

Summary: Intervention & Options

Department /Agency: Food Standards Agency	Title: Impact Assessment of proposed Commission regulation concerning the composition and labelling of gluten-free foods	
Stage: Consultation	Version: 1	Date: 11 July 2008
Related Publications:		

Available to view or download at:

<http://www.food.gov.uk>

Contact for enquiries: Bindhya Shah

Telephone: 020 7276 8173

What is the problem under consideration? Why is government intervention necessary?

Approximately, 1% of the UK population suffers from an intolerance to gluten and as such must avoid the dietary intake of cereals containing gluten. The number of foods marketed to these people is increasing rapidly to fulfil this need. However, the levels of gluten in products marketed to indicate this property vary greatly which causes confusion for the consumer and could cause serious health problems. The new EU Regulation seeks to put in place compositional criteria that must be met in order to make these claims and to control the wording that can be used to make such claims.

What are the policy objectives and the intended effects?

The objective of the Regulation is to harmonise rules throughout the Community on the use of claims highlighting the absence of gluten ('gluten free') or the reduction of gluten ('very low gluten'). Standardising the levels of gluten for such claims will improve consumer health as coeliacs will be able to identify with confidence foods that are suitable for their health needs. In addition standardisation of the terms will reduce consumer confusion, promote consistent labelling and facilitate international trade.

What policy options have been considered? Please justify any preferred option.


1. oppose adoption of the proposal
2. propose adoption of the proposal as drafted
3. negotiate for amendment of the proposal to take account of issues raised by stakeholders

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? The UK intends to review the implementation of this regulation three years after the provisions of the Regulations take effect (the provisions are expected to take effect in December 2011).

Ministerial/CEO Sign-off For SELECT STAGE Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister/Chief Executive*:



Date: 18/7/08.

* for Impact Assessments undertaken by non-ministerial departments/agencies and NOT being considered by Parliament

Summary: Analysis & Evidence

Policy Option: 2

Description: propose adoption of the proposal as drafted

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Reading and understanding the new legislation as required by industry (£2,200 in total) and local authorities (£2,300 in total). Reduction in administrative burden to industry (negative cost i.e. saving of -£1,500 per annum).
	One-off (Transition)	Yrs	
	£ -50	3	
	Average Annual Cost (excluding one-off)		
£ 0		Total Cost (PV)	£ -230
Other key non-monetised costs by 'main affected groups' The application of this legislation to food as sold, rather than as designed to be eaten, would mean some foods were excluded from coeliacs' diets without good grounds, imposing a cost on coeliacs by reducing their informed choice			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups'
	One-off	Yrs	
	£ 0		
	Average Annual Benefit (excluding one-off)		
£ 0		Total Benefit (PV)	£ 0
Other key non-monetised benefits by 'main affected groups' Improved health for coeliacs in the UK			

Key Assumptions/Sensitivities/Risks

Price Base Year 2007	Time Period Years 3	Net Benefit Range (NPV) £ 230	NET BENEFIT (NPV Best estimate) £ 230
-------------------------	------------------------	--	--

What is the geographic coverage of the policy/option?	UK			
On what date will the policy be implemented?	2009			
Which organisation(s) will enforce the policy?	Local Authorities			
What is the total annual cost of enforcement for these organisations?	£ 0			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	No			
What is the value of the proposed offsetting measure per year?	£ N/A			
What is the value of changes in greenhouse gas emissions?	£ negligible			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro 0	Small 0	Medium 0	Large 0
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)		(Increase - Decrease)	
Increase of	£ 0	Decrease of	£ 1500
		Net Impact	£ -1500

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Summary: Analysis & Evidence

Policy Option: 3

Description: negotiate for amendment of the proposal to take account of issues raised by stakeholders

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Reading and understanding the new legislation as required by industry (£2,200 in total) and local authorities (£2,300 in total). Reduction in administrative burden to industry (negative cost i.e. saving of -£1,500 per annum).
	One-off (Transition)	Yrs	
	£ -50	3	
	Average Annual Cost (excluding one-off)		
	£ 0		Total Cost (PV) £ -230
Other key non-monetised costs by 'main affected groups'			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups'
	One-off	Yrs	
	£ 0		
	Average Annual Benefit (excluding one-off)		
	£ 0		Total Benefit (PV) £ 0
Other key non-monetised benefits by 'main affected groups' Improved health for coeliacs in the UK			

Key Assumptions/Sensitivities/Risks

Price Base Year 2007	Time Period Years 3	Net Benefit Range (NPV) £ 230	NET BENEFIT (NPV Best estimate) £ 230
-------------------------	------------------------	--	--

What is the geographic coverage of the policy/option?				UK
On what date will the policy be implemented?				2009
Which organisation(s) will enforce the policy?				Local Authorities
What is the total annual cost of enforcement for these organisations?				£ ongoing
Does enforcement comply with Hampton principles?				Yes
Will implementation go beyond minimum EU requirements?				No
What is the value of the proposed offsetting measure per year?				£ N/A
What is the value of changes in greenhouse gas emissions?				£ negligible
Will the proposal have a significant impact on competition?				No
Annual cost (£-£) per organisation (excluding one-off)	Micro 0	Small 0	Medium 0	Large 0
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)			(Increase - Decrease)
Increase of	£ 0	Decrease of	£ 1500
		Net Impact	£ -1500

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Evidence Base (for summary sheets)

1. Reason for Intervention and intended effect of the measure:

The proposed Commission Regulation will put in place compositional criteria related to the claims 'gluten-free' and 'very low gluten' for foods which have been specifically manufactured to satisfy the particular nutritional requirements of people who are intolerant to gluten as provided for Commission Directive 89/398/EEC (as amended) on foods for particular nutritional uses.

In addition, the proposed Regulation will also introduce a provision to allow foods that are naturally free of gluten (i.e. those for normal consumption) to be labelled as 'gluten free' as long as the foods meet certain compositional requirements in relation to the levels of gluten.

This Regulation should ensure that all foods which are labelled to indicate their suitability for people intolerant to gluten will use harmonised labelling terms thereby reducing consumer confusion about these products. In addition, this new regime will facilitate better consumer understanding about how much gluten there is in the foods that they buy and thereby help to improve the health of these consumers. This Regulation will also align the EC legislation with the recently agreed Codex international standard for foods targeted at people intolerant to gluten thereby facilitating international trade.

Once in force the Regulation will apply in all EU Member States. Provision as to execution and enforcement will be made in national Regulations for England, Scotland, Wales and Northern Ireland.

2. Background

Currently there are no specific Community rules on the use of claims to indicate the absence of or the reduced level of gluten in foods and national rules can vary widely across the EU. This creates uncertainty and potential confusion for the consumer thus impacting negatively on their health, may impede the free movement of these products and hence creates unequal conditions for competition.

Article 4a of Directive 89/398/EEC (as amended) on foodstuffs for particular nutritional uses (particulate foods) envisages rules for foods that have been specially formulated and/or manufactured to be gluten free. The proposed Regulation addresses that requirement by setting out compositional and labelling criteria for such foods. In addition, Article 2(3) of Directive 89/398/EEC provides the scope to allow foods that are naturally gluten free to be labelled using the same claim as particulate foods. The proposed Regulation uses this provision to lay down the compositional criteria that these normal foods would have to meet in order to be able to make a 'gluten-free' claim.

People who are intolerant to gluten (coeliacs) suffer from a serious autoimmune disorder (coeliac disease) that is triggered by consumption of gluten (proteins found in cereals such as wheat, rye, barley). This affects approximately 1% (Bingley *et al.* British Medical Journal, 2004, 7435; 322-323) of the UK population. A diet free from cereals containing gluten is prescribed for coeliacs, and provides the only relief from the symptoms of this condition, which may include weight loss, stomach pains, diarrhoea and, in some cases, malnutrition, with attendant consequences e.g. anaemia, osteoporosis. As wheat is usually found in most types of bread, pasta, pizza, pastry and cakes, a gluten-free diet is not easy to achieve and the absence of such cereals from the diet may result in deficiencies of nutrients usually obtained from these sources.

The food industry has developed a range of products in which the gluten content has been eliminated or reduced. This is achieved in a number of different ways. Some products have been reformulated to remove the gluten-containing ingredients or to include substitute ingredients i.e. the gluten-containing cereal is replaced by a cereal ingredient which does not contain gluten, such as maize or rice flour. Such products tend to have very low levels of gluten, which may be present as a result of cross contamination at some point in the food chain. Other products include gluten-containing cereals that have been specially processed to remove the gluten (e.g. codex wheat starch) and usually contain a slightly higher residual level of gluten than the substitute products. However due to technological constraints it is not possible currently to eliminate gluten altogether from all specially formulated foods, and in some cases it

is necessary to include some wheat starch in order to maintain the consistency and/or texture of the food.

There is also some debate as to whether individuals with coeliac disease can tolerate oats as they contain a protein that is similar to gluten. Recent evidence suggests that most but not all coeliacs can tolerate oats. It may be that the individuals react to oats that are contaminated with small amounts of other cereals, such as wheat, because of the conditions under which they are grown, harvested or transported. Some oat products are therefore manufactured using specially sourced oats in which the cross contamination from gluten-containing cereals is carefully controlled. The level of gluten in such products is typically very low.

Whilst most coeliacs can tolerate small amounts of gluten in their diet, the sensitivity varies between individuals. Therefore, it is important to enable individual consumers to differentiate between the different types of products aimed at coeliacs such that they can make informed choices and manage their condition effectively. This can be achieved through clear criteria for the different sorts of products and unambiguous claims on the labelling of all products specifically manufactured for coeliacs.

Pre-packaged foods which are naturally gluten free should also be able to make voluntary claims (i.e. gluten-free) to highlight this property. This will enable consumers to choose from as wide a range of foods as possible to maintain a low gluten diet. All other pre-packaged foods, which contain levels of gluten above 20mg/kg either because they include gluten-containing ingredients or through cross-contamination during processing, should not be able to make a voluntary claim about their levels of gluten. Eating significant amounts of foods with levels of gluten above 20mg/kg would be detrimental to coeliacs' health. In addition, the allergen labelling requirement of Directive 2000/13/EC (as amended) means that the inclusion of gluten-containing cereal ingredients in a food product will be clearly declared, thereby allowing coeliacs to avoid such products.

3. Provisions in the proposed Regulation

The key proposals of the Regulation are:

- to define terms 'gluten', 'pure oats' and 'wheat' as applicable in the Regulation;
- to allow parnuts foods which have been specially manufactured to eliminate or substitute a gluten-containing cereal to make the claim 'gluten free' if the residual level of gluten in the foods as sold to the final consumer is less than 20mg/kg;
- to allow parnuts foods which have been specially manufactured using gluten-containing cereals which have been specially processed to remove the gluten to make the claim 'gluten-free' if the residual level of gluten in the foods as sold to the final consumer is less than 20mg/kg;
- to allow parnuts foods which have been specially manufactured using gluten-containing cereals which have been specially processed to remove the gluten to make the claim 'very low gluten' if the level of gluten in the foods as sold to the final consumer is greater than 20mg/kg but less than 100mg/kg;
- to allow ordinary foods to use the claim 'gluten free' if the level of gluten in the foods as sold to the final consumer is less than 20mg/kg.

4. Options

The following options are available prior to adoption of the proposed Regulation:

1. oppose adoption of the proposal
2. propose adoption of the proposal as drafted
3. negotiate for amendment of the proposal to take account of issues raised by stakeholders

Each of these options carries a number of risks to consumers, industry and Government; these are discussed below:

Option 1: oppose adoption of the proposal

There is general support from Member States for this proposal and the UK acting alone would not be able to prevent its adoption in Europe. Without co-operating and influencing in the negotiations the UK would have to implement a proposal that would not take into account the needs of UK consumers and industry. In addition this would not fulfill the Agency's commitment to protect health and to provide the consumer with comprehensive labelling information in order to make informed choices.

Moreover, this option would have a negative impact on the free movement of goods within the Community.

Option 2: do nothing - adopt the proposal as drafted in to UK law

The UK is broadly in support of the proposal as drafted but would like to see some further changes to reflect some of the requests from UK industry (see option 3).

Option 3: negotiate for adoption of the proposal following further negotiation to take account of issues raised by stakeholders

As stated in Option 2 above, the UK is broadly in support of the provisions as presented. However, the UK would like to see the composition criteria applied not only to foods as sold to the final consumer, but also, where appropriate, to be applicable to reconstituted versions of dry or dehydrated foods (such as bread mixes or dehydrated soups). Since these foods are not designed to be eaten as sold, it would not be appropriate or helpful for the consumer if the gluten level assessment was made on the dry or dehydrated product. There could be cases when the levels of gluten in the foods as sold would not meet the required criteria but the levels in the foods as prepared would be able to comply. In addition the UK would like further clarification regarding the positioning of the claims on packaging relative to the name of the product.

The Agency would welcome views from stakeholders on their preferred option.

5. Sectors affected by the proposed Regulation

The legislation will affect consumers and health professional groups, who will have better information regarding the gluten content of foods. Those manufacturers that produce and/or market foods that make claims about reduced gluten content will be affected by this legislation as will enforcement bodies.

6. Costs of the Options

The costs imposed by the Regulation may arise from any mandatory changes to labelling, voluntary changes to labelling, any voluntary reformulation, possible loss of market share and changes in enforcement requirements. There will also be some administrative costs and savings, explained in detail in section 8 below.

Cost of Option 1

Although option 1 above may not incur any costs for the industry it could potentially lead to trade barriers and lost business. In addition, there would be increased consumer confusion and as such a probable increase in health risks for coeliacs. Failure to enact domestic enforcement measures to render the Regulation effective would lead to the possible infraction proceedings against the UK and would represent a significant cost to Government.

The Agency would welcome views and evidence from stakeholders to help quantify the costs associated with not adopting the Regulation.

Cost of Options 2 and 3

Labelling changes:

Adoption of the Regulation may require some re-labelling of products and hence represent some costs to business. The claims which this Regulation controls are voluntary claims in order to allow manufacturers to clearly highlight one particular property of their product to the consumer. Many products which are specially manufactured to be gluten-free (i.e. gluten-free parnuts products) already make such claims and as such no re-labelling is required. However, those products which have been specially processed to reduce their gluten content may need to be relabelled as 'very low gluten' to comply with the new regulation. In addition the ordinary foods that manufacturers wish to label to indicate suitability for coeliacs may also need to be relabelled to comply with the new Regulation.

It is estimated that such re-labelling costs could be up to £1000 per affected product but the transition periods available (3 years from adoption which the UK has negotiated) should allow such costs to be absorbed in routine label changes.

The Agency would welcome views from industry regarding the appropriate transition periods for businesses to allow for sell through of products with current packaging, along with any evidence they have.

The Agency would welcome views and evidence from industry about the policy costs which are over and above what a business would do commercially, in relation to the provisions regarding labelling (re-labelling associated with the new requirements).

Reformulation

It is possible that some manufacturers may need (or choose) to reformulate their products in cases where they are not compliant with the compositional requirements of the Regulation in order to continue making the associated claims. Such a decision would be based on business considerations, as it may incur ongoing costs, although practical/technical restraints may also have a bearing on this.

The Agency would welcome comments and evidence from industry about the potential costs of reformulation of existing products on the UK market claiming to be 'gluten free' or 'very low in gluten'.

Loss of products

The Regulation will not stop products labelled as 'gluten free' or 'very low gluten' being placed on the market, provided they comply with the provisions therein. As outlined above this may require some products to be relabelled and/or reformulated. If products cannot be reformulated or relabelled to comply with the new requirements they will have to be relabelled such that the claims are not made. The Agency does not consider that any product withdrawal would be necessary.

The Agency would welcome views and evidence from industry about the potential costs and number of products that will be lost.

Testing products to determine levels of gluten:

Companies making claims regarding the levels of gluten on their products should be able to demonstrate that the claim is valid and does not mislead the consumer, as required by general food law. Therefore, manufacturers making claims about reduced gluten content may already have procedures in place to determine the levels of gluten in their products and as such this proposal does not bring new costs for testing products. This proposal does not stipulate a method of analysis; however the new Codex Standard stipulates that the R5 Mendez method should be used for analysis. It is anticipated that companies will use this method of analysis to ensure international consistency. Therefore, some companies and analysts may change the method of analysis they use.

The Agency would welcome views, with evidence, from stakeholders on any potential costs from change of testing regime.

The cost of regulation in this area is not likely to be great and is considered to be proportionate when balanced against the potential benefit to consumer health. Furthermore, the UK has negotiated a longer transition period for industry thereby further reducing any impact of this Regulation. The UK is aware of other issues raised by the industry and consumers (dehydrated products, positioning of claims on packaging) and negotiation on behalf of UK industry in these areas is covered in option 3.

The Agency would welcome views from stakeholders on whether they agree with the Agency assessment that the proposal will introduce minimal cost to industry.

7. Benefits

Benefits of Option 1

Option 1 does not afford any benefits. As the Regulation has direct legislative force the UK would have been forced to accept a situation less than advantageous to the UK consumer and more onerous to the industry without positive engagement and negotiation. Furthermore, non-implementation would constitute a breach of the UK's obligations under the EC treaty. In addition, this option would fail to deliver improved consumer protection and the risk of inappropriately labelled products being marketed to consumers would remain.

Benefits of Options 2 and 3

The main benefit of options 2 and 3 is improved health of coeliacs as they will be able to choose products that are low in gluten and which are labelled such that they can make an informed choice. It is anticipated that increased consumer confidence in products marketed to coeliacs in general will drive growth in the market increasing the number of products and the range of products available. The additional benefit of the harmonisation of legislation in this area is the elimination of trade barriers such as the obstruction of free movement of such goods and unequal conditions of competition.

The Agency would welcome views from stakeholders on whether there are any other benefits from the proposal.

Further Benefits of Option 3

Option 3 will give the added benefit that products such as pre-mixes of foods and dehydrated foods will be able to be labelled as 'gluten-free' or 'very low gluten' if they final food as consumed meets the compositional standard. This will further increase consumer choice and therefore benefit consumer health.

The Agency would welcome views and justification from stakeholders on whether other changes should be made to the EU proposal.

8. Administrative Burden Costs

Apart from the one off costs for reading and understanding of the new legislation, there are no added ongoing administrative burdens on industry or enforcement authorities.

It is expected that in each business one person will need to spend half an hour reading the guidance. The cost of this time is estimated as follows. The 2007 ONS ASHE (Annual Survey of Hours and Earnings) gives median gross hourly pay for Managers in Distribution, Storage and Retailing as £11.29. In line with the standard cost model, this is up-rated by 30% to account for overheads, to give a figure of £14.68. For one person spending half an hour, the average cost per organisation is therefore estimated to be £7.34. Coeliac UK have informed us that approximately 210 businesses in the UK are producing food about which gluten claims are made. To take account of any other businesses considering this claim, and new entrants, we round this up to 300. This gives a cost to industry of approximately £2,200 in total, assumed to be spread evenly over the three years of implementation.

The cost to enforcers is estimated in the same way. The median gross hourly pay for a Public Service Professional of £15.03 (ASHE 2007) is up-rated by 30% for overheads to give a figure of £19.54 per hour. Again, the expected time taken is half an hour for one person, so the cost per enforcement agency is £9.77. This cost will apply to the 231 local authorities responsible for food standards in the UK, giving a total cost to enforcers of approximately £2,300, assumed to arise at the time this becomes law.

There will be a reduction in administrative burdens for industry as companies will no longer have to notify the Agency when gluten free products are placed on the EU market. The Agency estimates that the administrative cost to a company, over and above what it would do commercially, of completing and submitting a notification form on marketing of a 'gluten free' or 'very low gluten' product is approximately in the region of £70. The Agency receives, on average, 22 notifications per year. The resulting reduction in administrative burdens is therefore likely to be in the region of £1500 per annum.

The Agency would welcome views and evidence from industry about the administrative costs which are over and above what a business would do normally.

9. Consultation

Consumer and health professional groups, manufacturers and industry bodies, enforcement bodies, individuals and OGDs are being consulted on the draft Regulation and this IA is part of the consultation. The Agency has consulted these stakeholders via informal mechanisms such as interested party letters throughout negotiations in Europe and international negotiations on the Codex standard.

The Agency would welcome comments from all stakeholders on any aspect of the Regulation, the proposed options or the draft impact assessment.

10. Enforcement

Local Authority enforcement officers will be responsible for enforcement of the new provisions. We are seeking information on costs to enforcement authorities that could arise as a result of this regulation.

The Agency would welcome comments from enforcement bodies about the impact that this Regulation may have on their work.

11. Implementation and Review

The UK intends to review the implementation of this regulation 3 years after its coming into force date in the UK which is expected to be December 2011.

Specific Impact Tests: Checklist

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	Yes
Small Firms Impact Test	No	Yes
Legal Aid	No	No
Sustainable Development	No	Yes
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	No	Yes
Disability Equality	No	Yes
Gender Equality	No	Yes
Human Rights	No	No
Rural Proofing	No	No

Competition Assessment

The proposed legislation does not impose any significant costs to industry and applies to all manufacturers equally. It should not limit the number or range of suppliers either directly or indirectly or reduce the ability of, or incentives to, suppliers to compete. Therefore, it is not expected to impose significant impact on competition.

Small Firms Impact Test

During our informal consultation no issues specific to small businesses have been raised.

As part of this consultation process the Agency will continue to talk to small businesses both directly and through their representative organisations. This will include a holding forum specifically for small businesses.

It is not thought that the proposed legislation will disproportionately impact on small business as there are very few, if any, incremental costs involved in achieving compliance

We would welcome views from small businesses and their representatives on the impact the new proposal will have on them.

Sustainable development

A preliminary sustainability assessment has been carried out on the proposed options in the light of the information we have to date concerning the costs and benefits listed in sections 5-7 above.

Option 1 does not create any new economic or social benefits. It may however, incur economic disadvantages to the Government which may be subject to infraction proceedings for not implementing enforcement sanctions related to the Regulation. This option may bring social disbenefit in terms of coeliac health as products placed on the UK market would not always be meeting the compositional criteria expected by coeliacs.

Options 2 and 3 may bring economic costs to the industry due to possible reformulation and/or relabelling. In light of the evidence currently available to the Agency these economic costs cannot be quantified. However, based on information obtained during informal consultation on this Regulation, the long transitional times, which the UK negotiated, to enable compliance with the regulations and any changes that need to be made to labelling, will allow companies to use up existing packaging. Therefore, it is expected that there will not be any significant amounts of wasted product, packaging or labels. It is unlikely that there will be any considerable implications on greenhouse gas emissions or negative impacts on natural resources. These options also bring social benefits in terms of improving coeliac health by ensuring that products are manufactured with the lowest amount of gluten possible and improve consumer information as the claims made on these products will be standardised.

The Agency considers that the social benefits (health and consumer information) of adopting this legislation outweigh the possible economic costs to businesses. Environmental impacts will not be significant and the possible negative affects of the legislation on waste will be minimised by the lengthy transitional period. Options 2 and 3 are relatively more sustainable than option 1.

The Agency would welcome comments from stakeholders on the social and environmental costs and benefits of the proposed options so that a sustainability assessment can be completed.

Race equality issues

The proposed legislation does not impose any restrictive compliance on any person from a particular race, gender or with disability.

Gender equality issues

The proposed legislation does not impose any restrictive compliance on any person from a particular race, gender or with disability.

Disability equality issues

The proposed legislation does not impose any restrictive compliance on any person from a particular race, gender or with disability.

Regulation

Draft

Draft

COMMISSION REGULATION (EC) No .../..

of [...]

concerning the composition and labelling of foods suitable for people intolerant to gluten

(Text with EEA relevance)

THE COMMISSION OF THE EUROPEAN COMMUNITIES,

Having regard to the Treaty establishing the European Community,

Having regard to Council Directive 89/398/EEC of 3 May 1989 on the approximation of the laws of the Member States relating to foodstuffs for particular nutritional uses¹, and in particular Article 2 paragraph 3 and Article 4a thereof,

Whereas:

- (1) Directive 89/398/EEC concerns foods intended for particular nutritional uses which owing to their special composition or manufacturing process are intended to satisfy the particular nutritional requirements of specific categories of the population. People with coeliac disease are a specific group of the population suffering from a permanent intolerance to gluten.
- (2) The food industry has developed a range of 'gluten-free' products. Because the removal of gluten from gluten-containing grains presents considerable technical difficulties and economic constraints, the manufacture of totally gluten-free food is difficult. Consequently, many foods for this particular nutritional uses on the market may contain low residual amounts of gluten.
- (3) An increasing number of foods are described in the Community as 'gluten-free'. Differences between national provisions concerning the conditions for the use of such descriptions may impede the free movement of foods and may fail to ensure the same high level of protection for consumers. For the sake of clarity and to avoid confusing consumers with different types of descriptions of products at national level, the conditions for the use of the terms related to the absence of gluten should be laid down at European level.
- (4) A revised Codex standard for foods for special dietary use for persons intolerant to gluten was adopted in [July 2008], with a view to enabling those persons to find on the market a variety of food suitable to their needs and to their level of sensitivity to

¹ OJ L 186, 30.6.1989 p.27. Directive as last amended by Regulation (EC) N°1882/2003 as of the European Parliament and of the Council (OJ L 284, 31.10.2003, p.1).

gluten. These rules should be taken appropriately into consideration for the purposes of this Regulation.

- (5) Wheat (i.e. all *Triticum* species, such as durum wheat, spelt, and kamut), rye and barley have been identified as grains that are scientifically reported to contain gluten. These grains can cause adverse health effects to persons intolerant to gluten and therefore should be avoided by them.
- (6) Most but not all people with intolerance to gluten can include oats in their diet without adverse effect on health. However, a major concern is the contamination of oats with wheat, rye or barley that can occur during grain harvesting, transport, storage and processing. Therefore the risk of gluten contamination in oat products should be taken into consideration.
- (7) Different people with intolerance to gluten may tolerate different amounts of gluten within a restricted range. In order to enable individuals to find on the market a variety of food appropriate for their needs and for their level of sensitivity, a choice of gluten-free products should be possible among products with different gluten content.
- (8) Foods for particular nutritional uses which have been specially formulated, processed or prepared to meet the dietary needs of people intolerant to gluten and marketed as such should be labelled either as "very low gluten" or "gluten-free" in accordance with the provisions laid down in this Regulation.
- (9) Article 2(3) of Directive 89/398/EEC provides for the possibility for foods for normal consumption which are suitable for a particular nutritional use to indicate such suitability. Therefore, it should be possible for a normal food which is suitable as part of a gluten-free diet because it does not contain gluten to bear terms indicating the absence of gluten. Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foods², such a statement does not mislead the consumer by suggesting that the food possesses special characteristics when in fact all similar foods possess such characteristics.
- (10) [Commission Directive 2006/141/EC of 22 December 2006 on infant formulae and follow-on formulae and amending Directive 1999/21/EC³ and Commission Directive 2006/125/EC of 5 December 2006 on processed cereal-based foods and baby foods for infants and young children⁴]
- (11) The measures provided for in this Regulation are in accordance with the opinion of the Standing Committee on the Food Chain and Animal Health,

² OJ L 109, 6.5.2000, p.29. Directive as last amended by Directive 2003/89/EC (OJ L 308, 25.11.2003, p.15).

³ OJ L 401, 30.12.2006, p. 1.

⁴ OJ L 339, 6.12.2006, p. 16.

HAS ADOPTED THIS REGULATION:

Article 1
Scope

1. For the purpose of Article 4a of Directive 89/398/EEC, this Regulation establishes for foodstuffs for particular nutritional uses especially formulated, processed or prepared to meet the special dietary needs of people intolerant to gluten, the terms to be used to that effect, the obligation to indicate the absence of gluten and the conditions under which such terms shall be used.
2. Furthermore, this Regulation establishes for other foodstuffs which due to their composition are suitable for people intolerant to gluten, the conditions under which they may indicate the absence of gluten.
3. [This Regulation shall apply without prejudice to the following Community provisions:
 - (a) Commission Directive 2006/141/EC;
 - (b) Commission Directive 2006/125/EC.]

Article 2
Definitions

The following definitions shall apply:

- (a) 'Gluten' means a protein fraction from wheat, rye, barley, or their crossbred varieties and derivatives thereof, to which some persons are intolerant and that is insoluble in water and 0.5 M sodium chloride solution;
- (b) 'Pure oats' means oats which have been specially produced, prepared and processed in order to avoid contamination by wheat, rye, barley, or their crossbred varieties, with a gluten content not greater than 20 mg/kg in total, based on the food as sold to the final consumer.
- (c) 'Wheat' means all *Triticum* species, such as durum wheat, spelt, and kamut.

Article 3
Foodstuffs for particular nutritional uses especially formulated, processed or prepared to meet the special dietary needs of people intolerant to gluten

1. Foods for particular nutritional uses specially formulated, processed or prepared to meet the special dietary needs of people intolerant to gluten consisting of or containing ingredients made from wheat, rye, barley, or their crossbred varieties which have been especially processed to remove gluten shall not contain a level of gluten greater than 100 mg/kg in the food as sold to the final consumer and shall bear the term 'very low gluten'.

In cases where these foods contain oats, pure oats shall be used.

2. Foods for particular nutritional uses as referred in paragraph 1 may bear the terms 'gluten-free' providing that the gluten content is not greater than 20 mg/kg in the food as sold to the final consumer.
3. Foods for particular nutritional uses specially formulated, processed or prepared to meet the special dietary needs of people intolerant to gluten consisting of or containing one or more ingredient which substitute wheat, rye, barley, or their crossbred varieties or/and pure oats shall not contain a level of gluten greater than 20 mg/kg in the food as sold to the final consumer and shall bear the term 'gluten-free'.

Article 4
Other foodstuffs

1. Without prejudice to the provisions in Article 2(1)(a)(iii) of Directive 2000/13/EC,
 - (a) foodstuffs for normal consumption and,
 - (b) foodstuffs for particular nutritional uses specially formulated, processed or prepared to meet the special dietary needs other than those of people intolerant to gluten that due to their composition are suitable to meet the special dietary needs of people intolerant to gluten that, due to their composition, are suitable to meet the special dietary needs of people intolerant to gluten,

may bear the term "gluten-free" providing that the gluten content is not greater than 20 mg/kg in the food as sold to the final consumer.

2. Foodstuffs as referred in paragraph 1 may not bear the terms 'very low gluten'

Article 5
Placement of labelling statements

When the terms "gluten-free" or "very low gluten" are used in accordance with this Regulation, they shall appear [in proximity to the name] under which the food is sold.

Article 5
Transitional measures

Foods which do not comply with this Regulation may continue to be put on the market until [dd/mm/yyyy- 3 years after the last day of the month of publication].

Article 6
Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, [...]

For the Commission

[...]

Member of the Commission

LIST OF INTERESTED PARTIES

A CAMACHO UK LTD
A G BARR
ABBOT LABORATORIES LIMITED
ABR FOODS
ACE LABELS PLC/ELLIS LABELS & SYSTEMS LTD
ADAMS PORK PRODUCTS
ADAMS WILSON & ASSOCIATES
ADAMSON BSMG
ADDENBROOKES HOSPITAL
ADVERTISING ASSOCIATION
ADVERTISING STANDARDS AUTHORITY
ADVISORY BODY FOR SOCIAL SERVICES
CATERING
ADVISORY CENTRE FOR EDUCATION
AGAINST THE GRAIN LTD.
AGRICULTURAL INDUSTRIES CONFEDERATION
AGRICULTURAL SUPPLY INDUSTRY
AGRICULTURE AND HORTICULTURE
DEVELOPMENT BOARD
AJINMOTO CO LTD
ALCONTROL LABORATORIES
ALFA CHEMICALS
AL-KHOEI FOUNDATION
ALLCHEM INTERNATIONAL
ALLERGY ALLIANCE
ALLERGY UK
ALLIANCE FOR NATURAL HEALTH
ALLIED BAKERIES LID
ALLIED DOMEQ RETAILING LTD
ALLIED TECHNICAL CENTRE
ALLSPORTS INTERNATIONAL LTD
ALPHA FLIGHT SERVICES
ALPRO UK LTD
AMATEUR ATHLETICS ASSOCIATION
AMERICAN FOOD INTERNATIONAL
AMERICAN MAIZE-PRODUCTS COMPANY (USA)
AMERICAN PEANUT COUNCIL
AMICUS
ANAPHYLAXIS CAMPAIGN
ANIMAL MEDICINES INSPECTORATE
AN-NISA SOCIETY
APCO EUROPE
ARKARIUS LIMITED
ARKOPHARMA (UK) LTD
ARLA FOODS PLC
ASDA STORES LTD
ASHTOWN FOOD RESEARCH CENTRE
ASHURST
ASHWELL ASSOCIATES
ASSISTANTE SECTORIELLE AGRO-ALIMENTAIRE
ASSOC OF BRITISH PAEDIATRIC NURSES
ASSOC OF THE BRITISH PHARMACEUTICAL
INDUSTRY
ASSOCIATED BRITISH FOODS PLC
ASSOCIATION FOR BREASTFEEDING MOTHERS
ASSOCIATION OF BAKERS INGREDIENTS
MANUFACTURERS
ASSOCIATION OF BRITISH ABATTOIR OWNERS
ASSOCIATION OF BRITISH CHAMBERS OF
COMMERCE
ASSOCIATION OF CEREAL FOOD
MANUFACTURERS LTD
ASSOCIATION OF CHEESE PROCESSORS
ASSOCIATION OF CONVENIENCE STORES
ASSOCIATION OF FROZEN FOOD PRODUCERS &
ICE CREAM FEDERATION
ASSOCIATION OF MUSLIM SCHOLARS
ASSOCIATION OF PASTRY CHEFS
ASSOCIATION OF PORT HEALTH AUTHORITIES
(APHA)
ASSOCIATION OF PUBLIC ANALYSTS
ASSOCIATION OF RADICAL MIDWIVES
ASSURED BRITISH MEAT
ASSURED FOOD STANDARDS
ASTON MANOR BREWERY
AUTHENTIXS
AVILTON FOODS LTD
BABY MILK ACTION
BABYLICIOUS LIMITED
BAKEBEST LTD
BAKERS DELIGHT LTD
BAKKAVOR GROUP
BANGLADESH CATERERS ASSOCIATION UK
BAPEN
BARBOUR INDEX PLC
BAREFIELDS LTD
BARENTZ BV
BARNET LONDON BOROUGH COUNCIL
BARRY ATWOOD
BASIC SKILLS AGENCY
BATEMANS
BEADLE HOUSE CLINIC
BEARFIELDS LIMITED
BEE FARMERS' ASSOCIATION OF THE UK
BEE SERVICES
BEIKER PRODUCTS LTD
BELLS OF LAZONBY LTD
BELSO'S (UK) CEREALS LTD
BERNARD MATTHEWS LTD
BERRY OTTAWAY AND ASSOCIATES LIMITED
BETH-DIN
BEVAN ASHFORD
BHF HEALTH PROMOTION RESEARCH GROUP
BIBRA INFORMATION SERVICES LTD
BIO BAMBINI
BIOCARE
BIOFORCE (UK) LTD
BIOHEALTH LTD
BIRD & BIRD
BIRMINGHAM CHILDRENS HOSPITAL
BIRMINGHAM CITY LABORATORIES
BIRMINGHAM LIBRARY SERVICES
BODYCOTE LAWLABS
BOLTON MBC
BONNIA PETITE BANQUETING LTD
BOOKER LTD
BOOTH SMITH & ASSOCIATES
BOOTS THE CHEMIST
BOROUGH OF REIGATE & BANSTEAD
BOURNE SALADS
BOURNMOUTH UNIVERSITY
BOWMAN INGREDIENTS
BRADFORD COUNCIL OF MOSQUES
BRADFORD ROYAL INFIRMARY
BRAKE CO LTD
BRAKES
BREAKSPEAR HOSPITAL
BREASTFEEDING NETWORK
BRENT COUNCIL
BRETBY CONFERENCE CENTRE
BREWERS & LICENSED RETAILERS ASSOCIATION
BREWSTER ET HUGUETTE WHITE

LIST OF INTERESTED PARTIES

BRISTOL CITY COUNCIL
BRITANNIA HEALTH PRODUCTS LTD
BRITISH AIRWAYS HEALTH SERVICES
BRITISH ASSOCIATION FOR ALLERGY,
ENVIRONMENT & NUT
BRITISH ASSOCIATION OF FLOWER ESSENCE
PRODUCERS
BRITISH ASSOCIATION OF NUTRITIONAL
THERAPISTS
BRITISH ASSOCIATION OF SPORTS & EXERCISE
MEDICINE (BASEM)
BRITISH BAKERS LTD
BRITISH BEEKEEPER'S ASSOCIATION
BRITISH BEER & PUB ASSOCIATION
BRITISH CARAMEL MANUFACTURERS
ASSOCIATION
BRITISH CHEESE BOARD
BRITISH COFFEE ASSOCIATION
BRITISH COMPLEMENTARY MEDICINE
ASSOCIATION
BRITISH DENTAL ASSOCIATION
BRITISH DIETETIC ASSOCIATION
BRITISH EGG INDUSTRY COUNCIL
BRITISH ESSENCE MANUFACTURERS
ASSOCIATION
BRITISH ESSENTIAL OILS ASSOCIATION
BRITISH FERMENTATION PRODUCTS
BRITISH FOOD IMPORTERS & DISTRIBUTORS
ASSOCIATION
BRITISH FROZEN FOOD FEDERATION
BRITISH FRUIT JUICE ASSOCIATION
BRITISH GOAT SOCIETY
BRITISH HEART FOUNDATION
BRITISH HERBAL MEDICINE ASSOCIATION
BRITISH HOSPITALITY ASSOCIATION
BRITISH HUMANIST ASSOCIATION
BRITISH INDEPENDENT GROCERS ASSOCIATION
BRITISH INSTITUTE FOR ALLERGY &
ENVIRONMENTAL THERAPY
BRITISH MEAT PROCESSORS ASSOCIATION
BRITISH MEDICAL ASSOCIATION
BRITISH NUTRITION FOUNDATION
BRITISH OLYMPIC ASSOCIATION
BRITISH PASTA PRODUCT ASSOCIATION
BRITISH PHARMACEUTICAL NUTRITION GROUP
BRITISH PIG ASSOCIATION
BRITISH POTATO MARKETING
BRITISH POULTRY COUNCIL
BRITISH RETAIL CONSORTIUM
BRITISH SANDWICH ASSOCIATION
BRITISH SOCIETY OF GASTROENTEROLOGY
BRITISH SOFT DRINKS ASSOCIATION LTD
BRITISH STANDARDS
BRITISH SUGAR PLC
BRITISH TENNIS COACHES' ASSOCIATION
BRITISH VETERINARY ASSOCIATION
BRITISH WEIGHTLIFTERS ASSOCIATION (BWLA)
BRITVIC SOFT DRINKS LTD
BROMLEY CENTRAL LIBRARY
BROOKS-CARTER CLINIC
BSEM
BUCKINGHAMSHIRE COUNTY COUNCIL
BUCKINGHAMSHIRE NHS TRUST
BUREAU VERITAS
BURSON-MARSTELLER/BKSH
BUSINESS EYE
BUSINESS IN SPORT & LEISURE
CADBURY SCHWEPPE'S PLC
CAMACOM LAW (SOLICITORS) LTD
CAMBRIDGE MANUFACTURING COMPANY LTD
CAMEDICA
CAMPAIGN FOR REAL ALE LTD
CAMPDEN & CHORLEYWOOD FOOD RESEARCH
ASSOCIATION
CANTOX HEALTH SCIENCES INTERNATIONAL
CARDIFF SCIENTIFIC SERVICES
CARGILL FLAVOR SYSTEMS/DUCKWORTH GROUP
CARTMEL STICKY TOFFEE
CARVER WILDE COMMUNICATIONS
CATALENT PHARMA SOLOUTIONS
CATERER & HOTELKEEPER
CATERING UPDATE
CAVAGHAN & GRAY
CCI
CENTRAL LOBBY CONSULTANTS
CENTRE FOR FOOD & HEALTH STUDIES LTD
CENTRE FOR PUBLIC HEALTH EXCELLENCE,
NATIONAL INSTITUTE FOR HEALTH AND CLINICAL
EXCELLENCE
CEREAL PARTNERS WORLDWIDE
CHARBONNEL ET WALKER
CHARLES BARKER PLC
CHARLES ROWE
CHARTERED INSTITUTE OF ENVIRONMENTAL
HEALTH
CHEMICAL BUSINESS ASSOCIATION
CHEMIST & DRUGGIST
CHEMISTRY & INDUSTRY MAGAZINE
CHICHESTER COLLEGE OF ARTS SCIENCES &
TECHNOLOGY
CHIEL FOODS & CHEMICALS INC
CHILD ACTION PREVENTION TRUST
CHILLED FOOD ASSOCIATION LTD
CHINESE NATIONAL HEALTHY LIVING CENTRE
CHINESE TAKE AWAY ASSOCIATION
CHOCOLATES FOR CHOCOHOLICS LTD
CHRISTAN HANSEN UK LTD
CHRISTCHURCH BOROUGH COUNCIL
CHRISTIAN HANSON
CHURCHES' COMMISSION FOR INTER-FAITH
RELATIONS
CITY OF YORK COUNCIL
CIVO-INSTITUTES TNO
CLARKE WILLMOTT SOLICITORS
CLARK'S ORIGINAL PIES
CLEARSPRING LTD
CLINIC OF NATURAL MEDICINE
CMI PLC
CMS CAMERON MCKENNA
COASTAL TRADING
COBRA
COCA-COLA COMPANY
COELIAC UK
COMMUNITY FOODS LTD
COMMUNITY NUTRITION GROUP
COMMUNITY PRACTITIONERS AND HEALTH
VISITORS ASSOCIATION
COMPASS GROUP UK & IRELAND
CONFEDERATION OF BRITISH INDUSTRY
CONFEDERATION OF INDIAN FOOD TRADE AND
INDUSTRY
CONFEDERATION OF INDIAN ORGANISATIONS (UK)
CONFOCO UK LTD
CONSENSUS ACTION ON SALT & HEALTH
CONSUMER EDUCATION & RESEARCH CENTRE
CONSUMERS FOR HEALTH CHOICE

LIST OF INTERESTED PARTIES

CONTRACT FOOD LTD
CONWY COUNTY BOROUGH COUNCIL
COOKIE MAN LTD.
CO-OPERATIVE GROUP
COORS BREWERS PLC
COPELAND BOROUGH COUNCIL
CORNWALL COUNTY COUNCIL
COSUCRA
COTT BEES LTD
COTTAGE RESTAURANT & LODGE
COUNCIL FOR RESPONSIBLE NUTRITION
COUNSEL LTD
COUNTRY MARKETS LTD
COUTRELIS & ASSOCIES
COVENTRY HEALTH AUTHORITY
COVINGTON & BURLING
CRAIGAVON AREA HOSPITAL GROUP NSS
CRANBERRY FOODS
CREATIVE INDUSTRIES
CROP PROTECTION ASSOCIATION
CULLINANE ASSOCIATES LTD
CUMBRIA COUNTY COUNCIL
D & T ASSOCIATION
D F ANSTEAD LTD
DABUR INDIA LTD
DABUR RESEARCH FOUNDATION
DAILYCER LTD
DAIRY COUNCIL
DAIRY UK LTD
DALE FARM (GB) LTD
DANISCO INGREDIENTS UK LTD
DANISCO-CULTOR
DANISH BACON & MEAT COUNCIL LTD
DBC FOODSERVICE
DEFENCE CATERING GROUP
DEL MONTE FOODS (UK) LTD
DENBIGSHIRE COUNTY COUNCIL
DENTSU BRUSSELS GROUP
DEPARTMENT FOR INTERNATIONAL
DEVELOPMENT
DEPARTMENT OF GASTROENTEROLOGY &
NUTRITION
DEPARTMENT OF HUMAN NUTRITION
DEPARTMENT OF LOCAL GOVERNMENT AND
THE ENVIORNMENT
DEPARTMENT OF TRADING STANDARDS
DEPT OF PHYSICAL EDUCATION, SPORTS
SCIENCE
DERBYSHIRE COUNTY COUNCIL
DERRISFORD HOSPITAL
DIABETES UK
DIAGEO
DIETETIC DEPT
DIETICIAN'S DEPARTMENT
DIETITIANS IN SPORT & EXERCISE NUTRITION
DORSET COUNTY COUNCIL
DOVES FARM FOODS LTD
DR STUART'S BOTANICAL TEAS
DROSSA
DRUCES & ATTLEE
DSM
DURHAM CITY COUNCIL
EALING COUNCIL
EAST & NORTH EAST HERTFORDSHIRE PTC
EAST RIDING OF YORKSHIRE COUNCIL
EAST SUSSEX COUNTY COUNCIL
ECLIPSE SCIENTIFIC GROUP
EDLONG COMPANY LTD
ELKS BISCUITS
ELLIOT SOLICITORS
ENGLISH GRAINS LTD
ENGLISH INSTITUTE OF SPORT
ENGLISH TOURIST BOARD
ENVIRONMENT COUNCIL
ENVIRONMENTAL DATA SERVICES
ENVIRONMENTAL HEALTH AND TRADING
STANDARDS SERVICE
ENVIRONMENTAL MEDICINE FOUNDATION
ESSENTIAL TRADING CO-OPERATIVE LTD
ETHICS COMMITTEE'S
EURODIET DISTRIBUTION AND WHOLESALE LIMITED
EUROFINS LABORATORIES LTD
EUROPE ANALYTICA
EUROPEAN FEDERATION OF HEALTH PRODUCT
MANUFACTURERS ASSOCIATION
EUROPEAN FOOD LAW ASSOCIATION UK
EUROPEAN RESEARCH INTO CONSUMER AFFAIRS
EUROPEAN SPECIALIST SPORTS NUTRITION
ALLIANCE
EVERSHEDS
EXETER & DISTRICT CONSUMER GROUP
F I DATA SERVICES
FACULTY OF PUBLIC HEALTH OF THE ROYAL
COLLEGE OF PHYSICIANS OF THE UNITED KINGDOM
FEDERAL OFFICE OF PUBLIC HEALTH
FEDERATION INTERNATIONALE DE FOOTBALL
ASSOCIATION (FIFA)
FEDERATION OF BAKERS
FEDERATION OF DANISH PIG PRODUCERS &
SLAUGHTERHOUSES
FEDERATION OF JAIN ORGANISATIONS
FEDERATION OF SMALL BUSINESSES
FEDERATION OF WHOLESALE DISTRIBUTORS
FEDERATIONS OF SYNAGOGUES
FIBRISOL SERVICE LTD
FINDUS LTD
FIRST FOR FOOD SERVICE
FISH TECHNOLOGY CONSULTANT
FISHMONGER'S COMPANY
FITNESS INDUSTRY ASSOCIATION
FLINTSHIRE COUNTY COUNCIL
FOCUS ON FOOD
FOOD & DRINK FEDERATION
FOOD & HEALTH RESEARCH
FOOD ADDITIVES AND INGREDIENTS ASSOCIATION
LTD
FOOD AND ENVIRONMENTAL DIVISION LGC LTD
FOOD BRAND GROUP (THE)
FOOD BRANDS GROUP
FOOD COMMISSION UK LTD
FOOD CONSULTANCY
FOOD ENGINEERING INTERNATIONAL MAGAZINE
FOOD GB LTD
FOOD LABELLING DATABASE
FOOD LAW GROUP
FOOD SCIENCE AUSTRALIA
FOOD STANDARDS AUSTRALIA NEW ZEALAND
FOODAWARE: THE CONSUMERS' FOOD GROUP
FOODLINKS LIMITED
FOOTBALL ASSOCIATION
FOR CHILDREN
FORESIGHT
FORUM OF PRIVATE BUSINESS
FORUM PRODUCTS LTD
FOX'S BISCUITS
FRESENIUS KABI LTD

LIST OF INTERESTED PARTIES

FRESH PACKS FOODS LTD
FRESH PRODUCE CONSORTIUM
FRESHPACK LTD
FRIDAY'S LTD
FRIENDS OF THE EARTH
FROZEN AND CHILLED POTATO PROCESSORS
ASSOCIATION
FTSE
FUEL PR
G C HAHN & CO LTD
G F DIETARY GROUP LTD
G R LANE HEALTH PRODUCTS LTD
GADSBY'S BAKERY
GARNELL CORPORATION LTD
GASTROENTEROLOGY UNIT
GB CHOICE
GENERAL CONSUMER COUNCIL FOR
NORTHERN IRELAND
GENERAL DIETARY LTD
GENUINE EMPOWERMENT OF MOTHERS IN
SOCIETY
GIN & VODKA ASSOCIATION
GIRACT
GIRAG SA
GLACTOSAEMIA
GLAXOSMITHKLINE
GLENRYCK FOODS LTD
GLISTEN CONFECTIONERY
GLOUCESTER CITY COUNCIL
GLUTAFIN
GLUTEN FREE FOODS LTD
GM FREEZE CAMPAIGN
GOLDEN WONDER LTD
GOOD FOOD DISTRIBUTORS
GOODMAN DERRICK
GOVERNMENT OF WESTERN AUSTRALIA
GOVERNMENT OFFICE FOR THE EAST
MIDLANDS
GRACE GMBH
GRAIG FARM ORGANICS
GRAMPIAN COUNTRY FOOD GROUP
GRANOVITA UK LTD
GRAYSHOTT HEALTH FOODS
GREENCITY WHOLEFOODS
GREENWOODS SOLICITORS LLP
GUILD OF BANGLADESHI RESTAURANTEURS
GUILD OF PRACTITIONERS
H J HEINZ
H M PRISON SERVICE
H T WEBB & CO LTD
HAEMOLYTIC URAEMIC SYNDROME HELP
HALAL FOOD AUTHORITY
HALAL MEAT
HALEWOOD INTERNATIONAL LTD
HALLMARK ANALYTICAL VENTURES LIMITED
HALO FOODS LTD
HALTON BOROUGH COUNCIL
HAMPSHIRE COUNTY COUNCIL
HAMPSHIRE SCIENTIFIC SERVICES
HANDMADE CAKE COMPANY
HARRODS LTD
HARROW LONDON BOROUGH COUNCIL
HARTWELL FOOD RESEARCH LTD
HAZELWOOD PRESERVES LTD
HEALAN INGREDIENTS LTD
HEALTH & CONSUMER PROTECTION
DIRECTORATE - GENERAL
HEALTH & DIET FOOD COMPANY
HEALTH CARE PRODUCTS
HEALTH FOOD MANUFACTURERS' ASSOCIATION
HEALTH PROMOTION AGENCY
HEATHER PAINE ASSOCIATES
HEINZ UK & IRELAND
HERON FOODS
HIGH COMMISSION FOR THE REPUBLIC OF SOUTH
AFRICA
HILDRED & COCKER LTD
HILL & KNOWLTON (UK) LTD
HIPPO UK LIMITED
HMPS
HOBBELINK
HOLFORD & ASSOCIATES
HOLLAND & BARRETT
HOME OFFICE HEALTH & SAFETY SERVICES
HONEY ASSOCIATION
HONEYROSE PRODUCTS LTD
HONG KONG GOVT - DEPT OF HEALTH
HOSPITAL CATERERS ASSOCIATION
HOULSTON MANOR WATER
HOWARD FOUNDATION RESEARCH GROUP
HUNTINGDON LIFE SCIENCES
HUSH(HAEMOLYTIC URAEMIC SYNDROME HELP)
HYGIENE & NUTRITION IN FOOD SERVICE
ICE CREAM ALLIANCE
ICE FRESH FOODS LTD
ICELAND FOODS LIMITED
ILCHESTER CHEESE CO LTD
ILS LTD
IMANS AND MOSQUES COUNCIL (UK)
IMPERIAL COLLEGE
INDEPENDENT NUTRITION LOGIC
INFANT AND DIETETIC FOODS ASSOCIATION
INNOCENT DRINKS
INNOCENT LTD
INNOVATION ADVERTISING
INNOVATIVE SOLUTIONS UK LTD
INSTITUTE OF FOOD SCIENCE & TECHNOLOGY
INSTITUTE FOR COMPLIMENTARY MEDICINE
INSTITUTE FOR OPTIMUM NUTRITION
INSTITUTE OF CHEMICAL ENGINEERS
INSTITUTE OF CHILD HEALTH
INSTITUTE OF DIRECTORS
INSTITUTE OF EDUCATION
INSTITUTE OF FOOD RESEARCH
INSTITUTE OF FOOD SCIENCE & TECHNOLOGY
INSTITUTE OF HOSPITALITY
INSTITUTE OF OPTIMUM NUTRITION
INSTITUTE OF PRACTITIONERS IN ADVERTISING
INSTITUTE OF REFRIDGERATION
INSTITUTE OF RURAL HEALTH
INTER FAITH NETWORK FOR THE UK
INTERNATIONAL FEDERATION OF ESSENTIAL OILS &
AROMA TRADES
INTERNATIONAL FISH MEAL & OIL MANUFACTURERS
ASSOCIATION
INTERNATIONAL FLIGHT CATERING
INTERNATIONAL FOOD INFORMATION SERVICE
INTERNATIONAL MARKETING
INTERNATIONAL MEAT TRADE ASSOCIATION
INTERNATIONAL PECTIN PRODUCERS ASSOCIATION
INTERNATIONAL SOFT DRINK COUNCIL
INTERSERVE (FACILITIES MANAGEMENT) LIMITED
INTERTAB
ION TRADING
IRISH YOGURTS LTD
ISBA

LIST OF INTERESTED PARTIES

ISBOURNE ENVIRONMENT LTD
ISLAMIC CENTRE OF GLASGOW
ISLAMIC CULTURAL CENTRE
ISLAMIC FOOD & NUTRITION COUNCIL
ISLAMIC FORUM OF EUROPE
ISLAMIC SHARIAH COUNCIL
ISLE OF MAN GOVERNMENT
ISP ALGINATES
J RALPH BLANCHFIELD CONSULTANCY
J SAINSBURY PLC
JACOBS BAKERY LIMITED
JAIN NETWORK
JAMES GILBERTSON & CO
JEAN GARON PUBLIC RELATIONS
JETRO LONDON
JOHN RUNDALL ASSOCIATES
JOHN RUSSELL ASSOCIATES/FAIA
JOHN TAYLOR AND SON
JOHN WEST FOODS LTD
JOHN WYETH & BROTHER LTD
JOHNSONS DIETARY PROVISIONS LTD
JOHNSTON CONSULTING
JOINT COUNCIL FOR ANGLO CARIBBEAN CHURCHES
JUST RACHEL QUALITY DESSERTS
K J LOVERING & CO LTD
KELLER & HECKMAN LLP
KELLOGG COMPANY (GB) LTD
KENT TRADING STANDARDS
KERRY FOODS UK
KETTLE FOODS
KIDNEY RESEARCH UK
KIKKOMAN TRADING EUROPE GMBH
KING'S COLLEGE LONDON
KINNERTON CONFECTIONARY CO LTD
KITCHEN RANGE FOODS LTD
KNIGHT INTERNATIONAL
KRAEBER (UK) LTD
KRAFT FOODS UK LTD
KREGLINGER EUROPE
L B CROYDON FOOD TEAM
L HEPNER & ASSOCIATES LTD
LA LECHE LEAGUE (GREAT BRITAIN)
LA ROCHE LTD
LABORATORY OF THE GOVERNMENT CHEMIST (LGC)
LACTATION CONSULTANTS OF GREAT BRITAIN (LCGB)
LAMBETH TRADING STANDARDS
LANCASHIRE COUNCIL OF MOSQUES
LANCASHIRE COUNTY ANALYSTS DEPT
LANCASHIRE COUNTY COUNCIL
LAW COMMISSION
LAW LABORATORIES LTD
LAWCODE
LAWDATA LTD
LAWRENCE GRAHAM
LAWSON DR R G
LEAD DEVELOPMENT ASSOCIATION INTERNATIONAL
LEATHERHEAD FOOD INTERNATIONAL
LEE KEE KUM (HONG KONG) FOODS LTD
LEEDS CITY COUNCIL
LEEDS METROPOLITAN UNIVERSITY
LEICESTER REFERENCE & INFORMATION LIBRARY
LEICESTERSHIRE COUNTY ANALYSTS LAB
LGC (TEDDINGTON) LTD
LIDL UK GMBH
LIFE TREE SHOP
LINCOLN CO-OP CHEMIST LTD
LOCAL AUTHORITIES CO-ORDINATORS OF REGULATORY SERVICES
LONDON BOROUGH OF BARKING & DAGENHAM
LONDON BOROUGH OF BRENT (ENVIRONMENTAL HEALTH)
LONDON BOROUGH OF ENFIELD
LONDON BOROUGH OF LAMBETH
LONDON BOROUGH OF SOUTHWARK
LONDON CHAMBER OF COMMERCE
LONDON FIRE BRIGADE
LONDON FOOD CENTRE
LONDON INTERNATIONAL GROUP
LONDON RETAIL MEAT TRADERS ASSOCIATION
LONZA
LOVELL WHITE DURRANT SOLICITORS
LOVELLS
LYN ANDERSON
LYONS TETLEY LTD
LYSI HS
MACFARLANES
MALTSTERS ASSOCIATION OF GREAT BRITAIN
MANCHESTER METROPOLITAN UNIVERSITY
MANCHESTER RUSK CO LTD
MARDON PLC
MARKAZI JAMIAT AHLE HADITH
MARKETING LAW ADVISORY SERVICE
MARKS & SPENCER PLC
MATTHEW CLARK LTD
MCC PUBLIC RELATIONS LTD
MCCAIN FOODS
MCCORMACK FOODS
MCDONALD'S RESTAURANTS LTD
MCKENNA & CO
MEAD JOHNSON NUTRITIONALS
MEAT AND LIVESTOCK COMMISSION (MLC)
MEDICINES & HEALTHCARE PRODUCTS REGULATORY AGENCY
MENCAP
MERIDIAN FOODS LTD
MERRYDOWN PLC
MERRYVALE
METAL PACKAGING MANUFACTURERS ASSOCIATION
METROPOLITAN POLICE SERVICE
MIDWIVES INFORMATION & RESOURCE SERVICE
MILLS & REEVE
MILTON KEYNES COUNCIL
MJSR ASSOCIATES
MOILAS OY
MONMOUTHSHIRE COUNTY COUNCIL
MORELANDS LTD/MH FOODS LTD
MOY PARK LTD
MP MEDIA SERVICES
MRC HUMAN NUTRITION RESEARCH
MULLER GROUP UK
MULTI LABELS LIMITED
MUSLIM COLLEGE
MUSLIM DOCTORS & DENTISTS ASSOCIATION
NAT ASSOC OF LOCAL GOVT OFFICIALS
NAT SOCIETY FOR PHENYLKENORIA (UK)
NATIONAL AMATEUR BODYBUILDERS ASSOCIATION (NABBA)
NATIONAL ASSOCIATION OF CIDER & PERRY MAKERS
NATIONAL ASSOCIATION OF HEALTH STORES
NATIONAL ASSOCIATION OF MASTER BAKERS

LIST OF INTERESTED PARTIES

NATIONAL ASSOCIATION OF WOMEN'S CLUBS
NATIONAL BEEF ASSOCIATION
NATIONAL CHILDBIRTH TRUST
NATIONAL CONSUMER COUNCIL
NATIONAL CONSUMER FEDERATION
NATIONAL COUNCIL OF HINDU TEMPLES
NATIONAL COUNCIL OF WOMEN OF GREAT
BRITAIN
NATIONAL DRIED FRUIT TRADE ASSOCIATION
NATIONAL EDIBLE OIL DISTRIBUTORS
ASSOCIATION
NATIONAL FAMILY & PARENTING INSTITUTE
NATIONAL FARMERS' UNION
NATIONAL FEDERATION OF CONSUMER
GROUPS
NATIONAL FEDERATION OF FISHERMEN'S
ORGANISATIONS
NATIONAL FEDERATION OF MEAT & FOOD
TRADERS
NATIONAL FEDERATION OF WOMEN'S
INSTITUTES
NATIONAL HEART FORUM
NATIONAL HEART FOUNDATION OF AUSTRALIA
NATIONAL INSTITUTE FOR HEALTH & CLINICAL
EXCELLENCE
NATIONAL INSTITUTE OF MEDICAL HERBALISTS
NATIONAL MARKET TRADERS' FEDERATION
NATIONAL OFFICE OF ANIMAL HEALTH (NOAH)
NATIONAL PHAMACEUTICAL ASSOC
NATIONAL PHARMACY ASSOCIATION
NATIONAL PIG ASSOCIATION
NATIONAL STARCH & CHEMICAL LTD
NATIONAL WOMEN'S REGISTER
NATURAL HEALTH PRACTICE
NATURALLY GOOD FOOD LTD
NATURE'S OWN LTD
NCGFCO (DANIELS)
NCH ACTION FOR CHILDREN
NESTLE UK
NEVILLE CRADDOCK ASSOCIATES
NEW COVENT GARDEN FOOD CO LTD
NEW ZEALAND FOOD SAFETY AUTHORITY
NEWCASTLE UPON TYNE CITY LIBRARY
NEWHAM COMMUNITY COLLEGE
NEWRY & MOURNE DISTRICT COUNCIL
NEWSPAPER SOCIETY
NMB CONSULTING
NORTH HERTFORDSHIRE NHS TRUST
NORTH SOMERSET COUNCIL
NORTH YORKSHIRE EAST FEDERATION OF
WOMEN'S INSTITUTE
NORTHAMPTONSHIRE COUNTY COUNCIL
NORTHERN FOODS PLC
NORTON ROSE
NORWEGIAN FOOD CONTROL AUTHORITY
NOTTINGHAMSHIRE COUNTY COUNCIL
NOVARTIS CROP PRODUCTION UK LTD
NOVARTIS MEDICAL NUTRITION
NUTRAGEN
NUTRI (IMPORTS & EXPORTS) LTD
NUTRICIA CLINICAL CARE
NUTRICIA LTD
NUTRILAW
NUTRILICIOUS
NUTRITECH & HFMA
NUTRITION AND ALLERGY CLINIC
NUTRITION ASSOCIATES
NUTRITION CONSULTANTS ASSOCIATION
NUTRITION POINT LTD
NUTRITION SOCIETY
ODDBINS
ODYSEY LTD
OFFICE OF COMMUNICATIONS
OLYMPIC MEDICAL INSTITUTE
OMYA CROXTON + GARRY LTD
ORAFIT
ORANGINA GROUP
ORCHARD HOUSE FOODS
ORGAN AUSTRALIA
ORGANIC AND FAIR CONSULTING
ORGANIC FOOD FEDERATION
ORGANIX BRANDS LTD
OXFAM FAIR TRADING COMPANY
OXFORD UNIVERSITY DEPARTMENT OF PUBLIC
HEALTH & PRIMARY CARE
OXFORDSHIRE COUNTY COUNCIL
PAGB
PARLIAMENTARY FOOD AND HEALTH FORUM
PATIENTS ON INTRAVENOUS & NASOGASTRIC
NUTRITION THERAPY
PEPSICO UK AND IRELAND
PERCHARD'S
PERRIGO UK
PERSHORE GROUP OF COLLEGES
PESTICIDE ACTION NETWORK UK
PHARMACEUTICAL SOCIETY OF G B
PHARMACY & PRESCRIPTIONS BRANCH
PIONEERING FOODS
PIZZA HUT (UK)
PLYMOUTH AND DISTRICT SOROPTIMIST
INTERNATIONAL
PLYMOUTH CONSUMER GROUP
PORTER FOODS CO. LTD
POTTERS HERBAL SUPPLIES LTD
POWER HEALTH PRODUCTS LTD
PREMIER FOODS LIMITED
PREMIER GROCERY PRODUCTS LTD
PREMIER INTERNATIONAL FOODS
PREMIER TRAINING INTERNATIONAL
PRINCES FOUNDATION FOR INTEGRATED HEALTH
PRINCIPAL FOOD MATTERS
PROFESSIONAL, MANAGERIAL AND HEALTHCARE
PUBLICATION
PROPRIETARY ASSOCIATION OF GREAT BRITAIN
PROTEIN TECHNOLOGY INTERNATIONAL
PROVISION TRADE FEDERATION
PULLINS BAKERS
QUALITY MEAT SCOTLAND
QUEEN ELIZABETH HOSPITAL
QUEENSWOOD NATURAL FOODS LTD
QUEST VITAMINS LTD
QVC
R TWINING AND CO LTD
RASPBERRY CREEK FOODS
RAYNE INSTITUTE
RCC REGISTRATION AND
READING SCIENTIFIC SERVICES LTD
REAPERS
REGISTER OF NUTRITIONAL THERAPISTS
REGULATORY SOLUTIONS
RHM GROUP
RIO TRADING COMPANY (HEALTH) LTD
ROCWELL NATURAL MINERAL WATER
RON DEWDNEY LTD
ROTHERHAM HEALTH AUTHORITY
ROTHERHAM NHS FOUNDATION TRUST

LIST OF INTERESTED PARTIES

ROUSE & CO
ROWARTH NUTRITION COLLEGE
ROYAL COLLEGE OF MIDWIVES
ROYAL COLLEGE OF NURSING
ROYAL COLLEGE OF PAEDIATRICS AND CHILD HEALTH
ROYAL COLLEGE OF PHYSICIANS
ROYAL COMMISSION ON ENVIRONMENTAL POLLUTION
ROYAL DANISH EMBASSY
ROYAL FREE HOSPITAL HAMPSTEAD CAMPUS
ROYAL HALLAMSHIRE HOSPITAL
ROYAL INSTITUTE OF PUBLIC HEALTH
ROYAL NATIONAL INSTITUTE FOR THE BLIND
ROYAL PHARMACEUTICAL SOCIETY OF GREAT BRITAIN
ROYAL SOCIETY FOR MENTALLY HANDICAPPED CHILDREN & ADULTS (MENCAP)
ROYAL SOCIETY FOR THE PROMOTION OF HEALTH
ROYAL SOCIETY OF HEALTH
RSSL
RUGBY FOOTBALL LEAGUE
RUGBY FOOTBALL UNION
RUPERT STANLEY COLLEGE OF FURTHER EDUCATION
RUSSELL HUME
RYVITA CO LTD
S & D CHEMICALS LIMITED
S M A NUTRITION
S&N UK
SAFEPHARM LABORATORIES LTD
SALT ASSOCIATION
SAMUEL SMITH BREWERY
SANDWELL INFORMATION SERVICE
SCHOOL OF SCIENCE & TECHNOLOGY
SCHOOL OF SPORT & EXERCISE SCIENCES
SCHWARZ PHARMA LTD
SCI - WHERE SCIENCE MEETS BUSINESS
SCIENTIFIC ADVISORY COMMITTEE NUTRITION
SEA FISH INDUSTRY AUTHORITY
SEAFOOD LABORATORIES LTD
SEASONING & SPICE ASSOCIATION (SSA)
SEED CRUSHERS & OIL PRODUCERS ASSOCIATION
SEEWOO FOODS LIMITED
SEFCOL INGREDIENTS LIMITED
SEVEN SEAS LTD
SHARON PICKLES
SHEFFIELD CITY LIBRARIES
SHELLFISH ASSOCIATION OF GREAT BRITAIN
SHOOSMITH
SHROPSHIRE BOROUGH COUNCIL
SHS INTERNATIONAL LIMITED
SIKH COUNCIL FOR INTER FAITH RELATIONS & CONVENOR OF THE SIKH NETWORK
SIKH MISSIONARY SOCIETY UK
SIMKINS PARTNERSHIP
SIMMONS & SIMMONS SOLICITORS
SIMPLY ORGANIC - SERIOUS FOOD COMPANY
SIMTOM FOOD PRODUCTS
SIS (SCIENCE IN SPORT) LTD
SIX CONTINENTS RETAIL
SLEAFORD QUALITY FOODS LIMITED
SLOUGH BOROUGH COUNCIL
SMA NUTRITION LTD
SMALL INDEPENDENT BREWERS ASSOCIATION
SMH CONSULTANCY
SNACK, NUT & CRISPS MANUFACTURERS ASSOCIATION
SOCIETY OF HOMEOPATHS
SODEXHO BUSINESS & INDUSTRY
SOIL ASSOCIATION
SOLGAR
SOLWAY FOODS
SOMERFIELD STORES LIMITED
SONNENBERG
SOUTH BANK UNIVERSITY
SOUTH WEST CONSERVATIVES
SOUTH WEST PROVINCIAL EMPLOYERS
SOUTHALL AREA COMMUNITY NETWORK
SOUTHBANK UNIVERSITY
SOVEREIGN PUBLICATIONS LTD
SPAR(UK)LTD
SPORT ENGLAND
SPRING SINGAPORE
ST GEORGE'S HOSPITAL MEDICAL SCHOOL
ST IVEL SPREADS
STAFFORDSHIRE COUNTY ANALYST
STARBAKE YORKSHIRE LTD
STEPHEN RHODES ASSOCIATES
STOKE ON TRENT CITY COUNCIL
STRUGAR NUTRITION CENTRE
STUTE FOODS LTD
SUFFOLK SAUCERY LIMITED
SUNSTART BAKERY
SURE START BREASTFEEDING PROJECT
SURE START CENTRE
SURREY COUNTY COUNCIL
SURREY TRADING STANDARDS
SUSTAIN: THE ALLIANCE FOR BETTER FOOD AND FARMING
TABLE JELLIES ASSOCIATION
TAMESIDE METROPOLITAN BOROUGH COUNCIL
TATE & LYLE PLC
TAYLOR JOYNSON GARRETT
TELFORD FOODS LTD
TESCO STORES PLC
THE BRITISH MEDICAL ASSOCIATION
THE BRITISH STANDARDS INSTITUTION
THE CARING CLINIC
THE DAIRY COUNCIL
THE EUROPEAN CONSUMERS' ORGANISATION
THE FOOD COMMISSION
THE NUTRITION SOCIETY
THE SOCIAL ENTERPRISE COALITION
THE SUGAR BUREAU
THE VEGAN SOCIETY
THOMAS LOWNES AND CO LTD
THOMPSON & CAPPER LTD
THORNTONS PLC
TOAST
TRADE UNION CONGRESS
TRADING STANDARDS INSTITUTE
TRADITIONAL FARMFRESH TURKEY ASSOCIATION
TRANSPORT AND GENERAL WORKERS' UNION
TREATS ICE CREAM LTD
TULIP UK
UCB PHARMA LIMITED
UDEX LTD
UGO FOODS GROUP LTD
UK ACTION COMMITTEE ON ISLAMIC AFFAIRS
UK SPORT
UK VLCD INDUSTRY GROUP
ULTRAPHARM LTD
UNICEF

LIST OF INTERESTED PARTIES

UNIGATE DAIRIES LTD
UNIGREG LIMITED
UNILEVER UK LIMITED
UNION OF MUSLIM ORGANISATIONS OF UK & EIRE
UNION PSD
UNITED BISCUITS (UK) LTD
UNITED FOODS INTERNATIONAL
UNITED GROUP RMD
UNITED KINGDOM REGISTER OF ORGANIC FOOD STANDARDS
UNITED KINGDOM VINEYARDS ASSOCIATION
UNIVERSITY COLLEGE & MIDDLESEX
UNIVERSITY OF BIRMINGHAM
UNIVERSITY OF BRADFORD
UNIVERSITY OF CENTRAL LANCASHIRE
UNIVERSITY OF HERTFORDSHIRE
UNIVERSITY OF LEEDS
UNIVERSITY OF LEICESTER
UNIVERSITY OF LIVERPOOL
UNIVERSITY OF NEW SOUTH WALES
UNIVERSITY OF PLYMOUTH
UNIVERSITY OF READING
UNIVERSITY OF SOUTHAMPTON
UNIVERSITY OF SUSSEX
UNIV-VIBE EXPORT LTD
VEGA - VEGETARIAN ECONOMY AND GREEN AGRICULTURE
VEGAN SOCIETY
VEGETARIAN & VEGAN FOUNDATION
VEGETARIAN SOCIETY
VEGETARIAN SOCIETY OF THE UNITED KINGDOM
VENTURE FOODS (UK) LIMITED
VETERINARY SCIENCE LIBRARY
VIBRANTLIFE LTD
VILLAGE BAKERY MELMERBY
VINEGAR BREWERS' FEDERATION
VITACARE LIMITED
VITRION UK LTD
VOICEVALE LTD
VYDEX NUTRITION
W.A. TURNER LIMITED
WAITROSE LIMITED
WALKER & SONS (LEICESTER) LTD
WALKERS CHARNWOOD BAKERY
WALSALL METROPOLITAN BOROUGH COUNCIL
WARBURTONS LTD
WARWICKSHIRE COUNTY COUNCIL
WEBER SHANDWICK
WEETABIX LIMITED
WEIDER PUBLISHING LTD
WELLFOODS LTD
WELLNESS FOODS LTD
WESSEX FOODS
WEST BERKSHIRE DISTRICT COUNCIL
WEST YORKSHIRE JOINT SERVICES
WESTERN COMMUNITY HOSPITAL
WESTERN GROUP ENVIRONMENTAL
WESTLER FOODS LTD
WHICH?
WHITBREAD GROUP PLC
WHITBY SEAFOODS LTD
WHITEHOUSE CONSULTANCY
WHITWORTHS FOODS GROUP LTD
WICKHAM LABORATORIES LTD
WILD OATS NATURAL FOODS
WILLIAM MORRISON SUPERMARKETS PLC
WILTSHIRE COUNTY COUNCIL
WILTSHIRE DIRECT SERVICES
WINE AND SPIRIT TRADE ASSOCIATION
WOMEN'S FARMERS UNION
WOMEN'S FOOD & FARMING UNION
WOODS SUPPLEMENTS
WORCESTERSHIRE COUNTY COUNCIL
WYETH CONSUMER HEALTHCARE
XYROFIN (UK) LTD
YAKULT UK LTD
YORKSHIRE PANTRY (THE)
YOUNGS SEAFOOD
ZOROASTRIAN TRUST FUNDS OF EUROPE