



475 Antrim Road
Belfast
BT153DA

T: 02890370222
F: 02890371231
E: info@ufuhq.com
W: www.ufuni.org

The GI team
Defra
2nd Floor
Horizon House
Deanery Road
Bristol
BS1 5TL

Date: 31/10/18

Dear The GI Team,

Consultation on establishing UK Geographical Indications (GI) schemes after EU exit.

I am writing to you to express the views of the Ulster Farmers' Union on the future of Geographical Indicators (GI) post Brexit. The Ulster Farmers' Union is the largest farming organisation in Northern Ireland (NI) representing approximately 11,500 farming families from all areas of NI and across all sectors.

Northern Ireland has a world class Agri-Food industry that produces top quality food. It is a completely missed opportunity if we do not market and promote it strongly, both here at home and further afield, to the highest standard. Northern Ireland currently has three products with Protected Geographical Indication status - Comber New Potatoes, Armagh Bramley Apples; Lough Neagh Eels and one Protected Designation of Origin - Lough Neagh Pollan. There are also three 'all island' PFN products registered by Department of Agriculture Food and the Marine (ROI) for spirits - Irish Cream, Irish Poteen and Irish Whiskey. However, we have become increasingly aware that our neighbouring nations have significantly more products with a protected status and are forging ahead with their food promotional activities; there is a very real chance that Northern Ireland will be left behind. Competition in world export markets is fierce and timing is everything.

Achieving Protected Geographical Indication status would help underpin the qualities of our local product and acts as a secure point of reference guaranteeing the products specificity. This would be of great benefit to NI farmers as it could be used as an instrument to encourage diversification and enhance the value of their produce.

The UFU is pleased that all existing GIs will automatically be protected in the proposed new UK GI scheme and supports the UK Government's intention to ensure that all UK GIs registered under the

EU schemes will continue to enjoy protections in the EU in the short to medium term to allow for development and implementation of the new scheme.

The UFU believe that over and above the transition period, Government must retain the budget to allow the development and delivery of a new credible scheme of the future. The application process must require local facilitation and the time frame involved must be thinner. Subsequently, any criteria for successful applications for a new proposed scheme must be pitched at a level that will deliver unique and meaningful differential within the supply chain at home and in new or other markets.

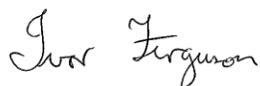
In respect to any future logos used, enhanced simplification or greater clarity of rules is required for example on the use of products and advertising. It is also imperative that this simple logo must be recognised instantly.

Once any scheme is awarded, greater clarity and communication on the rules of said scheme must be available. In addition, greater support on how best to use the status is required to best maximise potential economic uplift for the product. It is therefore important to maximise the marketing tool potential and scope all other opportunities to have greater collaboration with others i.e. the tourism industry.

There remains a lack of transparency, trust and information within supply chains. The producer must be profitable, this is priority. Local consumers consistently demand high quality, traceable food. A secure equitable supply chain is critically important. Government has not only a role to ensure market transparency but also that timely, accurate market information is made available to farmers. The development of improved and more integrated supply chains going forward also necessitates government involvement. Government need to ensure better and more robust transparency within the supply chain but this must not be linked to direct farmer support payments. They also have the responsibility to avoid abusive practices which is key to ensuring producer confidence.

Thank you for the opportunity to respond to this consultation, we trust that you will take our views into consideration. Should you require further information please do not hesitate to contact me.

Yours Sincerely,

A handwritten signature in black ink that reads "Ivor Ferguson". The signature is written in a cursive, slightly slanted style.

Ivor Ferguson

Ulster Farmers' Union President

1. What should UK logos of the PDO, PGI and TSG schemes represent, and how might this be reflected in their design?

The UFU would strongly advise against the use of flags or emblems as the logo for PDO, PGI or TSG schemes, not only due to the sensitive nature of flags and emblems in NI, but also because of the Red Tractor assurance scheme logo. GI products such as Scotch and Welsh Beef and Lamb adhere to Red Tractor standards and this could lead to repetition of a similar logo. This is wasteful of an opportunity to advertise the meaning and value of a food's protected status. Instead the UFU would suggest a simple logo, designed with integrity that reflects the origin and heritage of protected products and is straightforward to display on packaging - Industry and stakeholders must be engaged with when designing and agreeing a logo.

2. Is three years an appropriate adoption period for existing UK GI holders to update their packaging to reflect the new logo? If not, how long should the adoption period last

The UFU would suggest that three years after the transition period is an appropriate adoption period for existing GI holders to update their packaging with the new logo. However consideration must be given to products that are matured over a long period of time - wines, cheeses etc.

3. Do you consider that the First-tier Tribunal is an appropriate destination for the handling of appeals against decisions by the Secretary of State?

The UFU welcomes the right to appeal decisions and believe that fairness and independence are the most important aspects of any appeals process. The UFU would require further clarity before agreeing that First- tier Tribunals are an appropriate destination for the handling of appeals against decisions by the Secretary of State. What is the cost of a First- tier Tribunal, and are the cost recoverable upon the success of the applicant? Would the tribunal panel be independent of those involved in granting the protected status? Is the decision of the panel final? In addition, the applicant should be allowed to submit further evidence up to a certain time before the hearing and be allowed a representative to speak alongside them and/ or on their behalf. Is there a second stage where applicants can appeal the decision made at the First – tier Tribunal. Finally, this process should be completed within a reasonable and known time frame.

4. Do you consider that the General Regulatory Chamber Rules will suit the handling of these appeals? If not, why not?

Greater clarity and understanding of rules are required before answering.

5. Do you agree that the right to appeal should apply to all decisions listed at 4.12? Are there any others that should be added?

As per question four, until we fully understand the rules we will not be able to answer this question.

6. Do you have any other comments on the new UK GI schemes, or the wines and spirits regulations, as set out in this document?

Nothing more to comment at this stage.

