

Consultation on Consolidating and Simplifying the Food Orders Government Response

Introduction and background

1. The consultation seeking views on consolidating and simplifying the weights and measures legislation relating to the sale of food, including alcoholic drinks drink closed on 4th January 2005. The aim of the reform is to consolidate the existing UK legislation on quantity indications (which comprises three main Orders amended by five further Orders) into a single Order, and simplify it by modelling the requirements more closely on the relevant European Directives.
2. The main UK weights and measures requirements in this area are set out in three Orders made under section 22 of the Weights and Measures Act 1985 and five amending orders. The Orders provide a general obligation to label pre-packaged food with an indication of quantity and require certain pre-packaged foods to be made up only in specified quantities. The Orders also include a requirement that certain quantity information be provided for food not sold in pre-packages and create specified quantities for certain food not pre-packaged.
3. The main proposals for the reform of the Orders, on which the consultation sought views, are to:
 - Consolidate the eight existing UK Orders into a single Order which would also include the UK implementation of certain related EC requirements and update UK law in the light of a recent ruling by the European Court of Justice (ECJ) on the free movement of goods between Member States;
 - Simplify the provisions by modelling them on the general approach of Directive 2000/13/EEC rather than the present lists of specific foods;
 - Consider the scope to remove UK requirements within the existing Orders which are not required by EC law, so long as these are no longer necessary for consumer protection; and
 - A specific deregulatory proposal relating to bread freshly baked in convenience stores and supermarkets.

Responses Received

4. Sixty-Three substantive responses to the proposals have been received. These include a total of 23 responses from the enforcement community, including responses received from individual Local Authority Trading Standards Departments, regional Trading Standards groups, the Local Authorities Co-ordinators of Regulatory Services (LACORS) and the Trading Standards Institute (TSI). A total of 34 responses were received from the

business community, including 8 responses from individual businesses and 26 from trade associations. Six other responses were received including four from consumer groups or individual consumers. A list of the organisations whose responses are publicly available and details of how to view them is at Annex A.

5. Responses were very positive overall with a substantial majority of respondents supporting the consolidation and simplification of the current UK legal provision in principle. There was some divergence of views on specific proposals and there are a number of issues, identified below, which need further consideration before drafting the new legislation.

6. A meeting with stakeholders to report back on the responses to the consultation and to elicit further feedback was held on 26th January 2005. Discussion took place on some of the points raised by respondents in their written replies, the impact of the European Commission's proposal on specified quantities and on the timetable for making new legislation. The Department has also had discussions with a number of trade associations and consumer bodies on specific issues raised in the consultations.

Summary of issues requiring further work

7. In light of responses to the consultation, we will:

- Consider how the general rule that liquids should be sold by volume and other products by weight applies to highly viscous or composite products such as soups, sauces, honey etc.
- Consider whether an exception from quantity marking for single portion food intended as a minor accompaniment to another food or service should be included.
- Consider whether the rules on open containers require sufficient quantity information to be provided to consumers.
- Consider how box and bag schemes should be treated under weights and measures legislation.
- Consider whether the specified quantities for beer and cider should continue to include 1/3 pint measure whether this should be extended to include multiples of 1/3 pint, and whether different quantities should be specified for the service of liqueur wines, etc.
- Take account of the views of business and consumers, in negotiations at European level on the proposal for a new Directive on nominal quantities for pre-packaged products.
- Review the treatment of non-foods in weights and measures legislation.

Next Steps

8. We intend to carry forward the revision of the food Orders as soon as practical once the Commission's proposals to simplify EU law in relation to specified quantities have been enacted. Dependent upon early agreement of the European proposal, a consultation on a new draft Order to implement the new Directive and to make the other proposed changes could be published early next year with an earliest possible implementation date of 1st October 2006.

Responses by Question

The Central Proposal

Question 1

Do you agree that it would be desirable to consolidate and simplify the UK implementation of Directive 2000/13/EC and the other EC legislative provisions listed in Annex D?

9. All respondents who expressed a preference welcomed the consolidation and simplification of the UK implementation of the relevant EC laws. A number of respondents commented that the current legislation was overly complex and antiquated and needed to be reformed. We accordingly intend to bring forward a single new weights and measures food Order as proposed.

Pre-Packaged Foods - Indications Of Quantity

Question 2

Do you agree that the main requirement of the new Order should be a general requirement for pre-packaged foods to be labelled with an indication of the net quantity by volume in the case of liquids and by weight in the case of other products?

10. A large majority of respondents favoured including a general requirement that pre-packaged liquid foods should be labelled with an indication of net quantity by volume and other foods by weight. However, a number of respondents raised the question of how certain products such as soups, sauces and honey would be treated because it may be unclear whether they were considered to be liquids or solids.

11. A broad requirement for pre-packaged liquids to be marked by volume and other products by weight offers scope for considerable simplification. However we will consider whether specific provision would be desirable for products which could be either liquid or solid, such as honey or yoghurt, or for those with varying density such as sauces and soups. Alternatively, it might be more satisfactory to address such cases through guidance.

Question 3

Do you agree that the nominal quantity of ice cream should be expressed in volume irrespective of the quantity in which it is packed?

12. There was a clear divergence of views in response to this question. A small majority of respondents agreed that ice cream should be marked by volume, however several issues were raised by respondents. Firstly there was a concern that as the volume of ice cream varies with the level of air trapped in the product, selling by volume may provide an incentive for producers to increase the level of air to the detriment of consumers. A further concern was that it is more difficult for enforcement officers to check the volume of ice cream rather than its weight. On the other hand some respondents believed that consumers made purchasing decisions for ice cream based on portion size and such decisions would be aided by labelling by volume.

13. It is recognised that the density of ice cream varies significantly, making comparisons based on either weight or volume imperfect. The EC legislation which sets out the specified quantities by volume which derogate from the general principle of selling solids by weight is being reviewed and the Department will reconsider its position in light of the outcome of discussions at European level on a new Directive for specified quantities.

Question 4

Do you agree that foods that are normally sold by number, where the number of items can be easily seen and counted without opening the package or the number of items is indicated on the labelling, should be exempt from quantity indications?

14. There was strong support for foods normally sold by number to be exempt from quantity indications where the number of items can easily be seen without opening the package or where the number of items is marked. A number of respondents favoured the inclusion of a list of which goods may be sold by number, and some thought this should be based on the list of countable produce currently in place. Several respondents also favoured a limit on the number of items to which the exemption would apply, on the basis of what would be a reasonable number of items for a consumer to count. Concerns were raised that any exemption would make it harder for consumers to make price and quantity comparisons between goods sold loose by weight and the same goods sold packaged by number. One respondent proposed that rather than a product specific list, all fruit and vegetables should be required to be sold by weight except where packaged in a number below 5 items, where they could be sold by number.

15. The Directive itself exempts packages containing goods normally sold by number from weight or volume marking. It seems unlikely that there will be advantage in seeking to elaborate on that in the Order itself. However we will

consider how to clarify through guidance which goods are at the present time regarded as “normally sold by number”.

Question 5

Do you agree that the new Order should provide an exception from an indication of quantity for all foods (except for herbs and spices) in quantities of less than 5 g or 5 ml, and for all sugars in quantities of less than 20 g?

16. There was strong support for this proposal with a large majority of respondents favouring an exception from quantity marking for all foods (except for herbs and spices) in quantities of less than 5 g or 5 ml, and for all sugars in quantities of less than 20 g. Respondents identified this proposal as a dramatic simplification which would remove product specific exemptions and anomalies.

17. However some business respondents raised concerns over the removal of exemptions for certain products such as sauce and condiment portion packs, individual milk, jam and marmalade portions etc. Particular difficulties identified included the problems of incorporating readable quantity statements on small packaging and of controlling accurately quantity for very small packages.

18. We favour the simplification of the requirements for quantity marking and the removal of product specific exemptions. However consideration will be given in drafting the new Order over whether an exemption may be appropriate for single portion food intended as a minor accompaniment to another food or service.

Question 6

Would it be appropriate to include in the new Order any exemptions from indications of quantity, in relation to foods which are subject to considerable losses by weight or volume?

19. Less than half of respondents thought it necessary to include any new exemptions for foods which are subject to considerable losses by weight or volume. Several respondents suggested that such products include a statement that they are subject to weight or volume loss.

20. Given the response we are not convinced that there is a need to introduce any new exemptions from quantity marking for desiccating products. Changes being made under the Weights and Measures (Packaged Goods) Regulations 2006 will provide a new defence for packers of desiccating products under the average system where they can show that any deficiency below nominal quantity is due entirely to desiccation after packaging.

Question 7

Should the new food Order offer any exemptions for foods presented in fancy packaging such as figurines or souvenirs?

21. Only a minority of respondents were in favour of any exemptions for foods presented in fancy packaging. Respondents expressed concern over the potential for significant consumer detriment from foods sold in fancy packaging where it would be unclear to the consumer the quantity that was being purchased if there was no quantity indication. On the other hand some respondents indicated that in their view consumer choice was governed by the total product presentation rather than the weight alone.

22. The Department is not convinced that there is a need to introduce any exemptions for foods presented in fancy packaging such as figurines or souvenirs.

Question 8

Do you agree that the existing rules on open containers strike a reasonable balance between simplicity and ensuring the consumer is adequately informed, and can you provide information on the treatment of such packages in other Member States?

23. Two thirds of respondents who expressed a view agreed that the existing rules on open containers strike a reasonable balance between simplicity and ensuring the consumer is adequately informed.

24. However, a number of respondents expressed concern that the current rules, particularly the provision that certain open packs do not need to be marked with an indication of quantity, resulted in consumers being inadequately informed about the quantity that was being purchased. Other respondents were concerned that the current rules were difficult to enforce and were largely ignored.

25. Two respondents welcomed the flexibility that the current rules provide but favoured further clarification on where exemptions apply.

26. We will discuss the apparent problems with enforcement of the current rules with the enforcement bodies, but stronger requirements for labelling would seem disproportionate, particularly as they might impact on sales from market stalls, etc.

Question 9

Are there any particular foods for which multipacks containing packages which are not regarded as units of sale could usefully be exempted from the requirement to declare the number of packages?

27. No particular foods were identified which respondents would want to have exempted from the requirement to declare the number of packages.

28. Respondents were on the whole in favour of declaring the number of packages, which is already normal business practice.

29. In the absence of any information on particular foods that might benefit from an exemption, we do not propose to exempt any foods from the requirements to mark multipacks, which contain packages which are not regarded as units of sale, from the requirement to declare the total number of individual packages in the multipack.

Question 10

Do you agree that the UK legislation on aerosols should simply transpose the relevant EC requirements, and the provisions of Schedule 7 of the Weights and Measures Act 1985 should be removed?

30. A large majority of respondents agreed that the EC requirements should be transposed and the provisions on aerosols in Schedule 7 removed. However, several respondents expressed concern over whether the derogation permitted by Directive 80/232/EEC, which permits volume only to be marked, meet the recommendations of the OIML.

31. Our intention is to transpose the relevant EC requirements into the new Food Order and to repeal paragraph 3 of Schedule 7 which applies to aerosols. We will also take account of respondents' views in future negotiations on this issue in Europe.

Question 11

Do you agree that mixed packs should continue to be subject to a requirement to indicate the number of individual packages contained and their quantities, and can you provide information on the treatment of such packages in other Member States?

32. All respondents who expressed a preference agreed that mixed packs should continue to be subject to a requirement to indicate the number of individual packages contained in the pack and their quantities. The question of how "bag and box" schemes for the sale of locally produced vegetables should be treated was raised by one respondent. One respondent favoured a continued exemption or packages below 25 g.

33. The new Order will continue to require mixed packs to be subject to a requirement to indicate the number of individual packages and their quantities contained in the pack. The Department will also consider whether "bag and box" schemes should be subject to the new Order. Changes being made to the Weights and Measures (Packaged Goods) Regulations will require packages above 5 g to be labelled with quantity information. Therefore the current exemption for packages below 25 g will no longer apply.

Question 12

Do you agree that net quantity indications should continue to be required on all pre-packaged foods, and can you provide information on the treatment of such foods in other Member States?

34. All respondents who expressed a preference supported the proposal that net quantity indications should continue to be required on all pre-packaged foods.

35. A number of respondents wanted this requirement to apply more widely to all packages regardless of whether they were destined for retail sale. Other respondents expressed a preference for the requirement for net quantity labelling to apply in the same way as the Directive, i.e. to all foodstuffs to be delivered to the ultimate consumer or to restaurants, hospitals, canteens and other mass caterers.

36. One respondent commented on the treatment of foodstuffs in France where they reported that an average quantity declaration is required to be correct up to the first commercial transaction but does not apply at the point of sale to the ultimate consumer. They felt that by applying at the point of sale the UK legislation caused problems for manufacturers of products that were subject to desiccation.

37. It is our intention to retain the current application of the requirement to label all pre-packaged foods with an indication of net quantity. The draft Weights and Measures (Packaged Goods) Regulations include a defence in cases where any deficiency below nominal quantity, so long as it is not below a minimum standard, can be shown to be due entirely to desiccation after packaging.

Pre-Packaged Foods – Specified Quantities

Question 13

Do you have any views on the existing EC requirements for specified quantities either for or against change?

38. At the time of the publication of the Consultation on Consolidating and Simplifying the Food Orders in October 2004, the European Commission had not yet published its proposal to revoke non-mandatory specified quantities and to provide mandatory specified quantities for only four products (wine, spirits, soluble coffee and white sugar). Upon publication the Department wrote out to stakeholders with details of the proposal and seeking views on it. The responses summarised here are therefore in response both to the initial question and the subsequent letter highlighting the Commission's proposal.

39. Views were divided roughly between those who believed that all specified quantities should be maintained, those who felt that they should be

rationalised but retained for staple products and those who believed that they should be removed altogether.

40. Some respondents expressed the view that specified quantities should be maintained as they still have value in allowing consumers to make easy comparisons between products and brands. Concern was expressed by some that the small shops exemption from unit pricing requirements significantly reduced the effectiveness of unit pricing in consumer protection particularly for those groups who were more likely to use smaller shops such as the elderly and those with mobility difficulties.

41. Many respondents favoured simplification, and the opportunity to remove anomalies but retention of specified quantities for certain products.

42. Many respondents were in favour of retaining specified quantities for staple foods. Support was specifically expressed for mandatory specified quantities for bread (including by the Federation of Bakers, the National Association of Master Bakers, and the National Association of British and Irish Millers) tea (including by the UK Tea Association), spirits (by the Scotch Whisky Association and the Gin and Vodka Association), margarine (by the Margarine and Spreads Association) fresh milk (by Dairy UK) and wine (by the Wine Standards Board).

43. Conversely, some respondents favoured complete deregulation with the removal of all specified quantities and they expressed the view that specified quantities were no longer needed for consumer protection with the advent of unit pricing. In particular the Association of Cereal Food Manufacturers put the case for the removal of specified quantities for cereal products and the Biscuit Cake Chocolate & Confectionery Association favoured deregulation of specified quantities for chocolate and biscuit products.

44. With regard to the Commission's proposal specific concerns were raised over whether the level of intervals between ranges was sufficient at the upper and lower thresholds to prevent confusing sizes being permitted. The UK Travel Retail Forum favoured a continued exemption for duty free products, and noted this was not included in the Commission's proposal. Some respondents expressed concern over the inclusion of a sunset clause which would end all mandatory specified quantities after 20 years.

45. The UK Metric Association expressed the view that imperial equivalent sizes should be removed from the list of prescribed quantities.

46. The Department is in favour of a broad deregulation of specified quantities on the lines of the Commission proposal, but recognises that a case can be made for their retention for products in everyday use where there is a history of fixed sizes and where market conditions warrant. The responses to this consultation and subsequent meetings with stakeholders have identified five staple products not included in the Commission's proposal where both business and consumer groups in the UK favour retention. These are fresh milk, bread, tea, butter and margarine. However, we favour a review of the

operation of the regime after a suitable period of time rather than a sunset clause as proposed by the Commission.

47. The Commission's proposal is currently the subject of negotiations in the European Council under the UK Presidency and in the European Parliament. We will endeavour to keep stakeholders informed as negotiations progress.

Question 14

Do you agree that existing UK specified quantities should be maintained in relation to the sale of bread and milk when pre packaged?

48. Respondents were divided over whether these prescribed quantities should be retained. A majority favoured retention on the basis of consumer protection.

49. A number of business respondents favoured the retention of specified quantities for bread but with the introduction of a new specified quantity of 600 g, to give bakers greater opportunity to respond to consumer demand.

50. Conversely, a number of respondents from the enforcement community were concerned that allowing a new specified size between 400 g and 800 g (for example 600 g) would make it difficult for consumers to identify which loaf they were purchasing. The properties of bread make it possible for a 600 g loaf to have a very similar appearance to an 800 g loaf.

Food Not Pre-Packaged

Question 15

Do you agree that the new Order should require foods that are not pre-packed to be sold by volume in the case of liquids and by weight in the case of other foodstuffs, except for foodstuffs normally sold by number?

51. A large majority of the responses agreed that foods that are not pre-packed should be required to be sold by volume in the case of liquids and by weight in the case of other foodstuffs (except for foodstuffs normally sold by number).

52. Concerns were raised however over how foods which could be either liquid or solid and foods with a high viscosity would be treated. One respondent also raised the issue that some smaller firms may have difficulty in measuring volume rather than weight. A number of respondents also favoured simplification and updating of the list of countable produce and one suggested that selling by number alone should not be permitted in order to facilitate comparisons with the same products being sold by weight.

53. The Department supports the general principle that foods that are not pre-packed be sold by volume in the case of liquids and by weight in the case

of other foodstuffs. However consideration will be given to viscous foods and to the impact of measuring by volume rather than by weight.

Question 16

Do you agree that existing UK provisions for specified quantities should be maintained in relation to unpackaged bread and alcoholic drinks for consumption on licensed premises?

54. Respondents were largely in favour of retaining the existing provisions for specified quantities in relation to unpackaged bread and alcoholic drinks for consumption on licensed premises.

55. With regard to alcoholic drinks a number of issues were raised, including support for the introduction of metric specified quantities for beer and cider, which would allow easier comparisons between draught and bottled drinks. A number of respondents also favoured removing the 1/3 pint quantity as they considered it redundant. Conversely two respondents from the brewing industry favoured the introduction of an option to serve beer and cider in multiples of 1/3 pint to allow for new styles of lager and changing consumer taste. Two respondents raised the treatment of liqueur and dessert wines, with a smaller size suggested for these products or their removal from the list of specified quantities. It was also suggested that specified quantities be extended to brandy and other non-liqueur spirits in order to bring these into line with the treatment of other spirits.

56. With regards to unpackaged bread there was some concern from the enforcement community that the addition of the 600 g and 1000 g quantities put forward by the Federation of Bakers could lead to confusion by consumers with existing 400 g and 800 g quantities. Several respondents commented that the treatment of pre-packaged and unpackaged bread should remain consistent.

57. We will consider the options for revision of specified quantities for alcoholic drinks and unpackaged bread, taking into account comments received.

Part-Baked Bread

Question 17

Do you agree that retailers of bread from in-store bakeries should have the option of compliance with the minimum system rather than the average system?

58. A majority of respondents agreed that retailers of bread from in-store bakeries should have the option of compliance with the minimum system rather than the average system.

59. Several respondents commented that they welcomed the removal of this burden on business, particularly on small firms. A number of respondents were concerned that it should be clear which system the premises was

working to and that only one system should be in use at any single premises. One respondent suggested that retailers should register their option to opt out with their local weights and measures authority. Another suggested that the option be extended to all bakers of non pre-packaged bread.

60. We intend to introduce an option for retailers of part baked bread to choose to comply with the minimum rather than the average system. This new provision has been included in the draft new Weights and Measures (Packaged Goods) Regulations, which are currently part of a consultation exercise (see <http://www.dti.gov.uk/ccp/consultations.htm>) which closes on 7th October 2005. The draft provision requires retailers who wish to exercise the option to pack to the minimum system to notify their local weights and measures authority so it is clear which system they are operating to and which should be enforced.

Timing

Question 18

Do you agree that the commencement date for new weights and measures legislation should either be 1st April or 1st October, or are there alternative dates which should be considered?

61. A large majority of respondents agreed that the new Order should come into force on one of the two common commencement dates. While some respondents commented that the Order should come into force as soon as possible, others were concerned that 2005 would be too early.

Question 19

Do you agree that the weights and measures legislation should be reformed as soon as practical, rather than awaiting the completion of the European Commission's review?

62. A majority of respondents from the enforcement community favoured making the reforms as soon as practicable, however a majority of respondents from the business community favoured waiting until all the changes could be made at one time to avoid bringing in two sets of new legislation within a short period of time.

63. On reflection and following further consultation with stakeholders in January 2005, we propose to await the outcome of the European Commission proposal on nominal quantities for pre-packaged products (specified quantities) which is currently before both the European Parliament and European Council before making new legislation in this area. This will allow the new Food Order to include any changes to specified quantities that are needed implement the expected new Directive, and will avoid business having to adjust to two new sets of rules on weights and measures for foodstuffs in short succession. The earliest implementation date for the new Order would be October 2006. In the meantime, a short Order will be made bringing UK law into line with the ECJ judgement mentioned above.

General Questions

Question 20

Do you have any other comments on the content of the proposed new Food Order?

64. A number of respondents commented that the new Food Order should include a new requirement for quantity information to be provided where products are sold through media advertising, vending machines or internet sales.

65. One respondent emphasised that the new Order should avoid product specific definitions wherever possible, and another that the legislation should include an index and cross referencing to other legislative labelling requirements.

66. One respondent requested that the packaging and wrappers of pick and mix sweets continue to be sold gross.

67. We will consider these additional points when drafting the new Order. In relation to indexing and cross referencing, the new guidance issued with the legislation will seek to explain clearly the requirements in the legislation and to cross refer to other requirements that reader should be aware of.

68. A number of respondents commented on the need to tackle the issue of short measure beer, on which the Government last consulted in 2002. The DTI has consulted extensively on the question of the "full pint and we are continuing to consider the results of the consultations.

Question 21

Are there any other areas of weights and measures legislation which you think could be improved or made easier to comply with?

69. The most frequent request was for the new Order to be user friendly and accompanied by clear and practical guidance.

70. A number of respondents also requested that weights and measures legislation applying to non-foods should be reviewed with particular requests for a review of the treatment of wood fuel in bulk and sand and ballast in bulk sacks.

71. Two respondents were in favour of a complete review of all of the Weights and Measures Act 1985, which in parts dates from 1963, as it is now 40 years old. Requests were also made for changes to the Units of Measurement Regulations 1986 (for more offences), the Price Marking Order 2004 (for a reduction in scope of small shops exemption) and the Weights and Measures (Packaged Goods) Regulations 1986 (for revision of T1 and T2 rules).

72. Clear and simple guidance will be produced to accompany the new Food Order, to explain what the new law says and to give examples of how business may comply.

73. We will also consider whether changes are needed to the application of weights and measures law to non-foods such as wood fuel and ballast. We intend to seek further information from stakeholders over the operation of the existing rules to determine whether any amendment may be necessary.

Annex A

The responses to the consultation, except those made in confidence, are available at the DTI headquarters and can be accessed on request by contacting Paul Cole on 0207 215 0332. A list of those respondents who were willing to have their names and responses disclosed can be found below:

Association of Cereal Food Manufacturers
Bakers, Food and Allied workers' Union
Bee Farmers' Association Of The UK
Biscuit Cake Chocolate & Confectionery Association
British Beer & Pub Association
British Retail Consortium
Campaign For Real Ale
City of Edinburgh Council
The Co-operative Group
The Crossing Boundaries Partnership
Dairy UK
Doncaster Trading Standards
East Midlands Co-ordinators of Regulatory Services
Eversheds LLP
The Federation of Bakers
Federation of Licensed Victuallers Associations
Food and Drink Federation
Food Processors Association
The Gin And Vodka Association Of Great Britain
Hampshire County Council
Institute of Directors
Interbrew UK
Joan Walley MP
Kent County Council
Local Authorities Co-ordinators of Regulatory Services
Lancashire County Council
London Trading Standards Authorities
Manchester Business School
Margarine & Spreads Association
Marks & Spencer plc
Martin Vlietstra
MH Foods Ltd
Milton Keynes Trading Standards
Mitchells & Butlers
Montpeliers (Edinburgh) Limited
National Association of British and Irish Millers
National Association of Master Bakers
North West London Metrology Group
Northumberland County Council
National Weights and Measures Laboratory
Oldham MBC Trading Standards
Premier Foods

Provision Trade Federation
Royal Borough of Kensington and Chelsea Trading Standards
Sapori D'Italia (UK) Limited
Scotch Whisky Association
SCOTSS (Trading Standards in Scotland)
Scottish Beekeepers Association
Scottish Licensed Trade Association
Scottish Grocers' Federation
Snack, Nut & Crisp Manufacturers Association
Somerset Trading Standards Service
South Eastern Metrology Group
Stoke-on-Trent City Council
SWERCOTS (South West of England Regional Coordination of Trading Standards)
Trading Standards Institute
UK Baking Industry Consultative Committee
UK Metric Association
UK Travel Retail Forum
United Kingdom Weighing Federation
West Sussex County Council
Wine Standards Board
Yorkshire and Humber Trading Standards Technical Metrology Group

End

Consumer and Competition Policy Directorate

DTI

September 2005

www.dti.gov.uk/ccp/