

FOOD STANDARDS AGENCY CONSULTATION

Title: Review of communications with local authorities during incidents

CONSULTATION SUMMARY PAGE

Date consultation launched:	Closing date for responses:
01/10/2009	24/12/2009

Who will this consultation be of most interest to?
Food enforcement bodies, food industry and consumers

What is the subject of this consultation?
Review of communications with local authorities during incidents

What is the purpose of this consultation?
To seek stakeholder comments on proposed changes to communications with local authorities during incidents, to ensure that information reaches all interested parties in the most effective way.

Responses to this consultation should be sent to:

Name Beth Dunn Incidents Branch FOOD STANDARDS AGENCY Tel: 020 7276 8774 Fax: 020 7276 8446	Postal address: Area 4B, Aviation House 125 Kingsway London WC2B 6NH Email: incidentsconsultation@foodstandards.gsi.gov.uk
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Is an Impact Assessment included with this consultation?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> See Annex A paragraph 10 for reason.
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REVIEW OF COMMUNICATIONS WITH LOCAL AUTHORITIES DURING INCIDENTS

Introduction

1. We are seeking views on the review of our communication routes with local authorities during incidents.

2. The key aspects of this review are to:

- Review our communications with local authorities during incidents
- Consider the systems available and the likely circumstances under which we would issue communications to local authorities
- Establish whether we are being consistent in our approach regarding the issue of communications with local authorities
- Consider replacement of the existing Food Alert For Information (FAFI) with a Product Withdrawal / Recall Information Notice¹

3. Our core purpose is to work towards safe food and healthy eating for all. In doing this we will follow our core values of putting the consumer first, being open and transparent, and being science and evidence based. Part of this commitment is to inform consumers where foods that are, or have been, on sale are unsafe. We may also inform consumers about foods that do not fully meet all aspects of food legislation, but do not necessarily pose a food safety risk.

4. We define an incident as:

“Any event where, based on the information available, there are concerns about actual or suspected threats to the safety or quality of food that could require intervention to protect consumers’ interests.”²

5. We have been notified of more than 7,850 food and environmental contamination incidents³ since being set up in April 2000. For each incident the risk is assessed and an appropriate communications strategy is decided upon, including communication routes and methods. The vast majority of incidents have been resolved satisfactorily because of the way that we work together with local authorities and industry. It is through this co-operation that incidents are resolved swiftly and consumer health is protected.

6. Outputs from this review will be taken into consideration when reviewing the following documents:

- **‘Principles for Preventing and Responding to Food Incidents’⁴**,
Available on our website at:
<http://www.food.gov.uk/foodindustry/guidancenotes/incidentguidance/principlesdoc>
- **Incident Response Protocol**
Available on our website at:
<http://www.food.gov.uk/multimedia/pdfs/incidentresponserotocol.pdf>

7. Details of the proposals and background information on our current system for communicating with local authorities during incidents are outlined below, along with feedback from key stakeholders on the effectiveness of the system.

¹ On issue the notice would either be entitled Product Recall Information Notice or Product Withdrawal Information Notice depending on the circumstances.

² Food Incidents Task Force ‘Principles for preventing and Responding to Food Incidents’ (Revised April 2008)

³ Figures taken from the Agency’s Annual Report of Incidents 2008

⁴ Published in April 2008, including a new protocol for communicating during an incident.

Proposals

8. The key proposals are as follows:

Key proposal(s):

- Replacement of the Food Alert for Information with a Product Withdrawal / Recall Information Notice, used in cases of product withdrawals or recalls where all the correct action has been taken by the companies involved and no action is required by local authorities. Food Alerts for Action would remain unchanged and be used in cases where companies demonstrate that they cannot or will not adequately recall affected products. This will ensure that local authorities receive fewer Food Alerts. The change will also address industry's concerns about the terminology used whilst still ensuring that consumers are informed about product withdrawals or recalls. As well as being issued to local authorities the Product Withdrawal / Recall information notice would also be published on our website.
- Production of a summary of possible communication routes for when to publish Product Withdrawal / Recall Information Notices, Food Alerts for Action, Allergy Alerts, web stories, press releases and letters. This should ensure a more consistent approach and give stakeholders a clearer understanding of likely action in different circumstances.
- Production of standard template letters to local authorities and port health authorities to ensure a consistent approach.

BACKGROUND

Current system

9. The communication methods we currently use during an incident may include:

- a food (or feed) alert for information or action or an Allergy Alert
- a web story (information published on our website)
- a press release (proactively sent to the media)

10. When the incident is complex and multi-layered then all of these means of communication may be used and, as the situation evolves, additional material may be made public.

11. In normal circumstances, we will inform any investigating body that is investigating the company or the alleged incident about the action we intend to take and will share with investigators the contents of any Food Alert, Allergy Alert, web story or press release. It is particularly important during serious incidents that bodies whose work complements and supports our activities on food safety are informed and involved in the management of an incident from an early stage. This is especially true in the case of local authorities, who may have an enforcement role to play. Whenever appropriate we will also let the producer, retailer or importer see the information we intend to make public before we do so.

12. It is a legal obligation for a food business operator to inform the competent authorities if they consider or have reason to believe a food they have placed on the market may be injurious to health, or if it is unfit for human consumption and has left their immediate control. We use information provided to assess the potential risk to people and to formulate a suggested course of action for the local authority and company involved, as well as considering if advice to consumers is needed.

Food Alerts

13. Food Alerts were introduced in 2004 to replace the previous system of Food Hazard Warnings developed by the Department of Health before we were formed.

14. Under the current system, Food Alerts are the main route we use to communicate information to local authorities during incidents. There are two types of Food Alert:

- Food Alerts for Information (FAFI's) are issued to inform local authorities of actions already taken by a company in response to identified risks, and have increasingly been used to provide information on issues such as product withdrawals under Regulation EC 178/2002.
- Food Alerts for Action (FAFA's) are used to advise local authorities to take action during an incident investigation.

15. Food Alerts accurately let consumers know what the current level of risk is of the products involved (including brand names, durability dates, batch codes, etc.) and the actions taken by the relevant company (ies) or required by local authorities, including the legal basis (on Food Alerts for Action) for that action. The majority of Food Alerts (93% in 2008) are issued for information and do not advise local authorities to take action.

16. Where possible, we circulate draft Food Alerts to the relevant local authorities / companies for comments on factual accuracy prior to release. However, late notifications to the Agency can severely limit the time available for consultation because we may need to act quickly to minimise risks to consumers.

17. As well as being sent to all local authorities in the UK, Food Alerts are placed on the Agency website and can be seen by consumers. We do this as part of our commitment to openness because consumers have a right to know about food incidents that may affect them. It is also possible for consumers to subscribe to receive Food Alert details by email and text message⁵.

18. There will be a necessity to revise The Food Law Code of Practice should the proposed introduction of the Product Withdrawal / Recall Notice take place. This is because the Food Law Code of Practice makes reference to Food Alerts and will need to be updated accordingly.

⁵ It is proposed that, if and when the new system is agreed and implemented, external stakeholders will also be able to subscribe by email and text message to receive the new product recall/withdrawal information notices and they will be placed on our website.

Allergy Alerts

19. In 2006, as a result of feedback from both local authorities and consumers, we concluded that the Food Alert system was not the most effective way of contacting allergic or food-intolerant consumers who may have purchased a product that was subject to a recall or withdrawal due to it containing undeclared allergens. Consequently, in March 2007, we introduced the Allergy Alert notice system for incidents that do not need enforcement action.

20. We can issue an Allergy Alert at any time because its aim is to provide information direct to the consumer, whereas in the past Food Alerts were issued only during normal working hours as they were intended for local authorities. We now issue Allergy Alerts as soon as possible after receiving the information and in the most appropriate format for the recipient.

21. We also launched a free Allergy SMS Text Message Service in March 2007. It means that people with food allergies no longer need to access a computer and log on before finding out that there is a problem. Subscribers receive a text message whenever an Allergy Alert notice is issued. The text message system also helps reduce the information overload on local authorities and is more sustainable than the paper mail system used at present by consumer support organisations. Under the proposals we are not intending to make any changes to the Allergy Alert system.

Web stories and press releases

22. Web stories are issued to accompany any Food Alerts that are issued, and may also be issued as a stand alone message to alert consumers where we are not in a position to issue a Food Alert, e.g. due to lack of information, but wish to provide information to consumers. During high level incidents⁶ we may also issue press releases and will inform the relevant local authority (and the Local Authorities Coordinators of Regulatory Services) what we are going to be saying, so that they can prepare for, and respond to, media enquiries.

Decision on when to issue a press release / Food Alert / publish a web story

23. Our approach is based upon openness and letting consumers have useful facts. We also believe in taking a proportionate approach and appreciate that not all incidents require proactive communication to consumers. We will therefore make a judgement as to whether to issue proactive statements once we have facts to put into the public domain. Each incident is different and should be treated on its own merits but the type of issues we consider when deciding what, if any, proactive communication is required include:

- Potential levels of risk to consumers
- Distribution of product (i.e. national or local) and to what type of businesses (catering, retail, etc)
- Shelf life of product
- The action the company is taking (e.g. advertising, press releases, etc)

⁶ High level incidents are severe (e.g. potential to cause deaths, serious illness), complex (e.g. a large number of products affected, a high level of resources required to manage), widespread and likely to generate a high level of concern in public and media perception of the issue.

Agency linking to company websites

24. Our web stories and alerts will, wherever possible, link to the website(s) of the affected companies or relevant action groups. This is in addition to linking to any press notices issued by the company. Doing this conveys to our website visitors that the Agency has been working with retailers/manufacturers on publicising a particular incident, and company websites will often contain additional information of interest to consumers, local authorities and other interested parties.

Letters to local authorities and Port Health Authorities (PHAs)

25. Letters to local authorities and port health authorities are also used, where we may wish to make particular local authorities aware of an issue or ask port health authorities to sample specific consignments of products.

FSA consistency across the UK

26. The Agency aims for a consistent approach to responding and communicating about incidents, regardless of which part of the UK they occur. The whole of the Agency, including colleagues within our devolved administrations, adhere to the same principles of our incident procedures⁷ and we will manage our communication in the same proportionate and considered manner.

Information for local authorities

27. Local authorities are already informed by us about the majority of food incidents through the Food Alert system. However, we may not inform all local authorities on some occasions (e.g. the affected products have not left the factory or the incident is relevant to only one shop or a small area). We are committed to ensuring relevant local authorities are aware of what action we are taking. This is especially important when legal proceedings may be possible against any of the organisations involved in the incident. In these circumstances we will:

- inform local authorities who have responsibility for the home premises of the company about what action we are planning to take, for example, a web story or press release;
- wherever possible, share in advance (as above) information we are intending to make public;
- correct factual errors and consider other comments; and
- explain if we may not be able to give much time to consider comments on the release/web story before publication.

Rapid Alert System for Food and Feed (RASFF)

28. The Rapid Alert System for Food and Feed (RASFF), established in 1979, was set up to provide EU member states with an effective tool for exchange of information on measures taken to ensure food safety. We use the European Commission's RASFF system to obtain information about matters that we need to act on as well as to inform the Commission and other member states of matters that they need to act on.

⁷ Food Standards Agency Incident Response Protocol (revised February 2009)

Perceived areas for improvement of current system

29. Feedback for areas of improvement of the current system have been received from local authorities and industry, as follows:

- I. Some food businesses feel penalised by the prominent position of alerts on our website when all the required actions have been carried out. There is also a view that the use of the word 'alert' is overly alarmist, particularly since most Food Alerts do not relate to major consumer health issues. They have highlighted that this could be a possible cause of under-reporting of incidents.
- II. A small number of local authorities have commented that they receive too many Food Alerts each year.
- III. There is a perceived inconsistency in the way we make decisions about the issue of Food Alerts, and a need to clarify the circumstances under which we would issue alerts and web stories.
- IV. The current process for issuing a food alert requires two or three drafts being circulated for comment. This means that issuing alerts can be unnecessarily time consuming and cannot be done out-of-hours.
- V. There is a need for a more standardised format to be adopted in connection with our letters to local authorities and port health authorities.

Consultation Process

Questions asked in this consultation:

- Q1:** We are proposing to replace the existing Food Alert for Information (FAFI) with a Product Recall / Withdrawal Information notice⁸. The Food Alert for Action (FAFA) will remain unchanged. Do you support this course of action? If not, please explain briefly your reasoning. We would additionally be grateful for any comments on the draft Product Recall / Withdrawal Information notice at Annex C.
- Q2.** Do you have any comments on Annex D regarding possible communication routes during incidents and the likely circumstances under which these would be used, for example, are there any additional factors that should be considered?
- Q3.** Do you have any comments on the draft standard letter template at Annex E to local authorities and port health authorities?

Other relevant documents

30. You may wish to refer to the following documents:

- **Incident Response Protocol**
<http://www.food.gov.uk/multimedia/pdfs/incidentresponserotocol.pdf>
- **Annual Report of Incidents 2008**
<http://www.food.gov.uk/multimedia/pdfs/incidents08.pdf>
- **Principles for Preventing and Responding to Food Incidents (guidance document produced by the FSA's Taskforce on Incidents)**
<http://www.food.gov.uk/multimedia/pdfs/incidentsprinciples.pdf>

31. In addition, a dedicated incidents section containing further information is available on the Agency's website at www.food.gov.uk/foodindustry/incidents/

⁸ Annex C

Responses

32. Responses **are required by close 24 December 2009**. Please state, in your response, whether you are responding as a private individual or on behalf of an 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,

Elizabeth Dunn
Incidents Branch
Food Safety: Implementation and Delivery Division

Enclosed

Annex A: Standard Consultation Information

Annex B: Incident Classification Matrix

Annex C: Draft Product Withdrawal/Recall Information Notice

Annex D: Draft summary of possible communication routes during incidents

Annex E: Draft standard template letters to local authorities and port health authorities

Annex F: Interested Parties List

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. Responses will be open to public access upon request. The FSA will also publish a summary of responses, which may include personal data, such as your full name and contact address details. 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/pdfs/dataprotection.pdf> 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 F. 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. A Welsh version of the consultation package can be found at www.food.gov.uk
7. Please let us know if you need paper copies of the consultation documents or of anything specified under '**Other relevant documents**'.
8. 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 are available at <http://www.berr.gov.uk/whatwedo/bre/consultation-guidance/page44458.html>
9. Criterion 2 of HM Government Code of Practice on Consultation states *Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.*
10. The Code of Practice states that an Impact Assessment should normally be published alongside a formal consultation. We have not produced an Impact Assessment for this proposal because we do not believe that the proposed changes would result in any additional monetary costs or benefits to stakeholders. There

may, however, be some cost savings to local authorities due to a reduced administrative burden. If you disagree with this assumption we would be pleased to receive evidence to help us draft an impact assessment.

11. For details about the consultation process (not about the content of this consultation) please contact: Food Standards Agency Consultation Co-ordinator, Room 2C, Aviation House, 125 Kingsway, London, WC2B 6NH. Tel: 0207 276 8630.

Comments on the consultation process itself

12. 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>
13. 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.

Translating overall score to Classification level
 0-5000 = Low level
 5000-25000 = Medium level
 >25000 = High level

ANNEX B: INCIDENT CLASSIFICATION MATRIX

Severity	Health Effects	Consumers Affected	Risk Assessment	Perceived Risk (Consumers)	Perceived Risk (Media)
1	No effect	None	No risk	No Risk	No concern
2	Self Medication	Single Consumer	Minimal Risk	Very Low Risk	Slight concern
3	GP Presenter	Few Consumers	Short-term effects. Mitigation measures feasible	Low Risk	Limited/Localised concern
4	Hospital Presenter	Local Community	Long-term Potential Effects	Moderate Risk	Regional concern
5	Hospitalised	Vulnerable/Ethnic Group	Long-term Direct effects	High Risk	National concern
6	Death	All Consumers	Acute effects	Very High Risk	International concern

Complexity	Number of Reports	Number of Products	Number of Agencies Involved	Traceability
1	No previous report	Single Product/single location	Single Food Business	All Products Identified and Withdrawn/No food safety implications
2	Less than 10 previous reports	Single Product/Multiple Locations	Single Local Authority	All Products Identified and Recalled
3	Greater than 10 previous reports	Single Batch	Multiple Food Businesses	All Products Identified. Withdrawal/Recall Action Started
4	Local/Regional Report	Multiple Batches	Multiple Local Authorities	All Products Identified. Recall/Withdrawal Action Imminent
5	Widespread National Reports	Multiple Products/Single Batches	Devolved Administrations	Some Products Identified. Further Tracking Being Carried Out
6	Widespread International Reports	Multiple Products/Multiple Batches	Other Government Departments	No Products Identified. No Action Taken

Note: Multiply scores for each column under Severity and Complexity. Cross-multiply these results to obtain overall weighting for incident.

PRODUCT RECALL / WITHDRAWAL INFORMATION NOTICE

Ref:...../.....

Date: ... 200..

..... withdraws / recalls due to

Product:

Risk: Some / all of the above product has been found to be unfit / contain
[Insert line on risk to consumers].

Product details:

Best Before End / Use by:

Batch code:

Action taken by the Company:

The company has recalled from customers and / or withdrawn from sale the affected product. Product recall / withdrawal notices have been displayed in stores that sell the product, explaining to customers the reason for withdrawal / recall and the actions they can take if they have bought the affected product.

No other products are known to be affected

Advice to consumers:

**ENQUIRIES ABOUT THE CONTENT OF THIS NOTICE SHOULD BE MADE TO
TEL: 020 7276 8448; FAX: 020 7276 8446**

Food Standards Agency, Aviation House, 125 Kingsway, London, WC2B 6NH

ANNEX D

DRAFT SUMMARY OF POSSIBLE COMMUNICATION ROUTES DURING INCIDENTS

Method of communication	Purpose	Likely circumstances under which these would be issued	Communication channel(s)
Product withdrawal / recall information notice	To provide advice and information to consumers about products removed from sale.	<ul style="list-style-type: none"> • All correct actions taken by company(ies) involved to withdraw or recall products. • No action required by local authorities • Low health risk to consumers 	<ul style="list-style-type: none"> • Published prominently on FSA website. • Circulated to LA's dedicated email boxes • Text Alert • Email Alert
Food Alert for Action	To direct the actions of local authorities with respect to an incident investigation.	<ul style="list-style-type: none"> • Incorrect action taken by company(ies) to withdraw or recall products. • Action required by local authorities to ensure affected product(s) removed from the food chain. • Potential health risk to consumers 	<ul style="list-style-type: none"> • Published prominently on FSA website. • Circulated to LA's dedicated email boxes. • Text Alert • Email Alert
Allergy Alert	To provide advice and information to consumers about products removed from sale.	<ul style="list-style-type: none"> • All correct actions taken by company(ies) involved to withdraw or recall products. • No action required by local authorities • Potential health risk to allergic consumers 	<ul style="list-style-type: none"> • Published prominently on FSA website. • Circulated to LA's dedicated email boxes. • Email alerts to consumers • Text alerts to consumers
Web story	To provide advice and information to consumers about products removed from sale.	<ul style="list-style-type: none"> • A web story to be published to accompany any product recall / withdrawal notice, Food Alert for Action or Allergy Alert. • As a stand alone message to consumers when Agency is not in a position to issue an alert due to lack of information, but wishes to provide information to consumers. 	<ul style="list-style-type: none"> • Published prominently on FSA website • Email Alert
Press release	To provide advice and information to consumers about products removed from sale.	<ul style="list-style-type: none"> • Issued in addition to a web story during high level incidents. • Possible health risk to consumers 	<ul style="list-style-type: none"> • Published prominently on FSA website • Email Alert
Letter to local authorities / port health authorities	To make specific LA's aware of an issue or to request PHA's to sample specific consignments of products.	<ul style="list-style-type: none"> • Where specific LA's need to be made aware of an issue not covered by any of the above communication methods. 	<ul style="list-style-type: none"> • Sent by email or post.

To: (delete as necessary)

Heads of Environmental Health Services¹
Directors of Trading Standards¹
Chief Port Health Officers¹
Border Inspection Posts¹
Nominated Officers for Imported Food¹

CC: (delete as necessary)

LACORS, TSI, CIEH, APHA, APA, HPA

Date:

Reference:

Dear Colleagues

TITLE

Delete as necessary:

Background

Issue

Risk assessment

Actions required

Yours sincerely

Name
Branch
Division

¹ State whether England / Scotland / Wales / Northern Ireland



ANNEX

Insert press release, relevant legislation.

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ANNEX F

INTERESTED PARTIES LIST

ALDI Store's Ltd
Alert4Allergy
Allergy UK
Anaphylaxis Campaign
Aramark Ltd
Arla Foods UK
ASDA Stores Limited
Associated British Foods plc
Association of Cereal Food Manufacturers
Association of Convenience Stores
Association of Port Health Authorities
Birds Eye Iglo Group
Booker Group plc
Brakes Group
British Egg Industry Council (Lion Quality Scheme -Eggs)
British Food Importers' Association
British Frozen Food Federation
British Meat Processors Association
British Retail Consortium
British Sandwich Association
British Soft Drinks Association Ltd
Budgens Stores Limited
Cabinet Office
Cadbury plc
Cereal Partners UK
Chartered Institute of Environmental Health
Chilled Food Association
Co-operative Group (CWS) Ltd
Coca-Cola Great Britain & Ireland
Coeliac UK
Compass Group UK & Ireland Limited
Consumer Council for Northern Ireland
Consumer Focus
Costcutter Supermarket Group Ltd
Dairy Council for Northern Ireland
Dairy Crest Group PLC
Dairy UK Ltd
Department for Environment, Food and Rural Affairs
Department for Business Enterprise & Regulatory Reform
Department of Agriculture and Rural Development (N. Ireland)
Department of Health
Department of Health, Social Services and Public Safety (N. Ireland)
Directors of Public Protection Wales
Egg Marketing Inspectorate (EMI)
Environment Agency
European Commission
European Food Safety Authority
Federation of Bakers
Federation of Oils, Seeds and Fats Associations (FOSFA)
Federation of Small Business
Federation of Wholesale Distributors
Food Additives and Ingredients Association
Food and Drink Federation
Food Industry Centre UWIC
Food Safety Authority of Ireland
Fresh Produce Consortium
Green & Black's Ltd
Greencore
Greene King plc
H J Heinz Company Ltd
Health and Safety Executive
Health Food Manufacturers Association
Health Protection Agency
Health Protection Scotland
Iceland Foods Limited

ANNEX F

Infant and Dietetic Foods Association
Institute of Grocery Distribution
J Sainsbury Plc
Kellogg Company (GB) Limited
Kenko Commodities Plc
Kerry Food Ltd
Kraft Foods UK Ltd
Leatherhead Food International
Lidl UK
Livestock & Meat Commission for Northern Ireland
Local Authorities (Environmental Health) – England, Scotland, Wales & Northern Ireland
Local Authorities (Trading Standards) – England, Scotland, Wales & Northern Ireland
Local Authorities Co-ordinators of Regulatory Services
Local Government Association
Marks and Spencer Group plc
Mars UK Limited
Masterfoods UK
McCain Food (GB) Ltd
Muller Dairy (UK) Limited
Musgrave Retail Partners GB
National Association of British and Irish Millers
National Association of British Market Authorities
National Beef Association
National Consumer Council
National Consumer Federation
National Federation of Consumer Groups
National Federation of Meat & Food Traders
Nestle UK Limited
Nisa-Today's (Holdings) Ltd
Northern Foods plc
Northern Ireland Grain Trade Association
Northern Ireland Fish Producers Association
Northern Ireland Food and Drink Association
Northern Ireland Food Liaison Group
Northern Ireland Meat Exporters Association
Office of Fair Trading
PepsiCo UK
Premier Foods Ltd
Provision Trade Federation
Quality Meat Scotland (QMS)
Robert Wiseman Dairies plc
Royal Environmental Health Institute for Scotland
Royal Institute of Public Health and Hygiene
Royal Society for Public Health
Safefood
SALSA - Safe Local Supplier Approval
Scotland Food and Drink
Scottish Association of Master Bakers
Scottish Association of Meat Wholesalers
Scottish Federation of Meat Traders Association
Scottish Fishermen's Organisation
Scottish Game Dealers/Processors' Association
Scottish Grocers Federation
Scottish Association of Master Bakers
Seafish
Seed Crushers and Oil Processors Association
Snack, Nut & Crisps Manufacturers Association
Somerfield Group
Spar
Spirit Group Limited
Sustainable Development Commission
Tate & Lyle Plc
Tesco plc
The Association of Directors of Public Health
The Co-operative Group
The Food Commission
The Sugar Bureau

ANNEX F

Trading Standards Institute
Ulster Farmers Union
UK Halal Association
Unilever UK
United Biscuits (UK) Ltd
VEGA
Veterinary Laboratories Agency
Veterinary Medicines Directorate
Waitrose Limited
Welsh Consumer Council
Welsh Council For Voluntary Action
Which?
Whitbread Group plc
Wine and Spirit Trade Association
Wm Morrison Supermarkets Plc