

# British Frozen Food Federation



## T&L *update* 49

August 2008

All reasonable care is taken in the preparation of this newsletter, but no liability is accepted for any loss or damage caused to any person, company or organisation relying on any statement or omission in the contents

<b>International Code of Practice for Processing and Handling of Quick Frozen Foods</b>	<b>2</b>	<b>EFSA Scientific Panel to split</b>	<b>12</b>
Third revision of a Code of Practice that was first adopted in 1976 - includes a new definition for a quick frozen food.		Two new panels replace EFSA's AFC Panel (on food additives, flavourings, processing aids and food contact materials)	
<b>Other Codex Standards, Guidelines etc</b>	<b>3</b>	<b>Proposed new EC food additives regulations</b>	<b>13</b>
Recently adopted by the Codex Alimentarius Commission		Commission is close to agreement on measures to update and simplify legislation on additives, enzymes and flavourings.	
<b>Quick-Frozen Food Specifications</b>	<b>3</b>	<b>UK Climate Change programme Annual Report published</b>	<b>13</b>
QF Specifications from Campden & Chorleywood available on CD-ROM, with high-quality photographic illustrations		Annual Report to Parliament setting out progress of the UK's Climate Change Programme	
<b>Identification Marking of Fishery Products imported into the EU</b>	<b>4</b>	<b>UK Food Security in a Changing World</b>	<b>14</b>
New guidance from the Association of Port Health Authorities for importers and enforcement officers		Defra discussion paper, which will feed into a more detailed statement on food security policy later this year	
<b>New FGAs legislation published for consultation</b>	<b>4</b>	<b>RASFF Annual Report for 2007</b>	<b>14</b>
Defra consultation on further implementation measures on FGAs and ODS - includes personnel qualifications, company certification, and personnel registration		DG SANCO publishes 2007 Annual Report for the Rapid Alert System for Food and Feed	
<b>F-Gas Support</b>	<b>6</b>	<b>FSA annual report for 2007/08</b>	<b>15</b>
Defra website has expanded section, managed by F-Gas Support, the Government funded team set up to provide guidance for manufacturers, operators, contractors, etc		FSA publishes its annual report for 2007/08	
<b>GSP scheme extended to 2011</b>	<b>6</b>	<b>Healthy Food Code of Good Practice</b>	<b>15</b>
New regulation adopted covering the EU's Generalised System of Preferences for the period 2009-2011		FSA and Department of Health detail how the Healthy Food Code of Good Practice is to be taken forward	
<b>Proposals to revise the salt reduction targets</b>	<b>7</b>	<b>Food Matters - Towards a Strategy for the 21st Century</b>	<b>16</b>
FSA proposals for stricter salt targets, 2010 and 2012		Final report from the Cabinet Office Strategy Unit setting out a future strategic framework for food policy	
<b>Salt intake levels</b>	<b>8</b>	<b>Report on BRE and Regulatory Reform Agenda</b>	<b>18</b>
Recent survey reports average intake figure of 8.6g per day		From House of Commons Regulatory Reform Committee	
<b>Criteria for the use of the terms Fresh, Pure, Natural etc. in food labelling</b>	<b>9</b>	<b>Code of Practice on Guidance on Regulation</b>	<b>19</b>
FSA's revised guidance on the use of marketing terms, such as 'fresh', 'pure' and 'natural' for food labelling.		Code of Practice from the Better Regulation Executive	
<b>Recommended criteria for the use of "Fresh"</b>	<b>10</b>	<b>Active and intelligent food contact materials</b>	<b>19</b>
Advice on the use of "fresh" with frozen foods/ingredients remains unchanged, but has been broadened to include 'frozen <u>or processed</u> foods or ingredients.		FSA consultation on Commission proposal for specific regulation on active and intelligent materials	
<b>New ISO Standard to help manage risk in cold workplaces</b>	<b>11</b>	<b>Foods suitable for people intolerant to gluten</b>	<b>19</b>
ISO 15743:2008 describes methods and practices for assessing and managing occupational health and performance risks in cold workplaces		FSA consultation on draft Commission Regulation	
<b>EFSA Annual Report</b>	<b>12</b>	<b>FSA update on saturated fat work</b>	<b>20</b>
EFSA 2007 Annual Report, shows scientific output increasing by 63% in 2007		FSA update on work to reduce the amount of saturated fat	
		<b>School meals in Scotland</b>	<b>20</b>
		New Regulations published, coming into effect on 4 August 2008 (3 August 2009 for secondary schools)	
		<b>Explanatory Notes to Combined Nomenclature</b>	<b>20</b>
		New consolidated version of the Explanatory Notes	

## International Code of Practice for Processing and Handling of Quick Frozen Foods

The thirty-first session of the Codex Alimentarius Commission, at its recent meeting held in Geneva has approved a revised code of practice for quick frozen food

- **Recommended International Code of Practice for the Processing and Handling of Quick Frozen Foods**

This latest text is the third revision of a Code of Practice that was first adopted in 1976. Previous revisions were completed in 1978 and 1983.

The new text can be downloaded from the Codex website at <http://tinyurl.com/2vuxbd> (available in English, French and Spanish).

In this particular case, the Codex revision procedure has proved to be a long, drawn-out procedure. The initial draft text for the revision was developed in 2000/2001 by the International Institute of Refrigeration (IIR), and following a considerable amount of work within the Codex system, a revised text was finally considered for adoption by the Codex Commission at its 29th session in Geneva in July 2006, but this failed to make the expected progress. The draft had been submitted for adoption at Step 5, following which it was expected that hygienic/safety provisions would be finalized by the Codex Committee on Food Hygiene. However it proved impossible to resolve all the outstanding issues (relating principally to the separation of quality and safety provisions) and the proposed revision was returned to Step 3 of the Codex procedure.

The Codex Commission then established an Ad-Hoc Intergovernmental Task Force (hosted by Thailand, assisted by the United States), with terms of reference "to resolve all outstanding issues (including quality and safety provisions) within a period of two years, with a view to the advancement of the Code to Step 8". Further comments were sought on the draft text in order to solve as many outstanding issues as possible, with the Task Force then intended to meet just once. That meeting of the Task Force took place in February 2008.

The Task Force finalized the revision of the Code of Practice 'and agreed to forward its proposed text to the 31st Session of the Commission for adoption at Step 5/8 (with the recommendation for omission of Steps 6/7)'. This final stage has now been completed.

The Commission meeting in Geneva made only one amendment to the Task Force text, in making a specific reference to *Trichinella spiralis* in Section 4.3.1 on the impact of quick freezing on microorganisms and parasites. The Commission adopted the amended proposed draft Code of Practice at Step 5/8, with the omission of Steps 6/7.

As would be expected, after twenty-five years, the new

text represents a significant update on the previous 1983 revision.

**Possibly the most significant new feature of the Code is a new approach to the definition of a quick frozen food.**

The initial draft for the Codex revision, developed in 2000/2001 by the IIR, included a definition for a quick frozen food that was broadly in line with that in the EU's Directive on quick-frozen foodstuffs (89/108/EEC), with each definition linking a series of requirements:

- 'quick-freezing' process (zone of maximum crystallization crossed as rapidly as possible)
- temperature of the product maintained at a level of -18 °C or lower
- after thermal stabilization
- [permitted temperature tolerances (Codex only)]

### AND

- marketed to indicate that they possess this characteristic (EU) or 'labelled as such' (Codex)

The definition was maintained throughout the extended Codex revision process without apparently being questioned, until the meeting of the ad hoc Task Force in February. The Task Force dropped the requirement for 'labelled as such', (and also the reference to 'thermal stabilisation' which is now included later in the text)

- 'quick-freezing' process
- temperature of the product maintained at a level of -18 °C or lower
- permitted temperature tolerances

**Linking the quick-freezing process with a requirement for 'labelling as such' (or similar) has always been considered important in the UK, and a clear divergence now emerges between the Codex Code of Practice and EU legislation. With the increasing global significance of Codex decisions, there must be concern that there could be later implications for legislation in Europe.**

The situation in the UK is actually slightly different. The UK Regulations for quick-frozen foods (1990 and 2007) take a slightly different approach in implementing the EU Directive.

The UK Regulations link the definition for a 'quick-frozen foodstuff' to just two elements - the 'quick-freezing' process and the requirement to be labelled for the purpose of sale (placing on the market). The requirement for the temperature of the product to be maintained at a level of -18°C or lower is included later within the regulations. This is a more logical approach than that of the EU Directive (or of the Codex Code), which each repeat the -18° temperature requirement

from the definition as a requirement later in the Directive (Code).

In the UK, a loss of the reference to labelling (with no further changes) would result in the regulations applying in full to any product that has been subjected to a quick-freezing process.

The scope and objective of the Code is presented in the following terms:

"This Code applies to the receiving, preparation, processing, handling, storage, transport, distribution, and retailing of all quick frozen foods such as cereals, fruits and vegetables, fish, meat, poultry and their products, bakery and pastry products. The Code does not apply to edible ices, ice creams and milk.

"The objective of this Code is to provide guidance for the processing and handling of quick frozen food to help ensure product safety and other aspects of the production of quick frozen foods including, as appropriate, essential quality provisions, composition and labelling provisions of pertinent Codex commodity standards. The guidance, emphasizing proper cold chain management, incorporates good hygienic and good manufacturing practices and the application of the Hazard Analysis and Critical Control Point (HACCP) approach described in the HACCP Annex to the Recommended International Code of Practice: General Principles of Food Hygiene (CAC/RCP 1-1969). A prerequisite programme is described in the Code, covering essential requirements of hygiene in the production of quick frozen foods that should be in place prior to the application of HACCP."

#### **Other Codex Standards, Guidelines etc**

A number of other final texts were adopted at the same session of the Codex Alimentarius Commission, and these can now be found on the Codex website at <http://tinyurl.com/5z8p3v>

- Standard for Tomatoes Ref CODEX STAN 293 (2008)
- Recommended International Code of Practice for the Processing and Handling of Quick Frozen Foods Ref CAC/RCP 8 (1976) Revision 3 (2008)
- Code of Practice for the Reduction of 3-Monochloropropane-1,2-diol (3-MCPD) during the Production of Acid-Hydrolyzed Vegetable Protein (Acid-HVPs) and Products that Contain Acid- HVPs Ref CAC/RCP 64 (2008)
- Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Dried Figs Ref CAC/RCP 65 (2008)
- Code of Hygienic Practice for Powdered Formulae for Infants and Young Children Ref CAC/RCP 66 (2008)
- Guidelines for the Use of Flavourings Ref CAC/GL 66 (2008)

- Model Export Certificate for Milk and Milk Products Ref CAC/GL 67 (2008)
- Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Animals Ref CAC/GL 68 (2008)
- Guideline for the Validation of Food Safety Control Measures Ref CAC/GL 69 (2008)

An advance copy of the full report from the Codex Alimentarius Commission can also be downloaded from the Codex website as <http://tinyurl.com/6kbpdf>.

The final version of the report will be available in due course (September for English language version) from <http://tinyurl.com/2rmvkh>

### **Quick-Frozen Food Specifications**

A number of Quick-Frozen Food Specifications from Campden & Chorleywood Food Research Association are now available on CD-ROM, with photographic illustrations

Campden Quick Frozen Food Specifications have been used for many years by the industry as quality benchmarks for IQF fruit and vegetable products. They are written and approved by representatives from industry - including manufacturers, retailers and relevant trade bodies - and they act as authoritative standards, enabling buyers and suppliers to agree on product characteristics.

**One of the groups of characteristics covered is that of defects, such as blemishes, colour variants, clumping and improper cutting. Defects applicable to each particular product have been captured in high-quality images and are now available with the latest issue of the specification in CD-ROM format. Links in the text of the specification allows the images to be viewed in context, and their high quality allows the user to zoom in on specific points of interest and still maintain clarity in the illustration. The images can also be printed and used in the laboratory during routine product assessments.**

The products available in the new format are:

- Long-grain rice
- Peas
- Cut green beans
- Shredded cabbage
- Raspberries
- Sweetcorn kernels
- Broad beans
- Whole green bean

Further specifications will be issued in this format later in the year. Copies of the new specifications are available (from <http://www.campden.co.uk/>) at a price of £60 +VAT (CCFRA members) or £90 +VAT (non-members)

## Identification Marking of Fishery Products imported into the EU

The Association of Port Health Authorities (APHA) has produced a new guidance document for importers and enforcement officers on 'Identification Marking of Fishery Products imported into the EU'.

Copies will be available in due course to download from the APHA website at <http://www.apha.org.uk/>, but until copies are available from the website BFFF members can request copies (scanned from a preliminary hard copy) from the Long Bennington office.

The text below is reproduced from the APHA introduction to the guidance:

"This guidance document has been prepared by the Association of Port Health Authorities in consultation with representatives of UK BIPs, the Sea Fish Industry Authority and the Food Standards Agency. It is aimed at importers and Local Authority enforcement officers to promote compliance and consistent enforcement decisions.

"The identification marking of products of animal origin is an important part of the traceability system. This guidance was drawn up specifically to address the identification marking of fishery products and does not provide general guidance on compliance with the traceability requirements of Article 18 of Regulation 1781/2002, or on fish labelling rules. (Guidance on these subjects can be found on the FSA website see Sources of Further Information)

"Legislative changes have introduced a new and more detailed set of requirements that are applicable to the identification marking of fishery products; following this Local Authority BIPs have been considering their interpretation, as have importers.

"The rules governing the identification marking of fishery products are in place to protect public health. The requirements ensure that key traceability information is available throughout the food chain. Where a consignment does not meet the requirements, importation cannot be permitted. Such rejections are costly for the importer and therefore it is important to assist with the correct interpretation of the legislation. Through the development of this guidance, it is hoped that an advisory standard has been clearly set out that can be adopted by trade and enforcement authorities with a view to promoting compliance and supporting consistent interpretation and enforcement at import

"This guidance does not have statutory authority; it is intended to be a practical guide only, however, importers of fishery products may find it beneficial to check existing labelling against this advisory standard and to consider the requirements when purchasing new products and specifying new

packaging.

"This guidance makes the use of worked examples to explain some of the concepts explored in this document, however it is recognised that these scenarios will not be exhaustive and that individual imports may differ subtly from the examples given. It is the responsibility of Official Fish Inspectors (OFIs) I Official Veterinarians (OVs) working at the BIP to use their professional judgement to decide whether a consignment complies with the legislation.

"If after reading this guidance you require further assistance, a list of sources of further information is provided in this guide. Officers at the BIP will always be pleased to help you."

Requirements for identity marking for imported products of animal origin are now detailed in the EU's 'new' hygiene regulation 853/2004 (Section I of Annex II). For fishery products, requirements were previously contained in a series of country-specific Commission Decisions, but these country-specific requirements have all been repealed (with the exception of the Decision relating to the USA which continues in force)

**A key element of the new guidance is a series of detailed examples, each with the appropriate decision whether import would be permitted or not permitted.**

The APHA website also offers several short guides designed to help importers understand the rules and regulations for importing food into Europe. These guides are available <http://tinyurl.com/5pwrq7>:

- Importing Food - Introduction
- Importing Products of Animal Origin
- Importing High Risk Products (products not of animal origin, where specific emergency controls are in place)

## New FGas legislation published for consultation

Defra has issued a consultation document jointly with the Department for Business, Enterprise and Regulatory Reform, the National Assembly for Wales and the Scottish Executive concerning proposed Regulations on further implementation measures regarding fluorinated greenhouse gases and ozone depleting substances. Full details are available from the Defra website at <http://tinyurl.com/5q3y3k>. The deadline for consultation responses is 3 October.

Separate Regulations covering Northern Ireland will be issued by the Department of the Environment in Northern Ireland.

**The consultation paper sets out proposals for Regulations prescribing offences and penalties applicable to infringements of EC Regulation 842/2006 ('on certain fluorinated greenhouse gases'),**

and of ten Commission Regulations adopted at the end of 2007, which establish more detailed legal requirements for companies and qualifications for personnel working in five industry sectors covered by Regulation 842/2006, as well as dealing with other requirements relating to leakage checking, reporting and labelling.

The ten Commission Regulations are intended to support the objective of the 2006 Regulation to contain, prevent and thereby reduce emissions of fluorinated greenhouse gases covered by the Kyoto Protocol, so as to help combat climate change.

The consultation paper shows that it is proposed to build on the existing Fluorinated Greenhouse Gases Regulations 2008 (SI No 41), so that all the domestic legislation needed to give effect to Regulation 842/2006 and the ten new Commission Regulations will be in one place.

A number of industry sectors are involved, but the proposed Regulations are of particular interest to businesses dealing with manufacturing, installation, servicing and recovery of F gases from commercial and domestic refrigeration (and air-conditioning) equipment.

For convenience, the text of the EC Regulation 842/2006 can be found at <http://tinyurl.com/58vnad>

Included in the ten other regulations, those of interest in the refrigeration sector are the following:

- Leakage checking - Stationary refrigeration, air conditioning and heat pump equipment (Commission Regulation (EC) No 1516/2007)  
<http://tinyurl.com/55sosw>
- Minimum qualification and certification requirements - Stationary refrigeration, air conditioning and heat pump equipment (Commission Regulation (EC) No 303/2008)  
<http://tinyurl.com/5p7xsp>
- Format of label (Commission Regulation (EC) No 1494/2007)  
<http://tinyurl.com/5rc4td>
- Format of report (Commission Regulation (EC) No 1493/2007)  
<http://tinyurl.com/5cx5s8>
- Format for notification (Commission Regulation (EC) No 308/2008)  
<http://tinyurl.com/6a5nc2>

The new F-gas qualifications also cover working with ozone depleting substances. Hydrochlorofluorocarbons (HCFCs) are still used as refrigerants in some existing commercial refrigeration and air-conditioning equipment although the use of virgin HCFCs in the maintenance of such equipment will be prohibited from 1 January 2010. The use of all HCFCs for maintenance purposes will be prohibited from 1 January 2015.

The existing Ozone Depleting Substances

(Qualifications) Regulations (SI 2006/1510), as amended, need to be revoked and remade to take these new F-Gas qualifications into account so that holders of these qualifications can continue to work with ozone-depleting substances. The consultation therefore also invites views on the necessary proposed Regulations (The Ozone-Depleting Substances (Qualifications) Regulations 2009).

**All interested parties are invited to submit their views on any of the matters addressed in this consultation paper, although a series of specific questions are included to highlight certain issues.**

Readers may in particular wish to note the questions relating to personnel qualifications, company certification, and personnel registration:

- 'Personnel qualifications relating to stationary refrigeration, air conditioning and heat pump equipment':

Question three: Do you have any comments on regulations 19 (certification bodies for personnel) or 21 (interim certificates for personnel)?

Question four: Do you agree with the proposed qualification categories set out in regulation 20(3) and Schedule 1?

Question five: Do you agree with the proposed interim and transitional arrangements?

Question six: Do you have any comments on regulation 21(5) (certification body to issue interim certificates)?

- **Company certification for stationary refrigeration, air conditioning and heat pump equipment and fire protection systems**

Question fourteen: Views are invited on what body or bodies might be designated by the Secretary of State as certification bodies and on what type of certification scheme is preferred?

Question fifteen: Do you have any comments on regulations 22 (certification bodies for companies), 23 (certificates for companies) or 24 (interim company certificates) or 25 (mutual recognition)?

Question sixteen: Do you have any comments on how the company certification schemes should be operated (i.e. renewal or nonrenewal)?

Question seventeen: Do you have any comments on regulations 29 (certification bodies for companies), 30 (certificates for companies) or 31 (interim company certificates) or 32 (mutual recognition)?

Question eighteen: Do you have any comments on how the company certification schemes should be operated (i.e. renewal or nonrenewal)?

- **Personnel registration**

Question nineteen: Would you like the Government to propose regulations to require mandatory

personnel registration in a future consultation?

Question twenty: What reasons do you have for supporting or not supporting mandatory personnel registration?

## F-Gas Support

Readers are already aware of the activities of F-Gas Support, the Government funded team set up to provide guidance for manufacturers, operators, contractors and others that make, sell or handle F gases and ozone-depleting substances (ODS) and associated equipment.

The Defra website now contains a much expanded section on 'fluorinated greenhouse gases and ozone depleting substances', which is intended to explain

- What are "F gases" and "ozone depleting substances"?
- Who is affected?
- Impact on different business sectors
- What do you need to do to comply?
- Approach to biggest emitters
- Background
- About us - how to contact F-Gas Support

The information, managed by F-Gas Support, can be accessed from <http://tinyurl.com/5ewuw9>. An extensive series of web pages includes access to a series of information sheets, including

- Information Sheet GEN 1: Glossary of Terms related to the F gas and ODS Regulations (PDF 300KB)  
<http://tinyurl.com/6zld2>
- Information Sheet GEN 2 - Background to F gases and ODS (PDF, 300 KB)  
<http://tinyurl.com/5tm3p6>
- Information Sheet GEN 3 - Overview of markets and equipment affected by the F gas and ODS Regulations (PDF, 300 KB)  
<http://tinyurl.com/68wptm>
- Information Sheet GEN 4 - Links to the relevant legislation (PDF, 300 KB)  
<http://tinyurl.com/67b2gg>

and specifically concerning the impact of the new regulations on stationary refrigeration, air-conditioning and heat pump (RAC) applications:

- RAC 1- Overview (PDF 1.4MB)  
<http://tinyurl.com/5jrymg>
- RAC 2 - Usage of F gases and ODS (PDF 300KB)  
<http://tinyurl.com/684w53>
- RAC 3 - Key Obligations (PDF 300KB)  
<http://tinyurl.com/5938p8>
- RAC 4 - Getting Started (PDF 250KB)  
<http://tinyurl.com/5m2r2x>

- RAC 5 - Certification of personnel and companies (PDF 300KB)  
<http://tinyurl.com/62f4kb>
- RAC 6 - Practical Guidance and FAQs (PDF 300KB)  
<http://tinyurl.com/5ncm9j>
- Sample log sheet (PDF 30KB)  
<http://tinyurl.com/5dedtg>

To contact F-Gas Support:

- Ring the helpline: 0161 874 3663 - e helpdesk is open 9am to 5pm weekdays
- Email the helpdesk: [fgas-support@enviros.com](mailto:fgas-support@enviros.com)
- On the website: [www.defra.gov.uk/fgas](http://www.defra.gov.uk/fgas)
- Write to: F-Gas Support, P O Box 481, Salford, M50 3UD

F-Gas Support also helps regulators promote compliance with these environmental Regulations. F-Gas Support is being run on behalf of Defra and the devolved administrations by LACORS and Enviro.

## GSP scheme extended to 2011

A new regulation covering the EU's Generalised System of Preferences (GSP) for the three-year period 2009-2011 has been adopted by the EU Council of Ministers (General Affairs and External Relations Council) at its meeting on 22 July 2008.

The GSP is an autonomous trade arrangement through which the EU provides non-reciprocal preferential access to the EU market to 176 developing countries and territories, in the form of reduced tariffs for their goods when entering the EU market. It is implemented by a Council Regulation applicable for a period of three years.

With the current three-year phase of GSP set to expire at the end of 2008, the Commission made a proposal for a successor regulation on 21 December 2007. Following the opinion of the European Parliament, the EU General Affairs and External Relations Council has now adopted the new regulation

**In response to wishes expressed by users of GSP to ensure continued stability, predictability and transparency, the scheme remains broadly unchanged. However, it does implement some technical changes, in particularly taking account of evolutions in trade flows.**

GSP covers three separate preference regimes:

- (i) the standard GSP, which provides preferences to 176 Developing Countries and Territories on over 6300 tariff lines;
- (ii) the special incentive arrangement for Sustainable Development and Good Governance, known as GSP+, which offers additional tariff reductions to support vulnerable developing countries in their ratification

and implementation of relevant international conventions in these fields; and

(iii) the Everything But Arms (EBA) arrangement, which provides Duty-Free, Quota-Free access for the 50 Least-Developed Countries (LDCs).

#### Changes for the period 2009-11 will include:

**Graduation and De-graduation** - Whenever an individual country's performance on the EU market over a three-year period exceeds or falls below a set threshold, preferential tariffs are either suspended or re-established. These calculations are made on the basis of Product Sections established in the Harmonised System for classification of goods for trade. This graduation mechanism is only relevant for GSP and GSP+ preferences. LDC access under EBA is not at all affected. Graduation is triggered when a country becomes more competitive in one or more product groups and is considered no longer to be in need of the preferential tariff rates.

As a result of the re-calculations made on trade data for the period 2004-06, GSP preferences will be re-established for six countries (Algeria, India, Indonesia, Russia, South Africa, and Thailand) and suspended for one (Vietnam). Readers should however note that these changes do not concern any product groups in the food sector.

**GSP+** - At present, 14 beneficiary countries have qualified to receive the additional preferences offered under the GSP+ incentive arrangement. These will lapse at the end of 2008, but any country, including current beneficiaries, which wishes to receive GSP+ preferences from January 2009 can submit an application before 31 October. The new regulation will also provide for an additional opportunity for applications in mid-2010.

**Beneficiary countries list** - Two countries (Myanmar and Belarus) remain temporarily withdrawn from GSP preferences on the basis of Council Regulations (EC) No 552/97 and No 1933/2006 respectively, as the reasons for their withdrawals still persist.

More information is available from <http://tinyurl.com/6yrp9m>

### Proposals to revise the voluntary salt reduction targets

The Food Standards Agency has issued proposals for consultation concerning the revision of certain of its voluntary salt reduction targets and the revision of monitoring arrangements. Full details are available from the FSA website at <http://tinyurl.com/5edxn3>. The deadline for responses is 31 October 2008

The FSA identifies the key proposals as:

- to revise, in the light of experience and progress to date, the UK targets for the levels of salt in key categories of manufactured foods. Revised targets

are proposed for a limited range of food categories for 2010, and new targets are proposed for most foods (with some minor exceptions) for 2012

- to revise some product category descriptions
- to adopt a rolling programme of biennial reviews of industry progress and the need for further adjustments to the targets. The first review would take place in 2010
- to revise the monitoring framework for the salt reduction policy

The FSA writes that it developed its salt reduction targets for a wide range of food categories 'to help guide the food industry as to the type of foods in which reductions are required, and the level of reductions that are needed to help reduce consumers' intakes'. These targets were the subject of a public consultation in August 2005, and were finalised and published in March 2006. They cover 85 categories of manufactured-food that contribute most salt to the diet, including staple foods such as bread, bacon, breakfast cereals and cheese, and a wide range of convenience foods. The FSA believes the targets were set at levels that were challenging but achievable given the knowledge at the time, but also offered good progress towards reducing levels of salt in food products.

**At the time the targets were set in 2006 the Agency committed to a review in 2008 to consider progress made, the potential for setting further targets and to explore any technical difficulties identified.** The review started in December 2007 with the Agency holding a series of Stakeholder meetings. An initial meeting was used to outline the review process and a further 18 smaller food sector specific stakeholder meetings (January/February 2008) were held to discuss each of the targets in detail. The FSA says that a number of issues were raised at these meetings which were taken into account when setting the proposed revised targets including:

- Reformulation cycles and the number of further opportunities for salt reduction before 2010
- Lack of UK industry control on product formulations of foods such as imported canned salmon and certain cooked meat products.
- The balance between salt reduction and fat/sugar content e.g. in low fat cheeses.
- Cost/benefit of modifying or replacing equipment to enable salt reduction in product lines with a small market share.
- Ensuring that reductions in one sector moved at the same rate as those in others and that reductions did not just move purchasing to other options that might be higher in salt or higher in fat.
- Consumer expectations and acceptability of

changes to iconic products.

- Impending legislative changes e.g. the reduction in permitted levels of nitrate in food.
- Current commercial activities around the reduction of the use of additives in food.

#### The FSA's proposals include:

- stricter salt targets for 2010 for a number of product groups: bacon; ham and other cured meats; cooked sausages and sausage meat; meat pies; mozzarella; processed cheeses; margarines and other spreads; extruded snacks; pelleted snacks; salt and vinegar snacks; cakes; tomato ketchup; mayonnaise (reduced fat/calories); dehydrated instant mashed potato.
- for 2012 new and stricter salt target levels are proposed for almost all product categories
- a number of food categories (and sub categories) are being redefined - including ready meals and pizzas.

**For category 8, ready meals and meal centres: it is proposed that all ready meals and meal centres should now fall under one category.** This will make allocation of products to a category to monitor compliance with targets much simpler. The revised category also now includes all coated poultry products, as well as coated fish products, and all non-meat pies (eg cheese and onion pasties).

Existing targets for 2010 (g salt or mg sodium per 100g) are separated into four sub-categories:

- 8.1 Chinese/Thai/Indian - ready meals  
0.8g salt or 300mg sodium (average)
- 8.2 Chinese/Thai/Indian - meal centres  
1.0g salt or 400mg sodium (average)
- 8.3 Italian/Traditional/other - ready meals  
0.6g salt or 250mg sodium (average)
- 8.4 Italian/Traditional/other - meal centres  
0.8g salt or 300mg sodium (average)

For 2012, a single target is proposed across the entire product area

0.63g salt or 250mg sodium (average)  
1.13g salt or 450mg sodium (maximum)

**For category 10, Pizzas, it is proposed that just one target is set for 2102**

Existing targets for 2010 (g salt or mg sodium per 100g) are given for two sub-categories:

- 10.1 Pizzas with higher salt toppings e.g. cured meat (ham, bacon, pastrami, chorizo, salt beef), olives, anchovies and smoked fish, hard cheese, prawns, crayfish, crab, tuna and "Cheese Feast" or similar toppings  
1.2g salt or 470mg sodium (average)
- 10.2 Without high salt toppings e.g. chicken,

vegetables, etc

1.0g salt or 400mg sodium (maximum)

A single target is proposed for 2012 across all products:

0.88g salt or 350mg sodium (average)

1.25g salt or 500mg sodium (maximum)

Full details of all the proposed revised product categories, and targets for 2010 and 2012, are provided in the consultation document

### Salt intake levels

The FSA has published the results of a recent urinary sodium survey. The sample for the survey was made up of 692 adults aged 19-64 years and was designed to be representative of the UK population. **The survey reports an average salt intake figure of 8.6g per day, which the FSA compares favourably with 'the 9.0g day estimate from the 2005/06 survey and the 9.5g from the National Diet and Nutrition Survey from 2000/01'.**

The new survey was carried out by the National Centre for Social Research between January - May 2008. The estimated daily salt intake of the representative sample, based on 294 men and 398 women analysed in the study was 9.7g and 7.7 g, respectively (8.6 g/day for both men and women together).

The survey report notes:

"This brief report presents the results of a 24-hour urine sample study that was designed to provide estimates of salt intake using sodium concentrations in urine. The study was carried out among a representative sample of adults aged 19-64 in the UK. The estimated daily salt intake of a representative sample, based on the 294 men and 398 women analysed in the study was 9.7g and 7.7 g, respectively (8.6 g/day for both men and women together). These estimates are lower than those reported by the most recent NDNS for adults (9.5g/day) but are similar to recent estimates based on urinary sodium from 2005/06 in the UK (9.0g/day).

"In most respects the results from this study should be broadly comparable with those from the NDNS survey. However, comparability may be affected by some differences in methodology, including the way in which the samples were recruited, the offer of an incentive and response rates. The NDNS survey covered a full 12 month period, while most of the fieldwork for this study took place over the a period between January and May 2008, and there may be some differences reflecting seasonal patterns in salt consumption. While PABA analyses were used in this study to exclude incomplete samples, a different methodology was used for most of the NDNS sample."

The report can be found on the FSA website at <http://tinyurl.com/6blmp5> - **An assessment of dietary**

## **sodium levels among adults (aged 19-64) in the UK general population in 2008, based on analysis of dietary sodium in 24 hour urine samples**

Regarding the methodology, the report notes that the aim was for the study to collect 24-hour urine samples from 750 respondents, representative of the population aged 19-64 living in the UK. It was expected that this would yield samples sufficiently complete for analysis from around 80%, i.e. around 600 individuals.

"A random sample of 45 postcode sectors was selected initially, and within these a random sample of telephone numbers was drawn using random digit dialling. When eligible households were identified, a short telephone interview was conducted and the household was asked to take part in the 24-hour urine collection study. Within each household, up to two adults, aged between 19 and 64, were eligible to take part in the study, and if there were three or more eligible adults two were selected at random. Respondents were offered an incentive of £20 per person on successful completion of the study."

Details of the earlier National Diet and Nutrition Survey (Adults aged 19 to 64, Volume 3 2003) can be found on the FSA website at <http://tinyurl.com/6ojdsw>

NDNS Volume 3 presented findings on vitamin and mineral intakes and urinary analytes from a survey of the diet and nutrition of adults aged 19 to 64 years living in private households in Great Britain, carried out between July 2000 and June 2001. Section 3.6 covered sodium and chloride intakes and reported as follows (with a comparison against an earlier survey from 1986/87):

"Mean salt intakes calculated from urinary sodium excretion were 11.0g/day for men in this survey and 8.1g/day for women, ... compared with 10.1g/day for men and 7.7g/day for women in the 1986/87 Adults Survey"

[This suggested a population average for adults for 2000/2001 of around 9.5g/day]

Results from the surveys carried out in England, Wales, and Scotland during 2005 and 2006 can be found at <http://tinyurl.com/6d3env>.

### **Criteria for the use of the terms Fresh, Pure, Natural etc. in food labelling**

The Food Standards Agency has published its revised guidance on the use of marketing terms, such as 'fresh', 'pure' and 'natural' for food labelling. Guidance was originally issued in 2002, and the Agency consulted on proposals to revise the guidance at the end of 2007.

Full details, including the copies of the new guidance are available from the FSA website at <http://tinyurl.com/6enav6>

The 2002 guidance was issued following a report from

Food Advisory Committee. In 2004 the Agency carried out a survey that looked at the extent to which industry was taking account of the 2002 Guidance, and to help inform whether it should be revised. Of the 220 samples examined, 88 (40%) were considered by the participating public analysts not to follow the Guidance. The 2002 Guidance was then discussed at an Agency stakeholder meeting where it was recognized that advice for some of the terms might not be in line with currently understood meanings; and new terms had come into use that were not in the Guidance and these may have been being used in potentially misleading ways.

As a result, it was decided to commission consumer research into what some existing and some new terms mean to the consumer. A report of that research was published on the Agency website in 2006 (available from <http://tinyurl.com/bl7b9>).

The FSA says that the aims in producing advice on use of these marketing terms are to:

- assist manufacturers, producers, retailers and caterers decide when these descriptions may be used and when they should not;
- help enforcement authorities to provide consistent advice about labelling; and
- benefit consumers, by encouraging the adoption of consistent, transparent labelling practices.

The Guidance has been produced to provide informal, non-binding advice on:

- the relevant legal requirements for labelling food with marketing terms (Part 1); and
- general (Part 2) and specific (Part 3) best practice on the use of marketing terms.

**The guidance makes clear that compliance with the advice on best practice is not required by law.**

"This Guidance sets out voluntary best practice advice on the use of marketing information, particularly commonly used marketing terms that are of interest to consumers but not defined in law. It is issued to encourage the use of labelling terms that convey clear meaning and are not misleading. The use of these terms should be considered in the context of the label as a whole, the presentation of the product and on a case by case basis.

"The best practice advice applies equally to all food, regardless of whether it is prepacked or not, or the type of outlet from which it is sold.

For **General Best Practice Advice** (Part 2) the FSA makes the following recommendation:

**16. It is recommended that before using any term, the following points (which are based on the legal requirements set out in Part 1 outlawing false and misleading labelling, advertising and presentation of food) be considered and applied where possible:**

- foods should be sold without deceit and therefore should be labelled and advertised so as to enable a prospective purchaser to make a fair and informed choice, based on clear and informative labelling;

- a food must be able to fulfil the claim being made for it and therefore adequate information must be available to show that the claim is justified;

- where the use of the marketing term is potentially ambiguous or imprecise, the likely understanding of the 'average' consumer is a good benchmark;

- claims should allow fair comparison and competition between products, sectors and traders.

Other recommendations of a general nature include:

19. The labelling and presentation of the food as a whole should be used in assessing whether a particular label or description is likely to be considered misleading. Where a consumer might be misled by pictures, any potential ambiguity must be clarified by labelling that is equally clear and as prominent as the pictures.

20. It is not appropriate to use any marketing term unless its meaning is clear. For example, the term "seasonal" (not specifically covered in the Guidance) might be applied properly to UK grown strawberries in the summer months but could be misleading when applied to strawberries that have been either imported or grown in heated greenhouses in spring or autumn.

21. When using marketing terms it should always be clear in each case what characteristic of a product is being described. For example if the term "wild" is used (not specifically covered in the Guidance) then it could be helpful to clarify whether all stages in the life of an animal have been wild, or if the term "hand-made" is used then it could be informative to explain further if some stages in processing were not carried out by hand.

22. Where any qualification or explanation is necessary to understand the meaning of a marketing term this should accompany the term and associated imagery. It should be in a font and size that is easily legible and prominent to help consumers make their choice in full knowledge of the facts. Some enforcement authorities have reported that purchasing behaviour suggests that consumers are likely to be misled if the back or side of a pack carries 'small print' explanations or qualifications of claims that contradict or change the meaning of prominent claims and images on the front of pack.

24. It is generally not helpful to use "style" or "type" to qualify the terms covered by this advice (e.g. "farmhouse style"). If these qualifications are used then clarification should be provided where reasonable practicable to reveal the level of authenticity or link to the original product, whether by the region of origin, source of ingredients or method of production.

25. Research carried out on behalf of the Agency, published in 20064, found that the terms "traditional style" and "selected" were not easy to understand and it is suggested that their use should be avoided.

### Recommended criteria for the use of the term "Fresh"

The area that has been of greatest interest to the Federation has been the FSA's recommended criteria for the use of the term "fresh". The basic advice regarding the use of "fresh" with frozen foods/ingredients remains unchanged, although the title of the section concerned has been broadened to encompass 'frozen or processed foods or ingredients'.

The extracts below are taken from Part 3 of the guidance ('Specific Best Practice Advice').

26. The description "fresh" can be helpful to consumers where it differentiates produce that is sold within a short time after production or harvesting. However, modern distribution and storage methods can significantly increase the time period before there is loss of quality for a product, and it has become increasingly difficult to decide when the term "fresh" is being used legitimately.

27. The term "fresh" can also be helpful when used to identify products that have not been processed.

29. "Fresh" is often used in a number of phrases that may have an emotive appeal but no real meaning (e.g. "oven fresh", "garden fresh", "ocean fresh", "kitchen fresh", etc). These should be avoided.

#### **General:**

30. The terms "fresh" or "freshly" should only be used where they have a clear meaning, whether used alone or qualified by other terms. The description can help consumers differentiate between similar products, for example:

- fresh fruit salad that is made only from fresh fruit;
- fresh dairy products (such as cream) held under chilled conditions at point of sale, with limited shelf life, even where these have been subjected to a minimal, mild heat treatment such as conventional pasteurisation for safety purposes.

31. Expressions such as "freshly cooked", "freshly prepared", "freshly baked", "freshly picked" should have no other connotation than the immediacy of the action being described. Where such expressions are used, it is recommended they be accompanied by an indication (e.g. of the date or time or period - "freshly prepared this morning") of when the action being described took place.

32. Packaging, storage and other supply chain processes that control "freshness" should not be described in terms that may imply that only a short period after harvesting or preparation has elapsed before sale if

this is not the case. For example, a food that has been vacuum packed to retain its freshness should not be described as "freshly packed".

#### Fruit and vegetables:

33. The term "fresh" is now used generically to indicate that fruit and vegetables have not been processed (e.g. canned, pickled, preserved or frozen), rather than that they have been recently harvested. This is acceptable provided it is not used in such a way as to imply the product has been recently harvested (e.g. "fresh from the farm"; "freshly picked") if this is not the case (see paragraph 31 above).

34. The term "fresh" may be used to describe fruit and vegetables that have been washed and/or trimmed, provided that an indication that they have been washed and/or trimmed is also present. However, in the case of prepared fruit or vegetables, e.g. "fruit salad" that could be described as "fresh", then if it was obvious from its appearance for that product that fruit for example had been trimmed, peeled and cut then such indication would not be necessary, and it would be assumed that it had been washed.

35. Chill temperatures and other controlled atmospheres are used in the food production chain for the delayed ripening and/or extended storage of fruit and vegetables. The use of the term "fresh" is acceptable in these circumstances.

#### Meat:

36. Virtually all carcass meat is chilled following slaughter, principally as a hygiene measure. The term "fresh" is traditionally used to differentiate raw meat from that which has been (chemically) preserved. It would serve no purpose to disqualify chilled meat from use of the term "fresh". Use of the term "fresh" in these circumstances is acceptable.

37. Meat that has been previously frozen but which is sold thawed would not be considered by the average consumer to be "fresh". The term "fresh" should not be used in these circumstances.

#### Fish

38. Use of the term "fresh" to describe fish that has been kept chilled on ice, but not stored deep frozen, is acceptable.

39. Fish that has been previously stored deep frozen, but which is sold thawed would not be considered by the average consumer to be "fresh". The term "fresh" should not be used in these circumstances.

40. Smoked or marinated/salted fish should not be referred to as fresh because it has been preserved/undergone processing.

#### Fresh bread:

46. Terms such as "freshly baked", "baked in store" and "oven fresh" may mislead consumers into believing that they are being offered products that have been freshly

produced on site from basic raw materials. Some stores sell bread made from part-baked products that have been packed in an inert atmosphere or frozen off-site then "baked off" at in-store bakeries. Use of terms like "freshly baked", "baked in store" and "oven fresh" on these products could potentially infringe the general legal provisions referred to in paragraph 14 above.

#### Frozen or processed foods or ingredients:

47. The term "fresh" should only be used in relation to frozen or processed foods if its use is clear from the context. For example:

- "frozen from fresh" should only be used to indicate a food was fresh (i.e. recently made or harvested) when it underwent freezing;

- "made with fresh ingredients" should be used only where the intended meaning is that no processed ingredients (i.e. ingredients that have been dried, freeze-dried, frozen, concentrated, powdered, smoked, canned, etc) were used;

- "made with fresh X" should only be used where X is the name of an ingredient that has not been processed and the food does not also contain processed equivalents of the same ingredient. For example, a food described as "made with fresh tomatoes" should not also contain canned tomatoes.

#### Chilled foods:

50. For chilled convenience foods, unless the product complies with the appropriate criteria for use of the term "fresh" (or it is suggested otherwise in this Guidance), the term should not be used to describe foods when indicating a moderate shelf life under refrigerated conditions (e.g. for such products as chilled soups and sauces).

### New ISO Standard to help manage risk in cold workplaces

A new ISO standard is intended to provide a comprehensive methodology for assessing risk and managing work in cold environments.

'ISO 15743:2008, Ergonomics of the thermal environment - Cold workplaces - Risk assessment and management', has been developed to describe methods and practices for assessing and managing occupational health and performance risks in cold workplaces.

The standard gives practical instructions for risk analysis and management in cold working conditions. It describes:

- a model and methods for risk assessment practices in cold work
- a model and method for occupational health care professionals to identify individuals having symptoms which increase their cold sensitivity, plus optimal guidance and instructions for individual cold

protection

- informative guidelines on how to apply different international thermal standards and other validated scientific methods when assessing cold related risks
- a model and methods for cold risk management practices
- practical examples of working in cold conditions.

The International Organization for Standardization notes that working in a cold environment can involve several adverse effects on human performance and health (thermal discomfort, increased strain, decreased performance and cold-related diseases and injuries). Cold can also interfere with several other factors in the workplace, modifying or aggravating the risk of common hazards and increasing the risk of cold-associated injuries.

The Standard is intended to apply to working both indoors and outdoors, and includes working inside vehicles

**"ISO 15743:2008 complements a series of ISO standards concerned with work in cold conditions as well as other areas of thermal stress. It supports good occupational health and safety practice and will help developers, manufacturers, management, occupational safety personnel, occupational health care workers and others."** comments Prof. Ken Parsons, Chair of the ISO subcommittee that developed the standard.

ISO 15743:2008 was developed by ISO technical committee ISO/TC 159, Ergonomics, subcommittee SC 5, Ergonomics of the physical environment. It costs 120 Swiss francs and is available from ISO national member institutes and from ISO Central Secretariat.

More information is available from the ISO website at <http://tinyurl.com/5fdsq3>

### EFSA Annual Report

The European Food Safety Authority (EFSA) has published its 2007 Annual Report, which shows scientific output increasing by 63% in 2007 compared to 2006, and co-operation with national risk assessment authorities in Member States increasing significantly.

"2007 also marked 5 years of EFSA as Europe's food safety risk assessment body, providing the scientific benchmark on which European Union risk managers based many of their decisions to protect consumers in the EU. During 2007, EFSA's strategy of communicating its scientific advice to its principal clients and stakeholders and the public at large, helped bridge the gap between science and the consumer, and contributed to building public confidence in the way risks are assessed."

EFSA's scientific output increased by 63% during 2007

compared to 2006 with just over 200 scientific opinions and around 1,000 assessments of new applications and re-evaluations of previously authorised substances. EFSA has now produced more than 680 scientific opinions since it began work in 2002. The number of EFSA staff has increased to more than 300, with an annual budget now amounting to more than €50 million.

EFSA identifies highlights of its work in 2007 to include:

- the evaluation of a number of sweeteners, preservatives, colours and smoke flavourings (including the evaluation of the food colour "Red 2G")
- the completion of EU wide comparable surveys for salmonella levels in chickens
- the evaluation of maximum residue levels for over 200 pesticides substances
- the evaluation of carcinogenic aflatoxins and the first in a series of evaluations of marine biotoxins
- scientific advice to the European Commission on proposed changes to the EU's BSE rules on the removal of specified risk materials
- opinions on bluetongue and avian influenza and on pig welfare
- independent scientific assessment of Genetically Modified Organisms (GMOs) within the framework of co-operation with Member States, transparency and engagement of stakeholders

The Annual report is available on the EFSA website at: <http://tinyurl.com/6zrld5>

### EFSA Scientific Panel to split

EFSA's Scientific Panel on food additives, flavourings, processing aids and materials in contact with food (AFC) has held its final meeting. **The activities of the AFC Panel will be taken over by two new Panels, which have held inaugural meetings. The Panel on food additives and nutrient sources added to food (ANS) and the Panel on food contact materials, enzymes, flavourings and processing aids (CEF) will carry out work previously allocated to the AFC Panel.**

Members of the two new Panels have elected their respective Chairs. Dr. John Christian Larsen was elected Chair of the ANS Panel and Professor Dr. Klaus-Dieter Jany Chair of the CEF Panel. Each panel consists of 21 members, drawn from relevant fields, including toxicology, risk assessment, food consumption, exposure assessment, food technology, chemistry and microbiology.

"With the two new Panels, EFSA can fulfill the mid- and long-term needs in the area of food additives, nutrient sources added to food, food contact materials, enzymes, flavourings and processing aids

and respond to a high volume of requests for scientific advice within tight deadlines," said EFSA's Director of Risk Assessment Dr. Riitta Maijala. "This is particularly important in an area which is bound to receive an increased number of applications with the future adoption of EU legislation in the fields of food improvement agents and food packaging."

The decision to create two new panels was approved by EFSA's Management Board in September 2007. A formal proposal to modify EFSA's Founding Regulation was adopted by the European Commission's Standing Committee on the food chain and animal health in December 2007. Subsequently, EFSA launched an open call for experts to recruit scientists for the two new Panels. The Management Board appointed the nominated scientists in April 2008.

More information is available from <http://tinyurl.com/67mvk4>

### Proposed new EC food additives regulations

LACORS reports that the FSA has advised that the European Commission is close to agreement on the package of legislative measures that will update and simplify current legislation dealing with food additives, enzymes (new controls) and flavourings.

Twelve current measures will be consolidated into 4 separate EC Regulations covering a common authorisation procedure; food additives (inc colours and sweeteners); enzymes, and flavourings.

The FSA will consult on implementation of these measures in the UK in due course but LACORS draws attention to the following major aspects, as being of interest:

- food additives will only be authorised if they are safe in use; if there is a technological need for their use and they do not mislead the consumer;
- food additives will be completely banned in unprocessed foods with a few limited exceptions;
- in due course, warning statements ("may have an adverse effect on activity and attention in children") will be required for foods containing the 6 azo-dye colours (E102, E104, E110, E122, E124, E129), cited in the Southampton study;
- tighter controls on the use of the term "natural" in relation to flavourings; e.g. to use the statement "natural strawberry flavour", at least 95% of the flavouring must come from strawberries;
- the position of the use of natural and intense artificial flavour combinations e.g. in soft drinks etc is as yet unclear;
- the EC will also seek to re-assess the 300 additives and 2,600 flavourings currently in use in the EU;

LACORS notes that it will be seeking guidance on the

position of "processing aids" and will be pressing the FSA to consider producing accompanying notes for guidance.

[Information from the LACORS website at <http://tinyurl.com/5e2sva>]

### UK Climate Change programme Annual Report published

The Annual Report to Parliament setting out progress of the UK's Climate Change Programme has been published by Defra.

The document brings together material (most of which has been released previously) to provide a full summary of statistical data and Government activity in the field of climate change in the last 12 months.

Defra says that the report emphasises the importance of both reducing emissions and adapting to the impacts of climate change and outlines emerging policy in this area. It sets out previously published UK emissions data for carbon dioxide and greenhouse gases, along with the steps Government has taken, and proposes to take, to reduce emissions.

Defra highlights a number of key issues from the report:

- Provisional estimates show carbon dioxide emissions during 2007 were around 543.7 million tonnes, 2 per cent lower than the 2006 figure of 554.5 million tonnes. The decrease resulted from fuel switching from coal to natural gas for electricity generation, combined with lower fossil fuel consumption by households and industry.
- Under the Kyoto Protocol, the UK is committed to reducing total greenhouse gas emissions to 12.5 per cent below base year levels by 2008-12. Taking account of the EU Emissions Trading Scheme results, the 2006 final estimates show that emissions of the basket of gases covered by the Protocol fell by 20.6 per cent between the base year and 2006, down from 779.9 to 619.0 million tonnes carbon dioxide equivalent.
- New carbon dioxide emission projections are estimated at approximately 15.5 per cent below 1990 levels for 2010 and approximately 26 per cent below 1990 levels for 2020.

Alongside the Climate Change Programme Annual Report, the Department of Business, Enterprise and Regulatory Reform has published its fifth annual report on progress on the 2003 Energy White Paper.

A full copy of the Defra report is available at <http://tinyurl.com/5svecx>, while a copy of the Energy White Paper Annual Report is available at <http://tinyurl.com/5gtt47> (Fifth Annual Report on Progress towards the 2003 Energy White Paper 'Our Future - Creating a Low Carbon Economy')

## UK Food Security in a Changing World

Defra has published a discussion paper, "Ensuring the UK's food security in a changing world". The paper - which will feed into a more detailed statement on food security policy expected later this year - poses five key questions for the public and industry to comment on. In particular the Government is keen to hear the views of the agricultural sector, consumer groups and food retailers. To this end Defra will be holding a series of meetings, workshops and events to encourage discussion.

**The closing date for contributions is 15 September 2008. The views Defra receives on this discussion document and from the workshops and stakeholder events will inform a more detailed statement of food security policy that Defra intends to publish later in the year.**

The paper suggests a set of indicators that could be used in the future to assess food security. Views are being invited on these indicators and how they could be used.

The analysis of the UK food chain contained in the paper shows that the situation in the UK cannot be viewed in isolation. UK and global food security are interlinked, particularly in relation to world food markets and international energy supplies. However, UK agriculture has a vital contribution to make to food security both in Britain and internationally. The paper outlines the importance of the sector to the UK economy and its role in managing Britain's unique landscape and biodiversity.

The key questions posed in the report are:

- whether Defra has correctly identified the challenges facing global and UK food security.
- what the views of the food industry and wider public are about the action the UK Government is taking globally and domestically to address these challenges and ensure food security.
- what further role the agricultural, retail, and food service sectors can play in ensuring UK food security.
- whether the food security indicators cover the right areas and measure the right things.
- what steps we should take together if the indicators suggest there is a problem.

The five key indicators of food supply are identified as

- global availability;
- diversity of supply;
- food chain resilience;
- affordability; and
- safety and confidence.

The report also includes a broad consideration of the factors that contribute to food security and historical and future trends.

"Ensuring UK food security in a changing world" is available on the Defra website at <http://tinyurl.com/5cmcf8>

## RASFF Annual Report for 2007

The Health and Consumers Directorate-General of the European Commission has published the Annual Report for 2007 for the Rapid Alert System for Food and Feed (RASFF). Copies can be downloaded from the Europa website at <http://tinyurl.com/k22a7>

In 2007 there was a record number of notifications sent to the EU's Rapid Alert System for Food and Feed - 7,354 in total. There were 961 alerts and 2015 information notifications, with a further 4339 additional information notifications. The high number is mainly attributed to the increase of the additional information notifications - up by 13.5% compared to 2006. Most notifications in 2007 concerned official controls on the internal market (43%), while 42% concerned products from non-EU countries.

Alert notifications are sent when the food or feed presenting the risk is already on the market and immediate action is required. The majority (65%) of alert notifications in 2007 related to products originating in the EU, and most of these problems were detected by controls carried out on the market. Among the risks most reported through these alerts were the presence of potentially pathogenic micro-organisms, foreign bodies, heavy metals (such as mercury in fish) and mycotoxins.

Information notifications are sent when a risk has been identified but immediate action by other Member States is not necessary as the product has not reached their market. Most information notifications (73%) were on products originating in non EU countries.

A number of recurring topics are identified and described in detail. These include:

- Mycotoxins
- Dioxins
- Polycyclic aromatic hydrocarbons (PAH) in fishery products
- Mercury in fishery products
- Residues of veterinary medicinal products
- Foreign bodies
- Pesticide residues

There is also a specific 'country report' on China

## FSA annual report for 2007/08

The Food Standards Agency has published its annual report for 2007/08, available from the FSA website at <http://tinyurl.com/64x7jm>

The Agency says that the report, entitled 'Safe food and healthy eating for all', demonstrates how it has continued to respond in a timely, decisive and proportionate manner to protect public health.

"Our judgements will continue to be based on evidence that is rigorous, transparent and independent, because we believe our success lies in continuing to use the best available scientific evidence and advice."

Chapters in the report are

- Our vision
- Assessing performance
- Food safety
- Eating for health
- Choice
- Effective delivery
- Our resources over the next three years

Appendices include

- Performance against our Strategic Plan targets
- Our environmental position statement

Several chapters identify 'top challenges for the year ahead'

## Healthy Food Code of Good Practice

In January 2008 the Government published 'Healthy Weight, Healthy Lives: a Cross-Government Strategy for England' (from the Cross-Government Obesity Unit, Department of Health and Department of Children, Schools and Families). The strategy document can be downloaded from the Department of Health website at <http://tinyurl.com/36rp5h>

The five key elements of the strategy were described as:

- the healthy growth and development of children:
- promoting healthier food choices:
- building physical activity into our lives:
- creating incentives for better health:
- personalised advice and support:

The proposals for 'promoting healthier food choices' included:

- Setting out a Healthy Food Code of Good Practice to be finalised in partnership with the food and drink industry, including proposals to develop a

single, simple and effective approach to food labelling, and to challenge the industry (including restaurants and food outlets) to support individuals and families reduce their consumption of saturated fat, salt and sugar.

- OFCOM to bring forward its review of the restrictions already introduced on the advertising of unhealthy foods to children.
- Promote Local Authority planning powers to limit the spread of fast food outlets in particular areas e.g. such as close to schools or parks.

The FSA and Department of Health have now written jointly to stakeholders detailing how the programme is to be taken forward

"Within the strand on promoting healthier food choices, there is a challenge to all sectors of the food industry summarised in the Healthy Food Code of Good Practice. The Code sets out seven areas where the Government expects companies in every food sector to take action to demonstrate their commitment to promote healthy eating.

1. A single, simple and effective approach to food labelling used by the whole food industry, based on the principles that will be recommended by the FSA in light of the research currently being undertaken
2. Smaller portion sizes for energy dense and salty foods
3. Rebalance marketing, promotion, advertising and point-of-sale placement, so that we reduce the exposure of children to the promotion of foods that are HFSS and increase their exposure to the promotion of healthy options
4. Reductions in the consumption of and levels of saturated fat and sugar in food - in particular the consumption of drinks with added sugar, along the lines of continuing action on salt
5. Increased consumption of healthy foods, particularly fruit and vegetables
6. All food businesses to work with the FSA, DH and other stakeholders to deliver a single set of key healthy eating messages
7. Information on nutritional content of food in a wide range of settings (eg theme parks, visitor attractions, restaurants, take away foods) to be clear, effective and simple to understand

The stakeholder letter identifies a partnership approach as the way forward, identifying a series of key principles

- Government recognises that the Code is not starting from scratch, and will seek to build on progress to date.
- Government will use current mechanisms to work on elements of the Code wherever possible.

- Work on the Code should not replace or delay any other work to improve diets.
- The Code is intended to be stretching and we are seeking industry commitments which are substantive and quantifiable.
- Clear timescales will be set for the delivery of desired outcomes
- An evidence based approach will underpin the setting of outcomes and milestones
- Government will seek to make progress on all elements of the Code in parallel.
- Openness and transparency, with due respect to commercial confidentiality, and clear monitoring mechanisms.

Overall responsibility for the Healthy Food Code rests with DH Ministers and the Department of Health. However within this overall responsibility, DH and the FSA have more specific policy and programme leads, and an Annex to the stakeholder letter makes clear where day to day responsibility for each of the seven elements of the Code sits. This annex also sets out for each element of the Code the current position, the government's desired outcome and proposed milestones for making further progress."

Further information is available from the FSA website at <http://tinyurl.com/6x63pz>

**Food Matters**  
**Towards a Strategy for the 21st Century**

The Cabinet Office's Strategy Unit has published a report setting out a future strategic framework for food policy and practical measures for addressing issues around food and health, food and the environment and other concerns.

In September 2007, the Prime Minister commissioned the Strategy Unit to undertake a major project on food and food policy. The aims of the work were: to review the main trends in food production and consumption in the UK; to analyse the implications of those trends for the economy, society and the environment; to assess the robustness of the current policy framework for food; and to determine what the objectives of future food strategy should be and the measures needed to achieve them. A major analytical report was published as an interim stage in January 2008.

The final report '**Food Matters: Towards a Strategy for the 21st Century**' is available from the Cabinet Office website at <http://tinyurl.com/6q449h>

The Government identifies key recommendations including:

- Building on the Stern Review and drawing on the UK's world class science base, the UK should take a leadership role in looking at how the world can

meet the twin challenges of climate change and global food security. The Government's Chief Scientific Adviser is commissioning a major new project on this. It will explore how the food system and its associated policies will need to mitigate and adapt to climate change.

- The Government should launch a public engagement about a more joined-up approach to UK food policy that pursues fair prices, safer food, healthier diets and better environmental performance; Defra will work in partnership with DH and FSA, to develop and engage the public and food businesses in a new shared vision to guide future food strategy. This work will be completed by autumn 2009.
- The UK must continue to focus on fair prices, access to food and food security through competitive markets; Defra will shortly be issuing a discussion paper that takes forward this important debate.
- UK government must work with other European countries to promote the role of agriculture in mitigating and adapting to climate change; Defra will take this forward with other major partners, such as Germany and France, to build consensus on priorities and secure effective action.
- A new scheme should be launched to get the public sector in England providing healthier, more environmentally sustainable food. The Department of Health will take forward the development and launch of a new Healthier Food Mark for public food.
- UK government needs to help consumers to access healthier choices when eating out, and need to provide information that considers both the health and environmental aspects of food.

Further information can be found at <http://tinyurl.com/ypmpxq>

**The text below is taken from the Executive Summary and identifies how the Government 'needs to work in partnership with the food chain to bring about change'**

ES.38 The Government will continue to work with the food industry on advancing the Healthy Food Code of Good Practice set out earlier this year in the Government's strategy to tackle the problems of excess weight and obesity in England (Healthy Weight, Healthy Lives). It will look at how it can work with retailers and manufacturers to ensure that barriers to achieving the 5 A DAY target for fruit and vegetables are addressed, looking at accessibility, product placement and the range of products that can count as a portion of fruit or vegetables.

ES.39 Together with industry, the Government will develop a 'whole food chain approach' for identifying

the most important and high-risk food safety hazards in the food supply chain, and the points at which they can be best controlled. This will consider risk from all sources of food safety hazards, not just food-borne disease/microbial hazards, and will focus interventions at the highest risk points in the food chain.

ES.40 The framework put forward in the Stern Review - carbon pricing, new technologies and tackling market barriers - needs to be applied to the full food chain, here in the UK and elsewhere. As this happens, the non-CO2 GHG emissions associated with farming will receive more attention from policy-makers than they have had to date. There are new opportunities for farm businesses to exploit - such as generation of renewable energy from farm waste. But a smarter system for calculating on farm GHG emissions is needed if we are to be able to recognise and reward abatement. The Government has commissioned research to deliver such a system for the UK, and will work with international partners to learn from their approaches. The Government will also continue its leadership role on climate change in Europe by promoting the part that agriculture has to play in both the mitigation of, and adaptation to, climate change.

ES.41 Maintaining global food security while responding to climate change is a critical collective challenge for the 21st century. The Government will continue its global leadership on food security and climate change through its Chief Scientific Adviser commissioning a major new project to examine future global food systems. The project will explore how future systems might evolve in a world adapting to and mitigating climate change. The project will be international in scope, and will consider the implications for policy in the UK.

ES.42 Pressures on the food system today also need attention. The Government will commission an analysis of how the EU's regulations concerning genetically modified (GM) material are interacting with global trends in animal feed production and assess any potential impacts on UK livestock farming. The potential impacts of market trends for the integrity of the regulatory system, and thus for consumer confidence, will also be examined. The UK will continue to lobby for the EU to reach quicker decisions, whether positive or negative, on proposed GM products.

ES.43 A new strategy for packaging waste in England will be developed, set within the framework provided by the Waste Strategy for England. The strategy will encourage more prevention of packaging at source. It will aim to get incentives better aligned along the food chain to encourage more prevention of packaging and more re-use and recycling. It will also aim to improve information flows from manufacturers through retailers, consumers and local authorities to

re-processors.

ES.44 Alongside the development of this strategy the Government will open discussions with food chain businesses on a new voluntary agreement to achieve a demanding net packaging reduction target for 2012 and on a new objective to encourage the use of recycled material. It will also negotiate Courtauld Commitment-type agreements for other business sectors. It will consult with Devolved Administrations about these proposals and their possible extension beyond England.

ES.45 There is huge potential for households to reduce food waste - saving money and helping the environment. The Government will work with industry to set a target for substantial cuts in food waste in homes and business by 2012 and continue to support consumer-facing campaigns. Again, Devolved Administrations will be consulted about possible participation.

#### **On the Healthy Food Code of Good Practice:**

The Government expects companies in each food sector to demonstrate their commitment to addressing the obesity challenge by pledging action to promote healthy eating. It has undertaken to work with industry leaders and other stakeholders to agree a Healthy Food Code of Good Practice, based on the good work already under way. While the wording of the Code will not change, there is scope for agreeing outcomes, goals and milestones. When these are agreed, Ministers and industry leaders will establish the Code as a challenge to the industry as a whole.

#### **There is to be a Healthier Food Mark for the public sector (in England):**

Government should lead by example and commit itself to ensuring that food served by the public sector is healthier, more sustainably sourced, and more efficiently procured

ES.46 The public sector should be leading by example in the delivery of healthier, more environmentally sustainable food. Progress has been made in many areas but there is more to do. In England a promise of nutritious, more environmentally sustainable food will be delivered through a new 'Healthier Food Mark' that will show where healthier, more sustainable food is available. The standards behind the Mark will provide a lever to drive out the inefficiencies that currently hinder cost-effective public food procurement, so that the money spent yields better food.

ES.47 Adoption of the standards required to achieve the Healthier Food Mark will initially be voluntary. But, subject to experience, financial impact, further consultation and development of proposals, the Government will look at making compliance compulsory for central government departments and their

agencies, and prisons, by 2012. And as the scheme progresses, all public bodies in England will eventually be encouraged to sign up.

The criteria for the new Healthier Food Mark should cover:

- the design of menus - which should be nutritionally balanced, appetising and enjoyable, and built around choice and variety;
- sourcing of ingredients that are lower in saturated fat, salt and added sugar; and
- preparation and presentation of food, including portion sizes.

The criteria will also include measures to improve the environmental sustainability of the food procured - in the design and balance of menus, and in the procurement of ingredients (such as adopting the existing Public Sector Food Procurement Initiative guidance on sustainably sourced fish). Criteria should be updated as evidence on what constitutes a low-impact diet becomes clearer.

#### **Waste is identified as a major issue**

UK consumers spend an average of £420 per household each year on food that they then throw away. Eliminating household food waste would deliver major benefits, including a reduction in GHG emissions equivalent to taking one in five cars off UK roads. There are many simple, practical things that can be done by families to reduce the food that they waste (such as storing vegetables in the fridge) and greater efforts should be made to extract the maximum renewable energy from what remains, rather than sending it to landfill.

#### **There is to be a new Food Strategy Task force established:**

The Prime Minister has asked the Cabinet Office to establish and support a Food Strategy Task Force to monitor ongoing developments in the food system and food markets, to drive forward implementation of all the measures in this report and to publish regular updates on progress.

ES.48 The Cabinet Office will chair a new cross-Whitehall Food Strategy Task Force that will coordinate work across government on food issues (including the Government's medium term response to developments in global food markets) and ensure progress in delivering the measures in this report. Subgroups of the Task Force will take forward individual key actions, each chaired by a lead department. The Task Force will report annually to the Prime Minister. The reports will be published.

**A series of 'actions' are identified in the body of the report; these are then brought together in an Action Plan, which identifies the recommendation, the lead department, and implementation timing.**

- Action 3.1: Strategic policy objectives for food
- Action 3.2: A vision and strategy for food
- Action 4.1: Making it easier for consumers to access information on a healthy diet based on safe, low-environmental-impact food
- Action 4.2: Making it easier for consumers to make healthy choices when eating out
- Action 4.3: Aligning marketing and communications campaigns on key messages
- Action 5.1: Effective competition throughout the grocery supply chain
- Action 5.2: A whole food chain approach to tackling food-borne illness
- Action 5.3: Animal feed and the regulation of GM products
- Action 5.4: Increasing consumption of fruit and vegetables so that more people reach and exceed the 5 A DAY target
- Action 5.5: The future of food production in a low-carbon world
- Action 5.6: A smarter system for calculating greenhouse gas emissions from agriculture
- Action 5.7: Action to transform European agriculture's response to the risks, responsibilities and opportunities of climate change
- Action 5.8: A new food packaging strategy for England
- Action 5.9: Reducing food waste and recovering energy
- Action 6.1: Improving the nutritional standards and environmental sustainability of food served in the public sector in England
- Action 7.1: A Food Strategy Task Force
- Action 7.2: Improving food policy outcomes through the performance management framework
- Action 7.3: A joint research strategy for food
- Action 7.4: Public reporting on progress
- Action 7.5: Clarifying the interface between the Department of Health and the FSA on healthy eating

#### **Report on BRE and Regulatory Reform Agenda**

The House of Commons Regulatory Reform Committee has published a report following its inquiry into the effectiveness of the Better Regulation Executive and its role in the Regulatory Reform Agenda

'Getting Results: The Better Regulation Executive and the Impact of the Regulatory Reform Agenda' is available from the House of Commons website at <http://tinyurl.com/58at24>

LACORS has produced a summary of the document which is available from the LACORS Website at <http://tinyurl.com/622h5q>

## Code of Practice on Guidance on Regulation

Following a consultation earlier this year on the "Golden Rules of Good Guidance on Regulation", the Better Regulation Executive of BERR has now published the result as the **Code of Practice on Guidance on Regulation**.

The non-statutory Code, in which a number of the golden rules have been redrafted to reflect consultation responses, is available from the BERR website at <http://tinyurl.com/6heg6v>

BRE has also issued an associated guide to the Code, which is also available from the BERR website and is designed to help officials to meet the Code's requirements when writing guidance on how to comply with the law. (<http://tinyurl.com/6e42dj>)

The Code applies to UK Government Departments and their agencies. According to the Code, any Government guidance on legislation which has a significant impact on business and the third sector should comply with the golden rules:

- **Based on a good understanding of users**  
Effective guidance requires a good understanding of the target audience and their needs. Different types of organisations may have different needs for guidance.
- **Designed with input from users and their representative bodies**  
Input from the users and their representative organisations is important to ensure that the guidance is designed and communicated effectively.
- **Organised around the user's way of working**  
As far as possible, guidance will be aimed at helping businesses understand how the law applies to common business processes.
- **Easy for the intended users to understand**  
Guidance will be written in clear language appropriate to the intended audience. It will be as concise as possible and avoid unnecessary acronyms and jargon.
- **Designed to provide an appropriate understanding of how to comply with the law**  
Businesses should be confident that the guidance will help them understand how to comply with the law by providing a clear explanation of the law. While many regulations have exceptions or complexities, and their application will depend on particular facts, the guidance will give a clear understanding of how to comply in most cases. Simple checklists will be used wherever possible.
- **Issued in good time**  
To give organisations time to prepare for regulations, guidance will be issued at least 12 weeks before a regulation comes into effect, with some necessary exceptions, e.g. emergencies.

Sometimes more than 12 weeks will be needed, for example if a regulation is complex or costly to implement.

- **Easy to access**  
Guidance will be easily available to the user. It will be accessible via [businesslink.gov.uk](http://businesslink.gov.uk). Other forms of communication, including sending guidance directly to businesses or communicating through intermediaries, will also be used where they will be effective.
- **Reviewed and improved**  
Guidance will be reviewed to check it is up-to-date and allow direct feedback to check it works for the users. Guidance will be designed so that users can be confident that they are using the current version.

[Information from the LACORS website at <http://tinyurl.com/5glzm8>]

## Active and intelligent food contact materials

The Food Standards Agency has issued consultation papers on a European Commission proposal for a specific regulation on active and intelligent materials and articles intended to come into contact with food. Comments are requested by 31 August if possible, with a final deadline for comments of 17 October 2008. Full details are available from <http://tinyurl.com/5o25ac>

The general principles on all food contact materials and articles intended to come into contact with foodstuffs are established in Regulation (EC) No. 1935/2004, including 'active' and 'intelligent' materials and articles. The object of the proposed Regulation is to set down additional requirements for active and intelligent materials and articles to ensure their safe use.

## Foods suitable for people intolerant to gluten

The Food Standards Agency is consulting on a draft Commission Regulation concerning the composition and labelling of foods suitable for people intolerant to gluten. The deadline for comments is 30 September 2008.

The proposed Commission Regulation will put in place compositional criteria related to the claims 'gluten-free' and 'very low gluten' for foods that have been manufactured specifically to satisfy the particular nutritional requirements of people who are intolerant to gluten.

In addition, the proposed Regulation will also introduce a provision to allow foods that are naturally free of gluten (i.e. those for normal consumption) to be labelled as 'gluten free' as long as the foods meet certain compositional requirements in relation to the levels of gluten.

Full details are available from <http://tinyurl.com/6y34wc> (for England - there are separate consultations in Scotland, Wales, and N Ireland)

### FSA update on saturated fat work

The FSA has updated industry stakeholders on work to reduce the amount of saturated fat the UK population is eating, which is currently 20% above Government recommendations. More information is available from the FSA website at <http://tinyurl.com/5vcq5b>

The update included progress in the building of partnerships with specific sectors of industry to facilitate the reformulation of foods that contribute the most saturated fat to the diet, and work on portion size, which were both identified as key areas within the Agency's published proposals for work in this area.

The development of a public health campaign was also discussed, which will raise awareness of the health implications of eating too much saturated fat, and give people practical tips on how to choose a diet lower in saturated fat.

The Agency's presentation (**Marketing activity on saturated fats**: 15 July 2008) can be downloaded from <http://tinyurl.com/569ses>

### School meals in Scotland

The Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008 (SSI 2008 No 265) have been published and are available from the OPSI website (together with the associated Executive Note) - <http://tinyurl.com/5fbuvu>

The Regulations prescribe nutritional requirements for food and drink in schools in Scotland. They apply to public schools and grant-aided schools as well as hostels provided and maintained by education authorities. The

two areas regulated are school meals and other food and drink provided on school premises. "School meals" refers to school lunches in all schools covered by the Regulations as well as evening meals provided in hostels.

The Regulations come into effect on 4 August 2008. However, for secondary school pupils, the requirements set out in Schedules 1 to 4 (introduced by regulations 3 and 4) shall have effect on 3 August 2009.

Schedule 3 sets nutrient standards for school meals and specifies the different energy and nutrient contents, which must be provided in the average school meal. There are different levels of nutrient and energy levels for primary and secondary school pupils.

Lower sodium levels for both primary and secondary pupils will have effect on 31<sup>st</sup> December 2010. This phased approach takes account of the current difficulty of achieving the Hungry for Success target for sodium for school meals.

### Explanatory Notes to Combined Nomenclature

The European Commission has published the new consolidated version of the Explanatory Notes to the Combined Nomenclature (CN).

The Explanatory Notes to the CN are an important aid for interpreting the scope of the various tariff headings but do not have legally binding force. The Explanatory Notes were established by Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff.

The latest version is now available from EU Official Journal No C 133 of 30 May 2008. Copies can be downloaded from the Eur-Lex website at <http://tinyurl.com/5nesqq> (Note large file size - 13 MB)

**Note:** TinyURLs™ are used in this newsletter to replace some long web addresses, to help readers in obtaining further information from the websites concerned.

For more about TinyURL™ ('Making long URLs usable'), visit <http://tinyurl.com/>. TinyURL was created as a free service to make posting long URLs easier, and is a trademark of Gilby Productions

### Please Note that the BFFF Office has relocated

Members of the British Frozen Food Federation requiring further information about any item in this newsletter should contact Ian Farley, Technical and Legislative Co-ordinator

British Frozen Food Federation  
Warwick House

Tel: 01400 283090 / 283094 (dir) Fax: 01400 283097  
Mobile: 07714 671840 E-mail: [ianfarley@bfff.co.uk](mailto:ianfarley@bfff.co.uk)

Long Bennington Business Park  
Long Bennington, Newark NG23 5JR