NFU Scotland

Fair Labels,
Fair Markets

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INTRODUCTION

1. Label food clearly – wherever it's sold
Don't stop at supermarkets - apply origin labelling out of home and wholesale.

2.Close the loopholes on processed meat
Processing shouldn't erase origin – labels must still say where the meat comes from.

3.Put origin on the front, not in the fine print
Stop burying country of origin in tiny print.

4.End vague labels like "mixed origin"
They confuse customers and hide reality.

5.Protect flags and provenance
Don't let imported products borrow Scottish branding or national flags unfairly.

6.End the use of fake farms
Marketing should celebrate real farmers, not invent fictional ones.

7.Introduce legal protection for meat products
Stop plant-based alternatives from using names or branding that imitate traditional meat and mislead consumers.

8.Enforce tougher rules and report on them
Tougher, transparent enforcement is needed to restore trust and level the playing field.

Our research highlights over 80% of consumers say that origin is important to them, this figure is higher in Scotland, yet less than half of consumers feel they have enough information to tell them about where their food is produced. The current regulatory, policy, and practice across the market in relation to labelling of food products sold across the UK is confusing, vague and often misleading, creating a lack of transparency for consumers.

Currently country of origin labelling is not consistent across all areas. While some rules were brought in 2020 to close some loopholes, particularly in the retail sector, there remains significant amount of ambiguity which needs to be addressed.

We would like to see steps taken to increase the visibility and clarity of country of origin labels. Moreover, it is essential that imported products are also labelled accordingly. Consumers should be entitled to know the origin of the food they are buying to help them make informed choices. Efforts must be made to prioritise raising awareness and understanding of the current farming practises which ensure high health, welfare and husbandry to produce high quality food in the UK.

We believe that the existing regulation and practise on food labelling must be reviewed by UK Government to ensure consumers are able to make informed decisions, support domestic production and there is transparency across of food sector. While we acknowledge there are cases of good practise which we can learn from it is essential this is expanded to ensure consistency and clarity.

1. Label food origins clearly – wherever it's sold

There is significant variation between obligations depending on if selling direct to consumer or through wholesale. We ask that UK Government extend the principles of Country of Origin to wholesale and hospitality, which currently only requires accompanying papers, rather than a product label. This does not offer the same simple and effective way of identifying origin of a product. Furthermore, there is a complete absence of any regulation for country of origin labelling in the out of home sector, which is a concern, particularly as this accounts for almost a quarter of the calories we consumer in Scotland.

We firmly believe that this should be addressed extending the existing principles used in retail so that a consumer has the necessary information to make an informed decision at any point of sale. We acknowledge that this will require a collaborative approach across sectors to achieve an appropriate balance.

2. Close country of origin labelling loopholes on processed meat

The current obligations for country of origin do not cover sufficiently cover all products, once a product is processed, e.g. marinated, cured or cooked, there is no requirement for country of origin. While attempts were made to introduce requirements for declarations or clarifications through the primary ingredient rule to close loopholes, it is not always immediately clear for a consumer, there is scope to strengthen this rule further.

We would like to see the existing country of origin requirements extended to all processed meat products.

3. Require origin declarations on the front of pack

While the regulations for any declaration related to country of origin are required depending on the product, there is an opportunity to increase the visibility of such declarations and in turn give clearer information to the consumers. Consideration should be given to place such declaration on the front of the packaging.

For example, a product labelled Ayrshire Steak Pie, but can use Uruguayan beef, if a declaration is on pack, we have concerns that often such declaration is not obvious and can be missed by a consumer.

4. End the use of mixed origin labels

Our ShelfWatch data has found that over 30% of cooked ham was labelled as “mixed origin, we firmly believe that regulations brought in to prevent the use of mixed origin or vague origin declarations. The declaration which accompanies such products is often not immediately clear to a consumer, furthermore it does not offer the transparency that the principles of country of origin labelling is founded on.

5. Protect provenance features

Currently, there are no specific regulations that restrict the use of the national flag or other provenance features on packaging. In some cases, products display the national flag even when not all ingredients are of British origin, which can be misleading. This extends to instore branding, while we recognise efforts to promote Scottish agriculture in store however often consumers can be misled.

We would like to see stregthened and standardised regulation around the use of provenance features such as flags to avoid co-mingling of products to provide integrity to the use of any provenance features.

6. End the use of fake farms

While there is no specific legislation for country of origin related to instore branding or fake farms, the same principles apply that consumers must not be misled through any labelling. We would ask for a legislative framework to be developed, or at least a mandatory declaration to accompany any materials which are based on fictional farms and used as part of promotional activities. Instead, we encourage and support retailers and wholesalers who use real life examples of Scottish farmers, growers and crofters.

7. Introduce legislative protection for meat products

The market for alternative and plant-based products has continued to grow for several years, often promoted with names, branding and images which aim to imitate traditional meat products. This can be misleading for consumers, ultimately creating another area of ambiguity.

There are currently proposals to introduce clear principles for the protection of meat products being considered in the EU. These proposals aim to enhance transparency for the food composition and nutritional content so that consumers can make a well-informed choice. This is in addition to the existing regulations which protects dairy products such as milk, cream and butter.

We would like to see similar developments in the UK to ensure that consumers can make well-informed choices, particularly for those seeking a specific nutritional content that is traditionally associated with meat products.

8. Review of enforcement policy and practise

The aforementioned asks will only bring about meaningful change if they are underpinned by consistent, well-resourced and transparent enforcement. We would like Governments and their agencies commit to a review of the current policies and practice to ensure robust an effective enforcement. Furthermore, consideration should be given to a mechanism for regular reporting on the enforcement activities related to labelling. By doing this would give producers and consumers confidence on the integrity of the labelling and branding on food.

CONCLUSION

Consumers value origin information, yet current labelling rules fail to deliver clarity, consistency or cover the adequate breadth of products. To build trust and support informed choices, UK Government must review and strengthen food labelling regulation. Moreover, it is essential that as future initiatives such as method of production labelling, and sustainability or green claims, are rooted in meaningful industry engagement, supported by independent research, and underpinned by robust evidence. Without this foundation, there is a real risk of repeating the same challenges currently seen in origin labelling, creating more confusion, oversimplification, or unintended consequences for both consumers and producers.

There must be cross working with Scottish Government, Food Standards Scotland and local authorities to meet the needs of the consumer and deliver on wider government priorities for food security, local food production and sustainability.

This paper proposes ways to extend and amend existing requirements to improve transparency, protect domestic production, and uphold consumer confidence across the food system. We are ready to work collaboratively with governments and industry to deliver a fair, transparent, and consistent approach to food labelling that meets consumer expectations and supports Scottish agriculture.

CONTACT

Lisa Hislop, Supply Chain Policy Manager

T: 077060 876212 | E: lisa.hislop@nfus.org.uk

@nfuscotland