

**Assessment of South American
Beef Labels
according to REG (EC) 1760/2000**

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1. Question

The Member States of the European Union import almost 400,000 tonnes of beef from South America per year. Argentina, Brazil and Paraguay, Uruguay and Chile supply de-boned high-value cuts which are prized equally in gastronomy and private households in the context of the Hilton quota, among other arrangements.

In addition to high-value meat quality, however, compliance with the corresponding statutory requirements is also demanded. Thus, among other things, identification of the beef's origin and its traceability are obligatory in accordance with Regulation (EC) 1760/2000, including for imported goods from these so-called "third-party" countries. With this synopsis ORGAINVENT would like to examine the following questions:

- How do beef labels from third countries meet the requirements of European and German Regulations?
- Are they comprehensible for employees both for employees in German companies and for consumers?
- Are the labels – as is customary with German labels – suitable for integration into working and documentation processes here?

2. Legal background

Since July 1998 indications concerning the origin and further characteristics of beef must be provided in accordance with Regulation (EC) 820/97 and since 1.9.2000 in accordance with Regulation (EC) 1760/2000. This also affects beef from third countries that is brought into the EU. Under Regulation (EC) 820/97 many third countries have submitted so-called third country specifications for optional indications to the EU Commission in Brussels. These third-party specifications – notified by the EU Commission – are still valid today.

The following obligatory indications must be provided on the label in accordance with Regulation (EC) 1760/2000 Art. 13:

- + “a reference number or reference code ensuring the link between the meat and the animal or group of animals”
- + “the approval number of the slaughterhouse at which the animal or group of animals was slaughtered and the Member State or third country in which the slaughterhouse is located. The indication should read: ‘Slaughtered in (name of Member State or third country)’”
- + “the approval number of the cutting hall in which performed the cutting operation of the carcass or group of carcasses and the Member State or third country in which the hall is located. The indication should read: ‘cutting in: (name of Member State or third country)’”
- + “Member State or third country in which the animal was born”
- + “Member States or third countries in which fattening took place”

Art. 15 of the Regulation establishes: Beef imported into the EU for which not all indications in accordance with Art. 13 are available should be labelled as follows: “Origin: non-EC” and “Slaughtered in (name of the third country)”.

All indications on the label that are not made obligatory by Art. 13 Regulation (EC) 1760/2000 are optional indications (Art. 16). These also include, according to the legal interpretation of German authorities, logos, brand names, instructions on keeping, feeding, breed indications and much more. These indications may only be provided on third country labels if they are contained in the specifications of the affected third country as approved by the EU Commission (Art. 17).

In Regulation (EC) 1760/2000 there are no provisions as the language in which labelling should be done, normally the assumption is that the indications are composed “in a language which is easily comprehensible for the consumer” (in accordance with Article 16 (1) of Directive 2000/13/EC).

3. Collecting of labels

At the end of April 2005 50 companies from the food wholesale and retail sector were written to and alerted to potential deficiencies with third-country labels. At the same time the companies were asked to send in labels from current business. In the ensuing weeks around 70 labels were sent in, also by importers. 48 different labels were entered into the assessment undertaken at the beginning of July.

The distribution of the labels is an approximate reflection of the current relevance of the respective country of origin in market activity:

Country of origin	Argentina	Brazil	Chile	Uruguay
Number of labels	39	7	1	1

4. Stipulations for the assessment

In addition to compliance with statutory requirements, dealing with the labels in daily business in particular is at the forefront of the consideration. Structure and layout of the label indications make a considerable contribution to their reception and therefore to the conformity of companies’ own labelling.

- **Indications of origin and language**

Indications of origin (as required in Regulation (EC) 1760/2000 Art. 13) should be included on the label for the German market correspondingly in GERMAN.

Indications concerning origin and processing as well as the operating plant no. for slaughtering and processing should stand close together and not be spread

across the whole label. Furthermore, lettering sizes for the indications of origin should not differ significantly from that for other additional indications on the label.

Translations of “slaughtered in” and “cutting in” must be comprehensible, for “cutting in”, “produced in” or “de-boned in” is accepted.

- **Reference number for traceability**

In Argentina, for example, the TROPA no. is taken as the reference number for traceability, referring to the group of animals of a farmer that come to slaughter on a particular day. Frequently this is translated as troop no. or herd no. The nomenclature of the reference number is not uniformly regulated in other third countries. In Germany the indications: Ident-Nr. (*ID no.*), Chargen-Nr. (*rank no.*), Rückverfolgbarkeits-Nr. (*traceability no.*) are widespread and thus also familiar to staff. Consideration should be paid to this.

- **Optional indications**

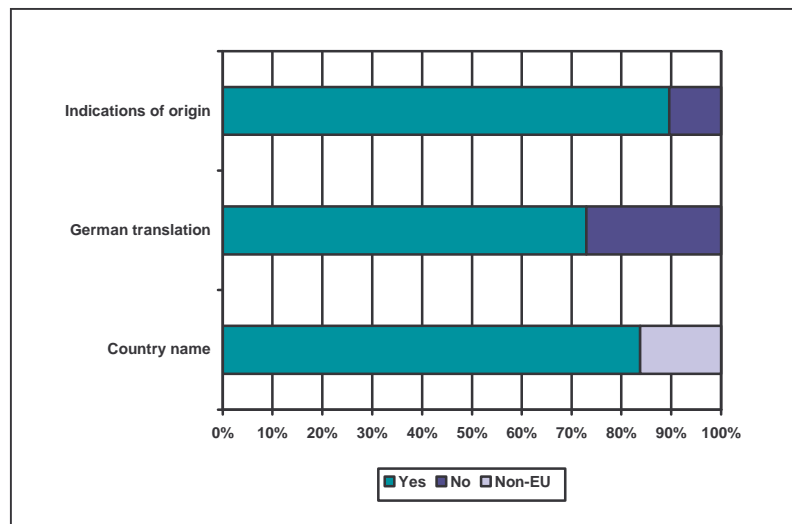
Indications that may be understood as consumer instruction (e.g. “Consume as soon as possible, as customary for excess temperature or opened packaging and fresh meat”) and best before date and storage instruction (“store at 0°C-2°C”) or packaging information (“vacuum-packed”, “originally packed in Argentina”) or sale information (“sold according to weight”) are generally not viewed as being subject to authorisation.

Indications (including logos or illustrations) which affect the beef directly (e.g. “vacuum packing means intensive maturation and therefore improved quality”, “Fresh”, “Argentine high quality beef”, “Black Angus”, “Pampas Angus”) are subject to authorisation in accordance with the special procedure of Art. 17 Regulation (EC) 1760/2000. None of these indications is currently covered by approved third country specifications!

5. Result of the assessment

- **Indications of origin**

It is still alarming that not all examined third country labels show the obligatory indications. Almost all labels (90%) display at least indications of origin (= birth, fattening, slaughtering), whereas only 77 % actual proclaim an origin (e.g. Argentina, Brazil), the remaining 13 % label only in accordance with Art. 15 Regulation (EC) 1760/2000 with the indication “Non-EU”. Indications of origin are mostly provided in Spanish, only on 27 % is the origin indicated in German. The indication of origin is almost always provided in very small writing, making it hard to notice...

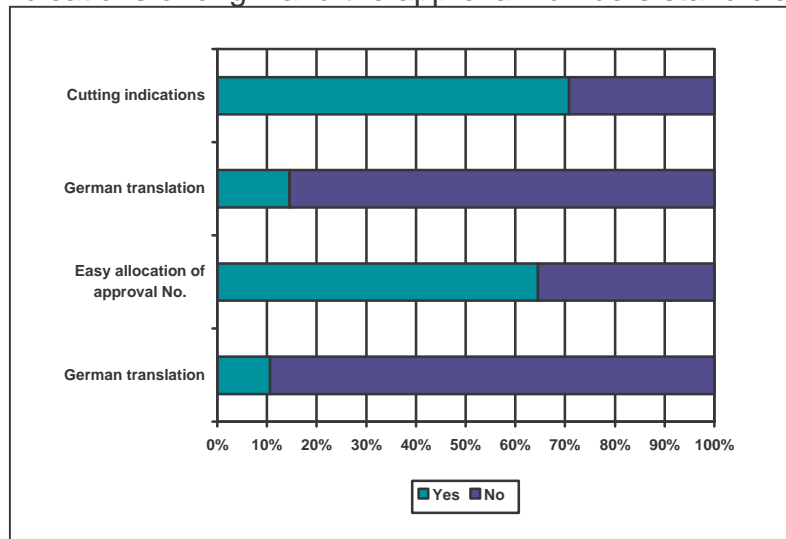


- **Cutting indication**

The indication concerning “Cutting + approval number of cutting halls” is on 70 % of the labels, while a German translation is present on only 14%. The mainly Spanish indications are often provided as “Production plant” or “Production”, which does not equate to a compliant translation („despiece en xxx“ according to the Spanish translation of Regulation (EC) 1760/2000). Here, too, fault can be found with the writing size and positioning of the indication, sometimes this indication is placed vertically at the edge of the label.

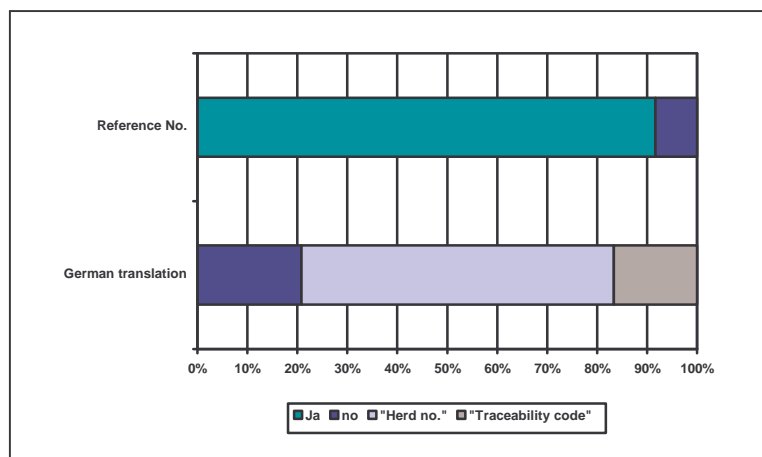
According to Regulation (EC) 1760 the approval number of the slaughter and cutting operations should be provided in immediate proximity to the slaughter or cutting indication, so that they are easy to allocate. This requirement is only met by 64% of the labels, for “German” labels only at 10 %.

On many labels the above indications are spread across the whole label, meaning that they cannot be grasped at first sight. Only for 27% of the labels examined do the required indications of origin and the approval numbers stand close together.



- **Reference number for traceability**

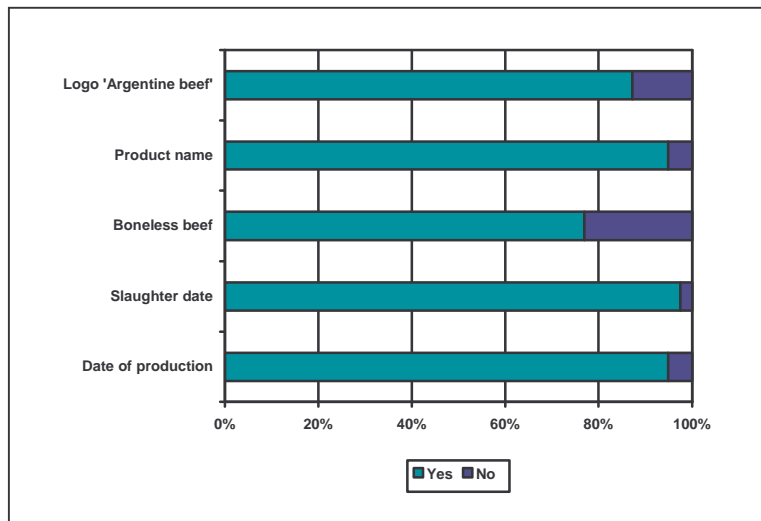
Reference numbers for traceability are found on 92% of the label. On Argentine labels they are mainly given as the “Tropa no.” and translated as “Troop no.” or “Herd no.” (62%), by contrast on all Brazilian labels examined there is the translation “Traceability code”. This translation is understood better by employees of the German wholesale and retail sector. However, Brazilian traceability codes are 14-figure, which is too long for transferral onto labelling scales in the German food retail sector.



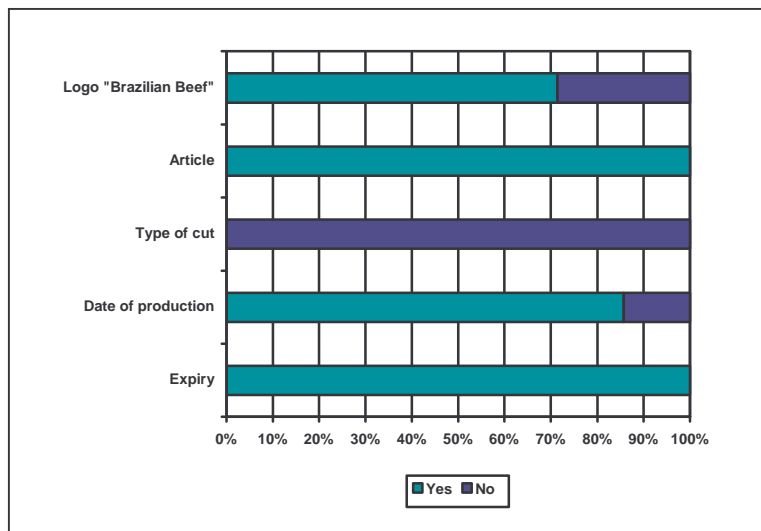
- **Optional indications**

From the approved additional indications of the **Argentine specification** (status: March 2003) the following indications are provided in addition to the meanwhile obligatory indications “Origin” and “Name and number of the operation”: “Animal logo with text Argentine Beef” (87%), “Product name according to nomenclature”

(95 %), “Category: beef” mainly as “Boneless beef – cut from hind quarter (or fore quarter)” (77%), “Date of slaughter” (97%), “Date of production” (82 %).



The Brazilian labels contain the approved indications “Logo with the words Brazilian Beef” (71%), “Type of goods” (article) (100 %), “Type of cut” (0 %), “Date of production” (85%), “Date of expiry” (100 %).



There are no approved third-country specifications for **Chile**.

For **Uruguay** the following indications are approved: “Origin” (this indication is now obligatory), “Article”, “Date of slaughter” and “Date of production”.

The examined label from Uruguay is noticeable for the fact that origin and processing indications are provided in Spanish, English, French and Italian, but only provide the origin in German as Non-EU!

On many labels indications are furthermore provided that are not covered by third-country specifications. In addition to consumer information (e.g. Consume as soon as possible if temperature exceeded or packaging opened, 25%) and storage information (85 %), sale information (sold according to weight, 31 %) and packaging information (e.g. vacuum packed, 23 %) are provided. However, since these are indications that can be easily comprehended or recognised by the consumer and are sometimes covered by other statutory requirements, they can be regarded as not subject to authorisation. However, a clear delimitation outside the responsible authorities is barely possible, since the German Federal Institute for Agriculture and Food (BLE) classifies similar indications as subject to authorisation (e.g. "vacuum-packed") .

It is undisputed that indications referring to cattle keeping or feeding characteristics, indications on breed or category and indications concerning quality or freshness according to the special procedure of Art. 17 Regulation (EC) 1760/2000 must be approved before they are permitted for indication on labels. These authorisations do not exist for the following indications that are found in third countries:

- Vacuum packaging means intensive maturation and therefore improved quality (14 %)
- Best quality pampas beef or Argentine high quality beef (4 %)
- Carnes pampeanas (2 %)
- Black Angus (2 %)
- Fresh (2%)

Labels that contain these indications are increasingly notified during authority and private neutral inspections and sanctioned where necessary by the authority or system organisation. Obviously, awareness of the problem on this point is only very low in the affected companies, but also among suppliers, in particular in the import industry and at South American supply operations. Only this can explain why there have been few efforts so far to improve labelling, which is often inaccessible from the European point of view, and put corresponding pressure on third countries.

6. Summary

Around 48 beef labels from South America were checked for conformity with stipulations of the European beef labelling regulation as well as for comprehensibility of the indications provided. The majority of labels do not contain the indications in the required form and language, furthermore, many indications are provided that are not covered by third-country specifications.

7. Outlook

The European beef labelling regulation has now been in force for 5 years for beef handled in the EU. In Germany and other Member States beef labelling is now a matter of course - after some teething troubles.

In third countries beef labelling is, however, not taken so seriously and often reflects traditional and well-established labelling practice. In addition it was overshadowed up to now during the inspections of the FVO (Food and Veterinary Office) by veterinary issues (e.g. foot and mouth disease). The clear perception among companies in third countries is that a modification of labelling and measures to trace beef represents a costly “additional service”, while these services have long been expected on the market in Europe as a matter of course.

Overall the inspection chain for beef labelling comes too late with regard to third-country goods: since the FVO primarily has other priorities and customs authorities likewise examine other, primarily veterinary and customs-related aspects for importation into Europe, it is only in the food retail sector that is noticed that the goods are not labelled according to statutory requirements. The local wholesale and retail sector is generally the one to suffer, since this it is responsible for labelling indications attached to the goods during its distribution process.

For a long time third countries were barely notified to the authorities in Germany in view of their rather low market volume; since the beginning of the year, however, a changed, more focussed inspection practice can be noted since the beginning of the year. It is therefore absolutely necessary to have a detailed agreement between the BLE, industries and inspection bodies with the intention of reaching a uniform understanding of the above mentioned deficiencies. Only then the chain of reaction can engage effectively in order to ensure that a change of consciousness in the supplier countries and therefore improved labelling can be achieved.

Likewise, the EU Commission should push through a revision of third-country specifications, since the still valid “old” third-country specifications were overtaken long ago and barely meet the information and safety requirements of the local market.