

Response ID ANON-CTKN-ARFV-Y

Submitted to Consultation on fairer food labelling
Submitted on 2024-05-07 15:59:52

Overview

1 a) Would you like your response to be treated as confidential?

No

Overview (continued)

2 What is your name?

Name:
James Legge

3 What is your email address?

Email:
james-legge@countryside-alliance.org

4 Which of the following best describes you?

Non-governmental organisation - You are responding in an official capacity as the representative of a non-governmental organisation or, non-profit organisation or, other organisation

Please specify :

Overview (continued)

9 Please provide the name of your business/organisation

Business/organisation name :

Countryside Alliance

10 Where does your business or organisation operate?

England, Scotland, Wales, Northern Ireland

Please provide further information:

11 Where is your business or organisation's headquarters?

England

Business or organisation headquarters, outside UK, please specify :

12 Is your business or organisation one of the following?

Small or Medium sized business: 10 to 249 employees

13 Does your business source or sell agricultural or food products?

Not applicable

14 What is the primary purpose of your business?

Not applicable

Please specify:

15 Please provide your 5 digit Standard Industrial Classification (SIC) code

5 digit SIC Code :

Not applicable

Introduction

Part A: Country of Origin labelling

16 a) How important do you think it is that mandatory country of origin labelling rules be changed so that they apply to the meat used in minimally processed meat products as they do already to unprocessed meat?

Very important

16 b) Please explain your answer

Please explain your answer:

The situation where a meat product can be labelled as British because it was processed in the UK is misleading. As with unprocessed meat, minimally processed meat should be clearly labelled so that the consumer can know where the animal was born, bred and slaughtered. If pork is imported and then processed in the UK into bacon, that bacon is not of UK origin and this should be clear. Without clarity as to origin the consumer cannot make informed choices and the market for UK products is distorted, especially where UK products may be produced to higher standards.

17 What five (minimally) processed meat products would be the most important to include?

What five (minimally) processed meat products would be the most important to include? :

Bacon, sausages, salami, ham and other meats where cured, smoked or salted.

18 If we did not use a list approach, please describe any alternative approaches you would propose to define which minimally processed meat products are included?

If we did not use a list approach, please describe any alternative approaches you would propose to define which minimally processed meat products are included:

The list approach may be simpler and clearer for those responsible for labelling and in terms of enforcement. However, an alternative would be to define minimally processed meat products in terms of the process they have undergone - salting, curing, smoking - and the number of processes. So pork that is smoked and then sliced to make bacon. There is a danger of differing interpretations of rules based on this approach.

19 a) Do you think that the use of national flags on food requires more regulation than described below?

Yes

19 b) If 'yes', how would you further regulate the use of national flags on food?

If 'yes', how would you further regulate the use of national flags on food?:

We would suggest that unless the product is of the same origin as any flag displayed then a national flag should not be displayed. A ready meal containing New Zealand lamb produced in the UK should not leave to consumer assuming it is UK produce. Perhaps more than one flag should be required where a product is produced in the UK but the main ingredients is not of UK origin. There would clearly need to be some allowance for imported foods bearing national symbols.

20 Should there be further controls on the use of flags on food labels?

Yes

If yes, please specify further what controls are needed

If yes, please specify further what controls are needed:

As above - flags should clearly relate to the origin and content of the product in question. It may be that more than one flag should be displayed where the final product is produced in the UK but the ingredients are not. What matters is that the use of flags and other national symbols does not lead the consumer to a false belief as to origin.

The underlying requirement for mandatory information on food is for the height of a lower-case 'x' to be 1.2mm or greater. There is no placement requirement for origin information, and it is often placed amongst other information on the back of the pack. Where origin information is required for the primary ingredient of food, being different to that of the food itself, it must be presented in text at least 75% of the size of the information on the food origin and in the same field of view, or as above, whichever is larger.

21 Should there be an additional requirement that mandatory origin information should be on the front of the pack?

Yes

22 What should the minimum size font be for mandatory origin labelling?

Make larger than 1.2mm 'x' height

23 Should the written origin of food be accompanied by a national flag or other symbol?

Not necessary

Please specify:

If flags are used then they should reflect origin. Otherwise their use should be avoided unless clarified by written statement of origin.

24 What role should be played by labelling requirements for seafood, farmed or wild-caught, in order to encourage consumers to buy more locally caught or produced seafood?

What role should be played by labelling requirements for seafood, farmed or wild-caught, in order to encourage consumers to buy more locally caught or produced seafood?:

We would support a requirement that unprocessed and minimally processed seafood products state clearly where caught or farmed, method where appropriate and ideally making clear that the source was sustainable.

25 Do you think information on the origin of food is sufficiently clear when it is sold via online platforms (either from a mainstream grocery retailer or other general retail platforms)?

It varies

26 What improvements would you like to see in how origin information is presented online, if any?

What improvements would you like to see in how origin information is presented online, if any? :

Rather than having origin under product details, which requires the consumer to check, the information could be placed next to the product name itself e.g. Sliced Breaded Ham (UK Pork). In effect this would be similar to requiring origin information on the front of packaging so it can be seen at a glance rather than in small print on the back.

Not Answered

27 a) Origin information, including when it is given in a café or restaurant, has to be accurate and not mislead consumers. However, it is not mandatory to provide it in these out-of-home settings. Should there be a mandatory requirement to state the origin of meat, seafood and/or dairy products in the out-of-home sector?

Yes

27 b) If yes, what form should this requirement take?

If yes, what form should this requirement take?:

This should be noted on the menu. There is little reason in the description of dishes why the country of origin cannot be included. It could also be a note on the menu card stating that all meat is of UK origin unless stated.

28 Should the requirements be applied equally to all out-of-home food businesses?

Don't know

please specify which businesses would require different requirements and/or exemptions:

In principle we think all out-of-home food businesses should know the origin of food products they are using - e.g. British pork or Dutch pork - and this information should be available from any third party supplier as part of food traceability. Such a requirement may increase the use of home produced food and support UK agriculture. We would suggest that this should also be a consideration in terms of public procurement for schools and hospitals etc.

However, we recognise that there is a danger that if the requirements are too burdensome then this could pose a challenge to small businesses such as a single local cafe.

29 If measures such as mandatory origin for minimally processed meat products, increasing the visibility of origin labelling, controlling the use of national flags and/or mandating origin labelling for the out-of-home sector were introduced, what do you think are realistic timescales for businesses to implement such policies from the point at which they are announced?

3 years

30 What exemptions should be given, if any?

What exemptions should be given, if any?:

31 Do you have any suggestions on how to smooth the costs and complexities of implementing these changes?

Do you have any suggestions on how to smooth the costs and complexities of implementing these changes?:

32 Do you have any other suggestions for improving country of origin information?

Do you have any other suggestions for improving country of origin information?:

We would suggest that for meat products, origin should be defined as where the animal was "born, reared and slaughtered". We would also suggest that the use of generic origin statements such as "Produced in the EU" should also be avoided.

Part B: Method of production labelling

33 a) Do you agree that method of production labelling should be mandatory?

Yes

33 b) Please explain your answer. If you answered no, please detail any alternative approaches that you feel would be effective in delivering informative, consistent and accessible information on method of production to consumers

Please explain your answer. If you answered no, please detail any alternative approaches that you feel would be effective in delivering informative, consistent and accessible information on method of production to consumers:

For the products under consideration this would seem sensible. If the purpose of labelling is to support consumers in making informed choices then method of production information is important. We would suggest that this, alongside better origin labelling, will assist domestic producers and also drive up standards, especially welfare. The example of the egg industry is instructive. We also wonder whether the proposal should extend to beef, i.e. grass-fed, etc.

34 a) Do you agree that any new mandatory method of production labelling should apply to both domestic and imported products?

Yes

34 b) Please explain your answer

Please explain your answer:

Consumer choice matters and choices can only be made where there is comparable information. Where a UK product has method of production labelling then any imported equivalent should do so. This is especially important as consumers may be choosing between a more expensive UK product, produced to a higher welfare method of production, and a cheaper imported product produced to a different or lower welfare method. Standard requirements on products offered in the UK ensures transparency, choice and a fair market for UK farmers.

35 What changes would your business have to make in order to adopt a mandatory method of production labelling scheme?

What changes would your business have to make in order to adopt a mandatory method of production labelling scheme? :

Not applicable

Part B: Method of production labelling (continued)

36 a) Do you think the proposed 18-month implementation period, intended to reduce the cost associated with applying new mandatory labelling is appropriate?

Don't know

36 b) If you do not agree with the length of the proposed implementation period, what length of implementation period do you think should be allowed to help reduce the costs associated with applying new mandatory labelling?

Please choose a number between 0-60 months on what you think the implementation period should be to help reduce costs associated with mandatory labelling:

36 c) Please explain your answer

Please explain your answer:

The Countryside Alliance is not a business and does not have the knowledge or expertise to assess how any change might be best implemented over a given timescale.

37 Are there any other ways in which cost to business associated with applying new mandatory labelling could be reduced?

Are there any other ways in which cost to business associated with applying new mandatory labelling could be reduced?:

N/A

Part B: Method of production labelling (continued)

38 a) Do you agree that labelling reforms should initially focus on pigs, meat chickens and laying hens?

Yes, I agree labelling should focus only on these three species initially

38 b) Please explain your answer

Please explain your answer:

We agree with the reasoning set out in the consultation. We can see merit in establishing method of production labelling in key areas but would support extension to dairy, beef, etc. Any extension to further categories should not be unduly delayed but will doubtless benefit from the experience and lessons learned in this first phase proposed for pigs, meat chickens and laying hens.

Part B: Method of production labelling (continued)

39 a) How important do you think it is that a method of production label includes processed as well as unprocessed animal products?

Important

39 b) Please explain your answer

Please explain your answer:

Consumer choice depends on information and the choices consumers make can drive changes in the market, not least in driving up welfare standards by supporting the higher welfare end of the market. A substantial part of what we consume is processed whether minimally or more extensively. Method of production labelling should complement origin labelling so it is known where a product is from and how it was produced. This would in our view apply to processed food. It would perhaps improve the ingredients in, for example, many ready meals and support UK farmers.

40 a) Do you agree that labelling should include minimally processed products for pork (for example, bacon)?

Yes, I agree that labelling should cover minimally processed products

Please explain your answer:

40 a) continued Chicken (for example, cooked chicken slices)

Yes, I agree that labelling should initially cover minimally processed products

Please explain your answer:

40 a) continued Eggs (for example, hard boiled eggs)

Yes, I agree that labelling should initially cover minimally processed products

Please explain your answer:

41 a) To what extent do you agree or disagree that it is important that the following processed products be labelled with method of production standards? Bacon:

Strongly agree

41 a) continued Sausages:

Strongly agree

41 a) continued Gammon:

Strongly agree

41 a) continued Sliced cooked pork meat for example, ham:

Strongly agree

41 a) continued Scotch eggs:

Strongly agree

41 a) continued Breaded chicken:

Strongly agree

41 a) continued Ready to cook chicken:

Strongly agree

41 a) continued Sliced cooked chicken meat for example, chicken slices:

Strongly agree

41 a) continued Egg whites:

Strongly agree

41 a) continued Hard boiled eggs:

Strongly agree

41 a) continued Quiche:

Strongly agree

41 a) continued Marinated meats:

Strongly agree

41 b) If you would like to propose an additional priority for labelling, please state below.

If you would like to propose an additional priority for labelling, please state below. :

We would suggest that for ready meals containing pork or chicken as the principal ingredient, such as a chicken korma, etc., and for e.g. quiche where egg is the principal ingredient, the method of production should be displayed together with origin - e.g. "UK free range chicken".

We could define which minimally processed products would be within scope of method of production labelling reforms, based on a defined list of products, which would be guided by responses we receive through this consultation.

42 If we did not use a list approach, please describe any alternative approaches you would propose to define which minimally processed meats are included

If we did not use a list approach, please describe any alternative approaches you would propose to define which minimally processed meats are included:

'Minimally processed' could be defined based on the number of processes gone through, such as being smoked, cured or cooked (e.g. for chicken slices) and where chicken, pork or egg is the principal ingredient in a product to be cooked, such as sausages or a ready meal.

Part B: Method of production labelling (continued)

43 a) To what extent do you agree or disagree with our proposal to label the production standard of only one ingredient, when labelling minimally processed products (for example, Scotch eggs)?

Strongly agree

43 b) Do you agree or disagree with our proposal to assign production standards based on the lowest standard of animal welfare in a batch?

Yes, I agree that the lowest standard should be labelled

Part B: Method of production labelling (continued)

44 a) To what extent do you agree or disagree with our proposal that all unprocessed and minimally processed pork, chicken and egg products in scope are labelled regardless of whether they are packed at the consumer's request, prepacked for direct sale or prepacked in a factory before sale?

Strongly agree

44 b) Please explain your answer

Please explain your answer:

45 a) To what extent do you agree or disagree with our proposal that all unprocessed and minimally processed pork, chicken and egg products in scope are labelled regardless of whether they are sold in a shop or supermarket, a restaurant or café, or from an online retailer?

Strongly agree

45 b) Please explain your answer

Please explain your answer:

We believe it is important that there is fair market for products regardless of where they are being sold. Labelling should be the same across the board to enable consumer choice and to ensure fairness between retailers.

Part B: Method of production labelling (continued)

46 a) To what extent do you agree or disagree with our proposal that labelling applies to products sold through the retail sector only?

Agree

46 b) Please explain your answer

Please explain your answer:

We accept that to include method of production as well as origin on menus etc would be a logistical challenge for many, especially small cafes etc. However, we would support government action to encourage the inclusion of such information and it should be mandated for businesses with websites, where the information would be straightforward to make available.

Part B: Method of production labelling (continued)

47 a) To what extent do you agree that standards should be based on inputs which are important for welfare, given the lack of examples of labels based on welfare outcomes and the additional supply chain complexity this would involve?

Agree

47 b) Please explain your answer

Please explain your answer:

Inputs makes more sense as it is based on the conditions in which animals are farmed. Welfare outcomes would require the assessment of an animal's experience. We do not think this is practical, nor do we see how this could be conveyed to the consumer in a simple and meaningful way.

48 a) To what extent do you agree or disagree with requiring welfare outcomes assessments to be carried out for products labelled tier 3 and above?

Neutral

48 b) Please explain your answer and detail any specific considerations you would like to share, for example around the practicality of this requirement. Please include any supporting evidence where available.

Please explain your answer and detail any specific considerations you would like to share, for example around the practicality of this requirement. Please include any supporting evidence where available.:

49 Are there additional metrics you think should be included in the draft standards (set out in the tables above)? For laying hens:

Don't know

Please list the proposed metric(s) you think should be included and explain your answer. :

49 continued For meat chickens:

Don't know

Please list the proposed metric(s) you think should be included and explain your answer. :

49 continued For pigs:

Don't know

Please list the proposed metric(s) you think should be included and explain your answer. :

50 Are there any proposed metrics you think should not be included in the draft standards?For laying hens:

Don't know

If yes, please state the metric(s) and explain your reasoning.:

50 continued For meat chickens:

Don't know

If yes, please state the metric(s) and explain your reasoning.:

50 continued For pigs:

Don't know

If yes, please state the metrics(s) and explain your reasoning.:

Part B: Method of production labelling (continued)

51 a) To what extent do you agree with the proposed tiered system above?

Disagree

51 b) Please explain your answer.

Please explain your answer:

While we agree with a tiered approach, we wonder whether five tiers is too complex from a consumer perspective. Tier 1 is effectively unknown status, tier 2 indicates basic UK standards and then three tiers exceeding baseline standards. How are consumers going to know what is the difference between a tier 3 and tier 5 product? In terms of the consumer and the choices they are making when purchasing products we struggle to see how having three tiers above baseline will help. It lacks clarity and we think products displayed should indicate that the welfare is unknown or has not been verified as meeting baseline UK standards, meets British baseline standards or exceeds baseline standards. Consumers then have a clear choice to purchase UK standards or higher or products unverified. Simplicity is going to be key.

Please see Annex B for a set of draft standards indicating possible requirements to be met for each tier. In the following section on label format and terminology, we welcome your view on how each of these draft tiers might be referred to on a label.

52 If you would like to suggest changes to the levels at which individual standards are set in the draft tiers, available in Annex B, please do so. For laying hens:

If you would like to suggest changes to the levels at which individual standards are set in the draft tiers, available in Annex B, please do so.:

52 continued For meat chickens:

If you would like to suggest changes to the levels at which individual standards are set in the draft tiers, available in Annex B, please do so below:

52 continued For pigs:

If you would like to suggest changes to the levels at which individual standards are set in the draft tiers, available in Annex B, please do so below.:

Part B: Method of production labelling (continued)

53 Do you agree with the proposal above detailing the period of life covered by the draft standards for each sector? For laying hens:

Don't know

Please explain your answer:

53 continued For meat chickens:

Don't know

Please explain your answer:

53 continued For pigs:

Don't know

Please explain your answer:

54 We are considering extending the period of coverage for laying hens to include the pullet rearing stage. Do you have any view on how this could be applied in practice and on the impacts of such an approach?

We are considering extending the period of coverage for laying hens to include the pullet rearing stage. Do you have any view on how this could be applied in practice and on the impacts of such an approach?:

The Countryside Alliance is not an industry body and does not have the expertise to comment on specific issues around farming practice.

Part B: Method of production labelling (continued)

55 a) On (a) the tier of the product: Which of the following would be most effective for presenting the tier of the product on a label? Please select one of the following:

Alternative option

55 b) Please explain why this is your preferred option and share any additional detail on your choice (for example, the specific numbers to use for each tier) and any relevant supporting evidence.

Please explain why this is your preferred option and share any additional detail on your choice (for example, the specific numbers to use for each tier) and any relevant supporting evidence.:

We would suggest a combination of colour and number as illustrated in the consultation document.

Part B: Method of production labelling (continued)

56 a) On (b) a colour corresponding to each tier: Do you feel that the label should include colours corresponding to each tier?

Yes, it is important for colours to be included

56 b) If yes, please provide colour suggestions for each tier.

56 b):

As noted we think a simpler approach with three tiers based on traffic light would be clearer and well understood - red, orange, green where green is highest.

56 c) Are there any impacts of inclusion of colour which should be considered?

56 c) Are there any impacts of inclusion of colour which should be considered?:

Part B: Method of production labelling (continued)

57 a) Do you feel the label should include terminology describing both method of production and level of welfare:

Yes, both

57 b) Please explain your answer or detail alternative options.

Please explain your answer or detail alternative options.:

A combination of number, colour and both descriptors will ensure that consumers understand what the label is telling them and help people recognise that a green label with 1 is the highest welfare standard, and the method to which this relates.

58 Please share any comments on label terminology options based on the draft standards in Annex B. This may include individual terms you feel should, or should not, be used. Please provide supporting evidence where available. Method of production term:

Please share any comments on label terminology options based on the draft standards in Annex B. This may include individual terms you feel should, or should not, be used. Please provide supporting evidence where available.:

The reference to "enhanced" is not helpful to the consumer on a label. What makes enhanced free-range different from free range? These terms may be useful in setting industry standards but in terms of labelling and consumers making choices, the simpler the better. As a consumer I want to know whether my eggs have not been verified as being produced to UK standards or equivalent, meet or exceed minimum welfare standards.

58 continued Level of welfare term

Please share any comments on label terminology options based on the draft standards in Annex B. This may include individual terms you feel should, or should not, be used. Please provide supporting evidence where available.:

Reference to Non-UK Standard may be misleading in some cases of imported products. There may be products that are equivalent to UK standards. Perhaps Unclassified is better, then Standard and then High or Higher/est. It is unclear what high as opposed to highest will mean to the consumer. What is the difference between high and highest from a consumer point of view? How much better is highest compared to high? Unless a person knows the industry standard behind the tiers then it is hard to know what the classification means. Perhaps Unclassified/Standard/Higher, meaning that the welfare standard is unverified, the product meets UK basic welfare standard or it exceeds the basic standard.

59 If you have proposed alternative production standards in your responses to previous questions, please provide suggestions for accompanying label terminology to match your proposals.

. If you have proposed alternative production standards in your responses to previous questions, please provide suggestions for accompanying label terminology to match your proposals.:

As above.

Part B: Method of production labelling (continued)

60 a) On (d) a picture illustrating method of production: To what extent do you support the inclusion of a picture illustrating the method of production?

Support

60 b) Please explain your answer.

Please explain your answer:

Public recognition is vital and ease of identifying products. Few people have the time or inclination to turn over every purchase to check details. Colour and numbering coupled with an image should make it immediately apparent to the customer. Familiarity with images will increase with exposure and time making them a simple and quick means of identifying types of product on the shelves.

Part B: Method of production labelling (continued)

61 a) Do you feel that the label should include a space for an assurance scheme logo?

Don't know

61 b) Do you think it is important that the label tells a consumer whether the product comes from a farm which is assured or is not assured?

Don't know

61 c) Please explain your answer

Please explain your answer:

We think that all the relevant information should be in a single place and clearly visible, including any assurance schemes. However, there is a danger that we have a welfare ranking based on UK standards and then assurance schemes which we assume exceed basic UK standards. Would all Red Tractor farm produce or RSPCA Assured farms get a top ranking automatically? Thought needs to be given to information overload and too much information covering the same issue on the same label, such that we would have a welfare standard on a label and then an assurance scheme logo. Does the assurance scheme represent a higher level of welfare, etc. than the tier indicated? What matters is the agreed standard behind all these indicators and logos so that the consumer can have confidence in what these symbols represent in welfare/production terms.

Part B: Method of production labelling (continued)

62 Please share any comments you would like to make on the mocked-up example label.

Please share any comments you would like to make on the mocked-up example label.:

Seems clear and simple. It is not immediately clear though that "Highest" is a reference to welfare and that this relates to the descriptor of method.

Part B: Method of production labelling (continued)

63 a) Do you support providing a link to further information on the label?

Yes

63 b) Please provide detail on how this should be done and any impacts of this.

Please provide detail on how this should be done and any impacts of this.:

QR code might be the best way to provide further information.

63 c) Please suggest any alternative options for signposting consumers to the information online, such as a mandatory requirement for accompanying signage in store.

Please suggest any alternative options for signposting consumers to the information online, such as a mandatory requirement for accompanying signage in store.:

64 Please share any other comments on the label format and terminology.

Please share any other comments on the label format and terminology. :

Part B: Method of production labelling (continued)

65 a) To what extent do you support or oppose the proposed system of Food Business Operators being responsible for ensuring the labelling applied to their products is accurate?

Support

65 b) Please explain your answer and share any relevant supporting evidence.

Please explain your answer and share any relevant supporting evidence. :

Those who apply the labels should be responsible for what that label says.

66 a) To what extent do you support or oppose the proposal that membership of a recognised farm assurance scheme could be used by a Food Business Operator to help verify the production standards for UK farmers?

Strongly support

66 b) Please explain your answer and share any relevant supporting evidence.

Please explain your answer and share any relevant supporting evidence.:

This would work and make things simpler for operators. However, the assurance schemes must align with the agreed standards so that the label is accurate in terms of information. If labelled highest in terms of welfare then the assurance scheme must meet or exceed the highest standard and an operator should be able to have that certainty.

67 a) To what extent do you support or oppose the proposal to use guidance to recognise bodies in other countries to help support label verification for the UK market?

Support

67 b) Please explain your answer and share any relevant supporting evidence.

Please explain your answer and share any relevant supporting evidence. :

In a global market it seems sensible to use mutual recognition where possible for standards which align so as to reduce the regulatory burden on business and make it easier to label products accurately and consistently. It must however be properly controlled so the position of UK producers is not undermined by products produced to lower standards getting into the country and undermining the domestic market by disadvantaging home produce.

68 Please identify any assurance schemes or bodies operating abroad that you would see as equivalent to one or more of the draft tiers, detailed in Annex B.

Please identify any assurance schemes or bodies operating abroad that you would see as equivalent to one or more of the draft tiers, detailed in Annex B.:

69 a) To what extent do you support or oppose offering a process where country-level recognition could be included in the guidance if a country's legal minimum standards met those of a particular tier?

Support

69 b) Please explain your answer and share any relevant supporting evidence.

Please explain your answer and share any relevant supporting evidence.:

As above. Mutual recognition where possible can support trade but also simplify the labelling process. However, while legislation in another country might set a standard that matched that of a particular tier there remains the question of whether those standards are actually met and enforced. Recognition at country level will need to be on the basis of genuine equivalence. As above, we do not want to see unfairness in the UK market and our producers put at an unfair competitive disadvantage.

70 Under the proposals above, farm assurance schemes would need to submit documentary evidence that they certify to one or more of the label standards, in order to be included in the government register. How frequently do you feel this evidence should be re-submitted, to ensure the register remains accurate and up to date?

Under the proposals above, farm assurance schemes would need to submit documentary evidence that they certify to one or more of the label standards, in order to be included in the government register. How frequently do you feel this evidence should be re-submitted, to ensure the register remains accurate and up to date?:

71 a) In cases where a Food Business Operator has not met their responsibility to accurately label products, we propose to ensure that prosecutions can be brought for the more serious cases of non-compliance. To what extent do you support or oppose this proposal?

Strongly Support

71 b) If you oppose the proposal to allow criminal prosecutions to be brought for non-compliance, what alternative would you prefer? For example, civil sanctions. Please explain your answer and share any relevant supporting evidence.

If you oppose the proposal to allow criminal prosecutions to be brought for non-compliance, what alternative would you prefer? For example, civil sanctions. Please explain your answer and share any relevant supporting evidence. :

71 c) If either criminal sanctions or civil sanctions are available, what do you think the appropriate penalties should be? Please explain your answer and share any relevant supporting evidence

If either criminal sanctions or civil sanctions are available, what do you think the appropriate penalties should be? Please explain your answer and share any relevant supporting evidence:

Part B: Method of production labelling (continued)

72 a) Do you feel there is an additional need for government inspections to form part of the certification for the label standards?

Yes, there is a need for government inspections

72 b) Please explain your answer and share any relevant supporting evidence.

Please explain your answer and share any relevant supporting evidence. :

We would support a light-touch level of government oversight to ensure public confidence and to ensure that the approach to labelling is consistent across the sector.

72 c) How could such a system, where government plays a role in certifying standards, operate for imported products? Please explain your answer and share any relevant supporting evidence, including any examples of existing systems you are aware of.

How could such a system, where government plays a role in certifying standards, operate for imported products? Please explain your answer and share any relevant supporting evidence, including any examples of existing systems you are aware of.:

72 d) Please share any additional impacts you feel may result from requiring government certification and inspection, with any relevant supporting evidence.

Please share any additional impacts you feel may result from requiring government certification and inspection, with any relevant supporting evidence.:

73 Please share any further comments on the monitoring and enforcement proposals.

Please share any further comments on the monitoring and enforcement proposals. :

Part B: Method of production labelling (continued)

74 a) Do you agree or disagree that our proposed method of production labelling requirements should apply on a UK-wide basis?

Strongly agree

74 b) Please provide any evidence to support your view.

Please provide any evidence to support your view.:

The UK is a single market and producers and consumers should have a single system. Differing standards will cause confusion. It would also distort the market were products in different parts of the UK are subject to different rules. It would also mean an additional cost on some producers but not others.

75 a) What differential impacts would these proposals have on you and/or your business if mandatory method of production labelling requirements were to apply on a GB-wide basis only, and the principles of the UKIM Act continued to apply, so that qualifying NI goods moving from NI to GB not meeting the method of production labelling requirements could be sold on the GB market?

What differential impacts would these proposals have on you and/or your business if mandatory method of production labelling requirements were to apply on a GB-wide basis only, and the principles of the UKIM Act continued to apply, so that qualifying NI goods moving from NI to GB not meeting the method of production labelling requirements could be sold on the GB market?:

N/A

75 b) How would your business manage these impacts if method of production labelling requirements were to apply on a GB-wide basis?

How would your business manage these impacts if method of production labelling requirements were to apply on a GB-wide basis?:

N/A

76 a) What differential impacts would these proposals have on you and/or your business if mandatory method of production labelling requirements were to apply on a GB-wide basis only, with respect to the movement of goods from GB to NI?

What differential impacts would these proposals have on you and/or your business if mandatory method of production labelling requirements were to apply on a GB-wide basis only, with respect to the movement of goods from GB to NI?:

N/A

76 b) How would your business manage these impacts if method of production labelling requirements were to apply on a GB-wide basis?

How would your business manage these impacts if method of production labelling requirements were to apply on a GB-wide basis?:

N/A

Part B: Method of production labelling (continued)

77 To what extent do you agree that this exemption would mitigate the burden on small businesses?

Strongly agree

78 What other exemptions might mitigate the impacts of our proposals on small and medium businesses?

What other exemptions might mitigate the impacts of our proposals on small and medium businesses?:

Part B: Method of production labelling (continued)

79 Do you agree with this estimate? Please provide evidence to support your answer.

Don't know

Do you agree with this estimate? Please provide evidence to support your answer.:

The Alliance is not a business and we have no expertise in this area.

80 a) If you are able to provide an up-to-date figure for the cost per SKU of labelling changes, please do so below.

If you are able to provide an up-to-date figure for the cost per SKU of labelling changes, please do so below.:

80 b) Please provide any evidence to support your response.

Please provide any evidence to support your response.:

81 a) To what extent do you agree or disagree with our assumption that all producers will incur familiarisation and compliance costs as a result of these proposed labelling requirements?

Not Answered

81 b) Please provide any evidence to support your response.

Please provide any evidence to support your response.:

Part B: Method of production labelling (continued)

82 Please provide any further evidence on likely traceability costs for a business. Please specify the sector or group this evidence relates to, and use worked examples if helpful.

) Please provide any evidence to support your response.:

83 Please provide any company-level data on the costs of undergoing an audit (for example, the costs to your business of undergoing a farm assurance scheme inspection).

Please provide any company-level data on the costs of undergoing an audit (for example, the costs to your business of undergoing a farm assurance scheme inspection).:

N/A

Part B: Method of production labelling (continued)

84 a) To what extent do you agree or disagree with our assumption that retailers set prices at a product category or business level?

Not Answered

84 b) Please provide any evidence you can to support your view.

Please provide any evidence you can to support your view.:

85 a) To what extent do you agree or disagree with our assumption that food business profits would overall stay the same in the long term?

Not Answered

85 b) Please provide any evidence you can to support your view.

Please provide any evidence you can to support your view.:

Part B: Method of production labelling (continued)

86 a) How do you anticipate the number of higher welfare (tier 1-3) unprocessed and minimally processed products on shelves in scope would change due to this intervention? We are particularly interested here in responses from retailers. For pork products:

Not Answered

86 a) continued For chicken products:

Not Answered

86 a) continued For egg products:

Not Answered

86 b) Please provide any evidence you can to support your view.

Please provide any evidence you can to support your view.:

87 a) What percentage of all imported unprocessed and minimally processed poultry and pig meat do you believe is used in processed products (retail and out of home sector)?

Not Answered

87 b) Please provide any evidence you can to support your view.

Please provide any evidence you can to support your view. :

88 a) Please provide detail on any additional impacts you can identify to businesses (domestic or abroad) as a result of the proposals being applied to imported products. How do you think the cost and/or volume of imported products will be affected by the labelling requirements?

) Please provide detail on any additional impacts you can identify to businesses (domestic or abroad) as a result of the proposals being applied to imported products. How do you think the cost and/or volume of imported products will be affected by the labelling requirements? :

88 b) Please provide any evidence to support your answer.

Please provide any evidence to support your answer. :

89 Do you have any further comments on our Impact Assessment or any other evidence you would like to share with us?

Do you have any further comments on our Impact Assessment or any other evidence you would like to share with us?:

Part B: Method of production labelling (continued)

90 a) To what extent do you agree that the proposals are likely to impact or improve relations between groups within the following categories protected under the Equality Act (2010)?

Not Answered

90 b) To what extent do you agree that the proposals are likely to impact or provide an opportunity to improve relations between groups within the following categories protected under the Northern Ireland equality legislation?

Not Answered

90 c) Please provide any evidence to support your view.

If you answered 'strongly agree/agree' to either Q90 a) or 90 b), please provide any evidence to support your view. :

Part B: Method of production labelling (continued)

91 Please share any additional areas of potential labelling reform which may deliver the benefits described above, for future consideration. Please include evidence where available.

. Please share any additional areas of potential labelling reform which may deliver the benefits described above, for future consideration. Please include evidence where available.:

Consultee Feedback on the Online Survey

Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Not Answered