation (EC) No 178/2002 laying down the principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety

² Regulation (EC) No 853/2004 of 29 April 2004 on the hygiene of foodstuffs; Regulation (EC) No 853/2004 of 29 April 2004 laying down specific hygiene rules for food of animal origin and Regulation (EC) No 854/2004 of 29 April laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption

- details of the consignor if different from the supplier;
 - name and address of the FBO to whom the food is being supplied;
 - the consignee if different (the consignor/consignee could be a food broker);
 - an identifying lot, batch or consignment number; and
 - the date of dispatch.
6. It is for the FBO to decide what constitutes a lot, batch or consignment but they should be aware that if they decide that their whole stock/production is considered as one batch, then their entire stock/production would be subject to recall or withdrawal in the event of a problem being identified.
7. Over the course of the negotiations in the EU Working Groups, FSA officials have informally consulted relevant industry representatives on the proposals and have worked to influence the discussions as a result of those consultations. Reports of EU meetings where hygiene policy is discussed are published on the FSA website.

Impact Assessment

8. A draft IA is included in this consultation and the FSA asks stakeholders to comment on the estimates of costs and/or benefits of clarifying the information FBOs are required to keep to demonstrate traceability as required by the introduction of Regulation (EU) No 931/2011..

The draft IA contains four questions.

Regulation (EU) No 931/2011

Q1: We invite stakeholders to comment on whether our assessment of the type of affected businesses in the UK, as set out in table 1, is a reasonable assessment. If you agree or disagree with this assessment, please provide evidence to support your response.

Q2: It is our assumption that there is a familiarisation cost for businesses associated with the Regulation. We invite businesses to comment on our estimate of half an hour for familiarisation and a further half an hour for dissemination to key staff within the organisation about the new Regulation. If you agree or disagree with this assessment, please provide evidence to support your response.

Q3: It is our assumption that there will be a one-off cost of familiarisation for enforcement authorities associated with the Regulation. We invite enforcement authorities to comment on our estimate of half an hour for familiarisation for an EHO in each LA and a further half an hour for dissemination to key staff within the organisation about the new guidance. If you agree or disagree with this assessment, please provide evidence to support your response.

Q4 We invite all stakeholders to comment and where applicable provide evidence on the above costs and benefits section.

9. We would welcome comments, particularly from FBOs and Enforcement Officers, in response to any or all of the questions above. If stakeholders can share any evidence or experiences, it would help us to demonstrate that the

estimates in the IA are well-founded. Please send comments to Liz Stretton via either e-mail or post (contact details overleaf).

Guidance

10. We are currently drafting targeted guidance to explain the effects of the new Regulation and measures FBOs will have to take to demonstrate that any requirements or provisions are being met. There are currently two full guidance documents in circulation explaining the requirements of Regulation (EC) No 178/2002 provisions for traceability:

- the UK issued [a guidance document in 2007](#)³
- the EU produced [a revised guidance document in 2010](#)⁴

We are considering withdrawing the UK guidance as the EU guidance covers the same requirements and replacing it with web-based sector specific text which would be targeted at primary producers, manufacturers and caterers. We envisage that this would be more user-friendly and provide the information in a manner which FBOs, particularly small and medium sized businesses, will find more useful. A draft example of the type of information we are considering uploading, in this case aimed at caterers, is provided at Annex C – please note that this is an early draft and the text is liable to undergo considerable amendment prior to it being finalised. This is intended as sector specific guidance so we will also be providing similar guidance for other food sectors. The text is provided to inform FBOs of the legal requirements of the Regulations.

Questions on guidance

Q5 Would the proposed format and content of guidance meet the needs of FBOs?

Q6 Is there another format that FBOs would prefer?

Other previous guidance documents

11. Links are provided here to:

[UK Guidance on Regulation \(EC\) No 178/2002](#)⁵ issued July 2007

[EU Guidance on Regulation \(EC\) No 178/2002](#)⁶ issued December 2010

Responses

12. **Responses are required by close 23 November 2012**. Please state, in your response, whether you are responding as a private individual or on behalf of an

³ <http://www.food.gov.uk/multimedia/pdfs/fsa1782002guidance.pdf>

⁴ http://ec.europa.eu/food/food/foodlaw/guidance/docs/guidance_rev_8_en.pdf

⁵ <http://www.food.gov.uk/multimedia/pdfs/fsa1782002guidance.pdf>

⁶ http://ec.europa.eu/food/food/foodlaw/guidance/guidance_rev_8_en.pdf

organisation/company (including details of any stakeholders your organisation represents).

Thank you on behalf of the Food Standards Agency for participating in this public consultation.

Yours faithfully

Liz Stretton
Food Policy Team
Hygiene and Microbiology Division

Enclosed

Annex A: Standard Consultation Information

Annex B: Impact Assessment – Regulation (EU) No 931/2011

Annex C: Example of webpage guidance

Annex D: List of interested parties

Queries

1. If you have any queries relating to this consultation please contact the person named on page 1, who will be able to respond to your questions.

Publication of personal data and confidentiality of responses

2. In accordance with the FSA principle of openness our Information Centre at Aviation House will hold a copy of the completed consultation. The FSA will publish a summary of responses, which may include your full name. Disclosure of any other personal data would be made only upon request for the full consultation responses. If you do not want this information to be released, please complete and return the Publication of Personal Data form, which is on the website at <http://www.food.gov.uk/multimedia/worddocs/dataprotection.doc> Return of this form does not mean that we will treat your response to the consultation as confidential, just your personal data.
3. In accordance with the provisions of Freedom of Information Act 2000/Environmental Information Regulations 2004, all information contained in your response may be subject to publication or disclosure. If you consider that some of the information provided in your response should not be disclosed, you should indicate the information concerned, request that it is not disclosed and explain what harm you consider would result from disclosure. The final decision on whether the information should be withheld rests with the FSA. However, we will take into account your views when making this decision.
4. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

Further information

5. A list of interested parties to whom this letter is being sent appears in Annex B. Please feel free to pass this document to any other interested parties, or send us their full contact details and we will arrange for a copy to be sent to them direct.
6. Please let us know if you need paper copies of the consultation documents or of anything specified under '**Other relevant documents**'.
7. This consultation has been prepared in accordance with HM Government Code of Practice on Consultation, available at: <http://www.berr.gov.uk/files/file47158.pdf> The Consultation Criteria from that Code should be included in each consultation and they are listed below:

The Seven Consultation Criteria

Criterion 1 — When to consult

Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2 — Duration of consultation exercises

Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3 — Clarity of scope and impact

Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4 — Accessibility of consultation exercises

Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5 — The burden of consultation

Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6 Responsiveness of consultation exercises

Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7 Capacity to consult

Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

8. **Criterion 2 states that *Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.***
9. The Code of Practice states that an Impact Assessment should normally be published alongside a formal consultation. Please see the Impact Assessments at Annexes B and C.
10. For details about the consultation process (not about the content of this consultation) please contact: [Food Standards Agency Consultation Co-ordinator](#), Room 2B, Aviation House, 125 Kingsway, London, WC2B 6NH. Tel: 020 7276 8140.

Comments on the consultation process itself

11. We are interested in what you thought of this consultation and would therefore welcome your general feedback on both the consultation package and overall consultation process. If you would like to help us improve the quality of future consultations, please feel free to share your thoughts with us by using the Consultation Feedback Questionnaire at <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>
12. If you would like to be included on future Food Standards Agency consultations on other topics, please advise us of those subject areas that you might be specifically interested in by using the Consultation Feedback Questionnaire at <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc> The questionnaire can also be used to update us about your existing contact details.

Title: Regulation (EC) No 931/2011 on traceability of food of animal origin IA No: FOODSA0017 Lead department or agency: Food Standards Agency Other departments or agencies:	Impact Assessment (IA)		
	Date: 12/06/2012		
	Stage: Consultation		
	Source of intervention: EU		
	Type of measure: Primary legislation		
Contact for enquiries: Liz Stretton Tel: 0207 276 8357 e-mail: liz.stretton@foodstandards.gsi.gov.uk			
Summary: Intervention and Options			RPC Opinion: RPC Opinion Status

Cost of Preferred (or more likely) Option			
Total Net Present Value	Business Net Present Value	Net cost to business per year (EANCB on 2009 prices)	In scope of One-In, Measure qualifies as One-Out?
-£1.36m	-£1.35m	£0.16m	No
			In/Out/zero net cost
What is the problem under consideration? Why is government intervention necessary? Regulation (EU) No 931/2011 clarifies the information required to demonstrate traceability for food of animal origin through the food chain. Food can pose a risk to human health if it is not produced, manufactured and handled hygienically. In general, consumers cannot observe the production, manufacturing or handling processes of foodstuffs. This means there is a benefit from government intervention both to require hygiene and food safety standards of food business operators (FBO) and to enforce them.			

What are the policy objectives and the intended effects? The policy objective is to clarify for FBOs and enforcers the specific documentation required to meet the traceability requirements in Regulation (EC) No 178/2002 for food of animal origin thus supporting implementation of EU law. These measures will ensure that all relevant information is provided and received by FBOs at all stages of the food production. It should lessen the possibility of food fraud and ultimately will assist in protecting public health as it will provide for fuller information to be available so it should be easier for enforcement officers to trace food back to source.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base) 1. Do nothing. In this instance, doing nothing would mean that the UK would not clarify for stakeholders, including food business operators and local authorities, the records required to demonstrate traceability which Regulation (EU) No 931/2011 provides. 2. Inform stakeholders and introduce guidance to assist the understanding of the new Regulation. This is the preferred option.
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Will the policy be reviewed? It will be reviewed. If applicable, set review date: 07/2017					
Does implementation go beyond minimum EU requirements?				No	
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.		Micro yes	< 20 Yes	Small yes	Medium yes
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)				Traded: N/A	Non-traded: N/A

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible SELECT SIGNATORY: Date:

Summary: Analysis & Evidence

Policy Option 1

Description: Do nothing – do not inform stakeholders of clarification of traceability documents contained in Regulation (EC) No 178/2002.

FULL ECONOMIC ASSESSMENT

Price Base Year	PV Base Year	Time Period Years	Net Benefit (Present Value (PV)) (£m)		
			Low: Optional	High: Optional	Best Estimate: 0
COSTS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)		Total Cost (Present Value)
Low	Optional		Optional		Optional
High	Optional		Optional		Optional
Best Estimate	0		0		0
Description and scale of key monetised costs by ‘main affected groups’ No incremental monetised costs are associated with policy option 1: ‘do nothing’, as this option will look to maintain the status quo.					
Other key non-monetised costs by ‘main affected groups’ As above there would not be any non-monetised costs associated with this policy option					
BENEFITS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)		Total Benefit (Present Value)
Low	Optional		Optional		Optional
High	Optional		Optional		Optional
Best Estimate					
Description and scale of key monetised benefits by ‘main affected groups’ No incremental monetised benefits are associated with this policy, as this option will look to maintain the status quo.					
Other key non-monetised benefits by ‘main affected groups’ No incremental benefits (non-monetised) are associated with this policy, as this option will look to maintain the status quo.					
Key assumptions/sensitivities/risks					Discount rate (%)
There are no incremental costs associated with policy option 1 – do nothing, as it is the baseline for which all other options are compared.					

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			In scope of OIOO?	Measure qualifies as
Costs:	Benefits:	Net:	No	NA

Summary: Analysis & Evidence

Policy Option 2

Description: Inform stakeholders and introduce guidance to assist the understanding of the new Regulation.

FULL ECONOMIC ASSESSMENT

Price Base Year 2010	PV Base Year 2010	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: N/A	High: N/A	Best Estimate: -1.36

COSTS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	N/A		N/A	N/A
High	N/A		N/A	N/A
Best Estimate	1.36		N/A	1.36

Description and scale of key monetised costs by 'main affected groups'

Total cost of policy: £1.36m. UK Industry: one off familiarisation cost of £1.35m. Enforcement authorities: one off familiarisation costs of £0.01m.

The total Equivalent Annual Net Cost (EANC) for UK Industry is an estimated £0.16m.

Other key non-monetised costs by 'main affected groups'

Non-monetised costs were not identified (see monetised costs above).

BENEFITS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	N/A		N/A	N/A
High	N/A		N/A	N/A
Best Estimate	N/A		N/A	N/A

Description and scale of key monetised benefits by 'main affected groups'

Monetised benefits were not identified (see non-monetised benefits below)

Other key non-monetised benefits by 'main affected groups'

Increased consumer protection from enhanced traceability requirements.

Key assumptions/sensitivities/risks	Discount rate (%)	3.5
Time taken for industry and enforcement (Local Authorities) to familiarise themselves with proposal: 30 minutes with a further 30 minutes required to disseminate to key staff.		
Equivalent Annual Net Costs (EANC) is applied to 'one-off' transition costs (familiarisation) in order to compare, on an equivalent basis, across policies spanning different time periods i.e. policies in excess of a one year time period.		

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:		In scope of OIOO?	Measure qualifies as
Costs: 0.16m	Benefits:	No	NA
	Net: 0.16m		

Evidence Base (for summary sheets)

Problem under consideration

1. The Commission has made Regulation (EU) No 931/2011 to clarify the information required to ensure traceability for food of animal origin through the food chain. This is to address problems which had been noted with certain sectors of the industry particularly in relation to coldstores.

Rationale for intervention

2. Food can pose a risk to human health if it is not produced, manufactured and handled hygienically. In general, consumers cannot observe the production, manufacturing or handling process of foodstuffs. Food safety hazards tend to be microscopic or otherwise not observable and so not readily identifiable by consumers. In most cases it is not possible for Food Business Operators (FBOs) to credibly inform consumers of the degree to which risk in foodstuffs has been minimised and consumers have an expectation that any risks have already been addressed. This means that there is a benefit from government intervention both to require hygiene and safety standards of FBOs and to enforce them.
3. As this is a directly applicable Regulation, we have to provide clarification of the requirements so that we can be confident that FBOs are fully in compliance with EU law and that we have discharged our responsibility and can demonstrate that we are facilitating compliance.

Policy objective

4. The policy objective is to clarify for FBOs and enforcers the specific documentation required to meet the traceability requirements in Regulation (EC) No 178/2002 for products of animal origin.

Background

5. Article 18 of Regulation (EC) No 178/2002 requires that FBOs should have systems in place to identify who has supplied them with a food, and to identify other businesses to which their food has been supplied, up until the point of selling to the final consumer. This is to ensure that in the event of a food safety problem targeted, accurate withdrawals can be undertaken which would avoid the potential for unnecessary wider disruption.
6. Following Food and Veterinary Office inspections to the United Kingdom in 2006, it was discovered that a number of food businesses did not appear to have sufficient traceability systems in place to demonstrate full traceability. In order to assess the nature of the issues, in November 2006, the Commission requested a survey of coldstores as this was the sector which appeared to have the most difficulty in meeting the requirements. The survey identified a number of legislative breaches in many Member States including failings in recording traceability.
7. The Commission Working Group on Hygiene Legislation has considered various methods of addressing these legislative breaches, and agreed to introduce a new piece of legislation that clarifies the information required under Article 18 of 178/2002. This has been taken forward as Regulation (EU) No 931/2011¹.
8. The Regulation will apply to products of animal origin defined as “unprocessed” or “processed” under Article 2(1) of Regulation (EC) No 852/2004. The definitions are as follows:
 - ‘unprocessed products’ means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed;
 - ‘processed products’ means foodstuffs resulting from the processing of unprocessed products. These products may contain ingredients that are necessary for their manufacture or to give them specific characteristics.
 - ‘Products of animal origin’ is defined in Regulation (EC) No 853/2004 Annex I, (8.1) as food of animal origin including honey and blood.

¹ The Commission have also introduced Regulation (EU) No 16/2012, which puts forward new requirements for the production, freezing and durability indications for food of animal origin. This Regulation was considered separately but is mentioned here as the two Regulations are related and have to date been discussed at the same time

9. The Regulation does not apply to food containing both products of plant origin and processed products of animal origin – sometimes known as ‘composite products’.
10. The Regulation applies at all parts of the food business distribution chain including retail. Information should be made available without undue delay when requested by the competent authority and should be kept until it can be reasonably assumed that the food has been consumed. The term “without undue delay” is not defined within the legislation, so it will be for the FBO and enforcing officer to agree on a reasonable time when the enforcing officer requests the information.
11. It is currently a requirement of Regulation (EC) No 178/2002 that FBOs ensure that certain traceability information is made available to the FBO to whom the food is supplied, and, upon request, to the competent authority.
12. The records which the Regulation clarifies are required to meet the requirements of Article 18 of 178/2002 are:
 - (a) An accurate description of the food,
 - (b) The volume or quantity of the food,
 - (c) The name and address of the FBO from which the food has been dispatched,
 - (d) The name and address of the consignor (owner) if different from the FBO, from which the food has been dispatched,
 - (e) The name and address of the FBO to which the food is dispatched,
 - (f) The name and address of the consignee (owner) if different from the FBO to which the food is dispatched.
 - (g) A reference identifying the lot, batch or consignment, as appropriate, and
 - (h) The date of dispatch.
13. The general traceability requirements for food business operators are set out in Article 18 of Regulation (EC) No 178/2002. These specify that FBOs shall be able to identify:
 - a. any person from whom they have been supplied with a food, a feed, a food-producing animal or any substance intended to be or expected to be incorporated into a food or feed.
 - b. other businesses to which their goods have been supplied.
14. Paragraph 29 of the FSA Guidance Notes on Regulation (EC) 178/2002 states:

‘Taken at face value, the only information Article 18 requires FBOs to provide is the name of the businesses who supply them and to which they supply their products, i.e. one step back – one step forward. However, EC law should be interpreted according to its purpose, and account has to be taken of the relevant recitals (7, 28 and 29) and role of Article 18 in supporting the notification requirements of Articles 19 and 20. It follows that, as a minimum, traceability records should include the address of the customer or supplier, nature and quantity of products and the date of transaction and delivery. It is expected that the provision and retention of this type of information is already standard practice in basic accounting. It can also be helpful to record the batch number or durability indication’.
15. Therefore, although the requirements in Regulation (EU) 931/2011 were put forward by the Commission as extra requirements for businesses, the requirement to keep records is already in place in Regulation (EC) No 178/2002. To assist FBOs, specific information about the type of information required is provided in the EU Guidance on Regulation (EC) No 178/2002. The information must be made available in an appropriate form to the FBO to which the food is being supplied. This is an additional requirement to just making it available to the competent authorities on request which is necessary under Article 18 of Regulation (EC) No 178/2002, although in practice, unless the products are being sold to the final consumer, this information would be required so that the next food business in the chain can maintain proper traceability records.

16. Paragraph III.3.2 (i) of the EU Guidance on Regulation (EC) No 178/2002² says that it should be clarified that the term “supply” should not be interpreted as the mere physical delivery of the food/feed or food producing animal. This term refers more to the transfer of ownership of the food/feed or food producing animal. However, brokers must be considered as a form of supplier for the purposes of this Article, whether or not they take physical possession of the goods. Identifying the name of the person physically delivering is not the objective pursued by this rule and it would not be sufficient to guarantee the traceability along the food chain. Regulation (EU) 931/2011 describes the consignor as ‘the owner if different from the food business operator from which the food has been dispatched’.
17. The other new compulsory recording activities contained in Regulation (EU) 931/2011, Article 3 (g) (i.e. ‘a reference enabling the lot, batch or consignment, as appropriate, to be identified’). It is expected that businesses would already keep this information. It is up to businesses to decide what should constitute a batch. In the circumstances of a recall, the total of a business’s output could be considered as one batch unless they decided to break their products down into smaller batches which would result in a more targeted recall.
18. Furthermore, the Regulation also requires that the information concerning consignments of food of animal origin is made available in an appropriate form to the FBO to whom the product is supplied as well as to competent authorities. The information referred to in Article 3 (a) (‘an accurate description of the food’); (b) (‘the volume and quantity of the food’); (c) (‘the name and address of the food business operator from which the food has been dispatched’); (e) (‘the name and address of the food business operator to whom the food is dispatched’) and (h) (‘the date of dispatch’) would be needed in any case by the FBO to whom the food is sent, but again not necessarily (d) (‘the name and address of the consignor (owner) if different from the food business operator from which the food has been dispatched’), (f) (‘the name and address of the consignee (owner), if different from the food business operator to whom the food is dispatched’) and (g) as there may be cases where the food business to which the food is sent may not currently know the name of the consignor if the transaction is carried out through an agent.
19. There has been considerable consultation with industry as to the potential costs of this measure. Originally industry considered that there would be considerable costs associated with demonstrating compliance with the requirements. The UK negotiated to avoid unnecessary burdens such as the need to keep records for certain time periods and production of records in real time; and to ensure that the proposal did not need to be implemented in a manner which would incur costs to businesses. Therefore, based on information industry has provided, it is envisaged that, apart from the familiarisation costs which are detailed in Table 3, the implementation of the Regulation will be cost neutral for FBOs. The Regulation is directly applicable in the UK, however, as it is a clarification of certain requirements already contained in Regulation (EC) No 178/2002, for which the General Food Regulations 2004 give enforcement powers, no new enforcement powers will be need to be enacted.

Options considered

20. Option 1 - Do nothing. In this instance, doing nothing would mean we would not actively inform stakeholders that this EU Regulation has been introduced. The actual provisions for traceability requirements under Regulation (EC) No 178/2002 are already in force without the specification of the documents required.
21. Option 2 – Introduce targeted guidance to assist FBOs understanding of the clarification the Regulation provides. As the Regulation provides clarification to the traceability requirements already contained in Regulation (EC) No 178/2002, the General Food Regulations 2004, which provides enforcement powers for Regulation (EC) No 178/2002, are sufficient to ensure the provisions contained in the new Regulation can be enforced so no amendments to domestic legislation is required. This is the preferred option. We expect the proposed guidance to be in the form of a sector specific web based factsheet and we will seek opinion on the format prior to publication.

Costs and benefits

Sectors and groups affected

² Guidance on the implementation of articles 11, 12, 16, 17, 18, 19 and 20 of Regulation (EC) No 178/2002 on general food law January 2010 http://ec.europa.eu/food/food/foodlaw/guidance/guidance_rev_8_en.pdf

Industry

22. All food businesses that undertake activities with products of animal origin, including coldstores, distributors, wholesalers and retailers, up until the point of sale to the final consumer as all of these sectors of the industry will need to ensure that they receive and supply the required information when buying in or selling on products of animal origin. The type of businesses likely to be affected by the proposal is set out below in table 1 using Standard Industrial Classification (SIC) codes taken from the Office for National Statistics (ONS) Inter Departmental Business Register (IDBR).

Table 1- Type of businesses affected

SIC Code	Business Type
10.11	Processing and preserving of meat
10.12	Processing and preserving of poultry meat
10.13	Production of meat and poultry meat products
10.20	Processing and preserving of fish, crustaceans and molluscs,
10.51	Operation of dairies and cheese making
10.52	Manufacture of ice cream
46.32	Wholesale of meat and meat products
46.33	Wholesale of dairy products, eggs and edible oils and fats,
46.38	Wholesale of other foods including fish, crustaceans and molluscs
47.22	Retail sale of meat and meat products in specialised stores
47.23	Retail sale of fish, crustaceans and molluscs in specialised stores
47.29	Other retail sale of food in specialised stores
56.10	Restaurants and mobile food service activities
56.21	Event catering activities

Source: The Inter Departmental Business Register (IDBR) - accessible via the Office for National Statistics (ONS), <http://www.statistics.gov.uk/idbr/idbr.asp>

Table 2 – Number of affected businesses by country and size

	Firm Size				
	Micro	Small	Medium	Large	Total
England	60,746	9,239	1,052	253	71,290
Wales	3,404	518	59	14	3,995
Scotland	6,612	1,006	115	28	7,760
NI	2,552	388	44	11	2,995
UK	73,315	11,150	1,270	305	86,040

Source: IDBR (ONS) 2011

Notes:

1. Totals may not sum due to rounding
2. Figures are the sum of premises listed under SIC codes as per table 1.
3. Firm size is based on the number of employees within an organisation. Micro 0 - 9 employees, Small 10 – 49 employees, Medium 50 – 249 employees and Large 250+ employees

Enforcement

23. Local Authorities and enforcers in premises subject to veterinary control will also need to familiarise themselves with the new legislation as they will be responsible for enforcement. Training would not be required.

Consumers

24. The Regulation should not have a direct impact or effect on consumers as the requirements to be able to demonstrate traceability are already included in Regulation (EC) No 178/2002.

Consultation Question

(1). We invite stakeholders to comment on whether our assessment of the type of affected businesses in the UK, as set out in table 1 is a reasonable assessment. If you agree or disagree with this assessment, please provide evidence to support your response.

Costs

Option 1

25. There are no costs associated with the do nothing option as it is the baseline against which costs identified in option 2 will be compared. However, if the UK did not provide clarification of the requirements and cannot demonstrate that we are facilitating compliance, the Commission could open infraction procedures against the UK which could result in a cost.

Option 2

Industry

Familiarisation Costs

26. There will be a one-off cost to industry for reading and familiarising themselves with the guidance. Familiarisation costs are calculated using the UK Standard Cost Model (SCM)³ and ONS Annual Survey of Hours and Earnings (ASHE)⁴.
27. It is estimated that it will take 30 minutes per business for a person to read and become familiar with the new arrangements and a further 30 minutes disseminating to key staff⁵. This means a total of 1 hour for familiarising. There are currently 86,040 food businesses operating in the UK which are directly affected by the proposal. Table 2 above displays the number of businesses affected in the UK broken down by location and size.
28. The total familiarisation cost is quantified by multiplying the hourly wage rate of a 'manager in distribution, storage and retail' of £15.68⁶ by the total number of businesses affected in the UK, resulting in a familiarisation cost to UK businesses of £1,348,935. Table 3 displays the familiarisation cost to industry broken down by location and firm size.

Table 3 – Industry familiarisation cost by country and firm size

	Firm Size				Total
	Micro	Small	Medium	Large	
England	£952,383	£144,842	£16,498	£3,962	£1,117,685
Wales	£53,370	£8,117	£925	£222	£62,634
Scotland	£103,668	£15,766	£1,796	£431	£121,661
NI	£40,011	£6,085	£693	£166	£46,956
UK	£1,149,433	£174,810	£19,911	£4,782	£1,348,935

Source: The Annual Survey of Household Earnings 2011 (ASHE) - accessible via the Office for National Statistics (ONS), <http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=15313>

³ Standard Cost Model Manual can be accessed here: <http://www.bis.gov.uk/files/file44503.pdf>

⁴ ONS AHSE can be accessed via: <http://www.statistics.gov.uk/statbase/Product.asp?vlnk=1951>.

⁵ While we recognise that dissemination of information will result in an opportunity cost in terms of time of key staff members we anticipate that this will be minimal and the additional hour will cover these costs.

⁶ Wage rate obtained from The Annual Survey of Household Earnings, 2011) (See: <http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=15313>). Median hourly wage of 'managers in distribution, storage and retail' (£12.06 + 30% to cover overheads = £15.68).

Notes:

- 1) Totals may not sum due to rounding
- 2) Firm size is based on the number of employees within an organisation. Micro 0 - 9 employees, Small 10 – 49 employees, Medium 50 – 249 employees and Large 250+ employees

Equivalent Annual Net Costs (EANC)

29. In order for 'one-off' transition costs to be compared on an equivalent basis across policies spanning different time periods, it is necessary to 'equivalently annualise' costs using a standard formula⁷. Under Standard HMT Green book guidance a discount rate of 3.5% is used.
30. A total one-off cost to industry affected by this proposal in the UK is an estimated £1,348,935. This yields an EANC of approximately £156,713 in the UK over 10 years. This breaks down to an EANC in England of £129,847, £7,276 in Wales, £14,134 in Scotland and £5,455 in Northern Ireland. Table 4 displays the breakdown of the EANC per country.

Table 4 – Industry EANC by country and firm size

Location	Industry EANC
England	£129,847
Wales	£7,276
Scotland	£14,134
NI	£5,455
UK	£156,713

Note: Totals may not sum due to rounding

Consultation Question

(2). It is our assumption that there is a familiarisation cost for businesses associated with the guidance. We invite businesses to comment on our estimate of half an hour for familiarisation and a further half an hour for dissemination to key staff within the organisation about the new guidance. If you agree or disagree with this assessment, please provide evidence to support your response.

Enforcement Authorities

31. There will be a one-off cost to enforcement authorities for reading and familiarising themselves with the guidance.
32. It is expected that one Environmental Health Officer (EHO) and one official from each Port Health Authority (PHA) will read the Regulations and disseminate the information to staff. We estimate that an Environmental Health Officer will take 30 minutes to read and familiarise themselves with the Regulations, and spend a further half an hour disseminating the key points to other authorised officers in the organisation⁸. This means a total of one hour for familiarisation. The familiarisation cost is quantified by multiplying the hourly wage rate of an EHO, £20.46⁹, by the number of enforcement

⁷ The equivalent annual net cost formula is as follows:
 $EANC = PVNCB/a_{t,r}$, Where $a_{t,r}$ is the annuity rate given by:

$$a_{t,r} = \sum_{j=0}^{t-1} \prod_{i=0}^j \left(\frac{1}{1+r_i} \right)$$

PVNCB is the present value of costs, r is the social discount rate and t is the time period over which the policy is being appraised.

⁸ While we recognise that dissemination of information will result in an opportunity cost in terms of time of key staff members we anticipate that this will be minimal and the additional hour will cover these costs.

⁹ Wage rate obtained from The Annual Survey of Household Earnings, 2010) (See: <http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=15313>). Median hourly wage of 'Environmental health officers' (£15.74 + 30% to cover overheads = £20.46).

authorities in the UK. There are 474 enforcement authorities in the UK with responsibility for the enforcement of food hygiene legislation, who will need to familiarise themselves with this proposal. This includes 354 LAs and 39 Port Health Authorities (PHAs) in England¹⁰, 32 LAs in Scotland, 22 LAs and one PHA in Wales, and 26 LAs in Northern Ireland. The total one-off familiarisation cost for enforcement authorities in the UK totals £9,699¹¹. Table 5 displays the number of LAs and PHAs per country with familiarisation cost.

Table 5 – Enforcement familiarisation cost by country

Location	Number of Local Authorities	Number of Port Health Authorities	Total Number of Enforcement Authorities	Familiarisation cost
England	354	39	393	£8,042
Wales	22	1	23	£471
Scotland	32	0	32	£655
NI	26	0	26	£532
UK	434	40	474	£9,699

Costs are estimated by multiplying wage rates uplifted by 30% to account for overheads. This means that the wage rates reported in the text are approximate to 2 decimal points and when grossed may result in a rounding error.

Equivalent Annual Net Costs (EANC)

33. As with the one-off familiarisation costs to industry it is necessary to equivalently annualise the one-off familiarisation costs for enforcement authorities.
34. The total one-off familiarisation cost to enforcement authorities affected by this proposal in the UK is an estimated £9,693. This yields an EANC of approximately £1,127 in the UK over 10 years, which per country equates to £934 in England, £55 in Wales, £76 in Scotland and £62 in Northern Ireland. Table 6 displays the breakdown of the EANC per country

Table 6 – Enforcement Authorities EANC by country

Location	Enforcement Authorities EANC
England	£934
Wales	£55
Scotland	£76
NI	£62
UK	£1,127

Note: Totals may not sum due to rounding

Consultation Question

(3). It is our assumption that there will be a one-off cost of familiarisation for enforcement authorities associated with the new guidance. We invite enforcement authorities to comment on our estimate of half an hour for familiarisation for an EHO in each LA and a further half an hour for dissemination to key staff within the organisation about the new Regulation. If you agree or disagree with this assessment, please provide evidence to support your response.

Benefits

Option 1

35. There are no benefits associated with the do nothing option as it is the baseline against which the benefits in option 2 will be compared.

Option 2

36. Most respondents to the informal consultations carried out by the Agency commented that this measure would either increase the traceability requirements for products of animal origin marginally,

¹⁰ The number of English local authorities has been updated to reflect boundary changes and the creation of nine new Unitary authorities

¹¹ £20.46 (familiarisation cost per LA) * 474 (total LA's and PHA's) = ££9,699

or would have no impact as the extra requirements are either already covered by legislation or are implemented as good practice.

37. There were no incremental benefits from opposing the draft Regulation; however the benefits from current traceability requirements will be maintained. Also, the UK will have implemented EU law and will avoid potential infraction procedures.

Consultation Question

(4) We invite stakeholder to comment and where applicable provide evidence on the above costs and benefits section.

Risks and Assumptions

38. Local Authorities and Industry will need to invest time to familiarise themselves with new guidance as they would be responsible respectively for enforcement and compliance.

Wider impacts

39. As mentioned previously in this impact assessment, the requirement to have full traceability measures in place is already in place through Article 18 of Regulation (EC) No 178/2002, therefore this Regulation should not have any wider impacts.

Summary and preferred option with description of implementation plan

40. Option 2 is the preferred option. The UK intends to introduce guidance which will provide evidence that the UK is in compliance with EU law. The guidance does not place additional burdens on industry as it reiterates and clarifies the requirements already contained in Regulation (EC) No 178/2002. There will be no need to introduce national legislation as the provisions in place to enforce the General Food Regulations 2004 will be sufficient to enforce these requirements. The Regulation will apply from 1 July 2012.

Specific Impact Tests

Competition Assessment

41. The guidance is not expected to either directly or indirectly have any impact on competition.

Small Firms Impact Test

42. The guidance will affect and have minimal impact on a large number of micro, small and medium-sized businesses. We are unable either to apply an exemption for micro businesses or to apply the requirements to a lesser degree, as the risk to human health if food safety measures are not applied correctly does not depend on the size of the business. Food safety measures must be risk-based therefore these measures need to be applied to all businesses whatever the size.

Sustainable development

43. The guidance will have little, if any impact, on the delivery of the principles of two of the three pillars of sustainable development and the environment, and will harmonise requirements in relation to public health.

Race equality issues

44. No impact on race equality is anticipated.

Gender equality issues

45. No impact on gender is anticipated.

Disability equality issues

46. No impact on disability is anticipated.

Consultation Questions and size of business**Consultation Question**

(1). We invite stakeholders to comment on whether our assessment of the type of affected businesses in the UK, as set out in table 1 is a reasonable assessment. If you agree or disagree with this assessment, please provide evidence to support your response.

Consultation Question

(2). It is our assumption that there is a familiarisation cost for businesses associated with the guidance. We invite businesses to comment on our estimate of half an hour for familiarisation and a further half an hour for dissemination to key staff within the organisation about the new guidance. If you agree or disagree with this assessment, please provide evidence to support your response.

Consultation Question

(3). It is our assumption that there will be a one-off cost of familiarisation for enforcement authorities associated with the guidance. We invite enforcement authorities to comment on our estimate of half an hour for familiarisation for an EHO in each LA and a further half an hour for dissemination to key staff within the organisation about the new guidance. If you agree or disagree with this assessment, please provide evidence to support your response.

Consultation Question

(4) We invite stakeholder to comment and where applicable provide evidence on the above costs and benefits section.

Size of business

To help inform our interpretation of your comments, it would be useful if you could also indicate the size of your business and to comment on whether you already have systems in place which would enable you to record the information as required in the legislation.

Location and size of business based on the number of employees [*Choose only one*]

		Location (Devolved Administration)			
		England	Wales	Scotland	Northern Ireland
Size of Business	Micro (9 or fewer employees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<20 (10 - 20 employees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Small (21 - 49 employees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Medium (50 - 249 employees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Large (250+ employees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Key facts for Caterers – Traceability, Withdrawal and Recall

As the Food Business Operator, it is your responsibility to ensure that only food which is safe and could not cause injury to health is supplied - this includes food which is sold or given away free. The information provided here is to inform you of the legal requirements which must be complied with to enable you to demonstrate that you are meeting the traceability requirements.

It is essential that you ensure that food is produced, stored and handled in a safe manner otherwise there is potential to cause food poisoning, which can have a serious effect, especially on vulnerable groups. The FSA has produced a toolkit of resources, including, *Safer food, better business for caterers*, *Cooksafe in Scotland and Safe Catering in Northern Ireland*, which set out the legislation and best practice to assist you in this area. Please see the link below.

<http://www.food.gov.uk/foodindustry/regulation/hygleg/hyglegresources/sfbb/sfbbcaterers/>

<http://www.food.gov.uk/scotland/safetyhygienescot/cooksafe/>

<http://www.food.gov.uk/northern-ireland/safetyhygieneni/safecateringni/>

Traceability information is needed so that if there is a problem, you would be able to provide your Local Authority with the information necessary for any food products which have left your immediate control to be withdrawn or recalled. If the problem were caused by an ingredient or an element of your product which was sourced from another food business operator, the Local Authority would be able to trace the ingredient back to source which would assist them in indicating whether there was a wider problem and to identify other products which would be likely to be affected and take any remedial action required.

Legislation requires food business operators to keep records of all food coming into or leaving their premises.

This requires a system that enables food to be traced one step forward and one step back until the point of being sold to the final consumer. If you are only supplying direct to the final consumer, you are not required to keep traceability records going forward, but you are still required to keep them for products or ingredients which come into your premises.

One step back – i.e. details of food you receive into the business			One step forward if you are supplying to another food business i.e. details of food you supply to another business		
Products of plant origin/composite products (products	Keep accurate records of: <ul style="list-style-type: none"> • what the food is, • the 	Keep the name and address of the food business operator		Keep accurate records of: <ul style="list-style-type: none"> • what food you supplied and • to whom you supplied the food up 	Keep a note of the date of dispatch

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<p>which combine products of animal origin with products of plant origin)</p>	<p>quantity,</p> <ul style="list-style-type: none"> • who supplied it and • the date it came in 	<p>which it has come from; this includes details of consignors such as agents when the food has not come directly from the food business operator</p>		<p>until the point of retail including the name and address of the food business operator which it is being supplied to; this includes details of consignors such as agents when the food is not going directly to the food business operator that they represent</p>	
<p>Products of animal origin</p>	<p>Keep accurate records of:</p> <ul style="list-style-type: none"> • what the food is • the quantity and • the date it came in 	<p>Keep the name and address of the food business operator who supplied it; this includes details of consignors such as agents when the food has not come directly from the food business operator</p>	<p>Keep a lot, batch or consignment reference *</p>	<p>Keep accurate records of:</p> <ul style="list-style-type: none"> • what food you supplied • and to whom you supplied the food up until the point of retail, including the name and address of the food business operator which it is being supplied to; this includes details of consignors such as agents when the food is not going directly to the food business operator that they represent and the lot, batch or consignment reference 	<p>Keep a note of the date of dispatch</p>

**It is up to the FBO to decide what is classed as a lot, batch or consignment, but you need to be aware that in the event of a withdrawal or recall if the whole production of the business is considered a lot or batch then the whole stock would need to be withdrawn/recalled;*

- It is for food business operator to decide how they keep and pass on their traceability information.
- Traceability can be demonstrated via receipts or commercial documents providing the information contained in the table above is included.

- Traceability records must be kept in a way allowing them to be produced to the Local Authority without undue delay.

In the event that food which is unsafe or injurious to health is placed on the market, the food business must contact their competent authority (in the case of caterers, this is most likely to be your Local Authority) immediately to alert them to the problem. In such an event, there are three main courses of action:-

- Withdrawal – this is when the product is removed from the foodchain
- Recall – this is when the product is removed from the foodchain and consumers are advised to take action – i.e. to return the food to where they had bought it or to destroy the food
- Remedial action – this can only happen when the food is still in the immediate control of the food business operator and the food is not considered to be unsafe or injurious to health (e.g. where something has not been labelled correctly)

Further information

Regulation (EC) No 178/2002¹ sets out the requirements for food law including traceability, safe food, withdrawals and recalls. Regulation (EU) No 931/2011² provides further clarification for the information required to demonstrate traceability of food of animal origin. Links are provided to these below. There is also full EU Guidance³ which provides information on the main requirements in Regulation (EC) No 178/2002; a link is also provided below.

Alternatively, food business operators can contact their Local Authority or the FSA[give contact details] for further advice.

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2002:031:0001:0024:EN:PDF>

² <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:242:0002:0003:EN:PDF>

³ http://ec.europa.eu/food/food/foodlaw/guidance/guidance_rev_8_en.pdf

ANNEX D – List of interested parties

England

3663 First for Foodservice
A Watson & Co Ltd
Abbott Laboratories Limited
Acacia Foods Ltd
Acorn Feed Products Ltd
ADAS
ADAS Holdings Limited
Agra Europe
Agricultural Industries Confederation
Allied Bakeries Ltd
Animal Health Distributors Association
Armitage Bros Plc
Asda Stores Limited
Ashwell Associates
Associated British Foods plc
Association for Public Health
Association of British Healthcare Industries
Association of Cereal Food Manufacturers
Association of Convenience Stores
Association of Meat Inspectors (UK) Ltd
Association of Port Health Authorities
Association of Private Market Operators
Association of Radical Midwives
Authentix - Product Authentication
Automatic Vending Association
BCCA
Bernard Matthews Farms Ltd
Bestway Cash & Carry Ltd
Bodycote Birmingham
Bodycote Lawlabs
Bongrain UK Ltd
Booker Ltd
British Alpaca Society
British Angora Goat Society
British Beer and Pub Association
British Cattle Veterinary Association
British Cheese Board
British Coffee Association
British Egg Industry Council
British Egg Information Service
British Feather Co Ltd

British Fishermen's Association
British Free Range Egg Producers' Association
British Frozen Food Federation
British Goat Society
British Institute of Agricultural Consultants
British Institute of Innkeeping
British Meat Processors Association
British Nutrition Foundation
British Pepper & Spice
British Pig Association
British Ports Association
British Poultry Council
British Society of Plant Breeders Ltd
British Soft Drinks Association Ltd
British Trout Association
British Free Range Egg Producers Association
Brixham Trawler Owner's Association
Business In Sport and Leisure
Calympex Ltd
Cargill Meats Europe
Carver Wilde Communications Ltd
Catering Update
CELCAA - European Liaison Committee for Agricultural and
Agri-Food Trade
Cellife UK LTD
Cereal Ingredient Manufacturers' Association
Cereal Partners UK
Chamber of Shipping
Chartered Institute of Environmental Health
Chew Valley Hide & Skin Co Ltd
Chilled Food Association
Chinese Take Away Association
Chitty Wholesale Ltd
Coca-Cola Great Britain & Ireland
Coeliac UK
Community Foods Limited
Confederation of British Industry
Confederation of the Food and Drink Industries in the EU
Consumer Focus
Continental Food Supplies Ltd
Contract Food Ltd
Cookery & Food Association
Co-operative Group
Cornish Fish Producers' Organisation Ltd
Cornish Guild of Smallholders
Cornwall Inshore Fishermen's Federation
Countryside Alliance
Covent Garden Market Authority

Crop Protection Association
Dairy Council
Dairy Crest Group plc
Dairy UK Ltd
Dalgety Produce
Dalehead Foods Ltd
Danone UK
Dawn Foods (UK) Ltd
DBC Foodservice Ltd
Delmonte Foods (UK) Ltd
Department for Environment, Food and Rural Affairs
Department of Health
Devon Catering and Cleaning Services
Dimerco Express (UK) Ltd
Dover Port Health
East Devon Fishermen's Association
Edlong Company Ltd
ESCA Food Solutions Ltd
Essential Trading Co-operative Ltd
Euro Environmental Containers Limited
European Caterers Association
European Molasses Importers & Dist Assoc
European Union of Wholesale with Eggs, Egg Products,
Poultry and Game
Eversheds LLP
Exeter Trawlermen's Association
Faculty of Public Health Medicine
Federation of City Farms & Community Gardens
Federation of Oils, Seeds & Fats Association Ltd
Federation of Synagogues
Feed Fat Association
Fibrisol Service Limited
Findus Group
Fish Producers' Organisation
Fishmeal Information Network
Fishmonger's Company
Fleetwood Fish Producers Organisation Ltd
Folkestone Fishermen's Association
Food Additives and Ingredients Association
Food and Drink Federation
Food and Environment Research Agency
Food Brands Group
Food Casing Association
Food Consultancy
Food GB Ltd
Food Standards Australia New Zealand
Food Matters Magazine
Forum of Private Business

Forum Products Limited
FOSFA International
FPS International
Freedown Foods Co Ltd
Fresh Produce Consortium
Fromages De France Ltd
Frontier Agriculture
Frozen and Chilled Potato Processors Association
G R Lane Health Products Ltd
Game Farmers Association
General Dietary Ltd
Gerard J Homan Ltd
Gerber Juice Company Ltd
GHR Foods Ltd
GIRACT
GlaxoSmithKline plc
Goat Veterinary Society
Gold Line Feeds Ltd
Golden Acres Ltd
Grain and Feed Trade Association
Greenwoods Solicitors LLP
Grimsby Fishing Vessel Owners' Association
Grimsby Seiners' Association Ltd
G's Marketing Ltd
Guild of Fine Food Ltd
Guild of Fine Food Retailers - Fortnum and Mason
H.S. Fishing 2000 Ltd
Healan Ingredients Ltd
Heather Paine Associates
HM Prison Service Catering Group, Peat House
Holstein UK
Honey International Packers' Association
Hospital Caterers Association
HP Foods Ltd
ILS Limited
ILS Ltd
Institute of Arable Crops Research
Institute of Fisheries Management
Institute of Food Research
Institute of Food Science & Technology
Institute of Hospitality
International Fish Meal & Oil Manufacturers Association
International Meat Traders Association
International Travel Catering Association
Isle of Man Government
J Ralph Blanchfield Consultancy
J Wharton (Shipping) Ltd
Jaffe

Jardox
Jeffery Davies & Davies Ltd
Jess Shirley & Son Ltd
JK Foods UK
Johnston Consulting
Jordans & Ryvita Company Limited
JPG Services
JRH Biosciences
K J Lovering & Co Ltd
Katsouris Brothers Ltd
Kedder Training
Kellogg Europe Trading Limited
Kelloggs Europe Trading Ltd
Kitchen Range Foods Ltd
Kraft Foods UK Ltd
La Leche League (Great Britain)
Lawdata Ltd
Leatherhead Food International
Leicestershire County Council
Licensed Animal Slaughterers & Salvage Association
Linking Environment And Farming
Livestock Auctioneers Association
London Chamber of Commerce and Industry
London Retail Meat Traders Association
Looe Fishermen's Protection Society
Lowestoft Fish Producers' Organisation
M & J Seafoods
Macfarlanes LLP
Malton Bacon Factory Ltd
Malvern Cheesewrights
Manx Fish Producers Organisation Ltd
Marks and Spencer plc
Marlow Foods Ltd
Mars UK Limited
Maryvale Farms
McConomy & Co Ltd
MDC Foods Ltd
Meadow Vale Foods Ltd
Melia White House Hotel - Lomondo Ltd
Microferm Limited
Micron2 Ltd
Millennium Fresh Foods Ltd
MJSR Associates
Moulvaley Farmers Ltd
National Association of British and Irish Millers
National Association of British Market Authorities
National Association of Cider & Perry Makers
National Association of Master Bakers

National Association of Perry Makers
National Beef Association
National Consumer Federation
National Dried Fruit Trade Association
National Edible Oil Distributors Association
National Farmers' Retail and Markets Association
National Farmers' Union
National Federation of Fish Friers
National Federation of Fishermen's Organisations
National Federation of Fishmongers Ltd
National Federation of Inland Wholesale Fish Merchants
National Federation of Meat and Food Traders
National Federation of Women's Institutes
National Game Dealers Association
National Gamekeepers' Organisation
National Sheep Association
Nestle UK Limited
Noble Foods Limited
NSF-CMi Ltd
Nutragen Ltd
Osgrow
Pasta Foods Ltd
Pasta Reale
Peel Holroyd Associates
PepsiCo UK & Ireland
Perfecta Limited
Pizza Two Four Ltd
Port of Felixstowe
Port Sutton Bridge Ltd
Poultry Club of Great Britain
Poultry World
Premier Food Hygiene Training
Provision Trade Federation
Pura Foods Ltd
Quality Milk Producers Ltd
R F Brookes
Rare Breeds Survival Trust
Rayne Institute
Red Poll Development Society Ltd
RGB Food Management Services
Rio Pacific Food Sevices Ltd (Funnybones)
Road Haulage Association Ltd
Rodfields Ltd
Royal Association of British Dairy Farmers
Royal College of Veterinary Surgeons
Salmon & Trout Association
Salt Association
School of Science and Technology

Sea Fish Industry Authority
Seamark Plc
Seed Crushers & Oil Producers Association
Snack, Nut & Crisps Manufacturers Association
Society of Food Hygiene and Technology
Society of Independent Brewers
South Devon & Channel Shelfishermen Ltd
South East Fishermen's Federation
South West Handline Fishermen's Association
South Western Fish Buyer's & Processors' Association
South Western Fish Producers Organisation
Stephen Rhodes Associates
Stilton Cheesemarkers Association
Stute Foods Ltd
Suffolk Small Holders Association
Sugar Bureau
Sussex Game Farm
Sustain: the alliance for better food and farming
Tangerine Confectionery Ltd
Tesco Stores plc
Thames Valley University
The Cheese Hamlet
The Mill House
Thomas Lowndes and Co Ltd
Traditional Farmfresh Turkey Association
Typhoo Tea Ltd
UK Association of Manufacturers of Bakers' Yeast
Unison
United Kingdom RVO Processors Association
Vegetarian & Vegan Foundation
Vegetarian Economy and Green Agriculture
Villa Soft Drinks Ltd
Vion Food Group UK
Vitacare LTD
Walker & Sons (Leicester) Ltd
Warburtons Ltd
Watchbel Ltd
Weddel Swift
Weetabix Limited
Westler Foods Ltd
Which?
Whitbread Group plc
Whitehouse Consultancy Ltd
Wine and Spirit Trade Association
Wirral Foods Ltd
Worshipful Company of Butchers
Worshipful Company of Fishmongers

Scottish stakeholders

AG BARR (Finlays NMW)
Aberdeen Buttery Co.Ltd
Adam Smith College
Andy Race (Fish Merchants) Ltd
Animal Health
Aquascot Ltd
Argyll & Clyde
Association of Deer Management Groups
Association of Scottish Shellfish Growers
Barratlantic Ltd
BASC Scotland
Baxters of Fochabers
Bell Bakers Limited
Berits & Brown Ltd
Bickiepegs
Black of Dunoon (Bakers) Ltd
BMA Scotland
British Deer Society
Brooks-Carter Clinic
Brookside Products Ltd
Buchanans (Scotland) Ltd
Burgon (Eyemouth) Ltd.
Calder Millerfield Ltd
Cardowan Creameries Ltd
Care Commission
Castle MacLellan Foods
Charles Tennant & Co Ltd
Chief Medical Officer Directorate
C J Lang & Son Ltd
Claymore Dairies
COSLA
Cosmo Ceramics Ltd
Cream o'Galloway
Crosshouse Hospital
Cumbrian Seafoods Ltd
Dairy UK - Scotland
Dawnfresh Seafoods
Deans of Huntly
Deeside Natural Mineral Water
DEVRO Plc.
Diageo Scotland
Direct & Care Services
Dunblane & Stirling Districts Beekeepers Ass.
Dundee College

Dundonnell Smoked Salmon
East Ayrshire Council
Edinburgh Community Food Initiative
Edinburgh Smoked Salmon Company (1992)
Ltd.
Federation of Small Businesses
First Milk Cheese Company
Fisheries Research Services
Food Industry (North) Development Services
Food Innovation Institute (F2i)
Food Microbiology, Fish Handling and
Processing
Food Partners Ltd.
Food Storage & Distribution Federation
Food Training & Consultants Company
Forestry Commission Scotland (Forest
Enterprise)
Framgord Ltd
GMB Scotland
G McWilliam (Aberdeen) Ltd
Galloway Lodge Preserves
Glasgow Caledonian University
Glasgow Metropolitan College
Glasgow Scientific Services
Glasgow University Veterinary School
Gourmet's Choice Ltd
Greenwood Academy
H.R. Bradford (Bakers) Ltd
Hallmark Meat Hygiene Ltd/ AA Duncan & Son
Hardys Sporting Scotland
Health & Sport Committee
Health Protection Scotland
Healhyliving Award
Highland Drovers Ltd.
Highland Smoked Salmon Ltd
Highland Spring Ltd
Hilton International
Hutchison Associates Ltd
Hutchison's Flour
Ian Hain Associates
Ingram Brothers Ltd.
Inverawe Smokehouses
Island Cheese Co Ltd.
Islay Crab Exports Ltd
J G Ross (Bakers) Ltd
James Aimer Ltd
James Rizza & Sons Ltd
James Ross & Son (Edin) Ltd.

John Hogarth Ltd.
John M Munro Ltd
Jura Fine Foods Ltd
JWC Services Ltd.
Keltic Seafare(Scotland)Ltd.
Klinge Foods Ltd.
Lactalis McLelland Limited
Larder Bytes Ltd
Loch Fyne Oysters Ltd
M A Mackinnon's Marmalade
M Corson
M&D Catering
M.D. Longhorn & Co
MacDonalds Smoked Produce
MacDuff Shellfish
Mackays Ltd
Mackies Of Scotland
MacPhie of Glenbervie Ltd
Macsween of Edinburgh
Marine Harvest (Scotland) Ltd
Matthew Algie & Co Ltd
McAusland Crawford
Microgram
Middleton Food Products
Moray Seafood Ltd
Mortons Rolls Ltd
Nairn Beekeepers
Napier University
National Beef Association Scotland
Neogen Europe Ltd.
Neville Craddock Association
NFU Scotland
NHS Borders
NHS Fife
NHS Grampian
NHS Highland
NHS Lothian
NHS Orkney
NHS Tayside
Nisha Enterprises Ltd.
Norscot Seafoods Ltd
Orkney Herring Co Ltd
Pan Fish Scotland Ltd
Paterson Arran Limited
Perth College
Pinneys of Scotland LTD
Puremalt Products Ltd.
Quality Meat Scotland

Robert Gordon University
Robert Wisemans Dairies
Rowett Research Services
Royal Environmental Health Institute for
Scotland
Royal Highland & Agricultural Society of
Scotland
Rural Directorate
Sangs (Banff) Ltd
Scallop Association
Scotch Whisky Association
Scotch Whisky Research Institute
Scotland Food and Drink
Scottish Association of Meat Wholesalers
Scottish Bakers
Scottish Beef Cattle Association
Scottish Beer & Pubs Association
Scottish Care Commission
Scottish Chambers of Commerce
Scottish Childminding Association
Scottish Churches Rural Group
Scottish Commission for the Regulation of Care
Scottish Crofting Foundation
Scottish Crop Research Institute
Scottish Federation of Meat Traders Association
Scottish Fishermen's Federation
Scottish Food & Drink Federation
Scottish Food Guide
Scottish Food Quality Certification Ltd
Scottish Game Dealers & Processors
Association
Scottish Government
Scottish Government
Scottish Government
Scottish Government
Scottish Government Criminal Justice
Directorate
Scottish Government Rural Directorate
Scottish Government Rural Directorate
Scottish Grocers Federation
Scottish Midland Co-op Society
Scottish Milk Products Ltd.
Scottish Organic Producers Association
Scottish Rural Property and Business
Association.
Scottish Salmon Producers Organisation
Scottish Salmonella Reference Laboratory
Scottish Sea Farms Ltd.

Scottish Women's Rural Institutes (SWRI)
Scrabster Seafoods Ltd.
Seafood Scotland
Seafood Shetland
Shetland Catch Ltd
Shieldaig Export Ltd
Shortbread House of Edinburgh Ltd
SNDRT
Soil Association Scotland
Speyfish Ltd
Spicemanns Ltd.
Spitfire Resources
SQA
Strathmore Foods Ltd.
Summer Isles Foods
T & L Food Services Ltd
Tayside Contracts
Tayside Scientific Services
The Applecross Trust
The Association of Meat Inspectors
The Halal Food Authority
The Scottish Licensed Trade Association
Tilquhillie Fine Foods
Thomas Tunnock Ltd
Tobermory Fish Co.
Unison
United Fish Industries
University of Glasgow
University Of Paisley
University of Stirling
Untie the Union
Walkers Shortbread Ltd
Wellington Church
West Minch Salmon
Wicken Fen Wholesome Foods
William Yule & Son Ltd
Women's Food & Farming Union