

March 2010

Research Briefing

Consumer Views on the Food Standards Agency in Scotland's Draft Guidance for Consumers in Scotland: Country of Origin Information on Food Labels

Gill MacGregor, Consumer Network Co-ordinator

Background

In January 2010, the Foods Standards Agency in Scotland (FSAS) issued a public consultation on its 'Draft Guidance for Consumers in Scotland on Country of Origin Information on Food Labels'. They wanted to hear from as many people as possible, particularly consumers, to ensure that the new guide is fit for purpose.

Existing Food Standards Agency guidance on country of origin labelling is intended to provide technical information to the food industry and enforcement staff thereby benefitting consumers through improved labelling practice. As such it is not directly aimed at explaining origin information to consumers.

As a result of this (and a recommendation in the 'National Food and Drink Policy for Scotland'), the FSAS has decided to develop a new information guide for Scotland to inform consumer choice and understanding.

Several other pieces of research have also identified an interest in country of origin information on meat and meat products and other fresh foods such as fish, dairy and fruit and vegetables. In addition to this, a previous investigation into meat labelling undertaken by the Consumer Network highlighted that there is some confusion over the descriptions and terms used on food labels.

1.1 Aims

FSAS intend to produce a guide to explain the current complex rules surrounding country of origin labelling using the minimum of technical language. Some of the examples given in the draft document do need to be developed further during the consultation period and they are considering including photos or labelling designs to improve the visual appeal of the guidance. All of the examples given are based on actual food labels found in Scotland and are intended to explain:

- the meaning of some of the terms and logos
- whether they are intended to give origin information or not

1.2 Country of origin labelling rules

Food labelling rules are developed in Europe and are currently being reviewed. Under present European policy, foods such as beef (and certain fruit and vegetables) must have labels saying which country they have come from. However, most foods (including ham, pies, sausages and ready meals) only need to include this information *if not giving it would be misleading*. Where this information is provided it only needs to be based on the place of 'last substantial change'.

This can be confusing for consumers, who generally associate 'origin labelling' with where the ingredients have come from, rather than where the food was made. Food that has undergone a substantial change (such as turning pork into sausages) can be labelled as 'produced in the UK', even though the pig may have been born, reared or slaughtered in another country.

The existing Food Standards Agency (FSA) guidance on 'country of origin' labelling suggests that products making a country of origin claim should also include information about where the animal was born, reared and slaughtered.

1.3 Consumer Focus Scotland's research methodology

Survey

Members of the Consumer Focus Scotland's Consumer Network were invited to take part in a short survey to gather their views on the 'Draft Guidance for Consumers in Scotland'. The Consumer Network is a group of over 350 volunteers from all parts of Scotland who help to keep us informed about consumer concerns. The Network is not designed to be representative but does include members from all 32 local authority areas, and has a reasonable balance over demographic factors such as age and gender. As such, the findings of this project should be viewed as indicative of wider consumer views rather than representative of the Scottish population. All Network volunteers were invited to complete a questionnaire, either online or on paper.

Focus group

All volunteers who completed the survey were asked if they would be interested in attending a focus group to explore the issues in more detail. Around thirty people indicated that they would like to do this, depending on timing and location. FSAS allocated a date in early March for a meeting in Glasgow so that the greatest use could be made of the feedback.

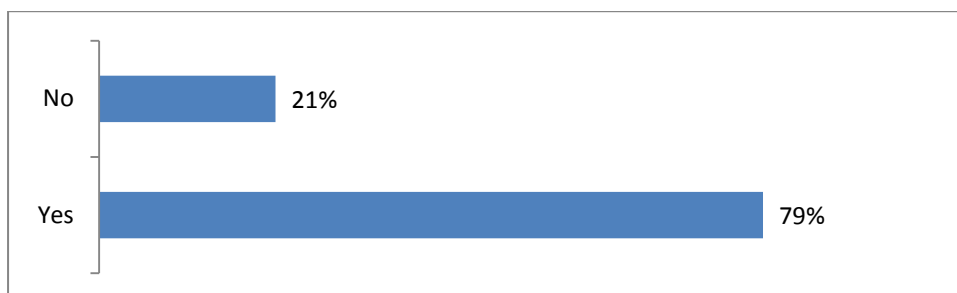
2 Key findings from the survey

In total, 99 Consumer Network volunteers took part in the survey. Please note that not everyone completed each section, so response rates are given for each question.

2.1 Accessibility

Does the draft guidance strike the right balance between being informative yet not overly technical?

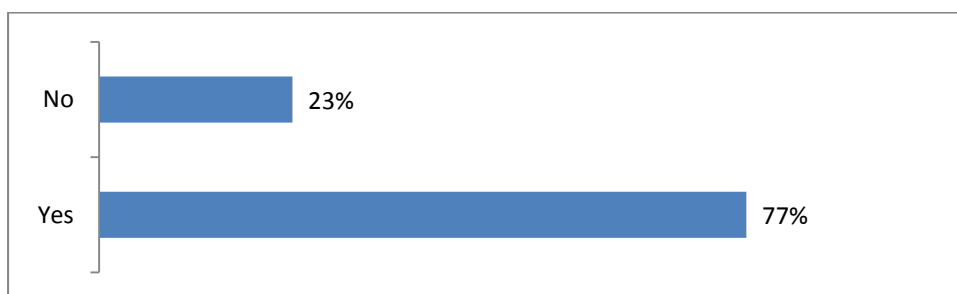
91 responses received.



- The only thing it doesn't make clear is the difference between what HAS to be on the label and what the producer may CHOOSE to include
- It's not always obvious when one description includes another more specific one e.g. Scotch beef and Scottish beef
- The guide explains each of the elements of the label and what they mean but does not go into too much detail about the specific standards behind the icon
- More info is needed on the meaning of 'substantial change' - more examples
- Information is informative and not too technical
- A good mix of headings, text and symbols
- A bit too technical - lots of confusing details

Is the guidance clear and easy to understand?

89 responses received.



- They have tried but the subject matter and associated legislation is so complex it is pretty much a lost cause. However, it lacks an index and a content list - both of which would help quite a lot
- I think it would look tidier if the information provided on the examples of labelling were numbered and then placed together on the page rather than in text-boxes with arrows all over the page
- Just too much to take in - too complicated because of the variations
- People just want to know where the food is from – they don't think they want a huge long explanation

- It's quite a complicated subject and quite a lot of info is given so it would take time for consumers to learn what to look for. Guidance makes it fairly clear
- Certain clarification is needed between 'last substantial change'. To me curing and slicing meat is still a substantial change, but then meat can undergo a further process by being made into a pie, which is clearly a substantial change. Also - confusing if something is EU or non-EU - why can't everyone have the same label to simplify further
- I am still confused about the difference between Scotch and Scottish
- I feel the FSA have done well but the labels themselves are so confusing/offer so much information, that it will be practically impossible to simplify/clarify things for consumers who do not have loads of free time to study labels
- Items explained in bullet points are easier to understand. A table with the main foodstuffs and which labelling is required by law

2.2 Range of products

Is the right mix of foods included in the guidance?

85 responses received.



- I'd like more info on pre-prepared foods/cold meats/pates
- Could do with more info on non-meat products and prepared foods - seemed very meat focussed
- Possibly some more staples and made-up products such as meatballs for example
- Good for a starting document. Some people will want to know about other products, for example - fish and shellfish, so there should be reference to where wider information may be found or that no regulations apply
- I think any more would be confusing

Are the examples of foods given representative of products that consumers in Scotland buy?

85 responses received.



- The Scottish public do buy many processed foods which don't appear in the guidance
- Need to include pre-prepared foods like fresh soups, ready meals, fresh and frozen
- There should be more info on ready-made meals, prepared sauces, tinned soups and meats
- The range covers high-end products to everyday items covering all incomes
- I wonder whether some people might like guidance on tinned foods
- Could take into account non-meat eaters more

2.3 Graphics and logos

The labelling examples have been presented using graphics based on the labels used on food available from a variety of retailers in Scotland. It would be useful to know if you find this approach helpful.

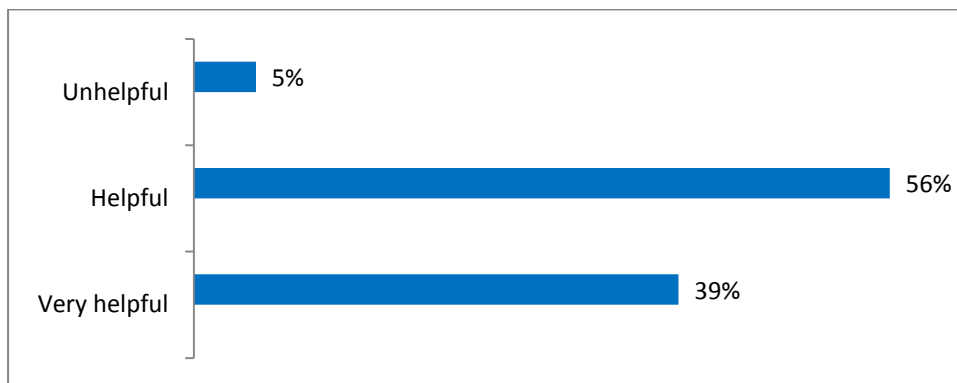
Would the inclusion of photos or labelling designs improve the visual appeal of the guide?
82 responses received.



- Maybe photos of actual labels would be better than labelling designs, it'd be easier to remember then
- I am not too keen on the idea of photos, the draft examples are easily read and would pose no printing problems
- A picture is worth a thousand words
- Must be carefully chosen to illustrate a point
- Label designs would be more beneficial than photos

How helpful do you find the examples which are based on actual food labels?

84 responses received.



- Without examples the guide would not be very readable at all. These are the key to helping understand and maintain "interest" - this is what the customer sees day in and day out and can relate to
- The more examples of these the better, really, especially of ones which are not particularly clear. Those included which have a Scottish flag, for example, very clearly show origin. Some examples of labels where origin is not clear would be good
- They represent best practice and this isn't made clear. There is a lot of use of the word 'may' and it needs to be made clearer what is mandatory and what is just helpful information
- It would be helpful but would the explanation be read? I like the idea that Scotch Beef, Scotch Lamb, Lockerbie Cheese and so on retain their identity (it's a kind of reassurance of quality)
- Too many different logos/labels. Could the style be uniform so that the consumer isn't bogged down with complexity
- They show the complexity of food labelling - how inundated we are with information - not all of which is very helpful
- It would be interesting to know what percentage of the population know what the labels actually mean

2.4 European Protected Food Names Scheme

There is growing interest in the European Protected Food Names Scheme i.e. Protected Designation of Origin (PDO), Protected Geographical Indication (PGI), and Traditional Speciality Guaranteed (TSG). Unlike the first two categories, the latter category does not place an origin requirement on foods registered with the Scheme.

Given the similarities between the Scheme logos, do you feel it would be helpful to provide a brief explanation of all three categories to consumers?

84 responses received.



- Complicated - examples useful
- I think the explanation given in the glossary is fine
- If this document is intended for ordinary consumers it is complex enough as it is - people who want this sort of information should be directed to the website for it
- Keeping the scheme logos with an explanation is a good idea when the explanations have an obvious difference - if they don't it just confuses further
- The logo script is unnecessarily small and should not be all in upper case. Red on yellow is difficult to read. Is 'Protected' necessary on a logo? 'Country of origin' is clearly insufficient alone - other terms are needed
- The similarity of the scheme logos will cause problems. Some people are colour-blind and won't be able to discern the difference. Maybe they should be a different shape, or have a different central logo (examples given). Red text is difficult to read against a yellow background
- A brief explanation in bullet points would be clear and easy to understand

2.5 Any other comments or suggestions?

48 responses received – a selection is given below:

- I thought the document was informative and interesting – I enjoyed reading it and learned a lot more about the subject matter. The addition of further photographs and label examples would improve the overall attraction of the document. I liked it
- I think consumers are beginning to be genuinely concerned both about where foods come from and the labelling needs to be crystal clear. Scottish Smoked Salmon could easily mean different things to different people
- The explanations of these symbols should be put up in supermarkets, in newspapers and on the news to make more people aware of them
- Changes to the legislation would minimise the confusion. It seems ridiculous that the rules are different for different products. The Scottish Smoked Salmon/Smoked Scottish Salmon shows how misleading information can be. If there is likely to be any confusion then the producers should not be allowed to use country names in the title of their foods at all. It is much clearer when the info is specific – farmed in Scotland, smoked and packed in Scotland. It was useful to see the symbols that don't indicate country of origin
- A very informative draft. At the moment labelling is confusing and does not always seem to be what it appears to be Smoked Scottish Salmon/Scottish Smoked Salmon.

You really have to know and understand labelling to purchase correctly. Most people don't have the time to understand it fully. Labels need to be clear and direct. 'Country of origin' and 'Last substantial change' are confusing

- Too many different styles of labelling. Easier if we could clearly identify what is on a label if they were similar – e.g. produce origin, logos all in the same place
- I think the logos should be larger – maybe square or rectangular. The tractor design is easier to understand. There is a danger in putting too many words on a label. It is hard to get the balance right – bright diagrams and logos are good and would be more easily recognised and understood
- I'd like to see some kind of table so 'at a glance' all the symbols could be displayed and then an indication given as to what symbols/information is compulsory and what is optional
- Glossary should show more of the symbols – in fact I suggest a glossary of symbols
- I would suggest using a table format where all the symbols could be displayed – like a glossary
- There are sometimes too many symbols – when the tractor (useful in its way) has to be taken into account as well. The problem really is one of simplification and I know the FSA is aiming at this. There is sometimes an overload syndrome
- I feel much work needs to be done on standardising the labels themselves. 'What should I look for on a label' is helpful, but perhaps a little of 'What does this label tell me' (Red Tractor – means formed and processed in UK). What I really want to know is if this label says British/Scotch/Scottish – does it mean the product is only processed here, and if so – where does it originate. Is there somewhere on a label that I can home in on for this info. Is it possible to give me a leaflet to carry around if there are more than two or three pieces of such information
- Delighted to see the steps being taken to extend information available to consumers. I hope circulation of the finished document will include schools!
- Simplicity and graphics help everyone especially those with learning difficulties. Different subject – could labels have a blank space where the customer can record when they opened the pack/froze the contents etc, which would be so useful
- I found the guide very clear and easy to understand. The pictures help you to know what the guide is explaining
- Make the logos larger to be read more easily. Some colours are more difficult to read – orange on yellow
- I think much will depend on the final design of the leaflet – style of headings etc to guide the reader between different sections
- I would put ALL the definitions of terms in the glossary – including country of origin, last substantial change

3 Key findings from the focus group

A total of eight volunteers came to the focus group in Glasgow on 9 March 2010, with people travelling from Selkirk, Cumbernauld, Alexandria, Newport-on-Tay, Glasgow, Edinburgh and Kirkcaldy. Travel costs and expenses were funded by Consumer Focus Scotland. The session provided a useful opportunity to explore why participants in the survey had responded in the way they did. In line with the views from the survey respondents, participants in the focus group were pleased that guidance for consumers is being developed.

Stephen Hendry introduced himself and his colleague Christine Green, as part of the Foods Standards Agency's team that deals with food labelling, food standards and general labelling. He explained that the Draft Guidance document is a result of requirements set out in the Scottish Food and Drink Policy. It is based on existing material on country of origin labelling, which has been updated to create a better, more easily digestible format for consumers:

“We’re not trying to change the rules about what’s on a label, we’re just trying to explain more clearly the current labelling rules. If there was one rule for origin it would be simple but there is a myriad and this needs to be explained clearly”

3.1 Accessibility

In terms of the judging how accessible the document is, our members thought that the information in the glossary is good, however there is too much information too soon and the guide as a whole is too wordy. The following points were discussed:

- Using tables to display the information clearly
- Using examples for each point
- Keeping the main document but producing a ‘quick guide’ – dual reporting
- Simplifying the current document for ‘general public’

Comments:

“If a product is too expensive then you can’t afford a choice, so the labelling is negligible sometimes.

I think it would be good if we just stuck to flags, with the name of the country on top of it. Even people who are illiterate can recognise a flag - their own flag at least. All the other labels should be unlike a flag. That would be helpful

“There is also a literacy problem for some people”

“I think it should be A5 size, people won’t read larger”

“Is it going to go out in schools? The population is not eating fresh food and the young people aren’t interested, they don’t know how to cook. Even if they read the label!”

“I think this would be better set out if it were tabulated, a few comments and details in each column. If you want a full list go to appendix”

“I accepted this document as not for absolutely everyone but for someone who really wants to sit down and study it - as such I feel that everything in here was worth putting in. As a document it should be there if you want to seek the information. Produce a two-page summary and keep this document as one for further consultation”

“For the general public you’re needing something as straightforward as you can possibly get - this is too complicated. It’s far beyond what they need. They just don’t want this kind of information. If you sat them down to read it they would say ‘have I got to?’”

Some of our volunteers thought that it would be a good idea to display some of the information in supermarkets - a big poster perhaps. People could slowly absorb this information without being made to read a whole pamphlet. Or perhaps at the meat section a big board could explain what the labelling is telling you.

3.2 Range of products

The majority of our participants felt that overall a broad enough range of examples has been given in the guide. However, some reservations were made as follows:

- There should be more clarification, there are so many and it is confusing
- Too many examples and the text is too comprehensive – trying to cover too much
- Too meaty!”

3.3 Graphics and logos

The focus group also provided a critical opportunity to explore the examples of labels given in the guide. Most of the examples given were viewed positively although there was some confusion over beef, veal and mince labels, and people thought that better differentiation is needed between ‘country of origin’ labelling for raw and processed foods. It was also pointed out that the FSAS must make it clear that there is no ‘uniform’ label – all are different.

Some examples of proposed new labels were shown to the participants (not in the draft guidance) which received a very positive reaction:

- Colour improves the labelling examples
- I think they’re fine - it surprised me how many formats there appear to be
- I like the colour and the spyglass

3.4 European Protected Food Names Scheme

In line with the views from the survey respondents, participants in the focus group agreed that more information was needed to explain this rather difficult area.

- Regional rules are too complex
- I understood the points that the guide made but I might not be typical
- I got lost at the ‘protected geographical indication’ (PGI) section. If you’re interested you should be directed to the website

‘Scotch’ and ‘Scottish’

“The difference isn’t very clear between Scotch and Scottish”

“Should be defined in more detail and linked more to PGI, with examples”

“Having read this I think consumers are being completely misled, e.g. Scottish smoked salmon and smoked Scottish salmon. It actually isn’t the same – but why would anyone suspect a difference?”

3.5 Last substantial change

The discussion session also provided a chance to clarify this area which our respondents found to be problematic. There is no statutory definition of place of origin or provenance in food labelling regulations. Pork meat cured into bacon or ham, or meat made into sausages or pies would be considered to be a substantial change. However, the simple slicing, cutting, mincing and/or packaging would not be called a substantial change. The country of origin is deemed to be the place of last substantial change.

Comments:

“The words ‘country of origin’ are meaningless then, you have changed my understanding of those words. It’s the country of the last substantial change”

“I want to know what happens to my food from when it’s been killed to when it’s on my plate. I’d vote with my feet if that was the case. If it’s going in my body I want to know how it’s been processed”

“I found that chicken labelled as from Thailand was really cheap in one store - their UK chicken was dearer but still a good price, but knowing about Thai bird flu I didn’t want to touch that kind. When it is the real ‘country of origin’ then that is helpful. I’d like to know that ‘country of origin’ is what it is, not after it’s been processed and calling **that** the ‘country of origin’”

“Is it not simply that people here take ‘country of origin’ to mean the wrong thing, (the actual raw materials) - not the end product which is processed in some way or cured. Something cured has had a substantial change and requires a new ‘country of origin’ but people object to that because it came from somewhere else in the first place. It’s the raw material versus any subsequent process”

“A product should say both, beef originated from ‘XXX’, product created in ‘XXX’”

4 Conclusions

The survey of Consumer Network volunteers has provided a useful insight into how members of the public view the draft guidance on 'country of origin' labelling on food products. It is clear from both the survey findings and the focus group that the participants feel very positively about the draft guidance, but have also highlighted a number of concerns.

As noted in the introduction, the findings of this project should be viewed as indicative of wider consumer views rather than representative of the Scottish population.

4.1 Accessibility

We asked a range of questions regarding the accessibility of the draft guidance. A majority of our respondents (79%) think the draft guidance strikes the right balance between being informative yet not overly technical. Most of our volunteers (77%) consider that the information given is clear and easy to understand.

However, a variety of suggestions for improvement were made including reducing the size of the guide to A5, using more concise language and dual reporting. A fair number of respondents recommended using a table to display the information more clearly. Some of our volunteers thought that it would be a good idea to display some of the information in supermarkets - a big poster perhaps – so that shoppers could slowly absorb this information without reading a whole leaflet. There was also a view from participants that the information should be distributed to schools – this was mentioned in the questionnaire and also in the focus group by different consumers.

4.2 Range of products

There was a consistent view from consumers that the right mix of foods is included in the guidance. A majority of 83% think that the examples of products given are representative of what Scottish consumers buy. However, despite this positive response some people want to see more non-meat examples given.

4.3 Graphics and logos

Consumers in both the survey and the discussion session were very positive about the inclusion of graphics or labelling designs to improve the visual appeal of the guide. A vast majority of 95% think that the examples of actual food labels given were 'helpful' or 'very helpful'.

4.4 European Protected Food Names Scheme

Given the similarities between the Scheme logos, most of our respondents agreed that it would be helpful to provide a brief explanation of all three categories to consumers. They also felt that further explanation and clarification is needed for the terms 'Scotch' and 'Scottish' which are still confusing and misleading to some extent.

In general, people thought that the draft guidance document puts across the information well. However, there are some concerns about:

- Price is most important – can a consumer afford to choose where their food comes from? i.e. 'country of origin' labelling is not a priority for some.
- The need to use clearer and more concise language and formats
- Scotch / Scottish definitions
- Last substantial change

The FSAS were keen to consult as widely as possible on their draft guidance and have been pleased to be able to involve consumers at such an early stage in its development to help shape and refine it. The comments and suggestions made by our Consumer Network volunteers in both our survey and focus group will be invaluable to ensure that the future guide is available and accessible to as wide a range of consumers as possible.

About Consumer Focus Scotland

Consumer Focus Scotland started work on 1 October 2008. Consumer Focus Scotland was formed through the merger of three organisations – the Scottish Consumer Council, energywatch Scotland, and Postwatch Scotland.

Consumer Focus Scotland works to secure a fair deal for consumers in both private markets and public services, by promoting fairer markets, greater value for money, and improved customer service. While producers of goods and services are usually well-organised and articulate when protecting their own interests, individual consumers very often are not. The people whose interests we represent are consumers of all kinds: they may be patients, tenants, parents, solicitors' clients, public transport users, or shoppers in a supermarket.

We have a commitment to work on behalf of vulnerable consumers, particularly in the energy and post sectors, and a duty to work on issues of sustainable development.