

The proposed approach to amendments to Welsh domestic legislation for food and feed safety and hygiene, food compositional standards, labelling

Consultation Summary Page

Date launched:	7th January 2019	Closing date:	4th February 2019
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Who will this consultation be of most interest to?
 Enforcement authorities, manufacturers, wholesalers, retailers of food products and other stakeholders with an interest in food and feed law.

What is the subject of this consultation?
 This consultation concerns proposed technical amendments to domestic legislation applying in Wales on food and feed hygiene and safety, and food compositional standards and labelling to ensure that this legislation can continue to operate after the UK has left the EU.

What is the purpose of this consultation?
 To provide stakeholders with the opportunity to comment on our proposals to make technical fixes to the relevant domestic legislation, and on our options for the more substantive corrections that may be required in relation to food compositional standards and labelling.

Responses to this consultation should be sent to:

Kerys James-Palmer Food Standards Agency 11th Floor Southgate House Wood Street Cardiff	Email: food.policy.wales@food.gov.uk
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Impact Assessment included?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> See Annex A for reason.
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The proposed approach to amendments to welsh domestic legislation for food and feed safety and hygiene, food compositional standards, labelling.

Detail of consultation

Food Standards Agency in Wales (FSA) would welcome your comments on our proposals.

Introduction

1. We are consulting on proposed amendments to domestic legislation on (a) food and feed hygiene and safety, and (b) food compositional standards and labelling. These areas of work are split across different government departments and are therefore being addressed separately within this document.
2. The Department of Health and Social Care (DHSC) on FSA UK advice will be making corrections to the retained direct EU legislation in relation to food and feed hygiene and safety and Defra will be making corrections to the retained direct EU legislation in relation to food labelling. No amendments are required to the current EU law on food compositional standards.
3. The amendments to the domestic legislation are required to ensure that a range of provisions can continue to operate after the UK has left the EU. The amendments proposed, and options explained, would apply if the EU and the UK were not to agree a transition period or a partnership arrangement and common approach to food legislation after the UK leaves the EU.
4. Where there are options on what amendments should be made, they are described in this document.

Proposals

5. The proposed amendments are relatively minor technical fixes, covering a range of issues such as:
 - Consequential amendments caused by amendments/revocations to Articles in EU Regulations which these domestic Regulations enforce.
 - References to “other’ Member States’/third Countries’ which are no longer appropriate post-exit.
 - Removing redundant provisions in Welsh legislation referring to European Commission (Commission) functions exercisable in Wales (e.g. provisions conferring power on Commission employees to enter property in Wales). The corrections to be made to retained direct EU law by the UK Government will remove the Commission’s functions in relation to Wales.
 - Removing references to payments in Euros.
6. In addition to these minor technical fixes, more substantial policy options need to be considered in relation to food labelling and compositional standards

Background

7. Following the EU exit referendum result in 2016, the FSA in Wales has been reviewing the operability of all food and feed domestic legislation applying in Wales for which it has policy responsibility. The purpose of the review is to identify the amendments needed to the legislation to ensure that it is operable after the UK leaves the EU.
8. The Regulations proposed will address necessary corrections identified as being required in our domestic regulations in relation to (a) food and feed hygiene and safety and (b) food compositional standards and labelling. These domestic regulations mainly provide for the enforcement of directly applicable EU regulations. In relation to food compositional standards, they also transpose EU Directives. The corrections that need to be made to directly applicable EU legislation in this area were subject to separate consultations in September and October 2018:
 - <https://www.food.gov.uk/news-alerts/consultations/proposed-approach-to-retained-eu-law-for-food-and-feed-safety-and-hygiene>
 - <https://consult.defra.gov.uk/food/food-labelling-amending-laws/>

Proposed changes

9. Corrections are likely to be required to the following SIs–

Food and Feed Hygiene and Safety

- The Genetically Modified Food (Wales) Regulations 2004
- The General Food Regulations 2004
- The Food Hygiene (Wales) Regulations 2006
- The Official Controls (Animals, Feed and Food) (Wales) Regulations 2007
- The Fishery Products (Official Control Charges) (Wales) Regulations 2007
- The Quick-frozen Foodstuffs (Wales) Regulations 2007
- The Meat (Official Controls Charges) (Wales) Regulations 2009
- The Food Irradiation (Wales) Regulations 2009
- The Official Feed and Food Controls (Wales) Regulations 2009
- The Plastic Kitchenware (Conditions on Imports from China) (Wales) Regulations 2011
- The Materials and Articles in Contact with Food (Wales) Regulations 2012
- The Food Safety (Sampling and Qualifications) (Wales) Regulations 2013
- The Food Additives, Flavouring, Enzymes and Extraction Solvents (Wales) Regulations 2013
- The Animal Feed (Composition, Marketing and Use) (Wales) Regulations 2016
- The Novel Foods (Wales) Regulations 2017

Food Compositional Standards and Labelling

The Food (Lot Marking) Regulations 1996
The Bread and Flour Regulations 1998
Spreadable Fats (Marketing Standards) and the Milk and Milk Products (Protection of Designations) (Wales) Regulations 2008
The Fish Labelling (Wales) Regulations 2013
The Food Information (Wales) Regulations 2014
The Products Containing Meat etc. (Wales) Regulations 2014
The Honey (Wales) Regulations 2015
The Country of Origin of Certain Meats (Wales) Regulations 2015
The Natural Mineral Water, Spring Water and Bottled Drinking Water (Wales) Regulations 2015
The Caseins and Caseinates (Wales) Regulations 2016
The Jam and Similar Products (Wales) Regulations 2018

10. Most of the proposed amendments are relatively minor technical fixes which will not equate to a change in policy, and will cover a range of issues, for example, removing references to the EU or payments in Euros. The amendments will also include minor technical changes to the Spreadable Fats (Marketing Standards) and the Milk and Milk Products (Protection of Designations) (Wales) Regulations 2008, for which Welsh Government has policy responsibility.
11. The amendments will not result in a material change in the level of protection the Wales domestic legislation provides to human health, or to the high standards of food and feed (including the provision of food information and labelling).
12. In addition to these minor technical fixes, more substantial policy options need to be considered for food labelling and compositional standards legislation as set out below.

Honey – Country of Origin

13. The Honey (Wales) Regulations 2015 require honey packaging to show the country of origin of the honey. Where the honey is blended, using honey from more than one country of origin, it can currently be labelled as 'EU', 'non-EU' or 'EU and non-EU' (or else list the individual countries of origin).

Options:

Option 1 – no change

14. If current rules for showing the honey's country of origin were retained, honey packaging would continue to be required to either show all of the countries of the honey's origin or indicate whether the honey originated from EU countries. FSA does not consider that this option of retaining EU-focussed labelling would be appropriate once the UK leaves the EU.

Option 2 – ‘a blend of honey from more than one country’

15. Under this option, the term ‘a blend of honey from more than one country’ could be shown on the label instead of listing the individual countries of origin. This option might increase the labelling burden on producers initially (but see below about the possible inclusion of a transitional provision), but it is considered a less burdensome option for UK businesses than option 3. Only one form of words would be required for all blended honey from more than one country, thus making it easier for relevant food businesses. Consumers will still be aware that the honey consists of a variety of honey from differing origins but would not be able to identify blends of European honey from non-European blends.
16. As part of this Option, a transitional provision could be inserted to allow food businesses to place and keep on the market products labelled before exit day in compliance with the current EU-focussed labelling requirements.

Option 3 – ‘UK’/‘non-UK’

17. Under this option, instead of listing the individual countries of origin, producers would be permitted to use the terms ‘blend of UK and non-UK’ or ‘blend of non-UK’ on honey labels. However, this may be impractical because UK origin honey is generally sold as a single-origin product and rarely blended. This option would also increase the labelling burden on producers by requiring new labelling on blended honey from more than one country currently using the ‘EU’/‘non-EU’ wording (as opposed to listing individual countries of origin), prove costly to businesses where no UK-blend alternatives are available, and may suggest an inferior product.
18. To mitigate some of this additional burden a transitional provision could be inserted to allow food businesses to place and keep on the market products labelled before exit day in compliance with the current EU-focussed labelling requirements.

Q1: Do you agree that the assumption laid out in paras 14 – 18 reasonable?

Q2: What do you consider to be the best option of those described?

Please provide evidence to support your view.

Q3: Do you consider a transitional period is necessary for options two and three?

Q4: How long do you consider such a transitional period should be?

Please provide evidence to support your view.

Recognition of Natural Mineral Waters

19. The Natural Mineral Water, Spring Water and Bottled Drinking Water Regulations (Wales) 2015 (“bottled water regulations”) implement, among other things, EU legislation that requires natural mineral waters (NMWs) to go through a process of recognition to prove that they have the necessary composition and characteristics to be sold and marketed as NMWs in all EU Member States. Recognition is carried out by individual Member States in line with EU rules.
20. Currently 63 NMWs (60 domestic and three from current third countries) are recognised by the UK, having undergone a full recognition process in the UK.
21. There is a need to amend the current regulations once we leave the EU on 29th March 2019, whether with a future economic partnership agreement or in the context of a no deal scenario. If we were to leave the regulations un-amended, the wording of the current rules in the new context would bring unintended consequences:
 - Leaving references to Directive 2009/54 in place, rather than specifying the relevant legislation for each of the four administrations in the UK, could create ambiguity over Wales’s ability to determine what can be advertised, sold or otherwise traded as NMW in Wales. There is also a risk that English, Northern Ireland and Scottish NMWs could no longer be traded in Wales.
22. To ensure continued operability, the domestic rules must be changed, and the text amended to fit the UK’s new status out-with the EU.
23. The EU Commission has indicated that unless a future trade agreement or economic partnership agreement provide otherwise, the NMWs that had their recognition process undertaken by the UK will no longer be recognised in the EU market immediately after the UK leaves the EU. Please see link to the Commission Notice in the “other relevant documents” section of this consultation letter.
24. The Wales legislation provides for non-EU producers of NMWs to submit individual applications to trade in Wales to the Food Standards Agency. The process involves providing a large and complex amount of data, which in most cases needs to be gathered for up to two years prior to application. For successful applications, recognition lasts for five years, after which the producer must renew their recognition under a simplified process based on information supplied by the relevant authorities in the source country. In a scenario where the EU and the UK were not to agree a partnership arrangement and common approach to NMW recognition, the Welsh rules in the field of exploitation and marketing of NMWs would apply to producers in the EU Member States.
25. In 2016, the UK imported £116.3m worth of NMWs from the EU. French brands such as Evian and Volvic are respectively the top selling and third bestselling NMW brands in the UK.

Options for change – Recognition of natural mineral waters:

Option 1 – Removing the recognition for EU recognised natural mineral waters from day one after the UK's exit from the EU

26. This option would mean that EU NMWs would no longer be recognised in Wales immediately after a no-deal exit from the EU. Should the same amendments be made to the equivalent domestic legislation in force in the rest of the UK, the EU NMWs would no longer be recognised anywhere in the UK. These NMWs would need to submit a full application to one of the UK administrations to secure recognition before they could be legally sold as NMW in the UK.
27. This option would not maintain continuity for businesses and could give rise to the • Impact on consumer choice of NMW (as many as one in every three bottles of NMW sold in the UK are imported from the EU).
- Fluctuation in prices for the consumer, due to market forces.
 - Market changes which could also move the consumer to choose a different category of bottled water, i.e. spring water, bottled drinking water, to a different beverage, such as flavoured waters and other soft drinks, or away from purchasing beverages to consuming mains water. This would affect all NMW producers, domestic and imported.
 - Opportunities for Wales NMWs to expand their market share.
28. The FSA recognises that this option would have an impact on businesses that hold stock when the UK exits the EU. We would like information and evidence on the extent of these impacts and to what extent a transitional arrangement, whereby existing stock can be sold, but no new product imported, would mitigate against these impacts.

Option 2 – Rolling over of recognition of existing EU natural mineral waters

29. It is possible to take a unilateral approach and roll over existing recognitions of NMWs sourced in the EU. This would provide continuity and stability for businesses and consumers.
30. Rolling over the recognition of existing EU NMWs allows maintenance of the status quo for existing NMWs, wherever in the EU the recognition process took place. This reflects the position that recognised NMWs were safe at the time of EU Exit and therefore there is no reason to assume they are not after EU Exit.
31. However, the continuation of that arrangement would only be guaranteed for the first six months after EU Exit and not be guaranteed in perpetuity. A decision could be made at some point in the future to withdraw the rolled-over recognitions, depending on discussions with the EU and considerations at the time, always after a given period of notice.
32. If a decision were indeed to be made for recognition of EU NMWs to be withdrawn, after the initial six months plus the notice period, it would then be necessary for the water to be formally recognised in Wales by making an application under the Bottled Water Regulations.

33. This option will remove (or delay) the need for NMWs that had their recognition process undertaken elsewhere in the EU to undergo an immediate UK recognition process, ensuring continued stability in the market, which could otherwise affect market prices and consumer choice and confidence immediately after exit.
34. At the same time, this option would give Wales, working with the other administrations in the UK more time for consideration and an added period of flexibility to decide if, and when, to require the producers of NMWs, that had their sources recognised elsewhere in the EU, to make representations of their safety and quality conditions to administrations in the UK. This would enable Wales and the other administrations in the UK to maintain full control of the recognition, quality and safety of NMWs that had their source's recognition procedure undertaken elsewhere in the EU.

Option 3 – Rolling over of recognition of existing EU natural mineral waters for five years

35. For NMWs that had their recognition process undertaken elsewhere in the EU this option proposes continued recognition in Wales for a period of five years after the UK leaves the EU. Should the same amendments be made to equivalent domestic legislation in force in the rest of the UK, they would be required to undergo a full recognition process in order to continue to be sold in Wales and the rest of the UK at the end of the five-year period. Currently non-EU country producers are required to renew their recognition after five years.
36. This option would delay the need to process applications for five years ensuring stability in the market and market prices, and consumer choice and confidence in the interim.
37. On the other hand, this option – while enabling administrations in Wales and the rest of the UK to maintain full control of the recognition, quality and safety of the EU natural mineral waters – is a lengthy period to commit to no change.

Q5: Do you agree that the assumptions laid out in paras 24 - 34 are reasonable?

Q6: What do you consider to be the best option of those described?
Please provide evidence to support your view.

Q7: How long would such a transitional period need to be to ensure that the impacts of Option 1 were mitigated against.

Q8: If you support Option 1, do you think there should be a transitional period during which stock held prior to exiting the EU may continue to be placed on the UK market?

Q9: How long would such a transitional period need to be to ensure that the impacts of Option 1 were mitigated against.

Please provide information and evidence on the possible impacts of Option 1 if no such transitional period were allowed in your answers to the "Impacts" section below.

Transitional provisions – food labelling

38. The FSA considers that an appropriate period of adjustment and transition could be granted, following the UK's exit from the EU, during which food meeting the food labelling requirements in place prior to leaving the EU may continue to be placed on the market.
39. In this respect, we propose that transitional provisions be inserted into the Food Information (Wales) Regulations 2014 and the Country of Origin of Certain Meats (Wales) Regulations 2015. This is in addition to the transitional provision that is proposed for the Honey (Wales) Regulations 2015.

Food Information (Wales) Regulations 2014

40. As part of their UK-wide corrections to retained direct EU Regulation 1169/2011 on food labelling, the UK Government is proposing to amend Article 8 of that Regulation so as to effectively require food labels to display the name and address, in the UK, of the food business responsible for the food, or the name and address of its importer into the UK. Currently, the food label must display an address anywhere in the EU.
41. The effect of the UK Government's amendment to Article 8 of Regulation 1169/2011 is that businesses who wish for their foods to be placed on the market in the UK must be established in the UK or must have their foods imported into the UK by a UK importer. This may have significant implications for food businesses currently based in the EU 27 who wish for their foods to be sold in Wales.
42. The proposed transitional provision would mean that food businesses could, for a specified period of time (for example 18 months), continue to label foods and place them on the market even if the food label only displays the food business'/importer's address in the EU-27. Such products could then remain on the market until stocks are exhausted. UK Government have also consulted on similar transitional provisions.

Country of Origin of Certain Meats (Wales) Regulations 2015

43. The UK Government are proposing to make UK-wide corrections to retained direct EU Regulation 1337/2013 on the indication of the country of origin of meats of swine, sheep, goats and poultry. The amendments include corrections to Articles 5-7 of the Regulation in order to replace the current EU-focussed labelling requirements. For example, Article 5 currently requires specified types of slaughtered swine, sheep, goats and poultry to be marked with "Reared in: several member States of the EU". The amendments will change the requirement so that the specified meat must be labelled "Reared in: several countries".
44. EU Regulation 1337/2013 is enforced in Wales by the Country of Origin of Certain Meats (Wales) Regulations 2015. A transitional provision could allow food businesses to place/keep on the market meat that they label, pre-EU exit, with the current EU-focussed labelling requirements. Food businesses would be able to keep the products on the market until the exhaustion of stocks. This would lessen any potential impact that the labelling amendments would have on food businesses.

Q10: Do you consider a transitional period is necessary?

Q11: How long do you consider such a transitional period should be?

Please provide evidence to support your view.

Impacts

Food and Feed Hygiene and Safety

One-off Familiarisation Costs

Industry

45. We assume that all registered food establishments are concerned with this area of legislation and will therefore have to invest in understanding the new legislation. According to the ONS Inter Departmental Business Register (IDBR) there were 292,860 businesses active in the agri-food sector in the UK in 2017. We envisage minimal one-off familiarisation costs to business. We estimate that it will take each business up to 2 hours to read and understand the proposed regulations and then disseminate the information to key staff within their firm. It is unlikely that the envisaged changes will present any other impact on businesses' day to day operations as the rules are not changing because of these proposals.

Enforcement

46. There are 22 Local Authorities (LAs) in Wales. We envisage minimal one-off familiarisation costs to LAs; we estimate that it will take authorities up to 2 hours to read and familiarise themselves with the EU Regulations and then disseminate to staff and key stakeholders. It is estimated that one officer in each of these authorities (one Food/Feed Officer from each local authority; and one 'Port Health Officer' from each PHA) will need to undertake this task.

47. Compared with the current system, there would be no additional or new burden on enforcement bodies, other than those identified in the costs above.

Benefits

48. There are no incremental benefits associated with the proposal as it does not impose additional or new burdens on business and enforcement bodies.

Food Compositional Standards and Labelling

Impact of changes to the Honey Regulations

49. In relation to options two and three, we anticipate that the key non-monetised costs would be those related to relabelling, and familiarisation costs. This would affect all businesses producing blended honeys from more than one country currently using the EU / non-EU terminology. The inclusion of the proposed transitional period could give businesses more time to comply with the new

requirements and could allow for relabelling costs to be subsumed into planned labelling changes.

We wish to use this consultation to gather evidence and would welcome comments on any costs or benefits which you think we may not have considered or alternative views about the assumptions made in this section

Impact of changes to the NMW Regulations

50. For Policy Option 1 there will be impact on distributors and retailers that hold stock after EU exit if EU NMWs are no longer recognised and are therefore not permitted to be placed on the UK market. There may also be costs in finding new products and distribution networks for Welsh businesses that currently rely on, store or sell only EU brands.
51. Option 1 may provide opportunities for Welsh businesses producing NMWs to expand into any gap left by the removal of EU NMWs from the UK market. This will depend on the scalability of such businesses, and their ability to access distribution networks.
52. For natural mineral waters, the key non-monetised costs by 'main affected groups are not significant for Policy Option 2 and Option 3 since these options represent the status quo immediately after EU Exit. As such no economic impact has been foreseen, since there would be no difference to what is occurring right now. In terms of the key non-monetised benefits by 'main affected groups', it maintains the current level of consumer choice, market stability, both in terms of prices and market share.

We wish to use this consultation to gather evidence and would welcome comments on any costs or benefits which you think we may not have considered or alternative views about the assumptions made in this section

53. We have not produced an Impact Assessment at present but will revisit, depending on stakeholder feedback to this consultation.

Consultation Process

54. A 4-week consultation is being launched to provide interested parties with the opportunity to comment on the proposals.
55. Any responses received as part of this consultation will be given careful consideration and a summary of the responses received will be published on our website within three months of the proposed regulations being made.

Summary of consultation questions

Honey

Q1: Do you agree that the assumption laid out in paras 14 - 18 reasonable?

Q2: What do you consider to be the best option of those described?

Please provide evidence to support your view.

Q3: Do you consider a transitional period is necessary for options two and three?

Q4: How long do you consider such a transitional period should be?

NMW

Q5: Do you agree that the assumptions laid out in paras 24 - 34 are reasonable?

Q6: What do you consider to be the best option of those described?
Please provide evidence to support your view.

Q7: How long would such a transitional period need to be to ensure that the impacts of Option 1 were mitigated against.

Q8: If you support Option 1, do you think there should be a transitional period during which stock held prior to exiting the EU may continue to be placed on the UK market?

Q9: How long would such a transitional period need to be to ensure that the impacts of Option 1 were mitigated against.

Transitional provision – food labelling

Q10: Do you consider a transitional period is necessary?

Q11: How long do you consider such a transitional period should be?

Welsh Language

Q12: Do you consider that the policy/Regulations will have an effect on opportunities for use of the Welsh language?

Q13: We would like to know your views on the effects our proposed regulations would have on the Welsh language,

specifically, on:

- i) opportunities for people to use Welsh and
- ii) on treating the Welsh language no less favourably than English.

Q14: What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Other relevant documents

List of natural mineral waters recognised in the UK

<https://www.gov.uk/guidance/food-standards-labelling-durability-andcomposition#bottled-water>

Commission Notice

https://ec.europa.eu/food/sites/food/files/safety/docs/notice_brexit_mineral_waters.pdf

Responses

37. Responses are required by close 4th February 2019. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation/company (including details of any stakeholders your organisation represents).

Thank you on behalf of the Food Standards Agency for participating in this public consultation.

Yours,

**Kerys James-Palmer
Food Standards Agency
11th Floor Southgate House
Wood Street
Cardiff**

Enclosed

Annex A: Standard Consultation Information

Annex B: List of interested parties

Annex A: Standard Consultation Information

Disclosure of the information you provide

Information provided in response to this consultation may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want information you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

Any automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding.

The Food Standards Agency will be what is known as the 'Controller' of the personal data provided to us.

Why we are collecting your personal data and what we do with it

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

The Data Protection Act 2018 states that, as a government department, the Food Standards Agency may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

We retain personal information only for as long as necessary to carry out these functions, and in line with our retention policy. This means that this information will be retained for a minimum of 7 years from receipt.

All the personal data we process is located on servers within the European Union. Our cloud based services have been procured through the government framework agreements and these services have been assessed against the national cyber security centre cloud security principles.

No third parties have access to your personal data unless the law allows them to do so. The Food Standards Agency will sometimes share data with other government departments, public bodies, and organisations which perform public functions to assist them in the performance of their statutory duties or when it is in the public interest.

What are your rights?

You have a right to see the information we hold on you by making a request in writing to the email address below. If at any point you believe the information we process on you is incorrect you can request to have it corrected. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO) at <https://ico.org.uk/>, or telephone 0303 123 1113.

Our Data Protection Officer in the FSA is the Information Management and Security Team Leader who can be contacted at the following email address:
informationmanagement@food.gov.uk

Further information

If you require a more accessible format of this document please send details to the named contact for responses to this consultation and your request will be considered.

Annex B: List of interested parties

Agriculture and Horticulture Development Board
NFU Cymru
FUW (Farmers Union of Wales)
HCC (Hybu Cig Cymru) (Meat Promotion Wales)
NSA National Sheep Association
FAWL Farm Assured Welsh Livestock
NFMFT (National Federation of Meat and Food Traders)
WLBP Welsh Lamb and Beef Producers
Seafish
SAGB (Shellfish Association of Great Britain)
Welsh Fishermans Association
Menai Mussels
Federation of Small Businesses
Provision Trade Federation
Zero to five
Horeb Food Centre
Food Technology Centre
Prima Foods
Ultrapharm
Finsbury Foods
CH Foods
British Soft Drinks Association
BHA British Hospitality Association
British Retail Consortium
The Preselli Gold Sausage Co
Jersey Bakery Ltd
GRH Food Company Ltd
Burger Manufacturing Company Limited
EuroCaps Ltd
Tillery Valley Foods Ltd
Gwaun Valley Meats

Cardiff Metropolitan University
Shoda Sauces Europe Company Limited
James Hall & Co Ltd
The Food Technology Centre
Mitchells & Butlers plc
Castell Howell Foods Ltd
Dunbia (Wales)
Minton, Treharne & Davies Limited
Mirandas Preserves
National Farmers Union Cymru
Farmers Union of Wales
Hybu Cig Cymru - Meat Promotion Wales
Farm Assured Welsh Livestock
Cardiff Metropolitan University
British Sandwich Association
Royal Welsh Agricultural Society
Cig Oen Caron
ABP Food Group
3M Health Care Limited
FoodChain Europ Ltd
Council of The Welsh Highland Shepherds
Minton, Treharne & Davies Limited
Goch & Company Ltd
Sweet Delights
Carmarthenshire Cheese Company Pont Gar
Welsh Hills Bakery
Castell Howell Foods Ltd
Baraka Foods Ltd
The Patchwork Traditional Food Company
National Sheep Association Cymru Wales
Farmers For Action
Aberystwyth University
British Association for Shooting and Conservation

National Farmers Union Cymru
Hybu Cig Cymru - Meat Promotion Wales
Food Centre Wales
Guild of Welsh Lamb & Beef Suppliers
British Institute for Allergy & Environmental Therapy
Farmers Union of Wales
British Association for Shooting and Conservation
Farmers Guardian
Welsh Lamb and Beef Producers Ltd
National Federation of Meat and Food Traders
Lower Bank Farm
CDSC, National Public Health Service for Wales
St Merryn Meats Limited
Tillery Valley Foods Ltd
Llanwenog Sheep Society
Abergavenny Consultancy Ltd
National Sheep Association Cymru Wales
Natural Resources Wales
National Trading Standards Board
Welsh Government
Welsh Local Government Association (WLGA)