

Association of Independent Meat Suppliers

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For the attention of Mr. G. Attenborough
Interim Head of Communications

Dear Guy

Before responding directly to the series of questions set out in your consultation document I will first make some more general comments which I hope will set the context for my overall response.

General concerns

1. The Red Tractor is a set of foundation standards for assured food production covering food safety, animal welfare and the environment. Foundation means what it says - a base for other higher schemes.
2. Consumers buy on a combination of price and quality, but they expect to see good standards of food safety, animal welfare and care for the environment.
3. Red Tractor doesn't cover product quality and to get that level of quality across all foodstuffs would be difficult. What products would be excluded?
4. Confirmation that Wales and Scotland can continue to use their levy funds for promotion of their PGIs without using the red tractor, and what that means for England.

Concerns that there is insufficient information in the consultation to allow a full response and that it does not include an impact assessment.

1. The consultation does not outline what the EU commission's requirements for quality are. Will existing assurance standards need to be altered to meet the definition of "quality" and if so in what way?
2. The consultation mentions that private expenditure will have to abide by state aid regulations. Exactly what does this mean?

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3. The consultation does not include an assessment on the impact of a single logo on the English beef and lamb sectors. For example what is the objective of a single logo? Is it purely administrative convenience or is it meant to stretch the differential between assured and non-assured beef and lamb? If the latter what is the target level of differential that AHDB believes a single logo will achieve. If this work has not been carried out, can AHDB assure the industry that measures will be published?
4. Can AHDB confirm that a single RT logo will increase the differential between assured and non-assured beef and lamb in England, which has been built up by the Quality Standard Mark?

Accountability

1. Who will be accountable for establishing and agreeing performance indicators for the Red Tractor in various sectors? Will these be published?
2. If targets are not met what will happen?
3. If targets are not met will sector boards have the power to cease funding the Red Tractor without the agreement of the AHDB board?

I now turn to the specific questions raised in the consultation document.

1. Should AHDB invest levy payers money to promote the quality and standards of its sectors products?

AIMS members' money – and their farmer suppliers' money - is already invested to promote quality and assurance in England via the EBLEX Quality Standard Mark, and Protected Geographic Indications outside England. The answer to this question therefore depends on whether there would be any net benefit to altering these arrangements and without an impact assessment this is not apparent.

2. Does there need to be a rationalisation of existing quality marks?

AIMS considers it incumbent on AHDB to provide an impact assessment to fully establish whether English beef and lamb levy payers would gain or otherwise through a rationalisation. This should include an assessment of the risks inherent in shifting away from an established beef and lamb scheme owned by the English beef and lamb industry to a generic “British farming” logo.

Without this the status quo should remain.

3. Should AHDB invest levy funds to promote uptake within the industry, police the proper use of a mark and build consumer awareness about the quality and standards of all sector products? (The cost of this is estimated to be about £0.5m. per annum to AHDB and would be apportioned back to AHDB sector organisations).

Again, without a full impact assessment the status quo should remain.

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4. If levy payer money was to be invested, should AHDB;

- a) Create a new scheme?
- b) Adopt the RTL scheme as it is now? or
- c) Integrate existing standards in the beef and sheep sector into the RTL scheme?
(Note: pig sector standards already integrated)

There is insufficient information available to fully answer this question without an impact assessment.

However, IF a new scheme is required to enable those sectors that DO NOT ALREADY have quality schemes to use a single logo then this is delay that will be to the detriment of the English beef and lamb sectors, then the answer to creating such a new scheme must be a firm no.

5. In your sector, which products or market segments do you believe would most benefit from the promotion of quality characteristics (either general quality characteristics common to your sector and other sectors or ones specific to your sector)? Would you support levy payers' money being invested in this promotion?

Beef and lamb already have eating quality as a characteristic over and above RT assurance. There should be NO change to this.

Nor should baseline assurance be used as a way to increase environmental production requirements as this will place the farming industry at a severe competitive disadvantage.

6. If in your view, no products in your sector would benefit from promoting such a scheme (beyond a baseline investment outlined in paragraph 21), would you accept other AHDB sectors working together at a sector level on such a scheme through AHDB?

Entirely up to the sectors themselves, but decision making must be transparent and published by each sector company board.

7. Do you support levy-funded investment even though this will mean that EU guidelines for promotion would need to be observed by all parties participating in the scheme throughout the supply chain even where private funds were invested?

Yes; however as already noted the implications for sectors such as chicken must be clearly elaborated to the entire industry BEFORE any decisions are taken by AHDB and sector boards. It is simply too important to proceed without a full debate based on evidence.

I hope this answers all your questions in a satisfactory way but should you need any clarification then please do not hesitate to contact us.

Yours sincerely



NORMAN BAGLEY
Policy Director