



Guidance note for sampling food and feed to determine the presence of genetically modified (GM) material

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1. Introduction

This supplementary guidance note has been produced by the Novel Foods, Additives and Supplements Division of the Food Standards Agency with the aim of providing informal guidance to enforcement authorities for sampling food and feed to determine the presence of genetically modified (GM) material.

Food and feed containing GM material can only be marketed in the EU once a GMO variety has been authorised. Food and feed containing material from authorised genetically modified organisms (GMOs) must be labelled to allow consumers to make an informed choice. An exemption to the labelling requirement exists below a threshold of 0.9% for adventitious or technically unavoidable presence of a GMO, where operators can demonstrate that adequate measures have been taken to avoid GM material. Material from unauthorised GMOs is not permitted at any level.

The purpose of this document is to provide information regarding best practice for the sampling of food and feed to determine the presence of GM material in accordance with food law and the regulations governing GM food and feed.

This document is not a statutory code of practice nor is it a substitute for the Regulations and should be read in conjunction with them.

European and national legislation relating to food and feed containing GM material are listed in Annex A.

This guidance note is supplementary to the Agency's general GM guidance on Regulation (EC) 1829/2003, genetically modified food and feed, and Regulation (EC) 1830/2003, traceability and labelling of genetically modified organisms. This general guidance can be found on the Agency's website at:

<http://www.food.gov.uk/foodindustry/guidancenotes/foodguid/gmguidance>

A summary document describing the scope of the GM food and feed and GM traceability and labelling regulations is attached as Annex B.

If you require any further advice then please contact the Food Standards Agency, clearly stating the nature of your enquiry.

Enquiries should be addressed to:
Novel Foods, Additives and Supplements Division
Food Standards Agency
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London WC2B 6NH
Switchboard: Tel 020 7276 8000
Web address: www.food.gov.uk
E-mail: gmlabelling@foodstandards.gsi.gov.uk

2. Sampling of food and feed for the presence of GM material

2.1 Introduction

This supplementary Guidance Note provides clarification of where, what, when and how to sample for GM material in food and feed.

As set out in Annex B, the labelling exemption threshold for adventitious or technically unavoidable contamination by GM material is 0.9% for varieties that have undergone a safety assessment and have been approved for use in the European Union. Material from unauthorised GMOs must not be present at any level.¹

Any product containing GM material must be clearly labelled as containing GM. The 0.9% limit for adventitious contamination applies to each food or feed ingredient rather than to the finished food or feed product.

Analysis of samples for the presence of GM material usually relies on the detection of DNA sequences specific to GMOs. Some protein detection methods are available but are not validated for enforcement purposes.

2.2 Where to sample

Generally, where to sample depends on the likelihood of GM material being present. Because of a reduction in sensitivity of GM detection methods in processed ingredients (due to degradation of the target DNA or removal during processing), it is recommended that sampling of food and feed is done as early as possible in the manufacturing process. Therefore it is more effective to sample raw ingredients at the point of import or at manufacturing premises before they are processed into finished products. Where this is not possible the type of finished product should be considered before sampling, as outlined in section 2.3 below.

2.3 What to sample

When selecting what food or feed to sample for the presence of GM material the following should be considered:

The likelihood that the product may contain ingredients from GMOs (see section *i*) '*crop species to consider*').

Whether the product will contain sufficient intact DNA to allow identification of GM material (see section *ii*) '*types of food/feed to sample*').

i) Crop species to consider: Reference should be made to the list of authorised GMOs to which the 0.9% threshold applies. Table 1 contains a list of crop species for which GMO lines have been authorised for food and feed in the EU. This list will continue to be extended. An up to date list of GM varieties authorised (1), and undergoing authorisation (2), for sale in the EU, can be found at the weblinks below:

(1) http://ec.europa.eu/food/dyna/gm_register/index_en.cfm

(2) http://www.efsa.europa.eu/en/science/gmo/gm_ff_applications.html

¹ The temporary threshold of 0.5% for the presence of material not yet authorised but that has a favourable assessment from an EU scientific committee expired in April 2007.

Table 1: GMOs authorised as food and/or feed ingredients within the EU
(as of June 2007)

List of GM crops
Maize
Soyabean
Oilseed rape (Canola)
Cotton ²

Some GMOs may only be authorised for use in feed. Contamination of foods with GM material only authorised for feed use should be considered.

Consideration should also be given to species of GMO which have not been authorised within the EU, but which have been authorised by third countries, or for which experimental crops exist.

The Community Reference Laboratory (CRL) for GMOs validates methods to identify new GMOs as they are authorised or identified as a potential unauthorised contaminant of imported food and feed. The CRL, in collaboration with the European Network of GMO Laboratories (ENGL), is responsible for distributing reference materials to enable enforcement laboratories to carry out the tests.

ii) Types of food/feed to sample: Less processed food or feed is more likely to contain sufficient intact DNA suitable for testing. Composite products containing a large number of ingredients (e.g. ready meals), with a small proportion of a potential GM ingredient are less likely to yield a result that accurately reflects the GM content of the product. This is due to the dilution effect and the limitations of the sensitivity of the test. For these types of foods it is recommended that the individual ingredient is sampled at the point of manufacture. Other examples of foods that are likely to be unsuitable for testing are listed in Table 2. If there are doubts about the suitability of sampling a particular product then a public analyst (PA) with experience of testing for GMOs should be consulted.

Table 2: Examples of foods that are not suitable for testing for presence of GM ingredients

Food Type	Reason DNA unlikely to be present
Boiled sweets	DNA removed due to processing
Refined vegetable oils	“ “ “ “
Refined sugars (e.g. corn syrup)	“ “ “ “
Maltodextrins (e.g. sweeteners)	“ “ “ “
Canned foods	No detectable DNA remaining due to degradation
Acidic foods (e.g. pickles)	“ “ “ “
Salty foods (e.g. soy sauce)	“ “ “ “

² Used to produce cottonseed oil and animal feed.

2.4 When to sample

It is the responsibility of enforcement authorities to decide the overall frequency of sampling depending on local priorities and the sampling budget. Any recent Commission Decisions or food alerts involving GM material should be taken into account when deciding what and when to sample.

2.5 How to sample

Guidelines on how to sample for GM material from food are already in place. It is recommended that the documents listed below are consulted. It is also recommended that a public analyst should be consulted regarding preferred sampling methods.

- i) 2004/787/EC: Commission Recommendation on technical guidance for sampling and detection of GMOs and material produced from GMOs as or in products in the context of Regulation EC 1830:
http://eur-lex.europa.eu/LexUriServ/site/en/oj/2004/l_348/l_34820041124en00180026.pdf
- ii) CEN/TS 15568/2006: Foodstuffs - Methods of analysis for the detection of genetically modified organisms and derived products – Sampling strategies (previously ISO prEN 21568/2004)
- iii) In addition the FSA practical sampling guidance gives general sampling advice under the Official Food and Feed control legislation:
<http://www.food.gov.uk/enforcement/foodsampling/guidance/>
- iv) Feed or feed ingredient samples should be taken in accordance with Directive 76/371/EEC as implemented by The Feeding Stuffs (Sampling and Analysis) Regulations 1999 (as amended).

Consideration should also be given to the merits of formal versus informal sampling. Part 2 (Section 2.2) of the FSA practical sampling guidance (2.5iii above) refers to this process. If informal samples are taken, follow-up formal sampling should be considered for non-compliant results.

It should be noted that the capabilities of PA laboratories are continually developing, and many now have the capability for rapid DNA screening. Those without this facility will be able to refer analysis to a suitable laboratory.

3. Follow-up action

It is the responsibility of enforcement officers to follow-up results that indicate non-compliance. If appropriate, the enforcement authority at the point of entry should be contacted, so that testing can be carried out on further consignments of bulk commodities.

When a positive result using a qualitative screen is obtained, consideration should be given to a confirmatory test to identify the specific genetic modification present.

This could be followed by a quantitative assay if it is confirmed as an authorised GMO. Formal sampling should be undertaken if enforcement action is considered.

In case of dispute the Government Chemist fulfils the statutory function of Referee Analyst under the Food Safety Act 1990. Further information on the role of the Government Chemist is given on the website below:

www.governmentchemist.org.uk

The procedure for submitting samples for referee analysis is given in the following link:

<http://www.governmentchemist.org.uk/Function.aspx?elementId=563>

The Agency is currently rolling out the UK Food Surveillance System (UKFSS), which enables the electronic transfer of sampling data between local authorities and public analyst laboratories and ultimately allows the data to be stored in a central database. The system has been fully implemented in Scotland and Northern Ireland, and a number of English laboratories are also actively using the system. The remaining Local Authorities in England and Wales will be trained and have access to the UKFSS by the end of 2008.

The system provides an ideal mechanism for enforcement officers to report GMO sampling and testing results. More information on the system can be found at:

<http://www.food.gov.uk/enforcement/foodsampling/fss/>.

European and national legislation relating to food and feed containing GMOs.

European Union	England	Scotland	Wales	Northern Ireland
EC Regulation 1829/2003 on genetically modified food and feed	SI 2004/2335 – the Genetically Modified Food (England) Regulations 2004 and SI 2004/2334 – the Genetically Modified Feed (England) Regulations 2004	SSI 2004/432 – the Genetically Modified Food (Scotland) Regulations 2004 and SSI 2004/433 – the Genetically Modified Feed (Scotland) Regulations 2004	SI 2004/3220 (W.276) – the Genetically Modified Food (Wales) Regulations 2004 and SI 2004/3221 (W.277) – the Genetically Modified Feed (Wales) Regulations 2004	SR 2004/385 – the Genetically Modified Food Regulations (Northern Ireland) 2004 and SR 2004/386 – the Genetically Modified Animal Feed Regulations (Northern Ireland) 2004
EC Regulation 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC	SI 2004/2412 – the Genetically Modified Organisms (Traceability and Labelling) (England) Regulations 2004	SSI 2004/438 – the Genetically Modified Organisms (Traceability and Labelling) (Scotland) Regulations 2004	SI 2005/1914 (W.157) – the Genetically Modified Organisms (Traceability and Labelling) (Wales) Regulations 2005	SR 2005/271 – the Genetically Modified Organisms (Traceability and Labelling) Regulations (Northern Ireland) 2005
Recommendation 2004/787/EC technical guidance for sampling and detection of GMOs and material produced from GMOs as, or in, products in the context of Regulation EC 1830/2003	n/a			
EC Regulation 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.	SI 2006/15 - The Official Feed and Food Controls (England) Regulations 2006	SI 2005/616 - The Official Feed and Food Controls (Scotland) Regulations 2005, as amended by the Food	SI 2006/590 (W.66) - The Official Feed and Food Controls (Wales) Regulations 2006	SR 2006/2 - The Official Feed and Food Controls Regulations (Northern Ireland) 2006

		Hygiene (Scotland) Regulations 2006 (SSI 2006/3)		
EC Regulation 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety.	SI 2004/3279 - The General Food Regulations 2004	SI 2004/3279 - The General Food Regulations 2004	SI 2004/3279 - The General Food Regulations 2004	SR 2004/505 - The General Food Regulations (NI) 2004
EEC Regulation 76/371 establishing Community methods of sampling for the official control of feeding stuffs	SI 1999/1663 - The Feeding Stuffs (Sampling and Analysis) Regulations 1999 (as amended)	SI 1999/1663 - The Feeding Stuffs (Sampling and Analysis) Regulations 1999 (as amended)	SI 1999/1663 - The Feeding Stuffs (Sampling and Analysis) Regulations 1999 (as amended)	SR 1999/296 - Feeding Stuffs (Sampling and Analysis) Regulations (Northern Ireland) 1999 (as amended)

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GM food and feed in the EU must be authorised for use and labelled [No.1829/2003]. To facilitate labelling there is a requirement for information relating to the use of GMOs to be transmitted through the supply chains and retained for 5 years [No. 1830/2003].

Authorisation – Before a GM crop is authorised by the European Commission it must undergo a rigorous safety assessment by the European Food Safety Authority. A number of GM crops have been authorised for food and feed use in the EU e.g. soya, maize, oilseed rape, cotton seed. A list of authorised GM crops is available at http://europa.eu.int/comm/food/food/biotechnology/authorisation/index_en.htm. Authorisation is limited to a 10 year period and it is an offence for products from GM crops to be on the market if they are not authorised.

Labelling – There is a requirement for food and feed ingredients from GM crops to be labelled. Examples of ingredients for food that could potentially be produced from GM crops include soy foods (soy beverages, tofu, soy oil, soy flour, lecithin), rapeseed oil (products made with this oil may include fried foods, baked products and snack foods), maize foods (sweet maize, kernels, oil, maize flour, sugar and syrup), cottonseed oil (products made with this oil may include fried foods, baked products and snack foods). Please note that although these products may contain ingredients from GMOs they may not contain sufficient DNA to be suitable for testing (see FSA guidance note on sampling for GM). Examples for feed include maize, corn gluten feed, soybean meal and rapeseed meal. The following do not fall within the scope of these regulations and do not need to be labelled food produced with the help from a GM enzyme (such as cheeses produced by enzyme chymosin, products from animals fed GM animal feed (e.g. milk, meat and eggs) and food and feed produced by a fermentation process using a genetically modified micro-organism which is kept under contained conditions and is not present in the final product e.g. vitamins. Rules for providing labelling information are as follows:

Where a **food** contains more than one ingredient, the following indication must be given; 'genetically modified' or 'produced from genetically modified [name of organism]'.
Where a **food** is designated by the name of a category e.g. 'Emulsifiers', the following must appear in the list of ingredients; 'contains genetically modified (name of organism)', or contains (name of ingredient) produced from (name of organism)'.
If there is normally no list of ingredients given on a specific product the following must appear clearly on the labelling, 'produced from genetically modified (name of organism)'.
Where the **food** is offered for sale to the final consumer as non-pre-packaged food, or as pre-packaged food in small containers of which the largest surface has an area of less than 10cm², the information required must be permanently and visibly displayed either on the food display or immediately next to it, or on the packaging material, in a font sufficiently large for it to be easily identified and read.

For GMOs for **feed** use or **feed** containing or consisting of GMOs the words 'genetically modified (name of the organism)' shall follow in parentheses the name of the feed or alternatively can appear in a footnote.

For **feed** produced from GMOs the words 'produced from genetically modified (name of organism)' will need to appear in parentheses following the specific feed name or appear in a footnote to the list of feed.

Any characteristic which renders the **feed** different from its conventional counterpart will need to be specified. For example:

- Composition
- Nutritional properties
- Intended use
- Implications for health of certain species or categories of animals

In addition any characteristic or property of the feed which may give rise to ethical or religious concerns must be indicated.

An exception to the labelling rules – **Thresholds**

The Food and Feed Regulation provides for a threshold for the adventitious or accidental presence of GM material in non-GM food or feed sources (there is no threshold for supplies obtained from sources of unknown origin). This threshold is set at 0.9% and only applies to GMOs that have an EU authorisation. The temporary threshold of 0.5% for the presence of GM material not yet authorised but that had a favourable assessment from an EU scientific committee expired in April 2007. This means that such unauthorised GM material cannot be present at any level.

The threshold is **not** a provision for lack of due diligence or intentional mixing of GM and non-GM. It will be for the operator to produce evidence to show that presence of GM is adventitious or technically unavoidable e.g. through the use of suitable identity preservation systems.

The threshold is applied at the level of each individual ingredient and **not** the final food.

How can the labelling rules be enforced?

Traceability – The above labelling rules apply across the food and feed chain for GM crops. To facilitate accurate labelling there is a requirement for traceability systems to be established throughout the GM supply chain to enable the transmission of information.

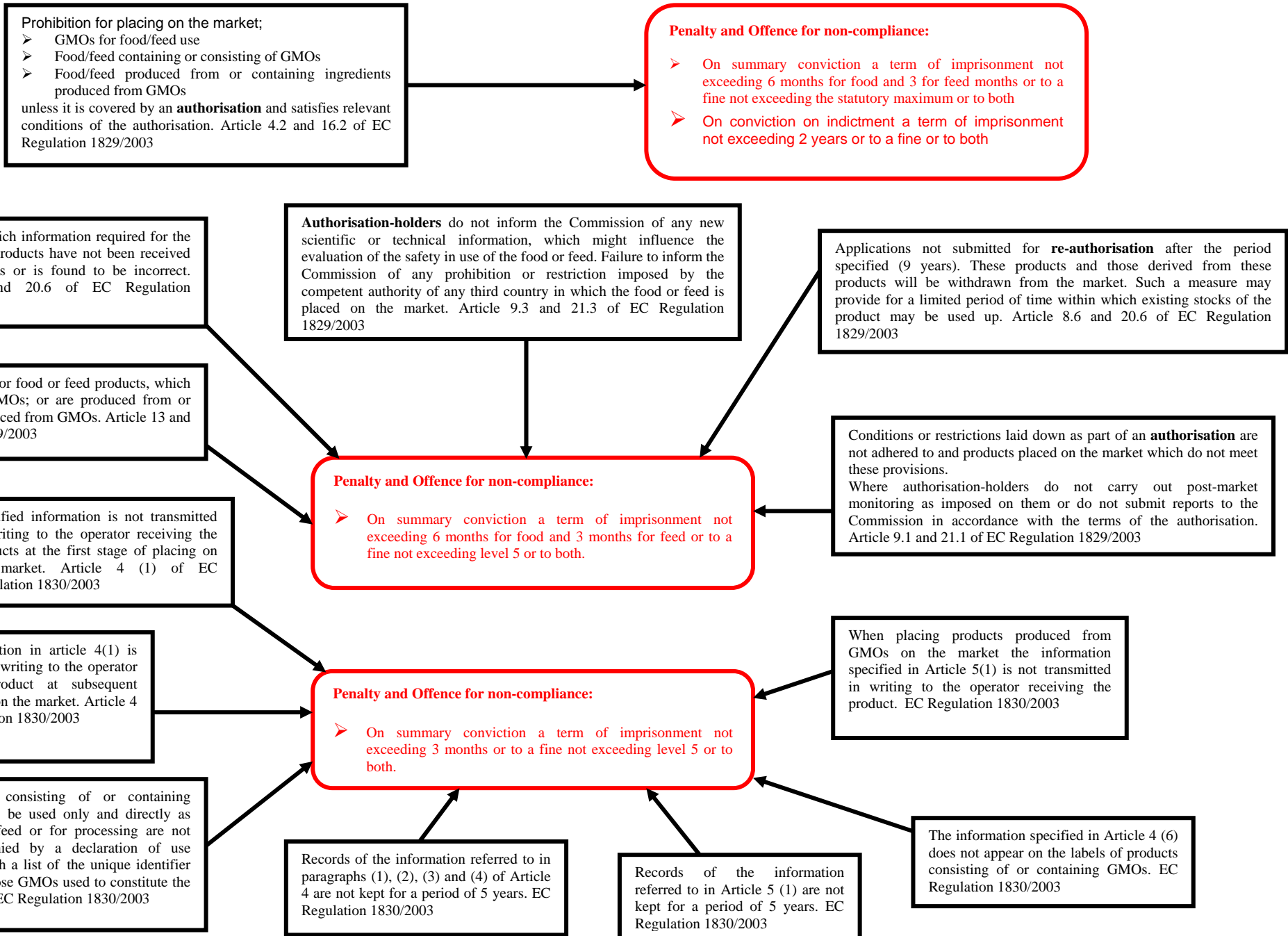
At the first stage of placing on the market operators must provide in writing to the operator receiving the product: that it contains or consists of GMOs; the unique identifier assigned to the GMO (list of unique identifiers available at <http://www2.oecd.org/biotech/frameset.asp>. This applies to unprocessed GMOs e.g. soya beans. At all subsequent stages of placing on the market the above information will be transmitted in writing.

For products produced from GMOs e.g. soya flour, the following need to be submitted in writing (a) an indication of each of the food ingredients which is produced from GMOs; (b) an indication of each of the feed materials or additives which is produced from GMOs; (c) in the case of products for which no list of ingredients exists, an indication that the product is produced from GMOs. This information must be retained for 5 years.

Exemptions to these rules apply to GMOs which are accidentally present in non-GM sources and where lot numbering is used.

Testing – for unprocessed or partially processed products from GM crops e.g. it is possible to use analytical methods to detect DNA or protein to verify the crop origin in addition to monitoring via a paper audit trail. For highly processed ingredients (e.g. highly refined soya oil) then only a paper audit chain will verify how the product should be labelled.

Enforcement of all provisions by Trading Standards Officers, Environmental Health Officers and Port Health Authorities



LIST OF INTERESTED PARTIES

In addition to all Local Authorities, Port Health Authorities and members of the UK GM analytical network (GAN) this letter has been sent to the following parties:

3663
Academy of Culinary Arts
Action with Communities in Rural England
Adams Food
Adas Nutritional Sciences Research Unit
Advance Communications
Advisory Body for Social Services Catering
Advisory Committee on Organic Standards
Agra Europe (London) Ltd.
Agricultural Industries Confederation (AIC)
Agriculture Biotechnology Council
Alara Wholefoods
Alivini Company Ltd
Alliance for Natural Health
Allied Technical Centre
Allied Technical Centre LTD
American Soybean Association
Anglia Oils Ltd
Animal Medicines Inspectorate
Aramark plc
Assistant Chief Trading Standards Officer
Assoc of Cereal Food Manufacturers
Assoc of Malt Products Manufacturers
Association of Convenience Stores
Association of Medical Microbiologists
Association of Public Analysts
Austrian Embassy
B & N E S Council Food & Trading Standards
Bako Northern Area
Barker Gotelee
Barnet Hospital
Barton Ley
Bath Consumers' Group
Bee Disease Insurance Ltd
Bernard Matthews Foods Ltd
Bespoke Foods Ltd
BFA
Billington Food Group Ltd
Biogemma UK Ltd
Bionova BV
Bird & Bird Library
Birmingham Central Library
Birmingham Environmental Services Dept
Bluecrest Foods Ltd
Bolton Metro Environmental Health Serv
Boots Company PLC
Bowyers (Wiltshire) Ltd
Brewing, Food & Beverage Industry
Brian J Turner Esq.
Britannia Pharmaceuticals Ltd
British Airways
British Asso. of Feed Supp. & Add. Manu. Ltd.
British Bakeries Ltd
British Beer & Pub Association
British Caramel Manufacturers Assoc
British Chambers of Commerce
British Council of Org of Disabled People
British Deer Farmers Association
British Equestrian Trade Association
British Essential Oils Association
British Free Range Egg Producers Association
British Fruit and Vegetable Manf Assoc.
British Heart Foundation
British Hospitality Association (BHA)
British Institute of Innkeeping
British Nutrition Foundation
British Pig Association
British Poultry Council
British Retail Consortium
British Sheep Dairying Association
Abbot Laboratories Limited
Action Against Allergy
Adams Food
ADAS
Adnams Brewery
Advanced Technologies (Cambridge) Ltd
Advisory Committee on Animal Feedingstuffs
Age Concern England
Agricultural Biological Council
Agricultural Industries Confederation (AIC)
Ajinomoto Co., Inc.
Alexandra Costello
Allergy Alliance
Allied Bakeries Ltd
Allied Technical Centre
American Embassy
Andrew B Perkis
Animal Health Distributors Association
Anne Dolamore
ASDA Stores Ltd
Assoc of British Pharmaceuticals Industry
Assoc of London Chief Env. Health Officers
Association for Women in Science and Engineering
Association of Independent Crop Consultants (AICC)
Association of Port Health Authorities
Atkin Nutritionals UK Ltd
Aventis Cropscience UK Ltd
Baby Milk Action Group
Barbour Index Plc
Barling Mr D
Barry Johns Fresh Foods
Bath and NE Somerset Council
BBKA
Bee Farmers Association
Berry Ottaway & Associates Ltd
Beth-Din
BIBBA
Biodynamic Agricultural Association
Bioindustry Association
Biotech & Bio Sciences Research Council
Birds Eye Wall's
Birmingham College of Food
Biscuit Cake Chocolate & Confectionary Alliance
Board of Social Responsibility C of E
Boodle's
Bowman Ingredients
Brewing Research Foundation International
Brewster et Huguette White
Bristol Training Standards
British Agrochemicals Association Ltd
British Assc of Feed Sup & Add Mfrs (BAFSAM)
British Association of Green Crop Driers
British Beekeeper's Association
British Beer and Pub Association
British Cattle Veterinary Association (BCVA)
British Council of Churches Trust
British Crop Protection Council
British Egg Industry Council
British Equine Veterinary Association
British Federation of Women Graduates
British Frozen Food Federation
British Goat Society
British Heart Foundation Promotion Res Grp
British Institute of Agricultural Consultants
British Medical Association
British Pasta Products Association
British Potato Council
British Psychological Society
British Sandwich Association
British Society for Allergy & Envir Medicine

LIST OF INTERESTED PARTIES

British Society of Animal Science
British Society of Plant Breeders
British Standards Institution
British Sugar
British Trust for Ornithology
Britvic Soft Drinks Ltd
Bunge UK Ltd
Business in Sport and Leisure
Cameron Mckenna
Campden & Chorleywood Food Res Assoc
Caterer and Hotelkeeper
Central Council for Physical Recreation
Central Science Laboratory York
Centre for Analysis of Risk & Regulation (CARR)
Charles Barker
Chartered Institute of Environmental Health
Checkmate International
Chef/Partner
Chemical Industries Association
Cheshire County Council
Child Poverty Action Group (CPAG)
Christian Aid
City of York Council
Cliff Hall Hotel
Co-operative Group (CWS) Limited
Coca Cola GB & Ireland
Coeliac Society
Commonwealth Countries League
Community Foods Ltd
Confederation of British Industry
Consortium for Purch and Distribution
Consumers' Association
Coq d'Or Restaurant Company Ltd
Cornwall County Council
Council for the Protection of Rural England
Council of National Beekeeper Assoc.
Courage Ltd
CQRA
Crop Protection Association
Cross Farm
Cullinane Associates Ltd
Dairy Industry Association
Danisco Sweeteners Ltd
David Nicholls Esq
De Ri K)Ltd
DEFRA - PSD
Department of Health
Dept of Food Science & Technology
Dept of Food Science and Technology
Dept. for Culture, Media & Sport (Tourism Div.)
Derby City Trading Standards
Dessert and Cake Mixes Association
Diabetes UK
Dorset Agenda 21
Dowcorning Ltd
Dr P Dale
Dr Raul Wyner
Durham County Council
E H Thorne (Beehives) Ltd
Eisai Pharma-Chem Europe Ltd
Enfield Trading Standards
English Tourism Council
ESRC - Genomics Centre, University of Exeter
Ethical Investment Research Service
Eurobest Associates
Europa Bio
European Commission - DG SANCO
European Public Policy Advisers
Eversheds (Norfolk)
Extra Care Charitable Trust
Falcon c/o AgrEvo UK Crop protection Ltd
Farm Animal Welfare Council (FAWC)
Fayrefield Foodtec Ltd
Federation of Licensed Victuallers Assoc
Federation of Small Businesses
British Society of Plant Breeders
British Soft Drinks Association
British Starch Industries Association
British Sugar plc
British Veterinary Association
Buckinghamshire Trading Standards
Burson Marsteller
Cadbury Schweppes PLC
Campden & Chorleywood Food Res Assoc
Campina
Catholic Bishops Joint Com on Bioethical Issues
Central Reference Library
Central Scientific Laboratory (CSL)
Centre for Ecology and Hydrology Directorate
Charnwood Bakery
Chaucer Food Ltd
Chef Partner
Chelgate Limited
Cheshire C C Trading Standards
Chessington Reference Library
Chorley B C Environmental Services
Christina Thomas
Classic Fresh Foods
Co-Op Parliamentary Office
Co-operative Wholesale Society Ltd
Coca Cola International
Commission for Racial Equality
Communique
Compassion in World Farming
Confederation of Indian Organisations (CIO)
Consumer & Competition Policy Directorate
Coors Brewers Plc
Cornwall C C Trading Standards
Corrigin Brothers Ltd
Council of British Pakistanis
Country Land and Business Association (CLA)
CPB Twyford Ltd
CRN
CropGem
Croydon Schools Catering
Custom Pharmaceuticals Ltd
Dairy UK Limited
David Marris (Crop Protection Association)
DDS
Debenhams Food Services Division
Del Monte Foods (UK) Ltd
Department of Trade and Industry (DTI)
Dept of Food Science and Technology
Dept. for Culture, Media & Sport (Tourism Div.)
Dept. of Env. Health & Trading Standards
Design & Technology Association (DATA)
Devon County Council Trading Standards
DLF Perryfields
Dow AgroSciences Ltd
Dr Norman Simmons
Dr Peter B Baker
Du Pont
E H Booth Supermarkets
Eden GB Ltd
Enfield Borough Council
English Nature
Ergo Communications
Ethical Consumer Research Association
EU Food Law
Eurofins Scientific
Europe - Japan Centre
European Federation of Wine and Spirit
European Union of Women
Exeter & District Consumer Group
Faculty of Health
Fallan Currie Consulting
Farm Animal Welfare Network (FAWN)
Federation of Bakers
Federation of Muslim Organisations
Federation of Synagogues

LIST OF INTERESTED PARTIES

Feed Compounder (Portlands Publishing Ltd)
Fermentation Products Alliance
Fienchmans Watch
Firmenich UK
Fishmeal Information Network
Flag
Food Additives and Ingredients Association (FAIA)
Food Commission
Food Labelling Database
Food Labelling Database
Food Labelling Database
Food Standards Australia New Zealand
Foreign & Commonwealth Office
Forum Products
Frank Dale Foods
Fresh Dairy Industry Federation
Friends of the Earth (HQ)
Friends of the Earth (South Dorset)
Funnybones Food Service Ltd
Gallery Restaurant
GEMS Genuine Empowerment of Mothers in Society
General Synod of the Church of England
Genetics News
GJW Government Relations Ltd
Golden Gopling
Grampian Convenience Foods
Greenpeace
Grove Farm Cottage
H J Heinz Company Ltd
Hadons Bakeries Ltd
Halton Borough Council
Harcourt Public Affairs
Health and Safety Executive (HSE)
Hemel Hempstead GM Action Group
Herbert Smith Solicitors
Hill and Knowlton (London)
Hindu Centre London
Holland and Barrett Retail Ltd
Home Grown Cereals Authority (HGCA)
Horticulture Development Council
Hotel and Catering Int Management Assoc
Human Genetics Commission
Huntingdon Research Centre
Hyperactive Children's Support Group
ICBT School
Ice Cream Federation
ICI
Imutran Ltd
Independent Equine Nutritionist
Information centre Trading Standards Institute
Inst of Chem Engineers-Food & Drink Div
Institute of Biology
Institute of Consumer Sciences
Institute of Directors
Institute of Food Research
Institute of Food Research
Institute of Food Science & Technology
Institute of Grocery Distribution (IGD)
Institute of Mechanical Engineers
Integrated Approach to Crop Research (IACR)
International Fishmeal & Fish Oil Organisation
Isotron plc
J Sainsbury plc
John Barrett
John Lewis PLC
John West Foods Ltd
Johnsons Fresh Products Ltd
Kate Trollpe
Keele University Hospitality
Kellogg Supply Services (Europe) Limited
Kent County Council Trading Standards
KFC (UK)
Kolak
Kraft Foods International
Kwik Save Stores
Feed Fat Association
Ferro UK Ltd
Financial Time Food Business
First Assist Group Ltd
Five Year Freeze
Focus Training
Food and Drink Federation
Food Ethics Council
Food Labelling Database
Food Labelling Database
Food Policy Update
Foodaware: the Consumers Food Group
Fort James UK
Frances Bissell
Fresenius Cabi
Fresh-Pak Chilled Foods LTD
Friends of the Earth (Leeds) Food Campaign
Friends of the Earth (Swindon)
Gaia Foundation
Gateway Food Markets Ltd
General Mills UK Limited
Genetic Food Alert
GeneWatch UK
GM Freeze
Grain and Feed Trade Association (GAFTA)
Green Alliance
Gregg Plc
Guild of Food Writers
H. D. R. A.
Halal Food Authority
Hampshire Trading Standards
Harvest Natural Foods
Health Food Association Manufacturers
Herbert Berger Esq
Hermitage Leisure Centre
Hilton Hotels
HMP Channings Wood
Holstein UK
Honey Association
Horticulture Research International
Human BSE Foundation
Human Nutrition Research Centre
Hygiene and Safety Consultant
IACR-Long Ashton Research Station
Ice Cream Alliance Ltd
IceFresh Foods Ltd
ILS Ltd
Independent Consultant
Infant and Dietetic Foods Association
Initial Catering Services
Inst of Env & Biological Sciences
Institute of Consumer Affairs
Institute of Consumer Sciences
Institute of Education
Institute of Food Research
Institute of Food Research
Institute of Food Science and Technology
Institute of Grocery Distribution (IGD)
Institute of Optimum Nutrition
International Fishmeal & Oil Mfr Ass(IFOMA)
Interserve (Facilities Management) Ltd.
ISPRA
Jetro London
John Innes Centre
John Russell Assoc
John Wyeth & Brother Ltd
Jon Ennever
Katerkit Ltd
Kellogg Company of Great Britain Ltd
Kellogg Supply Services Europe Ltd
Kent County Council Trading Standards
Kitchen Range Foods Ltd
Korean Embassy
Kraft Jacobs Suchard
Laboratory of the Government Chemist

LIST OF INTERESTED PARTIES

LACORs
Lancashire C C Trading Standards Dept
Law Commission
Law Laboratory
Leathams
Lewis Silkin Solicitors
Lifeplan Products Ltd
LMC International
Logistics Ltd
Lovell White Durrant Solicitors
Majestic Trading Co Ltd
Mama Roma Ltd
Marcus Williamson
Marks & Spencer
Marlow Foods Ltd
Martex (C/o FoodReg Ltd)
McCain Foods
McKenna and Co
Meat Hygiene Services
Medicines Control Agency
Metal Packaging
Michael Brooke
Mingalery
Miss A Paine
Miss C Clark
Miss C Lavell
Miss Fiona Monroe-Smith
Miss Kim Laight
Monsanto UK Ltd
Morelands Ltd
Mr A R Tuckwood
Mr B O'Farrell
Mr Colin & Mrs Aileen West
Mr David Green
Mr Dooklee
Mr Flockton
Mr I Barclay
Mr J Parton
Mr John Taylor
Mr L G Hanson
Mr Larkin
Mr Michael Brailsford
Mr N Rush
Mr P Barfoot
Mr Paul Anthony Taylor
Mr Robert Uint
Mr Simon Adams
Mr Tim Root
Mr Tony Wood
Mr Whelan
Mrs Beryl Bill
Mrs Gilli Davies
Mrs Jan Daly
Mrs S J Croisdale
Mrs W Cogan
Ms Brear
Ms Deb Strivens
Ms Jill Street c/o Mr Bob Blizzard MP
Ms Laville
Ms Lucy Johnson
Ms Mina Path
Muller UK
NABIM
National Association of Womens Clubs
National Asso. of Agricultural Contractors (NAAC)
National Association of Master Bakers
National Board of Catholic Women
National Citizens Advice Bureau Council
National Consumer Federation
National Council of Women
National Council of Women of Great Britain
National Farmers Union
National Fed of Meat and Food Traders
National Federation of Young Farmers' Clubs
National Institute of Ag Botany (NIAB)
Lake District National Park Authority
Lancashire Council of Mosques
Law Laboratories
League of Jewish Women
Leatherhead Food Research Association
Liddle UK GmbH
Linking Environment and Farming (LEAF)
Local Authority Caterers Association
London Borough of Redbridge
Lovells
Malsters Association of Great Britain
Marcantonio Foods Limited
Marjan Lelnik Esq
Marks and Spencer PLC
Mars Confectionery Ltd
Maxwells Restaurants Ltd
McDonalds Restaurant Ltd
Meat and Livestock Commission
Medical Research Council
Medway County Council (Food Standards Officer)
Methodist Church
Milk Development Council
Miriam Polunin
Miss Amie Adkin
Miss C Crawford
Miss Carol Stevenson
Miss Kate May
Monsanto Europe
Moorfields Eye Hospital
Mothers Union
Mr Alan Swindall
Mr Barry T Attwood
Mr Colin Spencer
Mr David Williams
Mr E T Reece
Mr Hugh Raven
Mr J Mound
Mr John Pigneguy
Mr K D Guy
Mr L Levidow
Mr Malcolm Alan
Mr Michael Brooke
Mr O' Neill
Mr P Harrison
Mr R G Hull
Mr Seamus McCrossan
Mr T Palmer
Mr Tony Dale
Mr Tovey
Mrs Anne Pawan SRD R. Nutr FHCIMA
Mrs E Russell
Mrs J Coull
Mrs Rosemary Hilling
Mrs Tee's Wild Mushrooms
Ms Barbara Saunders
Ms Christina Thomas
Ms J Morgan
Ms Kitty Butterwick
Ms Louise Stubbs
Ms Lynn Sellar
Ms Sue Olds
Muslim Council of Britain
Nat Assoc for Research into Allergy
National Assn of British and Irish Millers
National Assoc. of Health Stores
National Beef Association
National Cattle Association (Dairy)
National Consumer Council
National Council of Shechita Boards
National Council of Women (Sevenoaks Branch)
National Edible Oil Distributors' Association
National Farmers Union
National Federation of Women's Institutes
National Institute for Biological Standards
National Office of Animal Health

LIST OF INTERESTED PARTIES

National Pig Association
National Sheep Association
Nestle UK Ltd
Nestle UK Ltd (Food Labelling Database)
Neville Craddock Associates
New Zealand High Commission
NIAB
Nor Systems Ltd
North East Vegans
Northamptonshire Trading Standards
Novartis Seeds AG
Novo Nordisk Ltd
Nuffield Council on Bioethics
Nutragen Ltd
Nutriblend Ltd
Nutricia Chemical Care Ltd
Nutritional Society
Offices of Sally Keeble MP
Oral Technologies
Organic Food Ferderation
Oxfam
Paisner and Co
Parliamentary Food and Health Forum
Penny Viner
Pepsi
Pet Care Trust
Peterborough Council Trading Standards
Pig Improvement Group Limited
Pioneer Overseas Corporation
Plant Biotechnology Group
Plymouth Reference Library
Poole Consumer Protection Services
Potato Processors Federation
Prepacked Flour Association
Principal Hotel
Professor H Sewell
Professor J O Warner
Professor Philip J Dale OBE (Emeritus Fellow)
Professor T Sanders
Provision Trade Federation
Pubmaster Ltd
Quest International
Rainbow Wholefoods Warehouse
Reading B C Trading Standards
Real Food Team
Refreshments Department
Restec Laboratory
RHM Foods Ltd
Rhone-Poulenc Agriculture Ltd
Rio Trading Company
Ross Youngs International Ltd
Rowland Company
Royal College of Physicians(London)
Royal Danish Embassy
Royal National Institute for the Blind
Royal Soc for Men Handicapped Child & Adt
Royal Society for the Promotion of Health
Royal Veterinary College
RSPCA
SAFE Alliance
Salt Manufacturers' Association
Sandwell Information Service
Sara Jayne Stanes
Saunders Barbara
School of Medicine & Biomedical Sciences
Seed Crushers and Oil Processors Assn
Selfridges
SGS UK Ltd
Sharpes International Seeds Ltd
Shell Research Ltd
Shire Inns Ltd
SHS International Ltd
SiS (Science in Sport) Ltd
Small Business Service
Small Independent Brewers Association
National Renderers Association
National Starch & Chemical
Nestle UK Ltd
Network of Sikh Organisations UK
New Covent Garden Food Co. Ltd
NIAB
Nickerson Seeds Ltd
Norfolk C C Trading Standards
North York Moors National Park Authority
Northern Foods
Novartis UK Ltd
Nu-Mega Ingredients Ltd
NUS Services Ltd
Nutri-pharma
Nutricia
Nutritech
Oakland Fast Food
Oldham Metropolitan Borough
Organic Farmers and Growers Ltd
Osborne Clarke Solicitors
PAGB
Paisner and Co Solicitors
Pas (Grantham) Ltd
People First
Perfecta Ltd
Pet Food Manufacturers Association
Pickles and Sauces Association
Pioneer Genetique
Pioneer Overseas Corporation
Plymouth Consumer Group
Policy Unit
Potato Marketing Board
Precept PR Ltd
Princess Royal Hospital
Procter & Gamble
Professor J Bainbridge
Professor J R Blanchfield
Professor R Walker
Proprietary Association of Great Britain (PAGB)
Public Health Laboratory Service Board
Qualifry Limited
R Loeffler
Rank Hovis McDougall Plc
Reading Scientific Laboratory
Red Mill Snack Foods Ltd
Restaurant Association Great Britain
Revisss Services
RHM Technology Ltd
Richard Robinson
Roche Vitamins (UK) Ltd
Rothamsted Experimental Station
Royal College of Paediatric and Child Health
Royal Commission on Environmental Pollution (RCEP)
Royal Institute of Public Health and Hygiene
Royal Pharmaceutical Society
Royal Society for Health
Royal Society of Chemistry
RSPCA
Rugby College
Safeway Stores Ltd
Sandekker
Sandwich Plus
Sarah-Jane Evans
School of Biological Sciences
Scientific Services Department
Sekong Partnership
Seven Seas Ltd
Shapel Barn
Sheffield University
Sherwood
Showmen's Guild of Great Britain
Sinaed McGurk
SMA Nutrition
Small Farms Association (Yorkshire)
Smithkline Beecham

LIST OF INTERESTED PARTIES

Snack Nut and Crisp Manufacturers Assoc
Society of Chemical Industry (SCI)
Society of Food Hygiene Technology
Soil Association
Somerfield Stores Ltd
Somerset County Council
Soroptimists Group
South Bank University
Soya Protein Association
Specialist Food Ingredients Ltd
Spice & Seasoning Association
St Ivel Ltd
Staffordshire County Council
Suffolk Meat Traders & Consumers Assoc
Sun Valley Peanuts Ltd
Support Training & Services Ltd
Sustain - Alliance for Better Food & Farming
Swans Hotel
Swindon Borough Council
Syngenta Seeds
T Miller
Taylor Joynson Garrett
Tendercut Meats Ltd
Terrence Higgins Trust
Thanet D C Environmental Services Dept
The Anchor Inn
The British Allergy Foundation
The Chamberlain Partnership
The Chinese Takeaway Association (UK)
The Commercial Farmers Group
The Crown Estate
The Dairy Council
The George Group
The Guardian
The Hungerford Chartery
The Lard Association
The Limes
The National Beekeeping Centre
The National Heart Forum
The Original Black Vodka Company Ltd
The Royal Society
The Scotch Whisky Association
The Trading Standards Institute
The Vegan Society
The Whitehouse Consultancy Ltd
Tim Brigstocke Associates
Townswomen's Guilds
Trading Standards Department
Trading Standards Department
Trading Standards Institute
Trading Standards Service
Transport and General Workers Union
Tryton Foods
Tulip International
UCLES
UK Association of Fish Meal Manufacturers
UK Maize Millers' Association
UK Renderers Association
Ulster Farmers' Union
Unilever Research
Union of Liberal and Progressive Synagogues
United Biscuits
United Kingdom Baking Industry
University of
University of Leeds
University of Southampton
USDA
Van De Moorle
Vanessa Hall
Vegetarian Society
Veterinary Medicines Directorate
Waitrose Ltd
Warrington B C Trading Standards Serv
Websters Bed & Breakfast
Weetabix Ltd
Socialist Environment & Resources Assoc
Society of Feed Technologists
Society of Independent Brewers (SIBA)
Solihull Metropolitan Borough Council
Somerset C C Contracts Support Services
Soroptimists International
Soup and Gravy Manufacturers Association
Sovereign Food Group
Specialist Cheesemakers Association
Specialist Publications
SPRU-Science & Tech Policy Research
St Pansras Hospital
Suffolk Coast Port Health Authority
Sugar Bureau
Sunrise Poultry Farms
Surrey County Council Trading Standards
Sustainable Development Commission
Swedish Foods
Syngenta New Farm Crops Ltd
SynPharma International
Tate and Lyle PLC
Taylor's Health Care
Tenneco Tackaging
Tesco Stores Ltd
The Anaphylaxis Campaign
The Belt and Braces Food Co. Ltd.
The British Coffee Association
The Chilled Food Association
The Co-operative Group (CWS) Limited
The Cottage Restaurant & Lodge
The Crown Inn
The Genetics Forum
The Gin & Vodka Association of GB
The Health Development Agency
The Institute of Refrigeration
The Library of Ashurst Morris & Crisps
The Lion Hotel
The National Council of Women
The National Medicines Society
The Ritz Hotel
The Science and Technology Centre
The Scottish Beekeepers' Association
The Trading Standards Institute
The White Swan
The Women's Environmental Network
TNO BIBRA International
Trading Standards Department
Trading Standards Department
Trading Standards Department
Trading Standards Institute
Trading Standards, Worcestershire C C
Tricon Restaurant
TUC
U.K. Vineyards Association
UK Assoc of Mfrs of Bakers Yeast
UK Environmental Law Association (UKELA)
UK Preserves Manufacturers Association
UK Sport
Unigate
Unilever Research
Union of Muslim Organisations of UK and Eire
United Biscuits
Universe Ingredients
University of Bristol
University of Leicester
University of Sussex Library
USDA
Vandemootele (UK) Ltd
Vega Research
Verner Wheelock Associates
Vitrition UK
Warburtons Ltd
Warwickshire County Council (Legal Services)
Wedlake Bell
Wendy's Ltd

LIST OF INTERESTED PARTIES

West Yorkshire Trading Standards Service
Weston Research Laboratories Ltd
Which
Whitbread PLC (London)
WI Country Markets Ltd
Withers Solicitors (Ref GFB)
Women's National Commission
Womens Farming Union
Wragg & Co
Yorkshire Trading Standards

West Yorkshire Trading Standards Service
Weston Research Laboratories Ltd
Whitbread PLC
Whitbread PLC (Luton)
Winteringham Fields
Women's Food and Farming Union
Women's Unit Cabinet Office
Worcestershire Scientific Services
Wyeth Europa