

## **EXECUTIVE NOTE**

### **The Feeding Stuffs (Scotland) (Amendment) Regulations 2006 SSI/2006/516**

The above instrument is made under powers conferred by section 2(2) of the European Communities Act 1972(a) and of all other powers enabling them in that behalf. The instrument is subject to negative resolution procedure.

#### **Policy Objectives**

1. The Feeding Stuffs (Scotland) Amendment Regulations 2006, further to this known as the Regulations, will apply to Scotland only. There will be separate but parallel legislation for England, Wales and Northern Ireland.
2. These Regulations are intended to provide for the implementation in Scotland of one of the provisions of Council Directive 2002/2/EC, requiring compound animal feeds to be labelled to state the percentage inclusion of each ingredient ("percentage listing"). The Regulations implementing Directive 2002/2/EC came into force on 6 November 2003, but -- on an application by some UK feed companies -- the provisions of those Regulations that concerned percentage listing were suspended before that date by order of the Court of Session, pending a reference to the European Court of Justice (ECJ) for a ruling on the validity of the percentage listing provisions of the Directive.
3. In December 2005, the ECJ ruled that the Directive's requirement for compound feed manufacturers to declare the percentage of each ingredient within a tolerance of +/-15% was proportionate and therefore a valid part of EC law. However, another requirement for manufacturers to disclose exact percentage information to customers on request was rejected by the Court on the grounds that it was disproportionate.
4. The Regulations will re-introduce into law in Scotland an EC measure which requires compound animal feedingstuffs to be labelled with a list of ingredients in descending order by their percentage weight of inclusion, within a tolerance of +/-15% for each declaration. The Directive containing this measure had originally been brought forward by the Commission as one of a number of pieces of legislation which it was claimed would improve feed safety.

#### **Consultation**

5. The Food Standards Agency carried out a public consultation in Scotland between 27 March 2006 and 19 June 2006, to seek views on the draft Regulations from a wide range of stakeholders including consumer organisations, non-Governmental organisations, the food industry, and enforcement authorities. One Scottish response was received to the consultation. These responses did not raise any significant issues.

## **Manpower and Financial Effects**

6. The measure does not have implications for central government or Local Authorities.

Food Standards Agency Scotland  
October 2006

### **LIST OF INTERESTED PARTIES**

ABP Scotland	Edinburgh Smoked Salmon
Agriculture Industries Confederation (AIC)	Express Dairies Direct Service
AHDA	Falkirk Council Development Services
AIC Scottish Council	Federation of Small Businesses Scotland
Allied Distillers	First Milk
Alsop Transport Services	Fisheries Research Services
Association of Meat Inspectors	Food Certification (Scotland) Ltd
Association of Public Analysts of Scotland	Food Training and Consulting Company
Assured Chicken Production (ACP)	FRS Marine Laboratory
Barbour Index	Fusion Linking
Biotechnology and Biological Sciences Research Council	Glasgow Caledonian University
British Egg Industry Council	Glasgow Metropolitan College
British Egg Products Association	Glasgow Scientific Services
British Goat Society	Glasgow University Veterinary School
British Marine Finfish Association	Glengorm Estate
British Poultry Council	Glenside Organics
British Trout Association	Grampian Country Food Group
British Veterinary Association	Green City Wholefoods
Business Gateway	Greenpeace
Caledonian Cheese Company	Greggs, Scotland
Campden & Chorleywood Food Research Association Group	Guinness UDV
Charis Innovative Food Services Ltd	Halal Food Authority
Chilled Food Association Ltd	Harbro, Scotland
Commercial Microbiology Ltd	Highland Cattle Society
Co-operative Group (CWS) Ltd	Highlands & Islands Enterprise
CoSLA	Independent Farming Group Scotland
Dairy Herd Health & Productivity Service	Institute of Auctioneers and Appraisers in Scotland
Dairy UK – Scotland	James Finlay Ltd
Davidson Bros (Shotts) Ltd	LACORS
Diageo	Landcatch Ltd
Dundee College	Macaulay Land Research Institute
	Malt Distillers Association of Scotland
	Marks & Spencer

McAusland Cranford  
Meat & Livestock Commission  
Moray Seafood Ltd  
Moredun Research Institute  
Napier University  
National Beef Association  
Natural Environmental Research  
Council  
NBA Scotland  
Neogen Europe Ltd  
NFU Scotland  
North Atlantic Fisheries College  
Organic Food Federation  
Orkney Meat Ltd  
Puremalt Products Ltd  
Quality Meat Scotland  
Quality Trout UK Ltd  
Road Haulage Association Ltd  
Robert Gordon University  
Robert Wiseman Dairies  
Roslin Institute  
Rowett Research Institute  
Royal College of Nursing  
Royal Environmental Health  
Institute for  
Scotland  
Royal Society of Edinburgh  
ruma  
Sanquhar Academy  
Scotch Whisky Association  
SCOTSS  
Scottish Agriculture College  
Scottish Association of Master  
Bakers  
Scottish Chambers of Commerce  
Scottish Civic Forum  
Scottish Consumer Council  
Scottish Council for Development  
and  
Industry  
Scottish Crofting Foundation  
Scottish Crop Research Institute  
Scottish Egg Producer Retailers  
Association  
Scottish Enterprise  
Scottish Environment Protection  
Agency  
Scottish Environmental Research  
Centre

Annex 5  
Scottish Federation of Meat  
Traders  
Association  
Scottish Flour Millers Association  
Scottish Food & Drink Federation  
Scottish Food Quality Certification  
Ltd  
Scottish Food Safety Officers  
Association  
Scottish Gamekeepers Association  
Scottish Local Authorities  
Scottish Quality Salmon  
Scottish Retail Consortium  
Scottish Rural Property and  
Business  
Association  
Scottish Salmon Smokers  
Association  
Scottish Sea Farms Ltd  
Scottish Seed & Nursery Trade  
Association  
Scottish Water  
Sea Fish Industry Authority  
SEERAD  
Shetland Salmon Farmers  
Association  
Shetland Seafood Quality Control  
SIMBOIS  
Society of CO's Environmental  
Health in  
Scotland  
Spitfire Resources  
Strathaird Salmon Ltd  
SWRI  
Tesco Stores Ltd  
Trading Standards Institute  
UK Association of Frozen Food  
Producers  
UNIQ Prepared Foods  
United Fish Products  
University of Aberdeen  
University of Glasgow  
University of Paisley  
USDAW  
Verner Wheelock Associates  
W Forrest & Sons Ltd  
2 Members of the Public

# **PARTIAL REGULATORY IMPACT ASSESSMENT**

## **1. TITLE OF THE PROPOSAL**

### **THE FEEDING STUFFS (SCOTLAND) (AMENDMENT) REGULATIONS 2006**

**Implementation of Directive 2002/2/EC of the European Parliament and of the Council of 28 January 2003 amending Council Directive 79/373/EEC on the circulation of compound feedingstuffs and repealing Commission Directive 91/357/EEC.**

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

2.1 These Regulations are intended to provide for the implementation in Scotland of one of the provisions of Council Directive 2002/2/EC, requiring compound animal feeds to be labelled to state the percentage inclusion of each ingredient ("percentage listing"). The Regulations implementing Directive 2002/2/EC came into force on 6 November 2003, but -- on an application by some UK feed companies -- the provisions of those Regulations that concerned percentage listing were suspended before that date by order of the Court of Session, pending a reference to the European Court of Justice (ECJ) for a ruling on the validity of the percentage listing provisions of the Directive.

### **i) The Objective**

2.2 The Regulations will re-introduce into law in Scotland an EC measure which requires compound animal feedingstuffs to be labelled with a list of ingredients in descending order by their percentage weight of inclusion, within a tolerance of +/-15% for each declaration. The Directive containing this measure had originally been brought forward by the Commission as one of a number of pieces of legislation which it was claimed would improve feed safety.

### **ii) The Background**

2.3 Since 1991, the ingredients of compound (i.e. manufactured) animal feeds have had to be declared in descending order by weight, either by category of ingredient or by the specific names of the ingredients. In 2000, the Commission introduced a proposal to delete the category option for feed for farmed livestock and to require ingredients to be declared in descending order by their percentage rate of inclusion. The Commission justified this proposal with a claim that it would improve the traceability of feed materials and transparency for feed purchasers (i.e. livestock farmers).

2.4 Member States, including the UK, supported the deletion of the category option. However, some Member States, again including the UK, argued against the percentage declaration of the ingredients of compound feedingstuffs on the grounds that: it was not required for human food; there had been no calls for it from feed purchasers; and it would add little if anything to the other nutritional and analytical information already required under EC animal feed law. Some feed manufacturers also opposed the proposal on the grounds that by requiring them to declare the exact formulations of their products it would compromise commercially sensitive research and formulation information.

2.5 The Council and Commission subsequently compromised on declaration in five separate percentage bands, but full percentage declaration was favoured by the European Parliament and the proposal therefore remained deadlocked for over a year. The proposal seemed set for formal reconciliation procedures until another compromise proposal for full percentage listing with a tolerance of +/-15% to allow for variations in declared analyses gained qualified majority support in Council. Feed manufacturers would additionally be obliged to provide customers with exact percentage information on request. This proposal was subsequently accepted by the European Parliament and adopted as Directive 2002/2/EC.

2.6 The UK voted against this compromise proposal, but its obligations as an EU Member State required it to implement the measure in domestic law. The Food Standards Agency therefore consulted on relevant draft Regulations in the first half of 2003, The Feeding Stuffs (Scotland) Amendment (No.2) Regulations 2003 -- which also provided for the implementation of other EC feed measures -- were signed by the then Minister on 11 June 2003. Shortly thereafter, the UK feed industry made application in Scotland to the Court of Session to have the provisions of this Scottish Statutory Instrument relating to percentage ingredient declaration suspended on the grounds that, by revealing their feed formulations, they would jeopardise the intellectual property in which they had invested. The UK feed industry further argued that the requirement to declare percentages was not related to the protection of public health and that the Directive therefore had an invalid legal base. The deletion of the option to declare by category for feed for farmed livestock was not contested.

2.7 On 30 October 2003, the Court of Session ruled that the feed companies referred to above had an arguable case, ordering that questions concerning the validity of the relevant parts of Directive 2002/2/EC should be referred to the ECJ for a ruling. The Court of Session further ordered that the relevant provisions of the implementing Regulations in Scotland should be suspended pending the outcome of the reference. The equivalent courts in England, Wales and Northern Ireland granted similar suspensions of their respective implementing Regulations.

2.8 The ECJ hearing took place on 30 November 2004. The Court's Advocate-General handed down a preliminary opinion on 7 April 2005, partially upholding the provisions of Directive 2002/2/EC. The full judgement was eventually handed down on 6 December 2005 and was as follows:

- the Directive was found to be validly based on the Treaty objective of safeguarding public health (Article 152(4)(b));
- the requirement to label compound feed ingredients within a tolerance of +/-15% was held to be proportionate and therefore valid; and
- the requirement to disclose exact percentage ingredient information to customers on request was found to be disproportionate and therefore invalid.

2.9 The Feeding Stuffs (Scotland) Regulations 2000 (as amended) have since been consolidated as the Feeding Stuffs (Scotland) Regulations 2005, which came into force on 1 January 2006. However, the provisions on percentage ingredient declaration inserted into the Feeding Stuffs (Scotland) Regulations 2000 by the Feeding Stuffs (Scotland) Amendment (No.2) Regulations 2003, were omitted from the consolidation because they were under suspension by order of the Court of Session. For the suspension order to continue to exist, the suspended provisions also had to remain in existence. Further amending Regulations are therefore necessary to revoke the suspended provisions and insert into the Feeding Stuffs (Scotland) Regulations 2005 a requirement for the ingredients of compound feeds to be declared in descending order by weight within a tolerance of +/-15%.

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

2.10 Although the UK voted against adoption of percentage ingredient declaration during the negotiation of Directive 2002/2/EC, its obligations as a Member State nevertheless required it to transpose the measure into national legislation. For the same reasons, the UK is now under a legal duty to give effect to the ECJ's ruling.

### **iv) Devolution**

2.11 Separate but parallel legislation will be made in England, Wales and Northern Ireland.

## **3. CONSULTATION**

### **i) Within Government**

3.1 Food Standards Agency officials in England, Wales and Northern Ireland have been consulted on the implementation of the ECJ's ruling and are content with the approach being taken. The views of Agriculture Departments (the Scottish Environment and Rural Affairs Department and the Department for Environment, Food and Rural Affairs) and the Federation of Small Businesses Scotland were sought as part of the consultation exercise. Food Standards Agency officials in Wales and Northern Ireland involved the

National Assembly for Wales and the Department of Agriculture and Rural Development in Northern Ireland in their respective consultation exercises. There were no objections to the implementation of this measure.

## **ii) With the Public**

3.2 Previous consultation in 2003 on the implementation of Directive 2002/2/EC revealed opposition from some companies within the feed industry to percentage ingredient declaration, for the reasons given in paragraph 2.6 above. The feed industry was nevertheless invited to comment further on the issue in the light of the ECJ's ruling upholding part of the Directive.

3.3 There was one response to the public consultation in Scotland that welcomed the measures introduced to improve transparency of feed formulations.

## **4. OPTIONS**

4.1 There are in practice only two options open to the UK: non-implementation or full implementation.

### **i) Non-Implementation**

4.2 Percentage ingredient declaration will provide purchasers of manufactured animal feed (chiefly livestock farmers) with information on the amount of each ingredient. However, it is questionable whether a declaration of the ingredients of a compound feed would allow farmers to derive information on its nutrient levels (i.e. the proportions of protein, fibre, oil, etc.).

4.3 Non-implementation of percentage ingredient declaration could also be argued for on the grounds that the Commission is due to embark on a wholesale review and recasting of animal feed labelling, with the aim of replacing four separate Directives (which have all been amended a number of times) with a single all-embracing EC Regulation. Percentage ingredient declaration could be reconsidered as part of this review but a proposed EC Regulation recasting animal feed labelling is not expected to be tabled for discussion until autumn 2007, and subsequent Council and European Parliament co-decision procedures could mean that it would be a further two years before an agreement is reached and a new measure adopted.

4.4 However, non-implementation of percentage ingredient declaration would conflict with both the ECJ's ruling which upheld the validity of certain provisions of the Directive and the UK's obligations as a Member State to implement EC law, and would undoubtedly attract infraction proceedings. The costs of such proceedings could include both the costs of a hearing before the ECJ and any penalties imposed by the Court, on application by the Commission, for non-compliance.

## **ii) Implementation**

4.5 The requirement for compound animal feedingstuffs to be labelled to declare the percentage inclusion of each ingredient within a tolerance of +/- 15% has been upheld as valid by the ECJ and therefore remains part of Community feed law. Implementation of this requirement in domestic legislation would fulfil the legal duty imposed by the ECJ's ruling and meet the UK's obligations as a Member State under Article 10 of the Treaty establishing the European Communities. This obligation exists independently of any timetable which may be adopted by the Commission for the introduction of a correction to Directive 2002/2/EC to remove the requirement to disclose exact percentages to customers on request.

4.6 The outcome of the Commission's review, mentioned in paragraph 4.3 above, cannot be anticipated. It is possible that a new Council and European Parliament Regulation adopted as a result of that review could maintain the percentage ingredient declaration. Deferment of implementation until the new feed labelling Regulation has been tabled would also breach the UK's obligations as a Member State and significantly increase the likelihood of infraction proceedings against the UK.

## **5. COSTS AND BENEFITS**

### **i) Sectors and Groups Affected**

5.1 The measure will have most effect on feed manufacturers, which will have to revise their labelling and may also have to recalibrate feed production equipment in order to record the percentage inclusion rates of each ingredient. As already indicated, some stakeholders have said that percentage ingredient declaration could also have an impact on some feed manufacturers' future R&D expenditure and on the nutritional expertise and advice currently offered to livestock farmers.

5.2 The measure will also have some impact on the work of local authority trading standards departments, which are responsible for the enforcement of animal feed legislation. This includes checks of feed products to determine the accuracy of labelling declarations. The Local Authorities Co-ordinators of Regulatory Services (LACORS), the co-ordinating body for local authority trading standards departments in Scotland, was invited to comment on the potential impact of percentage ingredient declaration on local authorities as part of the consultation, but no response was received on this particular issue.



## ii) Analysis of Costs and Benefits

5.3 It is difficult to quantify the potential costs and benefits of percentage ingredient declaration for compound feedingstuffs. This is attributable to the absence of information on both the current costs for the labelling of compound feedingstuffs and the potential costs of any new equipment (both machinery and computer software) which may be necessary to label feed in accordance with these new requirements. In addition, some of the potential costs and benefits may be non-monetary in their nature and thus difficult to translate into purely financial terms.

5.4 The costs and benefits could include the following:

### Costs

- one-off costs associated with capital expenditure on the acquisition of new plant and equipment;
- continuing costs associated with the need to produce new labels for each production run due to variations in feed formulation;
- a deterrent to investment in new feed formulations because of the need to disclose them on labels;
- negative impact on the international competitiveness of the feed industry due to copying of feed formulations by non-EU rivals, without investment in R&D of their own;
- loss of intellectual property by the feed industry;
- reduced performance from farmed livestock as farmers become less competitive with counterparts in third countries where feed R&D has not been similarly discouraged;
- potential for increased imports from third countries of feed ingredients and animal products produced to both lower costs and lower standards.

### Benefits

- enhanced traceability of ingredients, through their listing in full on the label or accompanying document;
- transparency in feed formulations, giving purchasers (chiefly livestock farmers) more informed choice of the quantities which make up their animal rations -- for example, to avoid high levels of particular ingredients or to favour others; and
- increased confidence in the quality of feeds and animal products for human consumption, through the knowledge that feed formulations are open to scrutiny.

5.5 One potential benefit of the EC's ruling, albeit more indirect, is that the rejection of the requirement in Directive 2002/2/EC to provide exact percentage information to customers on request means that feed manufacturers will not now need to invest in the potentially more expensive computer applications which would have been required to maintain precise records of feed mixes.

### **iii) Summary of Costs and Benefits**

5.6 A number of areas of cost and benefit have been identified, but information from stakeholders has not enabled total costings to be estimated. One feed manufacturing company provided some financial information relating to its operations but requested that the Agency treat this as confidential and therefore it has been omitted from this Regulatory Impact Assessment.

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

6.1 Information on the impact on small firms was sought as part of the original consultation in 2003, but data was not provided. Small firm stakeholders were again invited to assess and quantify either the scale of the additional costs they may face or the potential impact of the measure on small firms as a whole. However, no responses were received.

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

**7.1 No new or additional forms will be introduced.**

## **8. COMPETITION ASSESSMENT**

8.1 The UK feed industry is highly fragmented, with two large national compounders accounting for nearly 50% of market share. The remainder is divided between smaller compounders that have significant capacity in particular regions or areas of the UK, and co-operative or farmer-controlled compounders that typically have a single mill. The trend, for the past ten years or more, has been towards consolidation, with mergers reducing the number of individual firms and many of the co-operatives converting to limited companies. Reliable statistics on business numbers are difficult to obtain, but the Inter-Departmental Business Register (a database of the Office of National Statistics) for 2004 showed 260 firms with less than ten employees, 105 with less than fifty, 45 with under two hundred and fifty, and 5 with over two hundred and fifty employees. A return from the then HM Customs & Excise for the same year showed that 70 companies had a turnover of over £5million each, while 40 companies had turnovers of less than £50,000.

8.2 However, it is difficult to quantify the potential impact of percentage ingredient declaration on competition within the industry, or the competitive position of the industry vis-a-vis the feed industries of other Member States or non-EC countries in the absence of data on its current financial status -- in particular, on its cost structure, turnover and profit margins. In part this is because this data is not collected, either specifically or in a form which would permit the requisite comparative analysis, and in part because relevant financial data has not been provided in response to consultation exercises.

## **9. ENFORCEMENT, SANCTIONS AND MONITORING**

9.1 Enforcement of animal feedingstuffs legislation is the responsibility of local authority trading standards departments in Great Britain and the Department of Agriculture and Rural Development in Northern Ireland (DARDNI). Enforcement includes advice on labelling requirements and the sampling and analysis of feed products to determine the accuracy of labelling declarations for protein, fibre, etc.

9.2 However, there are no officially recognised methods of analysis for many feed ingredients. The accuracy of percentage ingredient declarations would therefore mostly have to be confirmed via examination of manufacturers' records.

9.3 The penalties for non-compliance with feedingstuffs legislation are set out in the Agriculture Act 1970 and in subordinate legislation made under section 2(2) of the European Communities Act 1972, namely the Feed (Hygiene and Enforcement) (Scotland) Regulations 2005. Non-compliance is to be treated as a criminal offence, and would be subject on conviction to fines and/or imprisonment.

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

10.1 The measure will be implemented in Scotland by the Feeding Stuffs (Scotland) (Amendment) Regulations 2006. Separate but parallel legislation will be made in England, Wales and Northern Ireland.

10.2 As stated in paragraph 2.7 above, the relevant provisions of the Feeding Stuffs (Scotland) Amendment (No.2) Regulations 2003 were suspended by order of the Court of Session on 30 October 2003. It was therefore necessary to apply to the Court of Session to lift the suspension order so that these provisions -- the only part of the Feeding Stuffs Regulations 2000 (as amended) not to have been revoked and consolidated by the Feeding Stuffs (Scotland) Regulations 2005 -- can be revoked by the amending Regulations and replaced by the provisions necessary to give effect to the ruling of the ECJ as discussed above.

10.3 Draft guidance to the feed industry and enforcement stakeholders on the application of percentage ingredient declaration has been drawn up by the Food Standards Agency which will help businesses to comply with the legislation in a proportionate fashion. This draft guidance will be subject to public consultation before the legislation is made and may be revised in the light of any comments received.

## **11. POST-IMPLEMENTATION REVIEW**

11.1 Within six months of the making of the legislation, the Food Standards Agency will carry out a review of the effects of the measure. This will take the form of a further stakeholder consultation, including the feed and agricultural

industries. The results of this review will inform the UK's negotiating position during the Commission's forthcoming review and recasting of feed labelling legislation.

## **12. SUMMARY AND RECOMMENDATION**

12.1 A number of stakeholders who responded to the consultation thought that percentage ingredient declaration of compound feeds was likely to have an impact on the feed manufacturing industry. Respondents also indicated that there may also be some indirect impact on the agriculture industry. The nature of this impact is detailed in the "Consultation" and "Costs and Benefits" sections of this RIA. In summary, the feed industry's chief concerns are the possible impact on its intellectual property and its future expenditure on research and development of new animal feeds because of the divulgence of commercially sensitive feed formulations.

12.2 This RIA has also outlined possible benefits of the legislation (in the section on "Costs and Benefits"). It has been difficult to quantify these benefits. However, there are a number of other factors which support the implementation of the measure, as follows:

- the measure will remove the requirement for feed manufacturers to disclose the exact ingredient information to customers, which the ECJ found to be disproportionate;
- the legislation is not new and was adopted in 2002. It was subject to the full co-decision procedure for the adoption of Community legislation with the Council of Agriculture Ministers and the European Parliament. Both the European Parliament and a majority of Member States (14 out of 15) supported it at that time;
- the legislation has been subject to judicial review both in the UK courts and by the European Court of Justice. Although it was argued that percentage ingredient listing is not a significant feed safety measure, the ECJ found that the requirement to label compound feed ingredients within a tolerance of +/-15% was proportionate to its legitimate aims and therefore valid; and
- if the UK did not implement the measure it would be subject to infraction proceedings which would attract a financial penalty. These would be ongoing until such time as the measure was transposed into UK legislation. Any change to EC feed legislation, which might amend the percentage ingredient requirement, could take several years to adopt.

**12.3 For these reasons, it is concluded that the UK must give effect to the ECJ's ruling on the validity of percentage ingredient declaration via the Feeding Stuffs (Scotland) (Amendment) Regulations 2006.**

<b>Option</b>	<b>Total Costs per annum – Economic, Social, Environmental</b>	<b>Total Benefits per annum – Economic, Social, Environmental</b>
1. Non-implementation	Costs of infraction proceedings (which would be ongoing), plus any financial penalties imposed (the figure would be at the Court's discretion).	Protection of some feed companies' intellectual property and retention of any commercial advantage over third country manufacturers. Maintenance of current level of research into feed formulations and expertise and advice offered to livestock farmers. No additional capital costs from investment in new labelling equipment.
2. Full implementation	Loss of some feed companies' intellectual property and commercial advantage. Possible reduction in research expenditure. Investment in new labelling equipment might be required by some companies. Possible reduction in economic performance of livestock farmers.	Percentage ingredient listing should give enhanced traceability of ingredients, more informed choice to purchasers of animal feeds and increased confidence in the quality of feeds and livestock products through the knowledge that feed formulations are open to scrutiny.  Fulfilment of the United Kingdom's EC legal obligations. No infraction proceedings against the UK (with their associated costs and adverse publicity).

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