

Report of the Departmental Committee on the Composition and Description of Food.

Contributors

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REPORT

OF THE

DEPARTMENTAL COMMITTEE

ON THE

Composition and Description of Food

*Presented by the Minister of Health to Parliament
by Command of His Majesty,
April, 1934*

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We hereby amend the terms of reference of the Committee which was appointed by the Minister of Health and the Secretary of State for Scotland, by Minute dated the fourteenth day of May, 1931, to enquire into the working of the law as to the composition and description of articles of food other than milk, so as to substitute for the terms of reference set out in that Minute the following:—

“ To consider whether it is desirable that the law relating to the composition and description of articles of food should be altered so as to enable definitions or standards to be prescribed, or declarations of composition to be required, for articles of food other than liquid milk; and if so to recommend what alterations of the law are required.”

Dated this twenty-fourth day of July, 1933.

(Signed) E. HILTON YOUNG,
Minister of Health.

(Signed) GODFREY P. COLLINS,
Secretary of State for Scotland.

We hereby appoint—

R. H. Hume, Esq.,

to be a member of the Committee appointed by our predecessors on the 14th May, 1931, to inquire into the law relating to the composition and description of articles of food other than milk, in the place of H. E. Goodby, Esq., J.P., resigned.

Dated this twenty-seventh day of October, 1933.

(Signed) E. HILTON YOUNG,
Minister of Health.

(Signed) G. P. COLLINS,
Secretary of State for Scotland.

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DEPARTMENTAL COMMITTEE ON THE COMPOSITION AND DESCRIPTION OF FOOD

REPORT

To the Right Honourable Sir EDWARD HILTON YOUNG, G.B.E.,
D.S.O., D.S.C., M.P., Minister of Health,

and

The Right Honourable Sir GODFREY COLLINS, K.B.E., C.M.G.,
M.P., Secretary of State for Scotland.

SIRS,

1. By Minute dated 14th May, 1931, we were appointed by your predecessors, the Minister of Health and the Secretary of State for Scotland, as a Committee to enquire into the working of the law as to the composition and description of articles of food other than milk, and to report what alterations, if any, in the law or its administration appear to be desirable.

2. Our Inquiry was suspended in October, 1931, as a measure of economy, and by your Minute of the 24th July, 1933, our terms of reference were amended and the following substituted :—

“ To consider whether it is desirable that the law relating to the composition and description of articles of food should be altered so as to enable definitions or standards to be prescribed or declarations of composition to be required, for articles of food other than liquid milk; and if so to recommend what alterations of the law are required ”.

We have now completed our Inquiry and beg to report as follows :—

3. Our meetings were not open to the public but opportunity was given to representative organisations to appoint persons to attend the meetings when evidence was being taken.

4. We have received memoranda in regard to our terms of reference from the Associations and other organisations set out in Appendix I of this Report. We have also heard oral evidence from the witnesses, a list of whom is given in Appendix II. It will be seen that we have had the advantage of hearing a very wide range of opinion and we wish to place on record our thanks both to the authors of the memoranda and to the witnesses who have given oral evidence.

5. We assume that in accordance with modern practice the memoranda and minutes of evidence will not be printed with this

Report and it would not be practicable to incorporate a full summary with the Report itself. As, however, they will be of considerable value to the parties interested, we suggest that copies should be deposited at the Offices of the Ministry of Health and the Department of Health for Scotland and be open to inspection by such parties.

I.—Effect of Evidence.

6. We have been impressed by the large measure of agreement to be found among our witnesses in support of the view that the law should be altered so as to enable definitions or standards to be prescribed or declarations of composition to be required although there has naturally been a considerable amount of divergence of opinion as to the action which they would consider it desirable to take in the exercise of these enabling powers. The Society of Public Analysts, for instance, advocated the institution of a comprehensive system of definitions and standards which would ultimately embrace all articles of food. The Parliamentary Committee of the Co-operative Congress considered that the enabling powers should only be exercised in the case of those commodities the value of which, "whether money value, food value or freedom from undesirable impurity, can only be determined by special knowledge". Other witnesses expressed the view that the enabling powers should be used sparingly and only in the case of the common articles of food. Amongst these may be mentioned the Food Manufacturers' Federation, who, while not in favour of any wholesale system of standards and definitions, recognised that some measure of control on these lines was inevitable and expressed themselves as strongly opposed to the use of misleading descriptions. One of their Sub-Committees submitted definite proposals as to the declaration of the contents of infants', invalids' and diabetics' foods.

7. A few witnesses representing individual trades, without expressing any opinion on the general principle, considered it undesirable that the articles in which they were interested should be regulated in this way. Other witnesses representing the National Federation of Meat Traders' Associations, the Manufacturing Confectioners' Alliance, and the Food Manufacturers' Federation expressed the view that it would be difficult and irksome to the development of makers' specialities to define or standardise many compound articles. One independent witness, with wide experience in the operation of the existing food laws, was of opinion that there were many food commodities for which a standard if provided would be unenforceable, or would be misunderstood by the housewife.

8. Virtually all our witnesses agree that modern statutes and orders regulating the composition of food have operated in the public interest, and that their enforcement has proved practicable.

II.—Existing Definitions, &c.

9. There are at present in operation in this country laws regulating in some respects the composition of a number of articles of food (including spirits, flour, bread, butter, margarine and condensed and dried milks) and there are also laws prohibiting or restricting the addition of preservatives and other harmful ingredients either to foods generally or to specified articles. Some of these laws, e.g. those relating to margarine, condensed milks and certain articles containing preservatives, also impose requirements as to labelling. It may also be pointed out that under the Food and Drugs (Adulteration) Act, the Minister of Agriculture has power to make regulations respecting what is to be regarded as the normal composition of milk, cream, butter and cheese.

10. In addition, there is an arrangement between the Society of Public Analysts and the Food Manufacturers' Federation (which of course has no legal sanction) as to the composition and labelling of jam of two specified descriptions and there is the voluntary grading of a number of articles by manufacturers who elect to use a prescribed "grade designation" (usually in conjunction with the National Mark) in pursuance of regulations made under the Agricultural Produce (Grading and Marking) Acts.

11. In a considerable number of the Dominions and foreign countries general enactments are in operation empowering the appropriate department to prescribe definitions and standards for articles of food and these powers have been exercised to varying extents. For example, we are informed that the number of articles so regulated in the Union of South Africa is about 50 and in Canada about 150.

III.—Advantages and Objections.

12. It is claimed that the enactment of a statutory definition for an article of food introduces a measure of certainty as to the characteristic defined which is beneficial to all parties concerned, including manufacturers, retailers, purchasers, enforcing authorities and the Courts of Law. Cases have occurred, for example lemon cheese and toffee, where, in the absence of a statutory definition, the whole character of an article has changed owing to trade practice and competition. This seems to us to point to the desirability of having a power to fix definitions but the exercise of such a power would need to be used with discretion and not in such a way as to prevent reasonable development and improvement in the manufacture of an article.

13. The terms "butter" and "margarine" were defined in the Margarine Act of 1887, and the Butter and Margarine Act

of 1907 ; and in these and other Acts detailed rules were laid down as to the conditions to be observed in the manufacture, importation and sale of these goods. It is no doubt due to this legislation that the term " butter " has the same meaning in commerce to-day as it had fifty years ago. On the other hand, cheese was defined in the Sale of Food and Drugs Act, 1899, and cream in the Artificial Cream Act, 1929, but in neither case does the definition give any quantitative limits for any of the constituents. Consequently these articles are sold with varying proportions of fat, simply under the description of cheese or cream as the case may be.

14. So far as we are aware there is very little objection to the legal enactment of simple definitions in the case of many articles of food, such as might be given in a technical dictionary, by reference to their nature, constituents or mode of preparation. There may, however, be considerable difficulties in prescribing standards or quantitative definitions. In the first place it may be impossible, by reason of the varying tastes and requirements of consumers, to find any one standard that would be generally satisfactory. In the second place it may be difficult, by reason of the complexity of the process of manufacture, either for all manufacturers or for those carrying on business on a small scale, to attain the necessary uniformity in their products.

15. There is also the objection that some articles for which there is a demand on their merits may be driven off the market because they fall below the standard (or, if different standards are fixed for several grades, below the lowest standard). In some cases this difficulty might be got over by the sale of the sub-standard article under a name different from that of the standardised article (e.g. a proprietary name) but in the case of staple commodities this would hardly be practicable. Where, however, the difference is merely one of dilution, the exclusion from the market would be of little moment. It is, for example, unlawful at present to sell under any description a mixture of milk and water, but no hardship is caused by this since any person requiring such a mixture can readily obtain it by purchasing milk and diluting it for himself.

16. We have formed the opinion that a large proportion of the food manufactured in this country reaches a high standard of quality and that many manufacturers take a pride in the production of good quality articles and exercise great care in their manufacture. We have certainly received no evidence that the lack of standards has resulted in malnutrition. The facts seem to shew that the average housewife, who may not have much knowledge of the principles of nutrition, makes her purchases with considerable skill having regard to the dietary, tastes and customs of different parts of the country.

CONCLUSIONS AND RECOMMENDATIONS.

IV.—The main Question.

17. Our answer to the question which we are asked to report upon is that it is desirable that the law relating to the composition and description of articles of food should be altered so as to enable definitions or standards to be prescribed, or declarations of composition to be required, for articles of food other than liquid milk.

18. The enabling power should be vested in the Minister of Health for England and the Department of Health for Scotland.* In a later paragraph we shall deal with the procedure which we think should be followed in exercising the power.

19. At the same time we wish to state that in our opinion the case for the extension of standards or definitions to all articles of food is not made out. We consider that in a large number of cases the housewife to-day gets an article of the nature, substance, and quality she demands and that she would not be benefited by a multitude of standards, definitions or declarations of composition. We are satisfied, however, that in some cases standards or declarations of composition or definitions of some kind are necessary for the protection of the consumer.

20. We think the main thing to be aimed at is that the public, when buying any important article of food, should know what they are getting. A considerable amount of elasticity must be allowed in the preparation of many articles, and we should recommend that the power to fix standards or definitions should only be used where it is shown that it is necessary for the protection of the public health (including nutrition) or the protection of the pocket of the consumer.

21. Declarations of composition may be prescribed either in addition to or in substitution for standards or definitions in cases where it is desirable that the purchaser should be informed of some fact relating to either the composition or the preparation of the article.

22. In any case the power should only be exercised if the question of conformity with the requirements or with the declaration as the case may be can be checked by chemical analysis or otherwise.

23. The guiding consideration should be that as far as possible the same term should always mean the same thing. It is obvious, however, that the scope of useful regulation must be limited by the considerations (a) that it is impossible to standardise flavour and general quality, and (b) that in some commodities the purchaser may be fully capable of judging for himself the nature of the article he is buying.

* Subsequent references in this Report to the Minister of Health apply equally as regards Scotland to the Department of Health for Scotland.

24. Although we were not directed to consider standards for particular articles of food, we came to the conclusion that we could not properly deal with the general question without hearing the views of various witnesses concerning standards, definitions and declarations of composition in regard to some articles. We have accordingly taken evidence specifically in regard to cheese, sausages, meat pastes, potted meat, infants' foods, invalids' foods, jam, ice cream, confectionery and other articles. This we did merely in order to be able to report on the general question and we do not propose to make any detailed recommendations as to the articles which in our opinion need standards, declarations of composition or definitions and those which do not.

25. We may record, however, that almost all our witnesses (except those concerned only with specific articles) have urged that foods specially offered for infants and invalids should bear on the label of the package containing them a declaration of their contents. We think it important in this case that the purchasers of such foods should know what they contain.

26. At the lower end of the scale we should place sweetmeats. We do not consider that standards, declarations of composition or definitions are at present needed for these articles unless it is found desirable to prohibit the use of certain ingredients. It was suggested by some witnesses that the term "toffee" should only be allowed to be used for a sweetmeat prepared from butter and sugar. The evidence of the Manufacturing Confectioners' Alliance showed that the amount of toffee manufactured in this country to-day is very large and that the bulk of it is made with a vegetable fat. We conclude that the purchasers of toffee to-day are getting what they want although it is not usually made with butter.

27. There are two further points to which we wish to draw attention. The first of these relates to the extraneous matter such as arsenic, lead, tin, or other impurity, with which food may become contaminated in the process of collection or preparation. As this concerns food generally and the substances employed in connexion therewith, it includes certain articles to which standards or definitions have already been applied. It should therefore be treated as a general question. The second point is the addition to an article of food of an ingredient which is claimed to be necessary for its production in a state fit for carriage or consumption, as, for example, starch in shredded suet. We are of opinion that the limits or standards which are at present usually adopted under both of these points should come under review.

V.—Advertisements and Labels.

28. A number of our witnesses have complained of the misleading nature of some food advertisements and food labels. We are satisfied that these complaints are well founded. The Food Manufacturers' Federation, Patent and Proprietary Foods Section, put the following recommendation before us :—

"It is our opinion that any attempt to control by statute statements about the composition of food will be stultified unless it is legally enacted that, for purposes of evidence as to the nature, quality and substance demanded of a food specific claims made in advertisements shall be deemed to be part of the package label. Though it is theoretically true that the purchaser is expected to examine the label of a product before he completes its purchase, it is a matter of common knowledge that the vast majority of purchasers do not do so. The description on which they have been induced to buy the product is in a large number of cases only that contained in the advertisements, and we hold very strongly that progress in the standardisation and description of food will be seriously hampered until this matter is dealt with."

We agree with the principle of this recommendation.

VI.—Warranty. (Protection of Retailer in regard to pre-packed articles.)

29. The view was generally taken by our witnesses that further safeguards are required for the protection of the retailer of pre-packed articles. Whether or not he has a pleadable warranty in respect of these articles, or has any knowledge of their nature, he is liable to prosecution with consequent risk of damage to his business from publicity, should they be reported by the Public Analyst as not genuine or up to standard, or to infringe any labelling requirements. As a rule the retailer of the pre-packed article does not know its exact composition and provided he exercises reasonable discrimination in purchasing his stock, and stores it under suitable conditions, and for a reasonable time, he has discharged his main obligations towards his customers. In the event of any pre-packed article of food becoming the subject of a declaration of composition, a standard or a definition, the position of the retailer, in respect of the sale of that article, would undoubtedly become more onerous if the general framework of the law and the general practice of administration remained unaltered.

30. Manufacturers and retailers alike have stated in evidence that the primary responsibility under the law should be transferred to the packer of such articles, that is, the originator of the package, and that the retailer, where he is not the packer, should be absolved from proceedings if he can show that he sold the article in the same condition as he received it and had no reason to believe that it was not in accordance with legal requirements and that he took all necessary precautions to protect it during storage. We agree with this view. We further consider that, so far as any article of food which may be the subject of a legal standard or definition is concerned, the invoice referring to that article and any label affixed thereto should be equivalent to a warranty that the article delivered may lawfully be sold under the name

used. The manufacturer or packer, for his part, should have the option of fixing a time limit beyond which he would not be held to be responsible for the contents of the package, thus safeguarding himself against the sale of deteriorated articles for the condition of which he was not to blame.

31. Where samples of a pre-packed article on sale in the district of a Food and Drugs Authority are found to contravene legal requirements, action could most effectively and economically be taken at the premises where the article is packed. Where these premises are situated in another Authority's district we recommend that the first-mentioned Authority should be empowered to require the Authority of the other district to cause samples of the article to be taken in the despatch department of the packer's premises and that the latter Authority should be empowered to take proceedings against the packer if the samples obtained from him are reported against. This would entail some extension of the present powers of entry and sampling, but we believe that no serious objection on the part of manufacturers or wholesalers need be anticipated.

VII.—The Procedure for Settling Standards and Definitions.

32. The Society of Public Analysts have placed before us a full statement of their views. They visualise the fixing of standards or definitions for everything on the market in the way of food or drink. They realise that to do this would involve much exploratory work and that many interests would need to be consulted. Their view is that the institution of a comprehensive system of standards and definitions and the consideration of the descriptions that should be given of compounded foods would be a very lengthy work. They state that—

“ the Society is strongly of opinion that the work should be given to a *permanent body that should have no other duties*. Its view is that a Statutory Advisory Committee should be formed by the Minister of Health, consisting of representatives of the Ministry, public analysts, manufacturers, and consumers. This Committee should meet at regular intervals and discuss all matters relating to the administration of the Food and Drugs Acts and all work coming within the purview of the Public Analyst; and it would relegate to Sub-Committees the consideration of particular problems as it might think desirable. On each of these Sub-Committees would be co-opted persons interested in the particular subject to be considered. The Committee would make recommendations to the Minister of Health. It would deal with food standards and definitions, labelling and description of foods, processes of analysis, and similar questions, and it should on request state definitely, with regard to any ingredient of a food, the interpretation of the term ‘injurious to health’ ”.

33. Many other witnesses have spoken of the need of an Advisory Committee to consider and advise the Minister in regard to the use of the power to fix standards and definitions, while the County Councils Association proposed that a Committee should be set up and that the Minister of Health should be obliged to follow their recommendations, in regard to the making of Orders fixing standards or definitions or declarations of composition.

34. We do not recommend the constitution of a new permanent body such as the Society of Public Analysts and others have advised would be necessary if all articles had to be brought under review. Some of the advocates of a new tribunal or permanent Committee seem not to have been aware that the Ministry of Health at present have an efficient Foods Department well equipped with expert knowledge in regard to foods and with its own laboratories, the main object of which is the protection of the consumer.

35. We entirely agree, however, that no standard or definition should be laid down and no declaration of composition should be required without giving the manufacturers and other persons concerned the fullest opportunity of hearing what is proposed to be done and submitting their views on the proposal. In all cases therefore the power to fix standards and definitions should be exercised by means of an Order, a draft of the Order should be published and ample time allowed to any persons interested to state their objections.

36. There are some articles in regard to which there should, we think, be no difficulty in arriving at a large measure of agreement with the manufacturers and other parties interested and these articles should be dealt with first by the Minister with the aid of his own experts who would consult any other Government Departments concerned and confer informally with the manufacturers and other interests. This was the procedure adopted in the case of the Public Health (Preservatives, &c., in Food) Regulations and it is recognised by practically all the interests concerned that it was satisfactory.

37. In any case where application is made to the Minister for an Order and the Minister is of opinion either before or after the publication of the draft Order, that there is a wide divergence of view between the parties interested or that there will be special difficulty in arriving at a decision, we think it would be best to refer the matter to a Committee of three independent persons who would hear evidence and report to the Minister. Such hearings should be public and the report of the Committee should be published. After receiving and considering the report it would, of course, be for the Minister to decide whether or not to proceed with the making of the Order. Similar procedure should be followed in any case where it is proposed to repeal or amend any Order previously made.

38. Steps would have to be taken to prevent the importation of articles which contravene any standards or other requirements which have been laid down, as is now done in the case of the Public Health (Condensed Milk) Regulations and the Public Health (Preservatives, &c., in Food) Regulations and other enactments. Where the article is pre-packed the importer should be held to be primarily responsible for any infringement of the law in relation to the composition and labelling of the article.

VIII.—Expenses of Administration.

39. Evidence was taken on the question whether the legal standardisation and definition of articles of food or compulsory declarations of composition would involve any increase of administrative costs to be met by Local Authorities. The Association of Municipal Corporations thought that if the number of articles so regulated is not very large it would not be necessary for Local Authorities to take any more samples than they do at present and consequently that no increase of expenditure need be anticipated. The County Councils Association took the view that standardisation and definition would involve a temporary increase of activity and therefore of expenditure but after a short time would reduce the need for taking samples, especially if pre-packed articles were sampled at the packers' premises. The views of representative associations in Scotland were not uniform on the question of expense. The witness for the Convention of Royal Burghs held the decided view that increased expense would result from a policy of standards if adopted to any considerable extent. On the other hand, the witness of the Royal Sanitary Association of Scotland considered that more effective sampling without extra expense would result. On the whole we think that the alteration involved in the expenditure of Local Authorities, whether it turned out to be in the upward or in the downward direction would not be material and that the consideration of the problem need not be affected by the question of expense to Local Authorities.

40. We are satisfied by the evidence that the cost of administration would be materially reduced if the present law were amended by enacting that it shall not be essential to submit to chemical analysis an article of food, the nature or composition of which may be sufficiently proved in some other way.

IX.—Revision and Consolidation of Statute Law.

41. It is generally agreed that the ancient statutes of pre-Victorian times dealing with the composition of tea and coffee are "dead letters," their objects being completely provided for by subsequent legislation. We therefore recommend that these Acts be repealed. We also think that consideration should be given to the question of replacing the two Acts of 1822 and 1836 (dealing

with the composition of bread and flour) by new legislation more suited to present-day conditions. Further, we think that the time is ripe for the consolidation of the statutes dealing with the composition of food.

42. In conclusion we wish to record our appreciation of the services of our Secretary, Mr. W. J. Peete, who has shewn much zeal and energy in fulfilling the duties which have fallen to him.

We have the honour to be,

Sirs,

Your Obedient Servants,

F. J. WILLIS, *Chairman*.
 JENNIE LAUREL ADAMSON.
 W. BARRATT.
 ELONA BECK.
 J. N. BECKETT.
 H. F. CARLILL.
 MARY E. COTTRELL.
 A. T. A. DOBSON.
 J. M. HAMILL.
 R. H. HUME.
 JEAN ROBERTS.
 R. A. ROBINSON.
 HERBERT SHAW.
 GEO. STUBBS.
 J. M. VALLANCE.

W. J. PEETE,
Secretary.

20th March, 1934.

APPENDIX I.

ASSOCIATIONS, ETC., WHICH SUBMITTED MEMORANDA TO THE COMMITTEE.

- Aplin and Barrett, Ltd., and the Somerset Cheddar Cheese Factors' Association.
 The Association of County Councils in Scotland.
 The Association of County Medical Officers of Health of England and Wales.
 The Association of Municipal Corporations.
 The Association of Public Analysts of Scotland.
 The Association of Pure Vinegar Manufacturers.
 The Bakery Allied Traders' Association.
 I. Beer and Sons, Limited.
 The Board of Trade.
 The Bread and Food Reform League.
 The British Dairy Farmers' Association.
 E. G. Haygarth Brown, Esq., I.S.O.
 The Cheshire Chamber of Agriculture.
 The Cheshire Cheese Federation.
 The Cheshire County Council.
 A. B. Cobham, Esq.
 The Convention of Royal Burghs.
 The County Councils Association.
 The Customs and Excise Department.
 The Department of Health for Scotland.
 The Dutch Dairy Association.
 The East and North-East Middlesex Off-Licence Protection Association.
 The Federation of Grocers' Associations of the United Kingdom.
 The Food Manufacturers' Federation, Incorporated.
 The Government Chemist.
 H. J. Heinz Co., Ltd.
 Hill Evans & Co., Ltd.
 The Home Office.
 The Ice Cream Association of Great Britain and Ireland (Incorporated).
 The Incorporated Society of Inspectors of Weights and Measures.
 The Institute of Chemistry of Great Britain and Ireland, Incorporated.
 The Institute of Hygiene, Incorporated.
 R. Lehmann & Co., Ltd.
 The London Ice Cream and Refreshment Traders' Association.
 The London Wholesale Spice and Rice Dealers' Association.
 The Malt Vinegar Brewers Federation.
 The Manufacturing Confectioners' Alliance, Incorporated.
 The Margarine Manufacturers Association.
 The Ministry of Agriculture and Fisheries.
 The Ministry of Health.
 C. G. Moor, Esq., M.A., F.I.C.
 The National Farmers' Union.
 The National Federation of Dairymen's Associations (Incorporated).
 The National Federation of Meat Traders' Associations (Incorporated).
 The New Zealand Honey Export Control Board.
 The Parliamentary Committee of the Co-operative Congress.
 The Parliamentary Committee on Food and Health.
 The Patent Office.
 The People's League of Health (Incorporated).
 B. O. H. Pratt, Esq.

The Royal Sanitary Association of Scotland.
 R. J. Russell, Esq., M.P.
 The Sanitary Inspectors' Association.
 The Scottish Federation of Grocers' and Provision Merchants' Associations.
 The Society of Chemical Industry.
 The Society of Medical Officers of Health.
 The Society of Medical Officers of Health (Scottish Branch).
 The Society of Public Analysts and other Analytical Chemists.
 Supex, Ltd.
 The Swan Brewery, Limited.
 The Temperance Refreshment Trade Federation of Scotland.
 J. W. Topley, Esq.
 G. Clark Trotter, Esq., M.D., D.P.H., F.R.S.E.
 The West India Committee.
 H. Whiteway & Company, Ltd.
 F. Wright, Mundy & Co., Ltd.

APPENDIX II.

EVIDENCE TAKEN BY THE COMMITTEE.

List of Witnesses.

<i>Name of Witness.</i>	<i>Representing.</i>
L. Classey, Esq.	Messrs. Aplin & Barrett, Ltd., and the Western Counties Creameries, Ltd., and Somerset Cheddar Cheese Factors' Association.
Dr. Charles Porter, B.Sc., M.D., D.P.H., etc.	Association of County Medical Officers of Health of England and Wales. Society of Medical Officers of Health. Association of Municipal Corporations.
Dr. W. G. Savage, B.Sc., M.D., D.P.H., etc.	
J. H. Dickson, Esq.	
Dr. A. Scott Dodd, B.Sc., Ph.D., F.I.C., F.C.S., F.R.S.E.	Association of Public Analysts of Scotland.
Dr. J. F. Tocher, D.Sc., F.I.C.	
F. G. W. Paige, Esq.	Association of Pure Vinegar Manufacturers.
H. White, Esq., F.C.S.	
Miss May Yates	Bread and Food Reform League.
T. C. Goodwin, Esq., J.P.	Cheshire Chamber of Agriculture. Cheshire Cheese Federation.
T. C. Goodwin, Esq., J.P.	Cheshire County Council.
S. Ernest Melling, Esq., F.I.C.	
Sir Henry S. Keith, LL.D., J.P.	Convention of Royal Burghs.
E. W. Cemlyn-Jones, Esq.	County Councils Association.
W. L. Platts, Esq.	
Lt.-Col. T. R. Ubsdell, D.S.O.	Dutch Dairy Association.
C. Eygenraam, Esq.	
B. Gerritzen, Esq.	

<i>Name of Witness.</i>	<i>Representing.</i>
Arthur E. James, Esq. W. Herman Kent, Esq.	Federation of Grocers' Associations of the United Kingdom.
A. W. Beach, Esq. W. B. Chivers, Esq. Lt.-Col. G. R. Harding, D.S.O. ... T. Macara, Esq., F.I.C., F.C.S. ... A. E. Marsh, Esq. H. Palethorpe, Esq. E. Shippam, Esq. G. P. Shippam, Esq. G. Short, Esq. C. P. Tomlin, Esq. Col. L. A. C. Southam, D.S.O. ...	
P. Coombes, Esq. L. R. M. Feltham, Esq. F. J. Orth, Esq. W. Walker, Esq. Dr. R. King Brown, B.A., M.D., D.P.H. A. Pompa, Esq.	Food Manufacturers' Federation, Incorporated.
W. J. Bishop, Esq. A. J. Lewis, Esq. R. Russell Shaw, Esq. F. D. Rateliff, Esq. Paul S. Cadbury, Esq. T. Macara, Esq., F.I.C., F.C.S. J. G. Mathieson, Esq.	
J. C. Bolton, Esq. F. Keevil, Esq. George F. Poole, Esq. Dr. W. N. Stokoe, Ph.D. (London), B.Sc., F.I.C., F.R.S.E. H. G. Richardson, Esq.	Messrs. Hill Evans & Co., Ltd., Worcester.
J. N. Beckett, Esq. Dr. J. M. Hamill, O.B.E., M.D., D.Sc.	Ice Cream Association of Great Britain and Ireland (Incor- porated).
J. B. Pitchford, Esq. J. E. Rayner, Esq.	
Rt. Hon. A. V. Alexander. J. G. Lunt, Esq. H. E. Monk, Esq., B.Sc., F.I.C. ...	Institute of Hygiene, Incorporated.
Professor J. C. Drummond, D.Sc., F.I.C. Dr. W. M. Willoughby, B.A., M.D., D.P.H. James Cumming, Esq.	London Ice Cream and Refresh- ment Traders' Association.
Dr. H. E. Cox, Ph.D., F.I.C. Dr. L. H. Lampitt, D.Sc., F.I.C. Professor H. Raistrick, D.Sc., F.I.C.	London Wholesale Spice and Rice Dealers' Association.
	Malt Vinegar Brewers' Federation.
	Manufacturing Confectioners' Alliance, Incorporated.
	Margarine Manufacturers Associa- tion.
	Ministry of Agriculture and Fisheries.
	Ministry of Health.
	National Federation of Meat Traders' Associations (Incor- porated).
	Parliamentary Committee of the Co-operative Congress.
	Parliamentary Committee on Food and Health.
	People's League of Health (Incor- porated).
	Royal Sanitary Association of Scotland.
	Society of Chemical Industry.

<i>Name of Witness.</i>	<i>Representing.</i>
A. B. Findlay, Esq.	} Society of Medical Officers of Health (Scottish Branch).
Dr. A. S. M. Macgregor, O.B.E., M.D., D.P.H.	
F. W. F. Arnaud, Esq., F.I.C.	} Society of Public Analysts and other Analytical Chemists.
Dr. J. T. Dunn, D.Sc., F.I.C.	
E. Hinks, Esq., B.Sc., F.I.C.	
Gilbert W. Hyde, Esq., B.Sc. ...	Swan Brewery, Ltd., Manchester.
Agostino Coia, Esq.	} Temperance Refreshment Trade Federation of Scotland.
C. Tronchetti, Esq.	
P. Malvisi, Esq.	} South Wales and Monmouthshire Caterers' Association.
G. Sterlini, Esq.	
G. Cabrelli, Esq.	Manchester and District Refreshment Traders' Association.
E. G. Haygarth Brown, Esq., I.S.O.	—