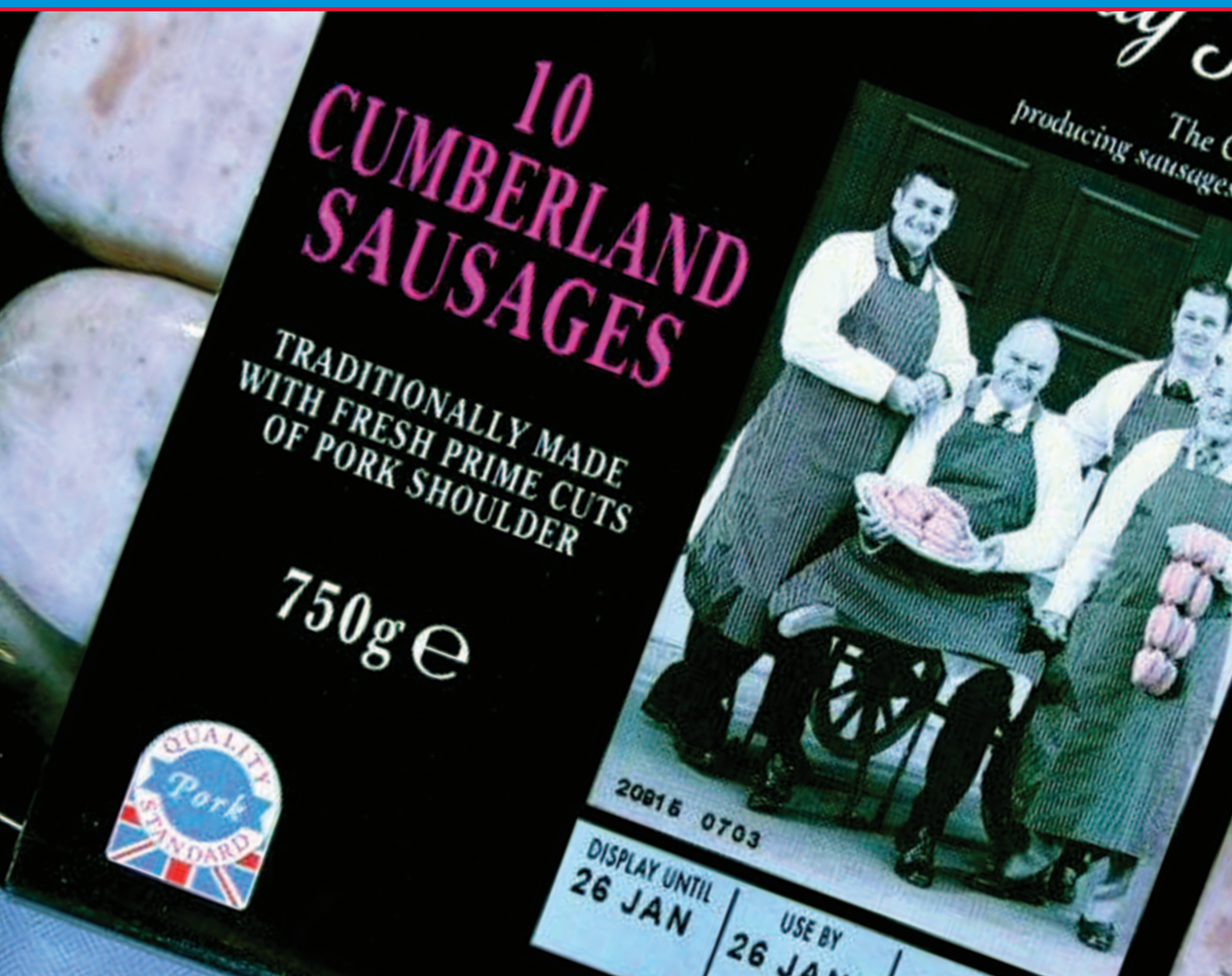


## BPEX Labelling Report – Updated 2009



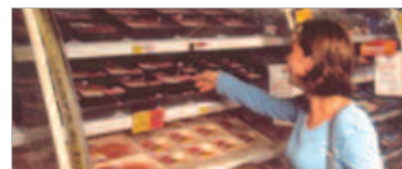
A review of the Labelling  
of Country of Origin of  
Pork and Pork Products



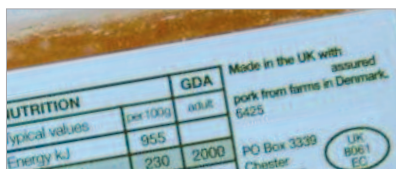
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# Introduction

This report updates the work BPEX carried out in 2006 to examine the efficacy of Country of Origin labelling of pork and pork products available on retailers' shelves. Three years ago we identified both good practice and examples of poor and misleading labelling. While we can report progress in some areas, there still remains much ambiguity and, in some instances, a complete absence of information – a case of two steps forward and one step back.



The 2006 report was prompted by a similar exercise across a wide range of foods by the Food Standards Agency ahead of its announced review of the guidance it then gave on Country of Origin labelling. This report, researched in January 2009, follows hard on the heels of a report by the Environmental, Food and Rural Affairs Select Committee into the English pig industry in which the Committee explicitly places responsibility for ensuring labels are clear and unambiguous on retailers.

The demand for such labelling is gathering momentum. In February, DEFRA Secretary of State Hilary Benn spoke of his desire to improve Country of Origin food labelling: "We need clear and unambiguous information and that's what I'm pressing for," he said. DEFRA Minister Jane Kennedy has made a similar point on numerous occasions lately and in January it was revealed that in discussions with supermarket representatives she said that more could be done to improve the labelling of pork products. And, of course, the issue was spectacularly highlighted by Jamie Oliver in his television programme in February.

In our 2006 report, I wondered whether a simple 'spring clean' exercise and a more robust approach to the consistency with which information was presented on pack was all that was needed. After all, all retailers had some products which were clearly labelled, provided unequivocal information for consumers and conformed to FSA Guidelines. Those same retailers, however, also had examples of own label products which were ambiguously labelled or, indeed, omitted completely Country of Origin information.

For BPEX and for pig producers in this country, the issue now is more than one simply of good housekeeping. We have made the case strongly and consistently for the clear and unambiguous labelling the Select Committee report says is retailers' responsibility on the grounds that almost 70% of imported pig meat would be illegal to produce in this country.

That fact was not lost on the Select Committee which expressed disappointment that such a high proportion of imported product does not meet UK welfare standards. It went on to say that parts of the retail sector are undermining producers' efforts by continuing to import pig meat that does not meet UK statutory welfare standards. And it added that consumers would be shocked to hear that such a large proportion of imported pig meat might have been reared in conditions banned in this country.

“Our efforts have been given renewed impetus by the findings of the Select Committee report and the wider groundswell of opinion on the matter”

Our 2006 report noted that ‘Produced in the UK’ as a solus on-pack message had become a euphemism for ‘Made from imported pork’. There are fewer examples of that in this update from the major retailers with one notable (and disappointing) exception.

We have included in this year’s survey two of the leading discounters given the extraordinary level of publicity they have enjoyed in the national press and anecdotal reports that consumers were flocking to these stores as the chill of economic climate began to bite.

Those companies have recently announced their intention to stock British pork and pork products. However, they have not followed this through in their labelling - most of their product ranges fail completely to tell consumers the Country of Origin. There is a real need to include unambiguous information which is open and clearly visible on pack.

There is evidence, too, that on a price platform, a number of retailers may be resorting to tertiary brands to flout good labelling practice and guidance and to maintain the integrity of their mainstream own label products. It is also hugely disappointing that major brands such as Wall’s and Richmond continue to refuse to include any indication of the Country of Origin on their sausages.

It is clear beyond doubt that retailers will use Quality Mark and logo endorsements such as Freedom Foods and Soil Association that indicate the provenance of their product prominently on pack. However, this rarely applies to the use of imported pork used to produce processed products such as bacon, ham, sausages or pies. Such products are more subtly treated with regard to Country of Origin labelling, if indeed this is addressed at all.

The industry’s quest for clear and unambiguous labelling - working with retailers and others in the supply chain to improve the situation - will, therefore, continue. Indeed, our efforts have been given renewed impetus by the findings of the Select Committee report and the wider groundswell of opinion on the matter. The importance of the issue can also be gauged by the fact that at its first meeting, the Pig Meat Supply Chain Task Force – set up under the auspices of Defra by Farming Minister Jane Kennedy – decided as one of its key issues to investigate how a standardised code of practice for clearer labelling could be introduced.

BPEX will campaign vigorously to achieve the level of clear and unambiguous labelling information which the Food Standards Agency believes is desirable, which Parliament, through its Select Committee, has endorsed and which the newly-formed Pig Meat Supply Chain Task Force has identified as a priority.

**Stewart Houston** Chairman BPEX



# Methodology



In January 2009 a comprehensive shopping survey of packs of pork, bacon, ham, sausages and other processed products was undertaken in stores operated by 10 of the UK's largest grocery retailers.

A total of 260\* packs was purchased and analysed to establish labelling information about the Country of Origin of the fresh pork or – in the case of processed pork products – the pork used as a raw material. A comprehensive photographic database of these packs has been created, with visual records of the front and, where appropriate, the back and sides of each pack.

Each pack was analysed to establish:

- Whether Country of Origin information was provided
- The exact nature of the information
- Where on the pack it was presented
- Whether visual symbols such as assurance marks and national flags were used.

This information is retained in a database which also contains product descriptions and processing plant health stamp codes.

Each product was placed in one of four categories:

- Having a specific Country of Origin statement either on the front or back of the pack
- Having a non-specific Origin statement; for example 'Product of the EU' or 'Produced in the UK from British, Danish, Dutch or German pork'
- Having a statement of origin with regard to the processing of the product but not including that of the pork raw material
- Not having any origin statement whatsoever.

*\*This total was made up of:  
58 fresh pork products,  
65 ham products  
54 packs of sausages  
57 packs of bacon  
16 gammon products  
7 pork pie products  
3 other processed pork products*

# Latest Guidance on Country of Origin Labelling from the Food Standards Agency



“research into labelling showed that more than 80% of meat products failed specifically to indicate the origin of the main meat ingredient”

The relevant legislation governing Country of Origin labelling is contained primarily in two pieces of EU legislation: Directive 2000/13/EC (Food Labelling) and Regulation (EC) No 178/2002 (General Food Law Regulation). The Food Safety Act 1990 and the Consumer Protection from Unfair Trading Regulations 2008 also apply as do the Food Labelling Regulations 1996.

The Food Standards Agency first issued Guidance on Country of Origin Labelling in 2002, stating clearly that such Guidance should be read in conjunction with the various pieces of relevant legislation.

The FSA updated its Guidance in October 2008. Its aim was not only to explain the legislation applicable to origin labelling but to provide advice on avoiding labelling practice which may mislead consumers. In addition, the Guidance provided voluntary best practice on how origin labelling could be made more informative for consumers.

The FSA had previously identified that better Country of Origin labelling was high on the list of consumers' demand for change and for that reason had set improving food labelling as one of its main objectives. The need was reinforced when its own research into labelling (undertaken in 2005 and published in 2006) showed that more than 80% of meat products failed specifically to indicate the origin of the main meat ingredient. FSA Guidance recommends that the origin be declared for meat ingredients in processed meat products.

In its advice on best practice on labelling, the FSA offers the following suggestions. For example, where a product is described as 'Produced in the UK', then the origin of any imported ingredients that characterise the product should be given. Therefore, it would not be considered best practice to describe a pork pie as 'Produced in the UK' if it is made from imported pig meat.

Rather, the FSA suggests it should be described as 'Made in Britain from imported pork' or 'Made in Britain from Dutch pork' or 'Made in Britain from pork sourced from the EU'.

There is also advice on best practice on displaying and presenting products that are similar in appearance but are of different national origin, with the suggestion that retailers may wish to avoid such confusion by ensuring that food packs are clearly labelled. The Guidance adds that there should be no misleading labelling through the display of the food as a whole or on promotional material. It is for retailers to ensure that the different origins of foods are apparent and consumers are not confused when, for example, similar foods from different countries may be merchandised closely together.



While it acknowledges that providing information on the origin of all ingredients in all products would be disproportionately burdensome, the FSA does suggest that the Country of Origin of the principal meat ingredients in meat products is declared.

#### **Legislation on which Guidance is based**

The FSA makes clear its Guidance should be read in conjunction with the various pieces of relevant legislation:

Directive 2000/13/EC states that the labelling and methods used must not mislead to a material degree and cites origin or provenance among the characteristics that must particularly be considered. The Directive goes on to state that this prohibition extends to the way in which food is arranged and the setting in which it is displayed.

The Food Safety Act makes it an offence to sell, offer or expose for sale “any food the presentation of which is likely to mislead as to its nature, substance or quality.”

The Consumer Protection from Unfair Trading Regulations 2008, which replaced the relevant part of the Trade Descriptions Act 1968 make it an offence to engage in unfair commercial practices. These include misleading actions or omissions that relate to the geographic or commercial origin of the product and that are likely to cause the average consumer to take a transactional decision that would not otherwise have been taken.

In addition, rules on compulsory origin labelling contained in the Food Labelling Regulations require the particulars of the place of origin or provenance to be given where omission of this information might mislead to a material degree as to the true origin or provenance of the food. The Regulations also require such particulars to be easy to understand, clearly legible in a conspicuous place and be easily visible.

#### **BPEX support**

BPEX welcomes the FSA’s Guidelines and will point to this advice on best practice in its campaign for clear and unambiguous Country of Origin labelling on all pork and pork products.

# Pork and Pork Products - BPEX Imports Report



“For those consumers who want to exercise discretionary choice at the point of purchase, clear and unambiguous Country of Origin information is a necessary prerequisite”

In its regular ‘Analysis of Pork and Pork Products Imported into the UK’, BPEX estimates that of the total tonnage imported, almost 70% of the pig meat would have been illegal to produce in the UK in the way that it was actually produced because this would have breached UK pig welfare legislation. Some of the pigs in supply countries are produced to ‘UK contracts’ specifically for the own label products of Britain’s major supermarkets and derive from production systems broadly equivalent to those in the UK. But most are not and the numbers being produced to ‘UK contracts’ specification has, in fact, been declining.

Research confirms that consumers remain concerned about imports of pork that fail to meet UK welfare legislation and they overwhelmingly agree that such pork should not be imported. Indeed the research shows that 93% of English consumers believe that pork and pork products should not be imported into the UK if they do not meet standards equivalent to those of the UK.

The market remains increasingly dependent on imported pork – much of it price driven at the expense of animal welfare. For those consumers who want to exercise discretionary choice at the point of purchase, clear and unambiguous Country of Origin information is a necessary prerequisite.

## **BPEX Quality Standard Mark for Pork, Bacon and Ham**

Now celebrating the 10th anniversary of its launch, the Quality Standard Mark helps consumers to identify pork and pork products from assured production systems and to very high animal welfare standards when compared with the EU on castration and sow stalls.

The QSM can be applied to fully assured supply chains where farm standards, transport and abattoir standards and (in the case of bacon, ham and sausages) processing standards are complied with and independently audited. The auditing of raw material used in processing plants ensures the integrity of the supply chain, traceability and Country of Origin labelling of products carrying the QSM.

Any use of the QSM without BPEX authorisation is an unfair commercial practice and results in a breach of the Consumer Protection from Unfair Trading Regulations 2008.

# Environment, Food and Rural Affairs Select Committee Report into the English Pig Industry



## The Wider Debate

The European Parliament has taken up the issue of Country of Origin within a wider debate on labelling. The Parliament has focused on the consumer's right to informed choice and has encouraged what it terms "reliable labelling" so that consumers know where the product comes from and under what quality standards it has been produced.

In March, MEPs backed food labelling rules that clarify the origin of food and where it is processed. They acknowledged that much of the food on retail shelves is produced in one place and may be processed in another country (even continent). The Parliament is pressing for the origin of all primary products to be stated on the label, as well as the place of processing and the origin of all the main ingredients and raw materials used in production.

## French Action

France has already taken such steps by introducing regulations requiring that all lamb packaged in France must be clearly labelled with the Country of Origin of the primary product.

## UK Public Opinion

Consumer research conducted in the UK shows clearly that consumers believe they are being misled when products described as 'British Bacon' or even where the description is 'Produced in the UK' is in fact processed from imported pork.

In its report on the English pig industry published in January 2009, the House of Commons Select Committee devoted a section in its 'Conclusions and Recommendations' to the subject of product labelling. The Select Committee expressed the view that the responsibility for clear and unambiguous labelling lay with retailers. This is especially the case when retailers use the qualities of British meat as a marketing tool.

The report also made reference to the Government's view that DEFRA and the Food Standards Agency could do more to promote understanding of the differences in labelling and noted the FSA's Guidance on Country of Origin labelling.

While the Select Committee's view is that the industry itself is responsible for ensuring consumers are aware of its high welfare standards, it is the Government's responsibility to ensure consumers have access to clear product information through labelling.

The industry has long campaigned for the clear and unambiguous labelling for which the report calls and in particular that the solus use of 'Produced in the UK' on pork products should be discontinued and, in addition, that the Country of Origin of the pork itself be shown on pack.

The Select Committee expressed its disappointment that so much of the pig meat imported to the UK does not meet UK welfare standards. A YouGov survey commissioned last year found that 87% of consumers agreed that pork imports should meet UK welfare standards. The Select Committee report calls on DEFRA to bring together the whole supply chain to establish a strategy for the best way of informing consumers of the choices available.

## Task Force to consider Country of Origin labelling

Country of Origin labelling will be one of the issues to be considered by a new Task Force that has been set up by the initiative of Farming Minister Jane Kennedy. The aim of the Pig Meat Supply Chain Task Force is to help secure the future of the British industry by helping the whole supply chain to thrive in a way that is sustainable in the long term. It will bring together key representatives, from all sectors in the pig meat supply chain, to increase collaboration between Government and the various sectors in the industry.

The Minister said that "everyone involved in the pig meat supply chain has a duty to ensure that there is a fair deal for all" when she announced the setting up of the Task Force in February.

At its first meeting in March, the 17-member Task Force agreed to investigate how a standardised code of practice for clearer labelling could be introduced.

# Labelling Survey Results

The headline results of the Country of Origin Survey 2009 results are given the table below:

Retailer	No of products	Specific Country of Origin statement either on front or back of pack	2006 survey figures with specific Country of Origin statement	Other origin statement *	'Produced in the UK' but with no Country of Origin indication**	No origin statement
Waitrose	16	16 (100%)	94%			
M&S	26	25 (96%)	90%	1 (4%)		
Sainsbury	36	34 (94%)	76%	2 (6%)		
Co-op	15	11 (73%)	63%	4 (26%)		
Tesco	25	18 (72%)	67%	7 (28%)		
Budgens	20	13 (65%)	100%	3 (15%)	1 (5%)	3 (15%)
Asda	36	23 (64%)	47%	9 (25%)	3 (8%)	1 (3%)
Morrisons	30	18 (60%)	70%	3 (10%)	8 (26%)	1 (3%)
Lidl	10	4 (40%)	Not included	1 (10%)		5 (50%)
Aldi	23	5 (22%)	Not included	2 (9%)	3 (13%)	13 (56%)
AVERAGE OWN LABEL		70%	72%			
BRANDS	23	16 (70%)	47%	3 (13%)		4 (17%)
TOTALS	260	183 (70%)		35 (13%)	15 (6%)	27 (10%)

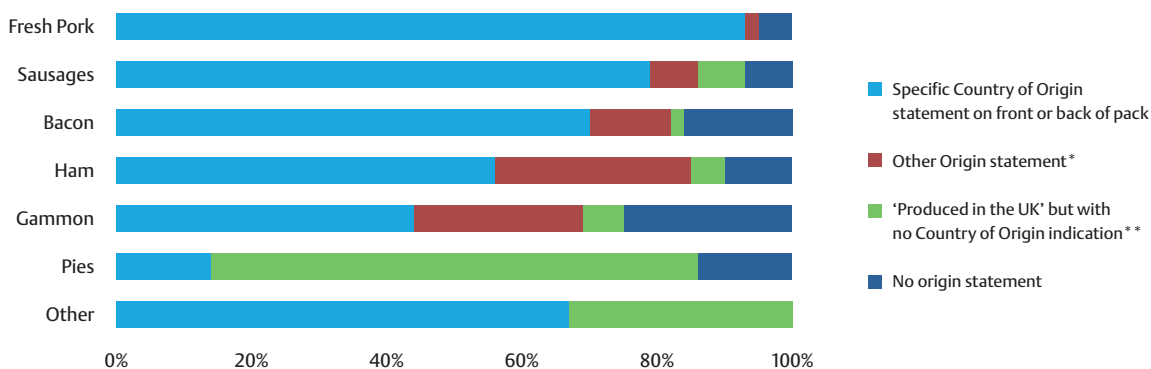
\* Other Origin Statement includes descriptions such as Produced in the UK from EU pork; Product of the EU; Produced in the UK from British, Danish, Dutch or German pork.

\*\* Where 'Produced in the UK' appears on processed pork products as the only indication and fails to give any country or countries of origin of the pork used in the product.

Full, detailed results, including photographic records of all products purchased are available from BPEX. Interested parties should contact BPEX Ltd, PO Box 44, Winterhill House, Snowdon Drive, Milton Keynes, MK6 1AX; or e-mail [info@bpex.org.uk](mailto:info@bpex.org.uk).

## Results by product

Product	No of products	Specific Country of Origin statement either on front or back of pack	Other origin statement*	'Produced in the UK' but with no Country of Origin indication**	No origin statement
Fresh Pork	58	54 (93%)	1 (2%)		3 (5%)
Sausages	54	42 (78%)	4 (7%)	4 (7%)	4 (7%)
Bacon	57	40 (70%)	7 (12%)	1 (2%)	9 (16%)
Ham	65	37 (57%)	19 (29%)	3 (5%)	6 (10%)
Gammon	16	7 (44%)	4 (25%)	1 (6%)	4 (25%)
Pies	7	1 (14%)		5 (72%)	1 (14%)
Other	3	2 (67%)		1 (33%)	
<b>TOTALS</b>	<b>260</b>	<b>183 (70%)</b>	<b>35 (13%)</b>	<b>15 (6%)</b>	<b>27 (10%)</b>



\* Other Origin Statement includes descriptions such as Produced in the UK from EU pork; Product of the EU; Produced in the UK from British, Danish, Dutch or German pork.

\*\* Where 'Produced in the UK' appears on processed pork products as the only indication and fails to give any country or countries of origin of the pork used in the product.

It can be seen that for fresh pork, the vast majority of packs carry specific Country of Origin information. On processed products, however, there is less clear information available: fewer than 6 out of every 10 packs of ham, for example, have specific Country of Origin information.

## Commentary – by retailer

### Waitrose

An exemplary situation with all of the Waitrose own label products purchased conforming to best practice guidelines with specific Country of Origin information on all packs.

### Marks & Spencer

Overall, Marks & Spencer continues to have clear and unambiguous labelling on its pork and pork products, the exception being a product listing a number of countries from which the ingredients may have been sourced.

### Sainsbury's

An improvement on what was already a generally good situation in 2006; this year's survey showed only two products which while 'Produced in the UK' were made from pork which could have come from a number of specified countries. All other products contained specific Country of Origin information.

### Co-op

The Co-op has improved the overall clarity of origin labelling over the past three years – as may be expected given its wider ethical stance on many food issues. However, work remains to be done as this survey shows that

while just about three-quarters of packs contain specific Country of Origin information, the rest indicated that the pork was from EU sources without being country-specific.

### Tesco

Tesco's origin labelling is generally good. Seven of the products purchased, mainly sausages and bacon products, had non-specific origin information – mostly that the product was sourced from the EU and some with the additional information that the meat was sourced from farms that met Tesco Welfare Standards.

### Budgens

This was a rather disappointing result from Budgens which, at the last survey, recorded 100% of own label products showing specific Country of Origin information. This latest survey shows not only packs that are not specific about origin, but a number that can be regarded only as unsatisfactory. One tertiary brand had stickers on the front of the pack proclaiming 'Locally supplied – less food miles'; yet in small type, less prominently, it said 'Product of EEC'. Another tertiary brand was inconsistent in its degree of information between two bacon products.

### Asda

Asda has made progress since the previous survey, moving off 'bottom' position of the table but there remains much that is unsatisfactory. Several products still have only 'Product of the UK' information while a tertiary pork pies product had no origin information whatsoever.

### Morrisons

It is somewhat disappointing, given that it trades heavily on a 'British proposition' that only 60% of the Morrisons products contained specific Country of Origin information and that one-in-four had only 'Produced in the UK'. It was notable that a Melton Mowbray Pork Pie product indicated that it contained British pork while another pork pie product with 'Mowbray' in its name showed only 'Produced in the UK'. A Morrisons Pork Steak product contained no origin reference at all.

## Commentary – by retailer (continued)

### Lidl

Lidl was included in the survey for the first time. The company has made a public commitment to switching more of its sourcing to British product. It announced that all of its fresh pork would be sourced in Britain from January this year, that 40% of its bacon would be British by February and that it aimed also to source 40% of its sausages from British producers. However, it is disappointing to note that emphasis on origin has not been followed through on pack. Less than half of all products contained specific Country of Origin information and half had no information whatsoever on origin. It is to be hoped that improvements to its labelling will lead to Country of Origin being clearly stated on all packs as soon as possible.

### Aldi

Another newcomer to the survey, Aldi also showed a disappointing result with more than half the products purchased containing no information on Country of Origin. Many packs contain the phrase that the product concerned “is passionately sourced from people who care about delivering quality to our customers,” but there is no indication of country of origin.

## Commentary – by brands

### Brands

Of the branded products purchased, those that can be described as niche or speciality (especially sausages) were generally informative and most contained specific Country of Origin information. National, well-known brands available universally in supermarkets were less informative with Wall's and Richmond brands, for example, containing no reference whatsoever to origin.

### Tertiary Brands

There is evidence that tertiary brands are making something of a comeback – perhaps a sign of the economic climate with retailers striving to arrive at a specific price point. It is, though, among these tertiary brands that some of the worst examples of misleading labelling can be found.

# BPEX's Call for Action



**“DEFRA must bring together the pig industry with the processing, retail, catering and hospitality industries to establish a strategy for the best way of informing the consumer of the choices available”**

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While it has to be acknowledged that some progress has been made in the three years since our first survey, much remains to be done to reach a satisfactory situation where consumers are able to make informed choices about the pork and especially the pork products they buy in supermarkets.

Regrettably, in a few instances, there has been a backward step. It may be that one of the reasons for that is the retailers concerned have turned to imported pork to be able to offer a specific price point to shoppers. This is not only a negative step, but a short-sighted one given that currency exchange rate has made imports more expensive and that recent reductions in the size of the EU pig herd will bring further supply side pressures.

It becomes even more desirable, therefore, that clear, unambiguous origin labelling is vital if consumers are to exercise choice and producers are able to compete on an equal footing.

BPEX repeats its call to retailers, processors and manufacturers to adhere to those few, sensible and straightforward guidelines suggested by the FSA with regard to the Country of Origin labelling of pork and pork products. In particular:

- include the origin of pork raw material on the labelling of all pork, bacon, ham, sausages and pies – as suggested in FSA Guidelines
- end the practice of using ‘Produced in the UK’ as the only indication of origin on pack – it remains a euphemism for ‘Made from Imported Pork’
- avoid the use of brand names and of imagery that imply origin and which may mislead consumers – especially when there is no or ambiguous information on origin
- use appropriate typefaces and font sizes and position them on pack to ensure that origin information is legible and clearly communicated to consumers
- include clear origin information where consumers may otherwise be misled by processing plant address or UK processing plant health number.

In addition, BPEX is happy to support the call made by the Environment, Food and Rural Affairs Select Committee on the subject of clear and unambiguous labelling that: “DEFRA must bring together the pig industry with the processing, retail, catering and hospitality industries to establish a strategy for the best way of informing the consumer of the choices available.”

BPEX is encouraged that the Pig Meat Supply Chain Task Force has identified the need for clearer Country of Origin labelling as a priority area and will contribute actively to the work of the Task Force in seeking to establish how a standardised code of practice for clearer labelling can be introduced as a keystone to ensuring long-term sustainability for the whole of the supply chain.