

TACD

TRANS ATLANTIC DIALOGUE TRANSATLANTIQUE
CONSUMER DIALOGUE DES CONSOMMATEURS

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Resolution on Country of Origin Labeling

Consumer Support for Country of Origin Labeling

Consumers have repeatedly and overwhelmingly expressed their support for country of origin labeling of food products both in the United States and in European countries. In the U.S., a nationwide poll done for the National Farmers Union in 2004 showed that 82% of respondents supported COOL¹. A 2007 poll conducted for the consumer group Food & Water Watch found that 82% of respondents supported a mandatory COOL program². Also in 2007, a Consumers Union poll found that 92% of respondents believed that imported foods should be labeled with their country of origin³. Most recently in August 2007 the international polling firm Zogby released survey results that demonstrated that not only did 85% of respondents say that knowing where their food comes from is important, but 88% of respondents said that they want all retail foods labeled with country of origin information. In addition, the Zogby survey reported that 95% of respondents believe consumers have a *right to know* the country of origin of the foods they purchase⁴.

In the E.U., consumer demand for country of origin labeling of food products is also high. A qualitative study done for the European Commission in 2005⁵ showed that consumers tend to be more attentive when buying food products than when buying other products. For food products, the study found that consumers spontaneously not only mention durability and composition, but also provenance as being the kind of information for which they most frequently look. A German consumer organization survey from 2007⁶, showed that 95% of the 3,500 respondents were not satisfied with the current E.U. regulations that require country of origin labeling only for certain food products such as

¹ National Farmers Union survey, 2004 at <http://www.nfu.org/wp-content/uploads/2006/05/Poll%20Results%20--%20COOL%20Jan2004.pdf>

² Food & Water Watch survey 2007 at <http://www.foodandwaterwatch.org/press/releases/food-labeling-82-support-cool>

³ Consumers Union poll, 2007 at <http://www.greenerchoices.org/products.cfm?product=crfood&pcat=food>

⁴ Zogby International survey, August 9, 2007 at <http://www.zogby.com/news/ReadNews.dbm?ID=1345>.

⁵ European Commission, Directorate General Health and Consumer Protection, „The Attitudes of the European Consumers Regarding Product Labelling“, Qualitative Study in 28 European Countries, conducted by OPTEM, May 2005

⁶ Verbraucherzentrale, Bundesweite Umfrage „Lebensmittel aus aller Welt – Kennzeichnung lückenhaft und missverständlich“, Eine Gemeinschaftsaktion der Verbraucherzentralen, Juli 2007, at http://www.vzbv.de/mediapics/bericht_umfrage_herkunft_von_lebensmitteln_23.07.2007_copy.pdf

beef, fruit and vegetables, fish and eggs. Respondents said that they wanted to see the indication of the origin of foods for products other than beef (80%) and milk (60%). Eighty-eight percent said that they also wanted country of origin labeling for the main ingredient of foods containing several ingredients. An earlier German study in 2004 showed similar results: 70% of the respondents considered the origin of food ingredients as very important or important. In the U.K, country of origin labeling was important to just over half (54%) or respondents interviewed in a survey in 2007⁷, with 25% rating it as “very important” and only one in five (19%) rating it as “not important at all.”

Benefits of COOL for Consumers

Country of origin labeling can provide consumers with additional information to make informed choices about the food they wish to purchase and consume. Many consumers may wish to purchase food from producers in their own country or may wish to purchase food products from another country known for producing a particular food. Reasons for this vary from environmental and ethical principles to food quality and food standard choices.

Without labeling that identifies where that food has been produced, consumers are unable to make those choices in an informed manner when they are at the point of purchase. Particularly in the E.U., consumers are not provided with adequate information regarding the origin of the product as label statements often refer to the processing or packaging of a multi-ingredient food product and not the origin of the main ingredients of the product itself.

Status of COOL in the U.S. and the E.U.

The labeling of foods by their country of origin is under various stages of consideration by a number of national governments as a way of providing consumers in those countries with additional information about the origin of the foods they may purchase and consume.

In the United States, mandatory country of origin labeling (COOL) was signed into law in 2002 as part of the Farm Security and Rural Investment Act, more commonly known as the 2002 Farm Bill. The COOL provision required country of origin labeling for beef, lamb, pork, fish, perishable agricultural commodities and peanuts. However, implementation of mandatory COOL was delayed by Congress for all commodities except wild and farm-raised fish and shellfish which went into effect September 30, 2005. Mandatory COOL for the remaining commodities is scheduled to go into effect September 30, 2008. As part of the 2007 Farm Bill, Congress worked with stakeholders to develop a compromise that clarified Congress’ original intent in the 2002 law. The Senate added additional commodities including poultry and goat meat; as of March 2008, it was not yet certain whether these additions would be in the final bill.

In the E.U. there is no mandatory country of origin labeling except for certain food commodities such as fruit and vegetables, beef, fish, eggs and wine. Prepackaged foods must be labeled with the name of the manufacturer, packager or seller, but this information does not necessarily provide consumers with information on where the food has been produced or on the origin of the ingredients. With the recently published draft regulation on the provision of food information to consumers the European Commission

⁷ Country of Origin Labeling Omnibus Research Report July 2007 carried out for the Food Standards Agency, www.food.gov.uk.

proposes to keep COOL on food voluntary, unless its absence could mislead consumers. However, this proposal establishes certain criteria for producers who wish to identify the country of origin or for member states who want to introduce mandatory COOL on a national level. For these cases, the proposal requires that the country of origin of the main ingredients in a multi-ingredient food must be listed if those ingredients originate from a different place than the finished product. Additionally, the proposal introduces the possibility of labeling a food as “made in the E.U.” in addition to the possibility of indicating the member state in which the product was produced.

TACD Recommendations

Mandatory Program

TACD supports a mandatory country of origin labeling program to assure that consumers are provided necessary information about the origin of the food they purchase and consume. Voluntary labeling programs do not offer the same benefit as a mandatory labeling program since, by definition, voluntary programs do not require all foods in a particular category to be labeled.

Proper Labeling

TACD supports mandatory country of origin labeling notification for commodities including, but not limited to, meat (including beef, lamb, pork, and goat), poultry, farm-raised and wild fish and seafood, fruits, vegetables, dairy products and nuts. All food products in these categories should be identified through the use of a label, stamp, mark, or sign that is on or near the food product. If the food product is prepackaged, the country of origin should be identified on the label. This should include information about the origin of the main ingredients as well as information about where the food was processed. Labeling should include all variations of the food product, whether it is fresh, frozen, canned or otherwise minimally processed.

Multi-ingredient products

TACD supports mandatory country of origin labeling of the main ingredients in a multi-ingredient food product. The product should be labeled with the country of origin of the main ingredients as well as the place of processing. TACD encourages manufacturers and retailers to label additional ingredients where possible. Identification of country of origin should be listed prominently on the food label.

The U.S. government should implement the country of origin labeling law as outlined in the 2002 Farm Bill and further clarified in the House and Senate versions of the 2007 Farm Bill. The U.S. Department of Agriculture should promulgate regulations in this regard so that mandatory COOL is implemented in the U.S. by September 30, 2008. Existing exemptions for butcher shops, fish markets and uncovered processed foods should be eliminated. The USDA should conduct periodic surveillance of the consumer marketplace to assure that COOL is being implemented properly and consumers are afforded this information. Repeated and willful violations of the law should be assessed penalties.

With its draft regulation on the provision of food information to consumers, the E.U. commission has gone a step forward in improved country of origin labeling, as it has clarified that there is a difference between the place of processing and the origin of a food product. We welcome this proposed clarification in language as it will provide consumers with appropriate information about the true origin of the main ingredients of a multi-ingredient food and not just where that food product was processed. The E.U.

proposal, however, is a voluntary one. The E.U. commission should, instead of leaving mandatory COOL to the member states, introduce mandatory country of origin labeling on the E.U. level. Leaving COOL to the member states will lead to different rules and schemes in different member states which may cause confusion among consumers. A mandatory European country of origin labeling regulation should then provide consumers across the E.U. with information on the origin of the main ingredients of food products as well as the place of processing. Furthermore, TACD does not support a “made in the E.U.” label as it is too broad for consumers who want to know the particular country in which a food product has been produced.

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