

# **DRAFT PARTIAL REGULATORY IMPACT ASSESSMENT**

## **1. TITLE OF PROPOSAL**

### **The European Commission's proposal for a Regulation on The Marketing and Use of Animal Feed**

## **2. PURPOSE AND INTENDED EFFECT OF THE MEASURE**

### **i) The Objectives**

2.1 The proposed Regulation is part of the European Commission's modernisation and simplification programme and will bring together many of the provisions relating to the marketing and use of animal feed in a single, comprehensive legislative document. This will ensure harmonised implementation of feed legislation by simplifying technical requirements and removing unnecessary administrative burdens. This will facilitate the functioning of the internal market by increasing the competitiveness of the EU feed sector and enable purchasers to make informed choices about the feed products they buy.

### **ii) The Background**

2.2 Animal feed legislation is a harmonised area in the European Union and includes provisions on the marketing and use of feedingstuffs. These include labelling declarations such as the ingredients used, including certain categories of additives; analytical declarations for protein, fibre, ash, etc.; the name and address of the business; the batch number and shelf life of the feed product; directions for use, as appropriate; and certain allowable claims. These requirements are currently set out in four separate EC Directives, as follows:

- Council Directive 79/373/EEC of 2 April 1979 on the circulation of compound feedingstuffs;
- Council Directive 82/471/EEC of 30 June 1982 concerning certain products used in animal nutrition;
- Council Directive 93/74/EEC of 13 September 1993 on feedingstuffs intended for particular nutritional purposes; and
- Council Directive 96/25/EC of 29 April 1996 on the circulation and use of feed materials.

2.3 Compound feedingstuffs are manufactured, often pelleted, mixtures of two or more ingredients, which may contain additives. Certain products used in animal nutrition are bioproteins (chiefly amino acid substitutes). Feedingstuffs intended for particular nutritional purposes are products formulated to meet the needs of animals whose digestive capability is temporarily or chronically impaired. Feed materials are single ingredients either fed singly to animals or used in the manufacture of compound feeds.

2.4 This legislation applies principally to feed for farmed livestock, but also covers feed for horses and farmed fish, pet food, and zoo and circus animals. This is because in practice it would be very difficult to separate feed for farmed livestock

from feed for other categories of animals because of the duplication of legislative provisions which would result.

2.5 The proposed Regulation is part of the European Commission's modernisation and simplification programme, and is put forward as a replacement for these four Directives. The proposed Regulation will thus bring together in one document most of the provisions relating to the marketing and use of animal feedingstuffs. The labelling of additives used or sold as they are -- i.e., without incorporation in a feedingstuff -- will remain outside the scope of the new measure, as will the labelling of feed containing or produced from genetically modified organisms (GMOs). This is because these two issues are already controlled by separate, recent EC Regulations, namely Commission Regulation (EC) 1831/2003 of 22 September 2003 on additives for use in animal nutrition and Commission Regulation (EC) 1829/2003 of 22 September 2003 on genetically modified food and feed. Two other pieces of legislation will also remain outside the scope of the proposed Regulation: undesirable substances in feed, which are controlled by Council Directive 2002/32/EC of 7 May 2002, and ingredients prohibited from use in feed, which are controlled by Commission Decision 2004/217/EC of 1 March 2004. These two measures are outside the proposal's scope because they concern materials and substances which are not intended to be incorporated in feed.

2.6 EC legislation does not cover the labelling of medicines incorporated in animal feed, which in the UK is subject to national legislation.

### **iii) Detail of the proposed Regulation**

2.7 The proposed Regulation contains a number of amendments to existing labelling legislation. These amendments are summarised in the following paragraphs.

#### *Status of Water*

2.8 Previously, there has been some debate amongst Member States as to whether water should be categorised as a feed material. The proposed Regulation states explicitly that water is excluded from its scope, "either taken in directly by the animals or intentionally incorporated into feed".

#### *Extension of the Principles of Feed Law to Non-Food Producing Animals*

2.9 The feed safety provisions of EC Regulation 178/2002 on the general principles of food law (which includes feed law) currently apply only to feed for food-producing animals -- i.e., farmed livestock producing food (milk, eggs and meat, including fish meat) for human consumption. The proposed Regulation would extend the coverage of Articles 15-18 and 20 of EC Regulation 178/2002 -- which concern feed safety, traceability and the responsibilities of feed business operators -- to feed for non-food producing animals.

#### *Demarcation between Complementary Feeds and Premixtures*

2.10 A complementary feed is a compound feed which has a high content of a particular ingredient or substance (e.g. a feed additive) but which requires to be mixed or provided with other feed (either feed materials or other compound feeds) in order to meet an animal's daily nutritional needs. Complementary feeds which contain levels of additives above the permitted maxima for finished feeds and which are sold direct to the final users are required to be labelled with instructions for their use, in particular to state (according to the species and age of the animal for which they are intended) the maximum quantity to be given per day. This is to ensure that the amount of additives received by the animal does not exceed the specified maxima.

2.11 A premixture is a mixture of feed additives, or a mixture of one or more feed additives with a feed material used as a carrier, and intended for incorporation in a compound feed rather than for direct feeding for animals. Premixtures are generally intended for use by commercial feed manufacturers, although they can be purchased and used by farmers who mix feed on their own holdings. Farmers and feed manufacturers who use premixtures must comply with conditions laid down in the EC Feed Hygiene Regulation (183/2005) which include, among other things, a requirement to have facilities in place to achieve a homogeneous mixture of additives.

2.12 The levels of additives in complementary feeds and premixtures are not subject to maximum inclusion rates. However, when these products are incorporated in other feed, the maximum inclusion rates for additives in complete feeds, as set out in their conditions of authorisation, must be observed. Some Member States have expressed concern over the marketing of complementary feed products which contain very high levels of additives, comparable to those in premixtures, because farmers using such complementary feeds are not required to have facilities to ensure proper mixing.

2.13 To address this concern, the proposed Regulation will specify that complementary feeds should not contain levels of additives of more than 100 times the maxima of additives in complete feeds. This measure is expected to help control the use of complementary feeds. However, further information from the feed and farming industries may be required to assess the potential impact of this provision on drenches, pastes and boluses (i.e., doses of additives fed directly on their own).

2.14 The proposed Regulation also contains controls on complementary feed containing coccidiostats and histomonostats, which are substances used to inhibit or kill certain parasitic infestations of the gastro-intestinal tract.

2.15 The proposed Regulation will also amend Article 16 of the EC Feed Additives Regulation, which relates to the labelling of premixtures. The existing provision requires the labelling of a range of information for each additive contained in a premixture, some of which (e.g. the date of manufacture and the batch number of each additive) is of minimal use to purchasers. The amendment will therefore delete the requirement to include this information on labels. The requirement to label essential safety information (e.g. directions for use) will be retained.

### *Products for Particular Nutritional Purposes*

2.16 Council Directive 93/74/EEC on feedingstuffs for particular nutritional purposes allows feeds to be marketed expressly for the dietary management of certain recurring, often short-term, nutritional conditions -- for example, support of renal function in case of chronic renal insufficiency; reduction of urate stone formation; compensation for maldigestion; regulation of glucose supply (diabetes mellitus); reduction of copper in the liver. The list of purposes is restrictive: feeds may be marketed and promoted only for these purposes, and then only for the species or categories of animals specified. The animals include farmed livestock, horses, cats and dogs. Feeds which meet the specified requirements do not themselves require authorisation.

2.17 Currently, additions or amendments to the list of particular nutritional purposes are made by the European Commission, assisted by the Standing Committee on the Food Chain and Animal Health, through amendment of the Annex to Directive 93/74/EEC. In practice, however, there have been very few such amendments, and those which have been made have principally concerned minor variations to the wording of the listed nutritional purpose or the required feed composition. Some industry stakeholders, particularly those in the pet food and horse feed sectors, have in consequence expressed concern at the absence of a formal mechanism for the consideration of new nutritional purposes which they wish to see added to the list.

2.18 The proposed Regulation would introduce a formal procedure for the consideration of submissions for new nutritional purposes to be added to the list. Applicants would be required to submit a dossier demonstrating that a specific feed meets an intended nutritional purpose and has no adverse effects on animal and human health, the environment and animal welfare.

### *Limits of Variation*

2.19 Council Directive 79/373/EEC on the circulation of compound feedingstuffs and Council Directive 96/25/EC on the circulation and use of feed materials both lay down upper and lower limits of variation for the declaration of analytical ingredients (protein, fibre, oil, trace elements, etc.) within which the actual content must fall in order to be congruent with the values declared on the label. The purpose of such tolerances is to allow for minor variations in manufacturing processes and the natural decay of some ingredients such as vitamins during a product's shelf life.

2.20 The Regulation proposes to simplify these limits of variation through a reduction in the number of declarations subject to such limits, although this simplification results in a tightening of some of them.

### *Allowable Claims*

2.21 In addition to the specific labelling requirements of Council Directive 93/74/EEC on feedingstuffs for particular nutritional purposes, Council Directive 79/373/EEC on the circulation of compound feedingstuffs lays down a number of general principles by which labelling must abide. These principles include a

requirement that the label must not claim that the feed will treat, prevent or cure disease; that the label must not mislead customers by either attributing special properties which the feed does not possess or suggesting that it has special characteristics when all feed has similar properties; and that any additional claims relate to objective or quantifiable factors which can be substantiated.

2.22 The proposed Regulation will retain these general principles but extend them by requiring that any claim for a specific composition or function of a feed be understandable by purchasers and verifiable by enforcement officials, and that the feed business operator making any such claim provide on request a scientific substantiation of it in the form of either documented company research or publicly available scientific evidence. It will still be permissible to make "generic" claims which are not based on a pharmacological or immunological action, e.g. for the role of vitamins.

### *Percentage Ingredient Declaration of Compound Feedingstuffs*

2.23 Current feed legislation requires that the feed material ingredients of compound feedingstuffs be declared according to their percentage weight of inclusion. This was introduced following the widespread contamination by dioxins of food and feed products in Belgium in 1999 on the grounds that it would assist ingredient traceability in the event of a future contamination incident. The requirement allows for a tolerance of +/-15% for each declaration.

2.24 The proposed Regulation will amend the requirement to declare the feed material ingredients of compound feedingstuffs according to their percentage weight of inclusion by restoring the previous option to declare them in descending order by weight, and by making percentage declaration voluntary rather than compulsory. However, manufacturers will be required to provide customers, on request, with quantitative compositional data, subject to a tolerance of +/-15% for each ingredient declaration, unless this information is considered to be commercially sensitive.

### *Labelling of Pet Food*

2.25 Manufacturers of pet food currently have the option to declare the ingredients by category -- e.g., "meat and animal derivatives", "oils and fats", "vegetable protein extracts" -- rather than by specific name in descending order by weight. The proposed Regulation would require that the label provides a freephone number for customers to obtain details of the exact ingredients, when they have been declared by category, and of all the additives used in the pet food, over and above those which are required to be declared on the label.

2.26 The proposed Regulation also includes a provision which would allow the Commission to establish a list of categories of feed material specifically for feed for non-food producing animals. However, it is not clear from the current text whether this would wholly replace or only supplement the existing list of categories.

### *Contaminated Feed*

2.27 The Annex to Council Directive 2002/32/EC on undesirable substances in animal feed specifies the maximum permitted levels for a range of contaminants. Feed which is found to contain levels of undesirable substances above these maxima is generally required to be withdrawn from the market and disposed of outside the feed chain, although in some circumstances it can be sent for cleaning or detoxification to reduce the contaminant load. However, there is currently no requirement for such feed to be labelled to indicate that it is to be cleaned or detoxified, and thus there is potential for its diversion back into the feed chain without undergoing such processing. The proposed Regulation will therefore introduce a provision requiring that such feed be labelled to indicate that it is intended to be cleaned or detoxified prior to use.

### *Derogations*

2.28 Council Directive 79/373/EEC on the circulation of compound feedingstuffs and Council Directive 96/25/EC on the circulation and use of feed materials both have a number of derogations which permit abbreviated or less extensive labelling declarations in certain circumstances -- for example, for arable farmers selling feed materials (such as field beans or turnips) direct to livestock farmers; and for the by-products of agro-industrial processes where the moisture content exceeds 50%, such as brewers and distillers selling used hops or barley mash to feed compounders. The proposed Regulation would retain most of these derogations, but would abandon the current exemption for agro-industrial by-products with a high moisture content.

### *Catalogue of Feed Materials*

2.29 Council Directive 96/25/EC introduced harmonised labelling requirements for feed materials through the introduction of a non-exclusive list of the most commonly used feed materials. The list specifies in each case the name to be used, the description to be satisfied, and the analytical declarations (for protein, fibre, moisture, etc.) to be made on the label. The list, in the Annex to the Directive, does not impose a restricted list of what can be fed to animals. However, all feed business operators who put into circulation a feed material which matches a description in the list must apply the name and analytical declarations relevant to that description.

2.30 The Commission is now proposing to replace the existing Annex with a Community Catalogue of feed materials, which would include -- as the Annex does now -- a name and a description of the feed material, together with any processing it has undergone. The Catalogue would also specify, for each feed material listed, an identification number and the analytical ingredients to be declared. The Catalogue would be subject to amendment and extension in consultation with Member States, the EFSA and feed stakeholders, and would be published in the C series of the *Official Journal*.

### *Codes of Practice for Good Labelling*

2.31 The Commission is proposing that the Regulation make provision for the adoption of two Codes of Practice for good labelling, one for feed for food-producing animals (i.e., farmed livestock) and one for pet food. Their scope would appear to be

restricted to the voluntary declarations which may be made and would seem to be intended to provide guidance to the feed industry on appropriate labelling. "Voluntary declarations" in this case would appear to mean those analytical declarations which are currently categorised as optional (as opposed to compulsory), and not the additional, non-statutory information which may be provided outside the statutory statement.

2.32 Like the Catalogue of feed materials, the Codes of Practice would be subject to amendment and extension in consultation with Member States, the EFSA and feed stakeholders, and would be published in the C series of the *Official Journal*.

### *Bioproteins*

2.33 Council Directive 82/471/EEC concerning certain products used in animal nutrition sets out the procedure for the consideration and authorisation of bioprotein products. Applicants for authorisation are required to submit a dossier of scientific evidence in support of the product, which will not be authorised unless it meets relevant criteria for safety, quality and efficacy.

2.34 Many of the products in the Annex to this Directive were reclassified as feed additives by EC Regulation 831/2003, and therefore removed from it. The Commission now proposes that Directive 82/471/EEC be repealed in its entirety and that the remaining products to which it applies be reclassified as feed materials. The justifications advanced for this are, firstly, that the remaining products have proven to be safe in use; secondly, that the existing authorisation procedures have proven dissuasive to the bringing forward of new bioprotein products; and, thirdly, that the safety risks of any new products can be managed through post-marketing surveillance, with products subsequently demonstrated to be unsafe considered for addition to the list of prohibited ingredients (i.e. products forbidden from use in feed).

2.35 The removal of the requirement to submit a dossier of scientific evidence in support of a new bioprotein product would clearly represent a reduction in administrative burdens for business.

### *Extension of Additives Labelling Requirements*

2.36 Current labelling rules for compound feed requires the declaration only of certain specified additives (e.g. copper, which is an essential nutrient for some species but toxic in excess for others); the declaration of other additives is voluntary. The proposed Regulation would require the mandatory declaration of all additives subject to a maximum inclusion rate, which would mean declaring a substantially wider range of additives for feed for both farmed livestock and pet food. The declaration would include the additive name and/or identification number, the added amount, and the functional group to which it belongs.

## **iii) Rationale for Government Intervention**

2.37 The proposed EC Regulation will replace four existing Directives concerning aspects of the marketing and use of animal feeds. These Directives were adopted at different times during the past three decades and have some inconsistencies between them as well as containing some redundant and superseded provisions. Government intervention is necessary to ensure that feed legislation is kept up to date and to reduce the administrative burdens on industry of compliance with it.

### **3. Food Standards Agency's preliminary view of the proposed Regulation**

3.1 The Food Standards Agency's preliminary view of the proposed Regulation is positive: in its opinion, the Regulation will consolidate and simplify feed marketing requirements. In particular, the repeal of the existing requirement for the percentage declaration of the ingredients of compound feeds has been one of the UK's chief goals and will be welcomed by the feed industry, which has been concerned that percentage declaration has compromised the commercial confidentiality of its feed formulations.

3.2 In addition, the introduction of a formal procedure for the addition of new nutritional purposes to the list of those for which dietetic feeds can be marketed is likely to be welcomed by the feed industry, in particular by the horse feed and pet food sectors. The additional requirements on allowable claims may be welcomed by the feed industry as they may help reduce the number of dubious or borderline claims made by some feed business operators.

3.3 However, the Food Standards Agency considers that there are a number of areas where active negotiation may yield a better outcome for stakeholders. These include:

- a proportionate approach to the proposed extension of additives labelling requirements. In the Food Standards Agency's opinion, the proposed extension would not contribute to feed safety, would increase the administrative burdens for both the feed industry and enforcement authorities, and could mean that important safety information (such as the directions for use) is overlooked by purchasers;
- clarifying with the Commission the criteria to be applied to the tightened limits of variation -- e.g. whether they will take account of the uncertainties naturally present in the sampling process;
- maintaining the derogation for labelling the analytical declarations of feeds with a moisture content of more than 50%, because of the difficulty of obtaining analytical results in such cases. In addition, a requirement to declare the analytical content of high-moisture feeds would in turn require their producers to invest in the sampling and analysis equipment necessary to make these labelling declarations, which would thus impose a new administrative burden on them;
- clarification of the circumstances in which it may be possible to request a pre-market assessment of new bioprotein products because of their potential safety implications;
- exploring with the Commission the exact scope and content of the proposed Codes of Practice for good labelling, as this is not clear from the present text of the proposed Regulation;

- carrying out an assessment of the impact on pet food manufacturers of the requirement to provide a freephone number for purchasers to obtain details of the ingredients used; and
- requesting an extension of EC feed legislation to cover medicated feedingstuffs and obtaining further clarification of the controls on complementary feeds containing coccidiostats and histomonostats.

#### **4. OPTIONS**

4.1 There would appear to be three policy options available with respect to the proposed Regulation. These are as follows:

Option 1 -- accepting the proposed Regulation unchanged; or

Option 2 -- rejecting the proposed Regulation in its entirety; or

Option 3 -- seeking an outcome proportionate to the needs of UK stakeholders.

##### **i) Accepting the proposed Regulation unchanged**

4.2 This would require UK agreement to all of the Commission's proposals, including the labelling of the additive content of compound feeds, the tightened limits of variation, and the deletion of the existing derogation for the labelling of feed materials with a moisture content higher than 50%. For reasons given earlier, these are considered to impose new administrative burdens on the feed industry, and agreement to them would not be a proportionate outcome for UK stakeholders.

##### **ii) Rejecting the proposed Regulation in its entirety**

4.3 This option would entail the retention in national legislation of the provisions of the four Directives which the proposed Regulation would replace, including the mandatory requirement to declare the ingredients of compound feeds by their percentage weight. For the reasons given earlier, neither the feed industry nor enforcement authorities are likely to welcome the unnecessary administrative burden which this provision would continue to impose.

4.4 Leaving existing feed labelling legislation unamended would also mean that the feed labelling regime in the UK was potentially out of step with that in other Member States. Although this may have few operational implications for the UK feed industry, the UK government would then be open to infraction proceedings by the Commission for apparently ignoring the adoption of the Regulation in place of the four Directives currently transposed into national legislation. In addition, the repeal of these four Directives would remove the legal basis for the Feeding Stuffs (Scotland) Regulations 2005, which might have to be remade on a purely national basis and might even be open to challenge as having no legal power and thus be unenforceable.

##### **iii) Seeking an outcome proportionate to the needs of UK stakeholders**

4.5 UK participation in the negotiations on the proposed Regulation would be consistent with the UK's record on the negotiation and implementation of EC legislation, and the eventual adoption of the Regulation by the UK would be commensurate with its obligations under the Treaty. Option 3 is therefore the preferred option for the UK to pursue.

4.6 The proposed Regulation, when adopted by the Council of Ministers and the European Parliament and published in the *Official Journal*, would apply directly in all Member States without first needing to be transposed into national legislation. However, it would be necessary to amend existing domestic national animal feed legislation by disapplying or removing all the current provisions governing the marketing and use of feed, which either duplicated or were in conflict with the EC Regulation.

4.7 The costs to business from the adoption of the proposed Regulation are not yet quantifiable, although its provisions are identical or very similar to those in the four Directives which it is intended to replace. At present, therefore, it appears that neither the feed industry nor enforcement authorities will be required to invest in new equipment or procedures, although there may be some costs associated with the post-marketing surveillance of new bioprotein products. Against this, there are likely to be some savings to both the feed industry and enforcement authorities from the deletion of the existing requirement for the percentage declaration of the ingredients of compound feed.

## **5. COSTS AND BENEFITS**

5.1 The costs to business of the options outlined above are not yet quantifiable, although its provisions are identical or very similar to those in the four Directives which it is intended to replace. At present, therefore, it appears that neither the UK feed industry nor enforcement authorities will be required to invest in new equipment or procedures in order to comply with the provisions of the proposed Regulation, although there may be some costs associated with the post-marketing surveillance of new bioprotein products. Against this, there are likely to be some savings to both the feed industry and enforcement authorities from the deletion of the existing requirement for the percentage declaration of the ingredients of compound feed.

5.2 This section will be updated following public consultation with interested parties.

## **6. SMALL FIRMS IMPACT TEST**

6.1 This section of the RIA will be completed as the policy develops in consultation with stakeholders.

6.2 The Federation of Small Businesses Scotland will be included in the forthcoming consultation on these measures.

## **7. "TEST RUN" OF BUSINESS FORMS**

7.1 This section of the RIA will be completed as the policy develops in consultation

with stakeholders, but see para 4.7.

## **8. COMPETITION ASSESSMENT**

8.1 This section will be completed as the policy develops in consultation with stakeholders

## **9. ENFORCEMENT**

9.1 Local authority trading standards departments in Scotland will be responsible for the enforcement of the provisions of the proposed Regulation. This will be unchanged from the existing arrangements for the enforcement of animal feed legislation.

## **10. IMPLEMENTATION AND DELIVERY PLAN**

10.1 The proposed Regulation would apply directly in all Member States without needing to be first transposed into national legislation. However, the UK's normal practice with EC Regulations is to provide for their enforcement by linking them to the powers already granted to enforcement officers (local authority trading standards departments in Scotland).

10.2 Because the proposed Regulation would apply directly in all Member States, the Feeding Stuffs (Scotland) Regulations 2005, which implement the four Directives which the Regulation would replace, will need to be revoked and replaced by new legislation to enforce the proposed Regulation. The separate but parallel Feeding Stuffs Regulations for England, Wales and Northern Ireland would similarly need to be revoked and replaced. Some amendments may also be necessary to Part IV of the Agriculture Act 1970 to disapply those of its provisions, particularly those concerning feed labelling, where they would duplicate or conflict with the EC Regulation.

10.3 The EC Regulation is unlikely to enter into force before late 2009 at the earliest. The amended national Regulations will be reviewed not less than a year later.

### ***Contact Point***

Stewart Herd  
Animal Food Chain and Novel Foods Branch  
Food Standards Agency Scotland  
St. Magnus House  
25 Guild Street  
Aberdeen AB11 6NJ  
Telephone: 01224 285138

## Interested Parties List

ADAS Scotland  
AIC Ltd  
Alsop Transport Services  
Animal Health  
Animal Health Distributors Assoc (UK)  
Aquascot Ltd  
Argyll & Clyde  
Association of Scottish Shellfish  
Growers  
Biodynamic Agricultural Association  
BMA Scotland  
British Deer Society  
British Egg Industry Council  
British Goat Society  
British Hospitality Association  
British Poultry Council  
British Trout Association  
British Veterinary Association  
British Veterinary Association (Scottish  
Branch)  
Brookside Products Ltd  
Brown Brothers Ltd.  
Caledonian Cheese Co  
Claymore Dairies  
Co-operative Group (CWS) Ltd  
COSLA  
Dairy UK - Scotland  
Deer Commission for Scotland  
Diageo  
Dundonnell Smoked Salmon  
Edinburgh Smoked Salmon Company  
(1992) Ltd.  
Farmlay Eggs  
Federation of Small Businesses  
Fisheries Research Services  
Food Additives & Ingredients  
Association  
Food And Drink Federation  
Food Certification Scotland Ltd  
Food Industry (North) Development  
Services  
Food Innovation Institute (F2i)  
Food Safety Authority of Ireland  
Framgord Ltd  
Glasgow Caledonian University  
Glasgow Metropolitan College  
Glasgow Scientific Services  
Glasgow University Veterinary School  
Glenmuick Estate  
Grampian Country Pork Halls Ltd  
Grampian Oat Products  
Hallmark Meat Hygiene Ltd/ AA  
Duncan & Son  
Harbro Ltd  
Health & Sport Committee  
Health Protection Scotland  
Highland Drivers Ltd.  
Hutchison's Flour  
IHS Technical Indexes  
Institute of Aquaculture  
Inverclyde Council  
John Hogarth Ltd.  
Lossie Seafoods  
MacRae Food Group  
Marine Harvest (Scotland) Ltd  
McIntosh Donald  
Meat and Livestock Commission  
Moray Seafood Ltd  
Moredun Research Institute  
Munlochy GM Vigil  
Mylnefield Research Services Ltd.  
National Beef Association  
National Beef Association Scotland  
Neogen Europe Ltd.  
Neville Craddock Association  
NFU Scotland  
NHS Fife  
NHS Grampian  
Norscot Seafoods Ltd  
Pan Fish Scotland Ltd  
Perth & Kinross Council  
Peterhead Port Authority  
Quality Meat Scotland  
Road Haulage Assoc Ltd  
Rowett Institute  
Royal Environmental Health Institute  
for Scotland  
Royal Highland & Agricultural Society  
of Scotland  
Royal Highland Education Trust  
Ruma  
SAC  
Scot Trout Ltd.  
Scotch Whisky Association  
Scotch Whisky Research Institute  
Scottish Association of Meat  
Wholesalers  
Scottish Beef Cattle Association  
Scottish Chambers of Commerce  
Scottish Consumer Council  
Scottish Crofting Foundation  
Scottish Crop Research Institute

Scottish Egg Producer Retailer  
Association  
Scottish Food Quality Certification Ltd  
Scottish Fresh Foods  
Scottish Government  
Scottish Government Rural Directorate  
Scottish Organic Producers  
Association  
Scottish Pig Producers Ltd.  
Scottish Rural Property and Business  
Association.  
Scottish Salmon Producers  
Organisation  
Scottish Salmonella Reference  
Laboratory  
Scottish Sea Farms Ltd.  
Sea Fish Industry Authority  
Seafood Scotland  
Sheep Veterinary Society  
Soil Association Scotland  
Strathaird Salmon Ltd  
Tan International Scotland  
Tayside Scientific Services  
TESCO Stores Ltd  
The Applecross Trust  
The Glenside Group Ltd.  
The Halal Food Authority  
The Malt Distillers Association of  
Scotland  
The Royal Society of Edinburgh  
United Fish Industries  
University of Aberdeen  
University Of Paisley  
Verner Wheelock Associates  
Walkers Shortbread Ltd  
West Minch Salmon  
William Forrest & Son (Paisley) Ltd  
Women's Food & Farming Union

125 Consultees + Local Authorities