



verbraucherzentrale

**FOODS WITH
REGIONAL INFORMATION –
CONFUSION OR
IMPORTANT PURCHASING AID?**

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FOODS WITH REGIONAL INFORMATION – CONFUSION OR IMPORTANT PURCHASING AID?

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1 SITUATION ANALYSIS AND AIM

The origin of foods is highly relevant for increasing numbers of consumers. According to their own account, at least half of all consumers deliberately pay attention to the regional origin of products and this trend is increasing.¹ A study of trends undertaken by the Federal Ministry of Food and Agriculture (BMEL) confirmed that regionality is the most important decision criterion in food purchasing and, according to the study, even comes ahead of price.²

Main motive for making a regional purchase:

BMEL study: taste, freshness, greater trust in regional agriculture, shorter transport routes, security of jobs through regional value chains³

Stiftung Warentest: to strengthen regional agriculture and thus assume responsibility for the surrounding region⁴

The topic of regionality is apparently a long-term megatrend, as purchasing decisions are increasingly influenced by sustainability criteria. 61 per cent of consumers believe that they will still be concerned about this topic over the next ten years.⁵ The preference for regionality is stronger in certain foodstuffs, mainly when it involves freshness, safety and trust. Priority is given to eggs, fruit and vegetables, meat and meat products, milk and milk products, and baked goods.⁶

Regionality is a difficult quality of trust to prove and the term "regionality" cannot be clearly defined. The current usage of what constitutes "regional" is also not clear. Consumer expectations range from the individual municipality to the district and federal state to, occasionally, the whole of Germany. According to a representative survey across Germany⁷ by Stiftung Warentest in July and August 2012, almost 27 per cent of all respondents considered a region to be a delimited natural region, such as the Allgäu, the Spreewald or the Rhone. For 28 per cent, the district is the region, for just under a quarter (23 per cent) it is the federal state. Only six per cent said it was the whole of Germany. The remaining respondents selected other definitions, such as the area directly around where they live, or several federal states, for example southern or northern Germany.

From the customer's viewpoint, the term "regionality" needs to be authenticated and is also highly emotionally charged. The communication-related presentation through advertising message and packaging can influence the perception of the topic at purchase⁸. The existing fuzziness of the term "region" thus enables an emotional charge to be added by the use of words such as "home-land", "from here", "good food", etc.

Therefore, this also harbours the risk that typical greenwashing strategies in the advertising and labelling of "regional products" come into play, for example, deliberately using "regional" as a term that has not been clearly defined without further explanation.

Place descriptions on foods are not advertising terms for consumers in some cases, but are interpreted as clear regional recipes and product identities. The expectation that elements of the production also take place in the region only occurs in the case of certain products with a regional description, e.g. milk from the Allgäu region. The general

¹SGS consumer study 2014, Trust and scepticism: What do Germans rely on when buying food?

²Federal Ministry for Food and Agriculture 2014: Purchasing and nutritional behaviour in Germany, TNS-Emnid survey for the BMEL

³(ibid.)

⁴Stiftung Warentest (2013): Results of survey of regional foods: That's what consumers expect, available at <https://www.test.de/Ergebnisse-Umfrage-regionale-Lebensmittel-Das-erwarten-die-Verbraucher-4568449-0/> viewed on 25 September 2015

⁵German Agricultural Society (Deutsche Landwirtschafts-Gesellschaft e.V. – DLG) 2011: New DLG study: Regionality from the consumer's perspective, available at <http://www.dlg.org/39.html?detail/dlg.org/4/1/4479> viewed on 30 September 2015

⁶AT Kearney GmbH 2013: Food: more demand for regional than organic, available at: <http://www.atkearney.de/documents/856314/1214358/PM+Regionale+Lebensmittel.pdf/72175f62-100c-41b5-b6e8-e712ff78f846> viewed on 29 September 2015

⁷www.test.de/Ergebnisse-Umfrage-regionale-Lebensmittel-Das-erwarten-die-Verbraucher-4568449-0/

⁸FIBL Deutschland e.V./MGH GUTES AUS HESSEN GmbH (2012): Development of criteria for a German-wide regional seal. Reports for the Federal Ministry of Food, Agriculture and Consumer Protection

6 | Situation analysis and aim

claim "from our region" implies, however, significantly higher expectations of the place of production than pure place descriptions.¹⁰

Typical greenwashing strategies:⁹

Lack of proof: Claims are made that cannot be verified through independent sources or proved through convincing studies.

Vague claims: Use of terms that are not clearly defined and that could be easily misunderstood.

Incorrect labels: Use of dubious institutes or self-invented labels that have no practical value.

Irrelevant claims: Making claims that are true but have no value.

Untruths: Sending factually inappropriate advertising messages.

According to a representative study¹¹, consumers would buy more regional products if they were cheaper. On the other hand, according to this study, many are also quite prepared to pay higher prices, e.g. for meat or eggs. Almost half of consumers would also buy more regional products if they were better informed about origin.

Food manufacturers and retailers use this trend and advertise in a wide range of ways using claims about regional origin and quality. For 96 per cent of German retailers, the topic of "regionality" is of central importance. It ranks as the second most important topic behind the topic of "price pressure". Regional brands like "Unsere Heimat – real & good", "von Hier" or "Rewe Regional" are increasing in importance. Occasionally there is more demand for "regional" than "organic". However, the lack of a standard definition and standards make it more difficult to determine the exact market volume of regional foods.¹²

The regional window introduced in 2014 aimed to improve transparency in the area of regional food and their recognition. In the recent publication of a consumer magazine on regional foods in the retail trade – with and without a regional window – the topic was examined with the very critical title of "Regional? Alien!". According to Öko Test, only 26 out of 106 tested products (25 per cent) actually came from the region.¹³ It also focused on the theme of the "taste of the homeland" in September 2015 and described the food retail trade's regional seal as "nicely non-binding".¹⁴

⁹<http://www.pwc.de/de/nachhaltigkeit/vorsicht-greenwashing-konsumenten-blicken-hinter-die-gruene-fassade.html> viewed on 26 November 2015

¹⁰Agrifood Consulting GmbH 2013: Grauzone Lebensmittelkommunikation, available at: http://zap.vzbv.de/b7adad6f-9c9a-426d-90a1-83f9eao276c5/Studie_Grauzone__Lebensmittelkommunikation_2012.pdf viewed on 28 September 2015

¹¹AT Kearney GmbH 2013: Food: more demand for regional than organic, available at: <http://www.atkearney.de/documents/856314/1214358/PM+Regionale+Lebensmittel.pdf/72175f62-100c-41b5-b6e8-e712ff78f846> viewed on 29 September 2015

¹²ebd.

¹³Öko-Test 2014: Regional? Alien! Volume 10/2014

¹⁴Focus 2015: Food from the Homeland, Volume 38/2015

2 REGULATIONS ON THE LABELLING OF PROVENANCE AND REGIONAL CLAIMS FOR FOODS

The following statutory regulations currently apply to regional claims and declarations made about food:

- Prohibition to mislead:

Under Section 11 of the German Food and Feed Law (LFGB) it is strictly prohibited to market or advertise food using misleading descriptions, information or packaging. In Section 11(1)(1) it is specified that, for example, it could be construed as misleading if information is given or claims are made about origin that are intended to deceive. This therefore applies to all optional information about origin that is generally permitted but is subject to this limitation. There is a similar regulation in the Food Labelling Regulation (LMIV) that applies EU-wide.

Example:

Campina GmbH & Co. KG was admonished by Verbraucherzentrale Berlin due to misleading advertising. The company marketed milk in Berlin and the new federal states under the description "Mark Brandenburg". However, this came from North Rhine-Westphalia and was filled in Cologne. The consumer association obtained an improvement to the labelling. It is being produced once again in Brandenburg.

- German Trade Mark Law

Under sections 126 et seq. of the German Trade Mark Law (Markengesetz – MarkenG), providers can protect geographical origin information as a trade mark. These kinds of protected products can also have particular

characteristics or qualities that the providers must then comply with. In contrast to EU provenance protection, for registered brands it is not binding under law that specific production steps must take place in the specified region.

Example:

The brand "Sachsenmilch" is a registered, and therefore protected, mark. It is not bindingly stipulated that the milk that is marketed under the mark comes from Saxony.

- Protected geographical information

In the EU, protected geographical statements are regulated by Regulation (EU) No 1151/2012 and the implementation ordinance (EU) No 668/2014. The aim is to protect regional descriptions relating to a region only for products that meet specific quality requirements. Protection of the registered descriptions applies in Europe and in third-party states. A distinction is made between the certification marks

- "protected description of origin" (g. U.) and
- "protected geographical statement" (g. g. A.).

The protected description of origin (g. U.) guarantees that corresponding foods have been produced, processed and manufactured in a limited geographical area in accordance with a recognised and stipulated procedure. The products thus have characteristics that only correspond to the region and the skills of producers in the region of production. The description of these kinds of protected products provides consumers with a secure orientation. Examples of products with g.U. are Emmental from the Allgäu, Altenburg goats' cheese or feta.

The protected geographical information (g.g.A.) documents that at least one of the production stages – production, processing or manufacture – has taken place in the region of origin. If processing takes place in the region, the raw materials may come from other regions. So, for example, in the case of Black Forest ham, the manufacture (seasoning, curing, smoking) takes place in the Black Forest. However, the pigs may be raised and

8 | Regulations on the labelling of provenance and regional claims for foods

slaughtered in other regions. Products labelled "g.g.A." thus have a specific characteristic or a reputation that links them to a specific region.

Example:

Food with protected description of origin, e.g. Emmentaler from the Allgäu or Odenwalder breakfast cheese. Foods with protected geographical claims, e.g. Thüringian Rostbratwurst or Black Forest ham.

- Describing the origin of eggs

Describing the origin of eggs is prescribed by law EU-wide through common marketing standards. These are regulated through three pieces of legislation:

- Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products,
- Commission Regulation (EC) No 589/2008 laying down detailed rules for implementing Council Regulation (EC) No 1234/2007 and
- Commission Directive 2002/4/EC of 30 January 2002 on the registration of establishments keeping laying hens, covered by Council Directive 1999/74/EC.

The stipulated labelling regulation for eggs within the EU requires that the relevant company number must be stated in addition to the method of rearing and the country of origin. This guarantees traceability to the rearing company. This transparency, however, only applies to unprocessed hen's eggs. For processed eggs or eggs as an ingredient, no further description of the origin is required.

Example:

Eggs with the code 1-DE-031234 come from free-range husbandry (Figure 1) in Germany (DE) and were laid in Lower Saxony (figure 03) in production operation 123 in stall 4.

On a voluntary basis, further information can be provided on foods such as certification marks or regional windows. However, these are not regulated in the EU or under national law and are thus also not subject to any uniform criteria. Generally, this voluntary information is also not checked by the state food monitoring supervisory authorities.

- Certification marks

Some federal states have developed their own certification marks with which they promote the origin of products and specify certain quality requirements. However, these are often very varied, sometimes non-transparent and the origin of the raw materials from the relevant federal state is not fully assured.¹⁵

Example:

In the case of combined products, when using the certification mark "Quality from Thuringia", at least 50.1% of the raw ingredients must come from Thuringia. Products are already labelled with the certification mark Schleswig-Holstein if they have been manufactured in the state. In the case of combined products, the ingredients do not have to come from this state, but in the case of mono-products such as potatoes, they must come 100% from the state.

- Regional window

The support association "Regionalfenster e.V.", established in 2012, is the owner of the registered mark "regional window", which was awarded for the first time in 2014 after a test phase. The Federation of German Consumer Organisations (VZBV) and consumer associations are members of its council, which consists of people from the fields of science, ministries and consumer protection. It supports and advises the support association.

The regional window is a voluntary declaration and only contains claims on the origin and the proportion of regionally produced ingredients/raw materials, the place of processing and, optionally, on the preliminary stages of the agricultural production of the product.

¹⁵Consumer associations within the joint campaign "Sustainable food" 2010: Transparency survey of the regional federal state programmes – Results report

The commissioned neutral control institute is also named. With the regional window, the origin of the raw materials must be clearly and comprehensibly stated, e.g. by stating the district, the federal state or the radius in kilometres. The region must be smaller than the Federal Republic of Germany. However, it can also extend across country or state borders (e.g. wheat from the Eifel or 100km around Aachen). The manufacturer can freely select the regional information. It must, however, be comprehensible to consumers. In the case of mono-products, the raw materials must all come from the stated region. In the case of combined products, this applies to the main ingredient. If the main ingredient comprises less than half of the total product weight, the other ingredients must also come 100% from the stated region until at least 51% of the total weight is reached. Further, the place of processing and the commissioned control company must be named in the regional window. Statements about the origin of the agricultural preliminary stages and operating supplies, such as feedstuffs or seed, can also be made.

The regional window is not a quality seal, but simply a statement of origin. The symbol is registered as a trade mark

Example:

Packed apples with the regional window information "from Lower Saxony" and packaged in "21635 Jork" were grown in Lower Saxony and packaged in Jork in the Altes Land near Hamburg. Whether or not they were also grown in Jork is not apparent from this.

3 THE MARKET STUDY: APPROACH

Regional-related claims and advertising for foods were also the focus of a Germany-wide market study by the consumer associations in summer 2015. This particularly aimed to determine the spread and importance that had then been achieved by the regional window. In the process, the use of the regional window by product groups was checked and the value placed on regional origin by consumers was assessed. The market survey focused on the following questions:

1. To what extent has the regional window spread throughout Germany, in which product segments can it be found and how is it used for advertising?
2. Can the region from which the product comes be recognised? Are the statements understandable to consumers?
3. Do the statements in the regional window agree with the other information on origin or, despite the regional window, are there other contradictions or abnormalities with the potential to mislead?
4. Does the regional window make it easier to recognise and thus to buy regional products?
5. In addition to the regional window, is there further information on the region or origin (seal, mark, statement of origin) on the food or in the advertising?
6. Is there a difference between products with and without a regional window? Are there special characteristics?
7. Is the origin of ingredients also listed on foods without a regional window?
8. How regional is regional actually? How large are the regions or what distances are covered?

The results of the market survey are used for consumer clarification and information. The publication of the

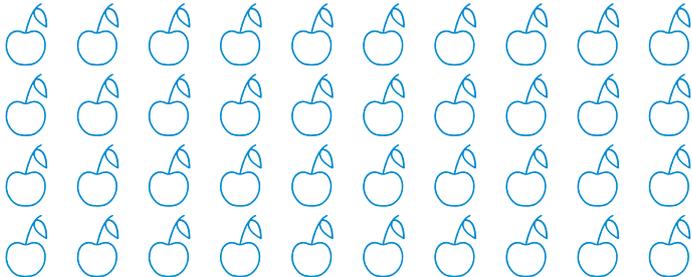
results and relevant consumer policy demands are intended to contribute to making regional labelling more consumer-friendly and transparent. The support organisation "Regionalfenster e.V." has been informed of the results of the market survey.

After a pre-test by the working group at the start of 2015, the German-wide test by the consumer associations was carried out in July 2015. The market survey carried out in the test markets took place by product group in northern, southern, eastern and western Germany in order to ensure a differentiated approach across Germany. However, in all cases it involved a randomised inspection without aiming to be representative or complete. Five products with regional window were procured per product group and federal state. In the survey, foods with other regional advertising were also included.

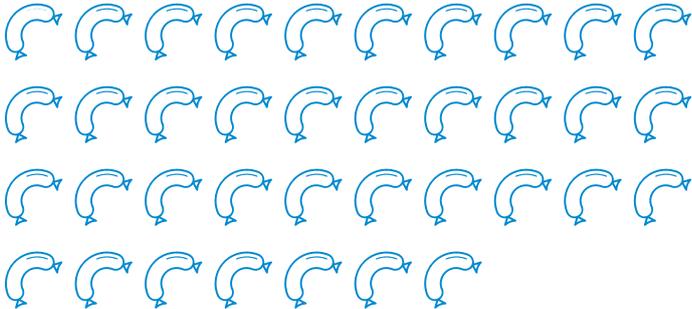
They were purchased in supermarkets, discount stores and in organic shops. A total of 121 products were checked and evaluated, of which 63 had regional windows and 58 had other regional information. Four product groups were included in which a regional link is preferred by consumers (see Section 1). In total, the sample comprised 25 packs of eggs, 19 milk products, 37 meat and sausage products, and 40 fruit and vegetable products. The survey questionnaire is included in Annex 1.

OUR SURVEY

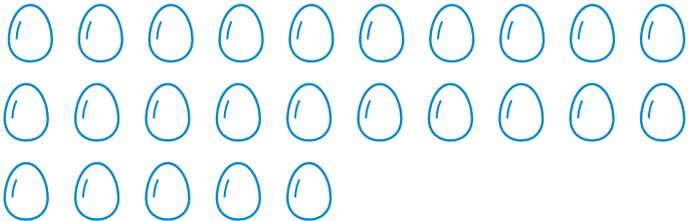
Fruit and vegetables



Meat and sausage products



Eggs



Milk products

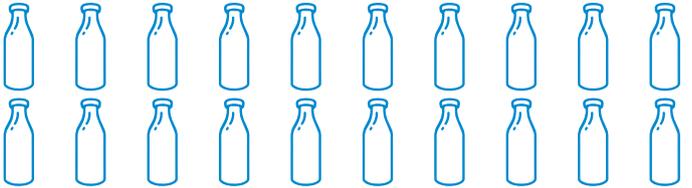


Fig. 1: Number of tested products by food group

4 RESULTS AND EVALUATION OF REGIONAL WINDOW

The following section contains the results of the check of products with the regional window. In addition, the regional advertising on the product and at point of sale are also included.

4.1 Regional foods – generally present in various ways

The spread of the regional window in the federal states is very similar overall. This applies both to the range of claims in food retailers and for the individual product groups. The market survey proves that the regional window is not yet comprehensively present throughout Germany and there are large regional differences in the range and in the amount of claims. There is therefore, depending on the federal state, a varying degree of difficulty for consumers to buy foods with a regional window. Thus, in the market survey, the range of foods with a regional window in the south of the Republic was noticeably greater than in the north.

On the individual product groups:

- Eggs and milk products segment:

The declaration and the supply of this group was recorded in six federal states (Baden-Württemberg, Berlin, Mecklenburg-Western Pomerania, North Rhine-Westphalia, Schleswig-Holstein and Thuringia). At the time of the market survey, there were only milk products with a regional window in Baden-Württemberg.

Eggs with the corresponding declaration could only be registered in the federal states of Brandenburg, Berlin, North Rhine-Westphalia and Thuringia. Ten packs of eggs and six milk products with regional windows were evaluated.

- Fruit and vegetables segment:

In all tested points of purchase in the federal states participating in the market survey (Lower Saxony,

Saarland, Bremen, Saxony and Brandenburg), the five intended product examples with regional window were found. The offering in this product segment was the largest across Germany.

- Meat and sausage products segment:

The required data was collected in the federal states of Rhineland-Palatinate, Bavaria, Hesse, Hamburg and Saxony-Anhalt. Other than a limited offer in Hamburg (three) and Hesse (four), at least five products were found in all tested federal states. Thus, a total of 22 products were included in the evaluation.

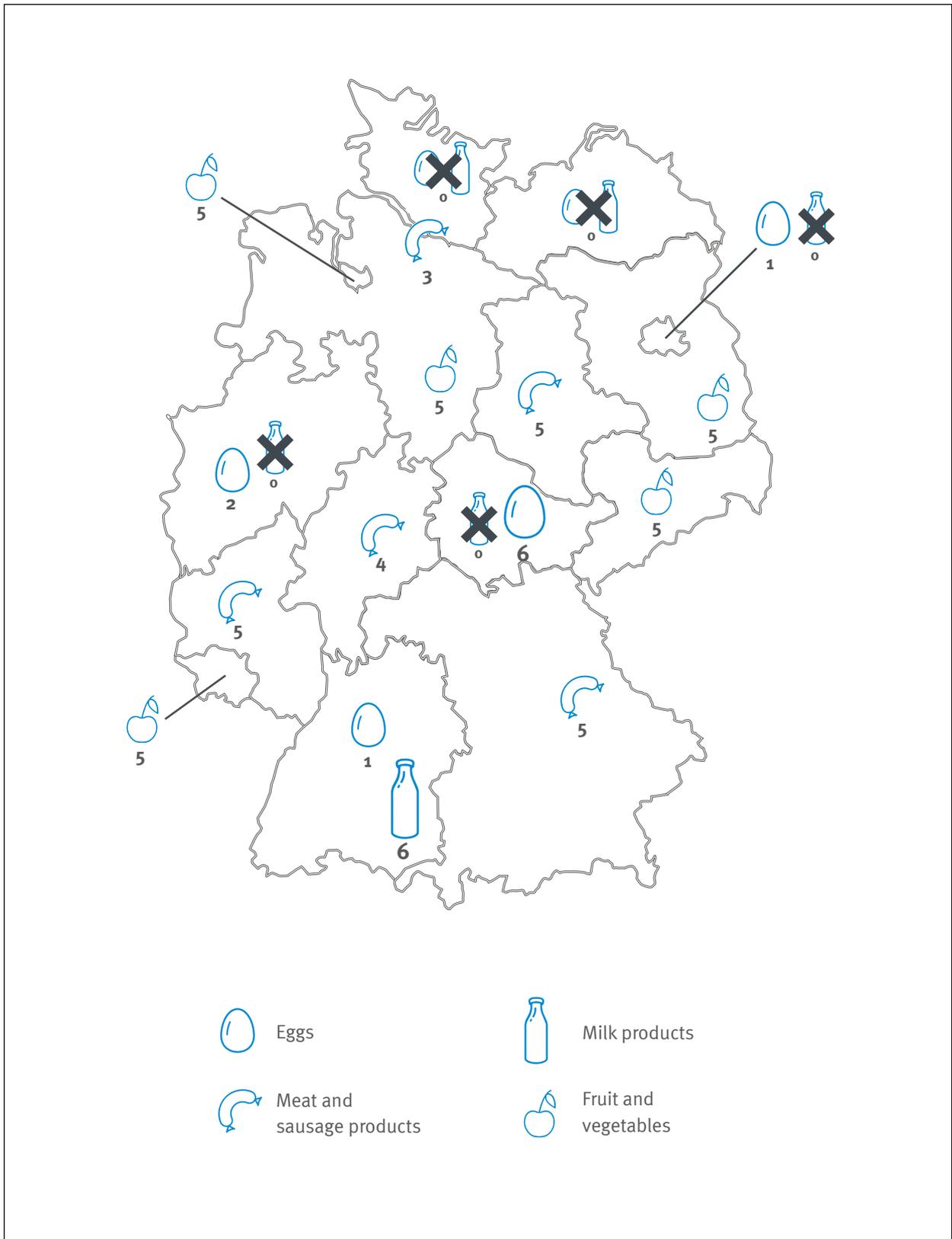


Fig. 2: General overview: Spread of the regional window – sample of the consumer associations in selected supermarkets and discount stores by product group

4.2 How regional are regional foods?

For all products included in the market survey, the distance between the place of purchase and the stated last place of processing (place of packing or manufacture) or the place of production (if available) was calculated. With the aid of the distance calculator www.entfernung.org, the street route was determined.

Sometimes, the actual distance between the place of purchase and the place of production of the raw materials was greater, as the producer could not always be determined in the case of products with a regional window.

The distances between place of packing or processing and place of origin of the ingredients to the place of purchase vary sharply. The shortest distance was 16 kilometres and the longest 474. The distance of 474

kilometres corresponds to a car journey halfway across Germany, e.g. from Flensburg to Kassel or from Kassel to Munich.

Products with a regional window where the distances between purchase and production vary sharply were also found within one place of purchase or one federal state. For example, at tegut (Swiss-owned supermarket chain) in Erfurt (Thuringia), there were eggs with a regional window under the tegut private label. Some of these eggs had been laid in Hesse (distance of 259 kilometres), others in Thuringia (27 kilometres). Both products were almost identically packaged and bore the regional window with the correct information. The difference in distance was almost tenfold in this case.

<p>Cherries</p> <p>bought in: Lower Saxony (Oldenburg) at Rewe Region: Rheinland-Palatinate Distance to place of purchase: 475 km</p>		<p>Turkey ham</p> <p>bought in: Halle (Saxony-Anhalt) at Galeria Kaufhof Region: Baden-Württemberg processed in: Großhöhenrain (Baden-Württemberg) Distance: 474 km</p>	
<p>Mini romaine salad</p> <p>bought in: Leipzig at Netto Marken-Discount Region: Saxony-Anhalt Packed in: Arensdorf (Saxony-Anhalt) Distance: 66 km</p>		<p>Pork chops</p> <p>bought in: Halle (Saxony-Anhalt) at Rewe Region: Saxony-Anhalt processed in: Teutschenthal (Saxony-Anhalt) Distance: 20 km</p>	

Fig. 3: Product examples with long and short distances between place of purchase and place of processing

The reason for this is that the regional window, in contrast to regional marks, does not make any stipulations on the marketing region of the products. So, for example, there can be 470 kilometres between the place of purchase and the place of processing (manufacture or packing). Although the region of origin of the ingredients and the precise place where the processing took place (for example packing) is stated transparently, the regional

window is not a guarantee that the food comes from the person's "own" region or was produced within a specific kilometre-radius of the region of purchase. Consumers must decide for themselves whether this meets their requirements for regional foods.

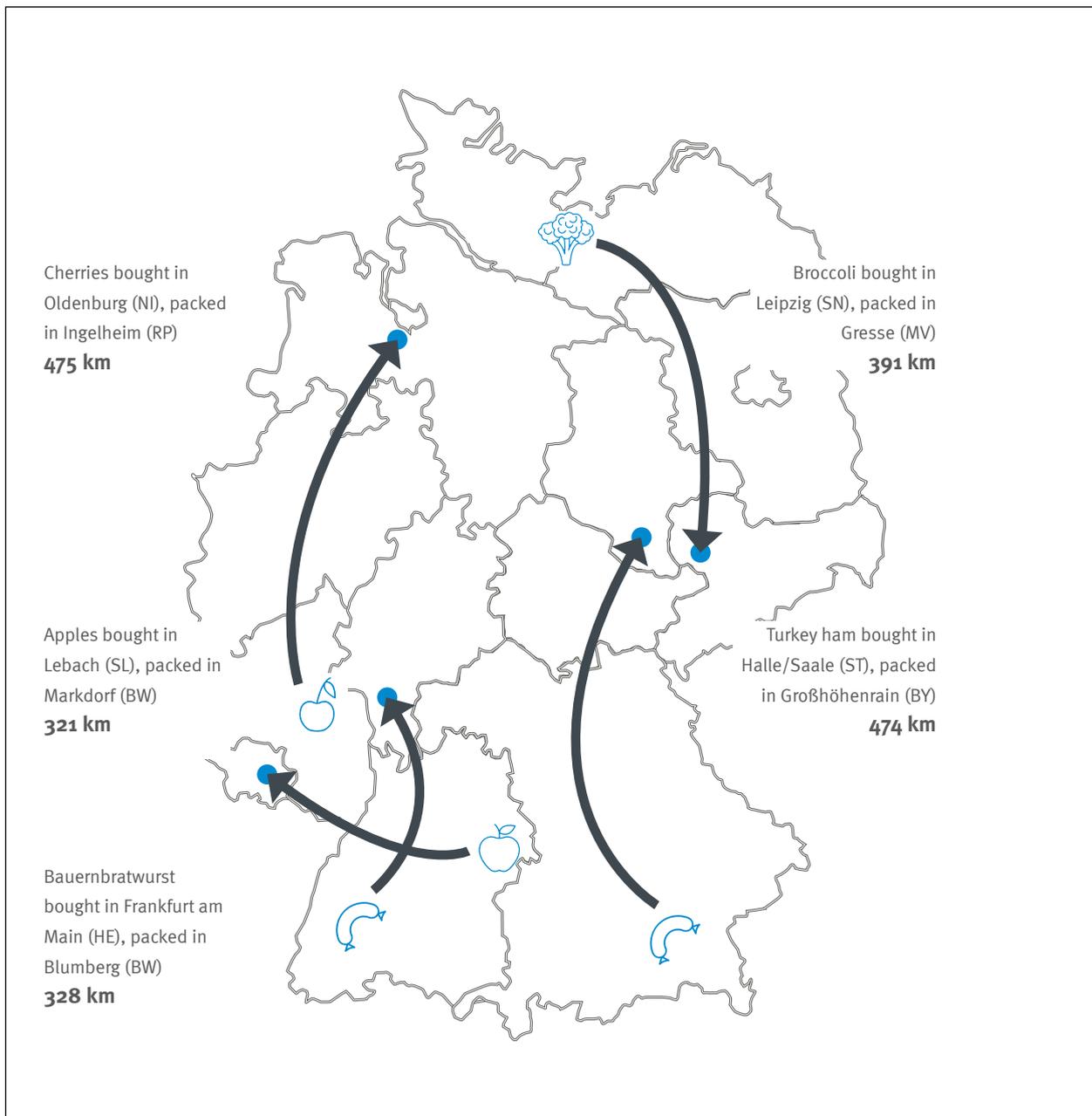


Fig. 4: Large distances between place of packing and place of purchase of selected products (in road kilometres)

4.3 Mono-products – regional window highly recognisable

In addition to the results on the marketing area described above and the appearance of the regional window, in the case of mono-products, e.g. milk, eggs, fruit and vegetables, all information was correct and clear. The regional window was highly recognisable on all products (Fig. 5). On 37 out of 41 mono-products, it could be seen at first glance as it was printed on the front of the pack. In the case of two milk products, the regional window was on the side. In the case of two fruit and vegetable products it was on the back of the pack.

4.4 Processed products – meat and sausage products

- **Recognisability**

Processed products with a regional window were only found in the meat and sausage products segment. On the majority of the tested products, the regional window was recognisable at first glance (Fig. 5). Also, due to the standard colours and type size used, they are highly visible. In the case of 5 out of 22 products, the regional window was on the rear of the pack. The claim on the front of the pack could have been more targeted in order

to make it easier to recognise products with a regional window.

There were some abnormalities regarding the regions or regional advertising only in this product segment.

- Proportion of regional ingredients in processed meat and sausage products.

The proportion of regional ingredients in processed meat and sausage products is stated in the regional window and was, in accordance with the guidelines, between 54 and 96 per cent in the products under review. Out of 22 meat and sausage products, only the Sülzfleischwurst (type of pre-cooked sausage) from Wolf GmbH (Netto Markendiscount) with a proportion of 54 per cent of regional ingredients was clearly at the lower range of the prescribed minimum proportion of 51 per cent. Other products contained up to 96 per cent of regional ingredients, such as the Bauernbratwurst from unsere Heimat echt & gut (EDEKA) or the Delikatess Regensburger from Ponnath (Aldi Süd) with 94 per cent.



Fig. 5: Products with regional window on the back of the pack, on the side and on the front (from left to right)



Fig. 6: Sausage products with 94 and 96 per cent of regional ingredients

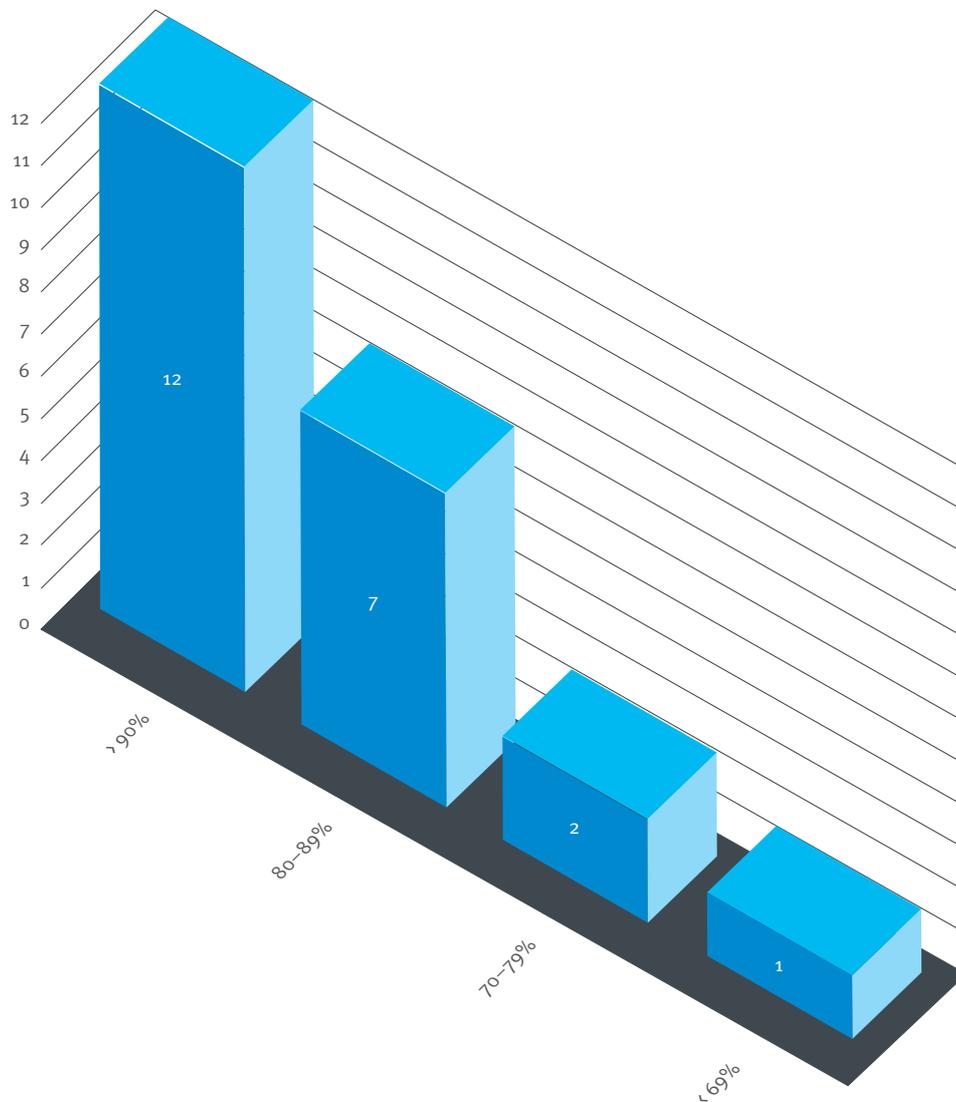


Fig. 7: Proportion of regional ingredients in processed products with regional window (n=22)

18 | Results and evaluation of regional window

- Large regions in processed meat and sausage products – meat tourism in Germany – the long route to the customer

In the case of eight out of 22 meat and sausage products with a regional window, several federal states were given as regions of origin. One in three meat and sausage products contained meat from two or more federal states. For example, the meat for the Roster without skin from Schildauer, purchased in Stendal (Saxony-Anhalt) at Netto Marken-Discount, came from pigs from Saxony, Saxony-Anhalt, Thuringia, Mecklenburg-Western Pomerania and Brandenburg. In the case of the turkey sausages from Höhenrainer, purchased at Kaiser's Tengelmann in Munich (Bavaria), the turkey meat came from establishments in Bavaria and Baden-Württemberg. A wide-ranging list of regions contradicts, in the view of the consumer associations, the intention of a regional mark.

<p>Sülzfleischwurst (type of pre-cooked sausage)</p> <p>bought in: Stendal (Saxony-Anhalt) at Netto Marken-Discount Comes from the regions of: Thuringia, Saxony, Saxony-Anhalt and Brandenburg</p>	<p>Delikatess Räucherenden</p> <p>bought in: Mainz (Rhineland-Palatinate) at EDEKA Comes from the region: South-West (German states: Bavaria, Baden-Württemberg, Hesse, Rhineland-Palatinate and Saarland)</p>	<p>Roster ohne Darm</p> <p>bought in: Stendal (Sachsen-Anhalt) at Netto Marken-Discount Comes from the regions of: Saxony, Saxony-Anhalt, Thuringia, Mecklenburg-Western Pomerania and Brandenburg</p>

Fig. 8: Products from broad regions

Some products whose ingredients came from the region or state in which the products were purchased are transported to other regions for processing or packing and then brought back. Thus the transport routes are sometimes "doubled" and, above all, long. One example of this is a pork schnitzel, purchased at Kaufland in Saxony-Anhalt. The animals, according to the information in the regional window, came from Saxony-Anhalt, but they were slaughtered in Lower Saxony (Laatzten) and then brought back to Saxony-Anhalt (Meineweh) to be butchered. This resulted in an additional transport route of approx. 290 kilometres just to take them from the place of slaughter to the place of butchery.

- Additional provenance information

The testers from the consumer associations noticed that almost all product with a regional window had further advertising in the form of seals, marks or indications of regional origin: 55 out of 63 products (87 per cent) with a regional window also had other information. These included claims such as "regional" or "homeland" through to information about the federal state or certification marks of the federal states. There were contradictions between the information in the regional window and the claims made in other regional advertising on four out of 22 meat products (18 per cent).

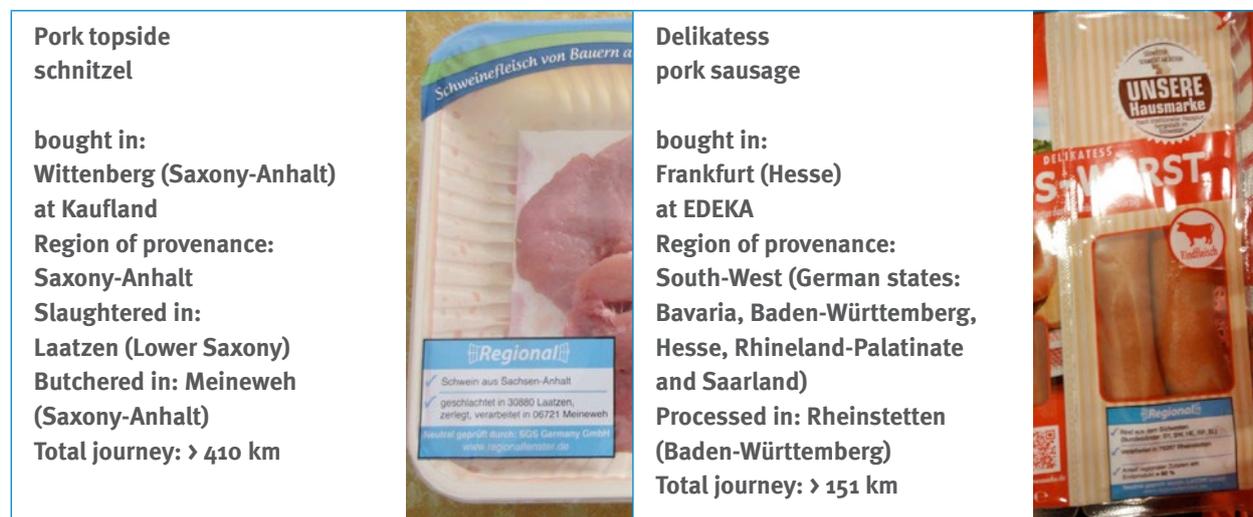


Figure 9: "Regional" products with long transport routes

There were two similar example products from EDEKA Südwest: Delikatess Rinds-Wurst and Delikatess Hinterschinken contained meat from animals from five federal states as the main ingredient, including from Hesse, where the product was bought (Frankfurt). However, the animals were butchered in Baden-Württemberg and processed there in the EDEKA Südwest meat plant and then transported "back" to Hesse. One reason for this is the establishment of the retailers' meat plants in the meat industry and in the concentration of slaughter in a few large companies with just a few sites.

The turkey sausages from Höhenrainer were advertised with "pure enjoyment from Bavaria". However, this was not linked to the origin of the raw material (turkey meat), as this came, according to the regional window, from Bavaria and Baden-Württemberg (see Fig. 10 left).

Also in the case of Rostern without skin from Schildauer Fleisch- und Wurstwaren, the advertising claims "specialities from Schildau" suggest a link to the origin. However, this relates to the place of production as the pork comes from five different federal states (see Fig. 8).

The brand "specialities from Thuringia" purchased at Netto Marken-Discount first clearly suggests a link to the federal state. The information in the regional window makes it clear that the ingredients in this product do not solely come from

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Thuringia, but also from three other federal states. (see Fig. 9 middle) and the brand "specialities from Thuringia" also only relates to the place of manufacture.

<p>Turkey sausages</p> <p>bought in: Munich (Bavaria) at Tengelmann</p> <p>Regional advertising: Pure enjoyment from Bavaria</p> <p>Region of provenance: Bavaria and Baden-Württemberg</p>	
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<p>Sülzfleischwurst (type of pre-cooked sausage)</p> <p>bought in: Stendal (Saxony-Anhalt) at Netto Marken-Discount</p> <p>Regional advertising: Specialities from Thuringia</p> <p>Region of provenance: Thuringia, Saxony, Saxony-Anhalt and Brandenburg</p>	
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Fig. 10: Products with regional window and additional regional advertising

5 OTHER REGIONAL ADVERTISING WITHOUT A REGIONAL WINDOW

As well as products with a regional window, food with other regional advertising but without a regional window was investigated. The detailed results are shown below.

<p>Beer ham</p> <p>bought in: Stendal (Saxony-Anhalt) at Aldi Nord Advertising on product: Regional specialities Comes from: Chemnitz (Saxony) Distance: 281 km</p>		<p>Eggs</p> <p>bought in: Kiel (Schleswig-Holstein) at Penny Advertising on product: Home tastes good ... always laid nearby Comes from: Lohne (Lower Saxony) Distance: 272 km</p>	
<p>Meat platter</p> <p>bought in: Hamburg at Netto Marken-Discount Advertising on product: The best from us at home Comes from: Schmölln (Thuringia) Distance: 482 km</p>		<p>Tomatoes</p> <p>bought in: Saarbrücken (Saarland) at Globus Advertising on product: Good food from the region – from Thuringia to Saxony grown by us Comes from: Alperstedt (Thuringia) Distance: 451 km</p>	

Fig. 11: "Regional" food from a long way away

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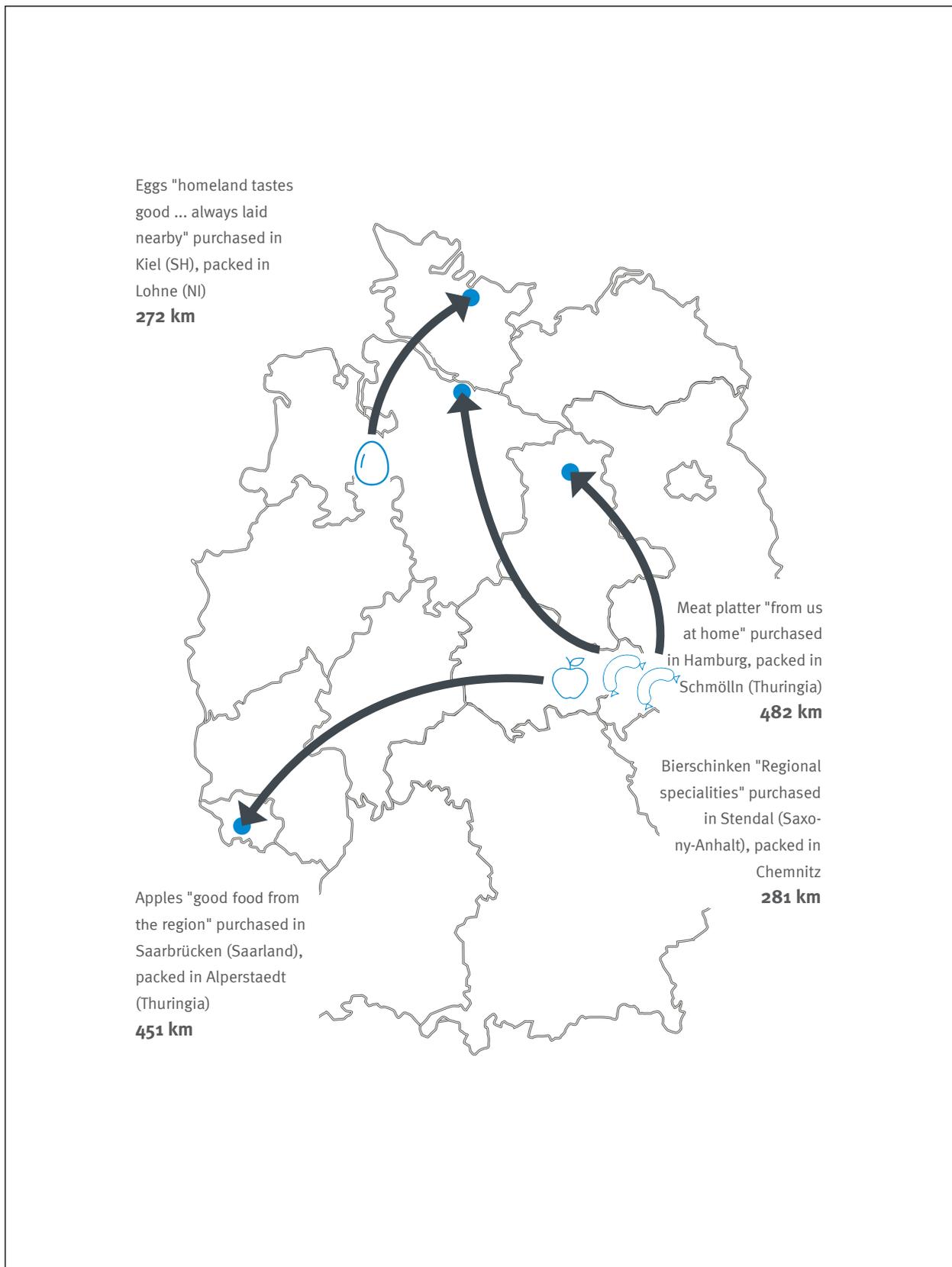


Figure 12: Large distances between place of packing and purchase of selected products (in road kilometres)

5.2 Origin not clear

In the information on origin on the shelf, there were also contradictions on the products and on advertising flyers. Some products came from a different region to the one advertised on the shelf or on the product.

- Advertising on shelf:

A herb quark from the Mark Brandenburg brand, purchased in Berlin at HIT Ullrich, in addition to the link to the place in the brand name, was advertised on the shelf with "I come from here!" (see Fig. 12). On the rear of the pack the actual place of production is shown – Cologne (North

Rhine-Westphalia). This is an example of a self-created label that has no value and thus is a typical greenwashing strategy (see Section 1).

Minced meat in a jar, purchased in Dessau (Saxony-Anhalt) at Edeka from the manufacturer Köthener Fleisch- und Wurstwaren indicates with the producer's company name the place of origin as Köthen. This is 23 kilometres from the place of purchase, Dessau. On the shelf it is also advertised with "from a maximum distance of 30 km". In fact, the product was manufactured in Döbeln, which can be seen from the veterinary control number stated on the product (EV number). Döbeln is in the federal state of Saxony and is 128 kilometres from Dessau (Saxony-Anhalt).

<p>bought in: Berlin at HIT Ullrich Advertising on product: Brandenburg mark</p>	<p>Advertising on shelf: I come from here!</p>	<p>Comes from: Cologne (North Rhine-Westphalia)</p>
		
<p>bought in: Dessau (Saxony-Anhalt) at Edeka Advertising on product: Köthener Fleisch- und Wurstwaren (Saxony-Anhalt)</p>	<p>Advertising on shelf: From a maximum distance of 30 km</p>	<p>Comes from: Döbeln (Saxony)</p>
		

Fig. 13: Products with misleading regional advertising

- Promotional flyer/advertising

The claims for the products in the promotional flyers also do not always agree with the actual origin. In the case of "good food from the homeland" "the best from Rhineland-Palatinate and Hesse!" (see Fig. 14), the actual region for the vegetables is not stated – the only information on origin is the mandatory statement "Germany". In the case of meat, there was neither information on the origin of the raw material nor the manufacturer. In the case of sausage products, it was also not recognisable where the ingredients came from. The producer Meister feines Fleisch – feine Wurst GmbH has its head office in Gäufelden (Baden-Württemberg). Thus the advertising claim "the best from Rhineland-Palatinate and Hesse" is misleading. If a company transmits such factually incorrect advertising messages regarding the regionality of products, it can be described as "greenwashing" (see Section 1).



Fig. 14: Promotional flyer for real-SB Warenhaus GmbH (week 29)

5.3 Long distances due to production and processing in different regions

Analogous to products that carry a regional window, there is also processing tourism in the case of products with other regional advertising. Some products whose ingredients are meant to have been produced in the region or state of purchase are taken to other regions for processing (e.g. cutting and packing) and then brought back. This results in "double" or at least long transport routes.

"Müritzer" cheese from Milram, purchased in Mecklenburg-Vorpommern at Edeka, comes "from the heart of Mecklenburg-Vorpommern" according to the advertising on the pack. But the advertising above the shelf "regional tastes brilliant" suggests a regional product. This is an advertising slogan that has no value in terms of the actual offer of regional food and thus is a typical greenwashing strategy (see Section 1). However, on the rear of the cheese is the identity mark of Lower Saxony. The number DE NI 086 EG stands for the branch of DMK – Deutsches Milchkontor – in Edewecht. This means that at least the last processing step took place in Lower Saxony. The distance between the stated regional place of origin in Mecklenburg-Western Pomerania (Müritz is a lake) and Edewecht in Lower Saxony is just under 400 kilometres (one-way route).

"Mecklenburg cheese" from Rücker, purchased in Schwerin (Mecklenburg-Western Pomerania), is advertised with a geographical reference on the product and on the shelf ("from our region"). The identity label: DE TH 632 EG, indicates that Bedien Concept GmbH in Streufdorf was the last processor. The cheese manufactured in Mecklenburg-Western Pomerania for Rewe was processed there (cut and packed). Thus, the cheese travelled firstly from the Mecklenburg-Western Pomerania region to another federal state (Thuringia) to Streufdorf in order to then come back to Schwerin, its place of purchase, a distance of 571 kilometres.

However, in the case of products without a regional window, this is not recognisable at a glance for the consumer.

<p>bought in: Rostock (Mecklenburg-Western Pomerania) at Edeka Advertising on product: Comes from the heart of Mecklenburg-Western Pomerania</p>		<p>Comes from: Edeweicht (Lower Saxony) last processing step</p>	
<p>bought in: Schwerin (Mecklenburg-Western Pomerania) at Rewe Advertising on product: Old Mecklenburger</p>		<p>Comes from: Streuendorf (Thuringia) last processing step</p>	

Fig. 15: Products with place of production outside the advertised region

5.4 Advertising without specifically stating the region

On some products it is advertised that they come from the region or from the homeland. However, no precise definition of the place of origin is made either on the product itself or on the shelf or the price tag. The examples we found involved loose fruit and vegetables with the mandatory statement of origin "Germany". The statement of the region, which is smaller than Germany, is missing. Here the region is not clear to the consumer without a definition of the region or distance and they remain completely in the dark.

		
<p>Apples</p> <p>bought in: Nuthetal (Brandenburg) at Rewe</p> <p>Advertising on price tag: Regional</p> <p>Information on origin: Germany</p>	<p>Cucumbers</p> <p>Bought in: Bremen at Alnatura</p> <p>Advertising on shelf: From the region</p> <p>Information on origin: Germany</p>	<p>Plums</p> <p>Bought in: Saarbrücken (Saarland) at real,-</p> <p>Advertising on price tag: Good food from the homeland</p> <p>Information on origin: Germany</p>

Fig. 16: Product examples with regional advertising with no information on provenance

5.5 From the region – raw materials recipe or just the manufacturer?

In the case of products with regional advertising without a regional window, an indication is generally lacking as to which region the regional claim relates: the region of origin of the ingredients, company's head office, place of processing or product recipe. This information is frequently missing both on the products (without regional window) as well as on the shelves, stand-up displays or in the supermarkets' advertising brochures.

For example, the advertising brochures of Rewe promote sausage products with "from the region" in the form of a place-name sign (see Fig. 19 left). Whether this relates to the head office of the manufacturing company or to the ingredients (meat) is not indicated here.

For the yoghurt with mango from Mark Brandenburg it says "quality from Brandenburg" on the shelf. Whether this relates to the primary ingredient of milk also remains unclear in this example. The manufacturers themselves mainly do not differentiate this on their products.

On the Katenrauch salami from Dürrröhrsdorfer is the label "Real craftsmanship from the region". There is no reference to the raw materials and it is also unclear whether the craftsmanship relates to the type of processing or the recipe.

Such vague statements can be described as a typical greenwashing strategy (see Section 1).

<p>Rewe</p> <p>Advertising: Sausages "From the region"</p> 	<p>real,-</p> <p>Advertising: Sausages "Good food from the homeland"</p> 	<p>Yoghurt</p> <p>Bought in: Berlin at HIT Verbrauchermarkt Advertising on shelf: Quality from Brandenburg</p> 
<p>Pork tongue</p> <p>Seen at: E-Center in Magdeburg (ST) Advertising on shelf: From a maximum distance of 30 km Company's head office: Zerbst (46 km)</p> 	<p>Salami</p> <p>Bought in: Magdeburg (ST) at Penny Advertising on product: Craftsmanship from the region.</p> 	<p>Goulash</p> <p>Bought in: Frankfurt (HE) at Rewe Advertising on product: Good food from the Eifel</p> 

Fig. 17: Regional advertising with incomplete information

5.6 Transparency on the retailer's websites?

In addition to the available statements at the point of sale and in the advertising flyers, the consumer associations researched examples on the websites of Edeka, the Edeka regional associations, Netto Marken-Discount, REWE, Penny, Kaufland, Lidl, real,-, Aldi (Nord and Süd), Kaiser's Tengelmann, Norma and Netto in October 2015 for further information on regional foods.

They only found specific criteria or a definition of regional products from the view of the retail chain in isolated cases. That is despite many retail chains and supermarkets having established their own regional trade marks. Whether regionality relates to the place of production

and/or the origin of the ingredients or only to a regional recipe or method of manufacture also mainly remains unclear. Advertising of regional products mainly focuses on the context of the sustainability strategies of the retailers or in association with their own labels. On the websites, a North-South divide could also be seen in the offer of regional foods. The amount and variety on offer increased from North to South.

6 SUMMARY

Comparing products with and without regional windows in the previous sections, it becomes clear that the information in the regional window enables transparency to be created in incomplete or unspecific information. Regional advertising is often unspecific or, in the worst cases, even misleading. By the use of the regional window, however, the actual region of origin, the number of federal states or regions, distances and proportion of regional ingredients is made clear to consumers.

However, the market survey also shows that, in the view of the consumer associations, the statutory regulation to date, for example the prohibition to mislead, the Trade Mark Law, protected geographical statements and the various certification marks of the federal states are not alone sufficient to enable consumers to make a transparent purchase of regional products and protect them from misleading advertising. The regional window is an important step in the right direction in order to prevent these problems.

6.1 Regional window

- **Good purchasing aid but difficult to find:**

Consumers who want to buy regional products can be guided by the regional windows on products that have them. It is actually very visible on packaging, but cannot yet be found overall in the food retail trade.

- **Large regions offer a great deal of leeway for providers:**

In some cases, larger regions were formed from several federal states. Thus, providers can include ingredients from different federal states. Consumers can be sure that the meat comes from this larger region. But from which federal state exactly remains unclear.

- **Regional windows, transparent origin, but not always from the region:**

The presence of the regional window is not necessari-

ly a guarantee that food also comes from the region in which it is sold. The marketing of products is not tied to a particular region, although the region and the most important places of processing are identifiable.

- **Proportion of regional ingredients in processed meat and sausage products:**

The proportion of regional ingredients in processed meat and sausage products varied from 54 to 96 per cent. A closer look at the label is therefore recommended.

6.2 Other regional claims without a regional window

- **Greenwashing with regional claims:**

General claims like "at home", "hometown" or "nearby" are frequently not transparent. These sometimes hide significant distances and an unclear origin of the raw materials. They therefore do not give consumers sufficient security when looking for regional products. In the view of the consumer associations, they act mainly to improve the image of the trade and the producers in order to serve this high-demand market segment.

- **Inappropriate statements on distances and origin:**

Claims on the distance and origin made, e.g. on the websites of the retail chains, in advertising brochures or at point of sale are not always transparent and true.

- **Regional claims relate only to the manufacturer:**

The parameters for regional claims are very varied, often they only relate to the place of manufacture but not to the origin of the raw materials.

6 CONCLUSION

The following measures are, in the view of the consumer associations, indicated in order to protect consumers from being misled and deceived:

- A greater offering on the part of the retail trade of foods with a regional window, particularly in respect of the increasing desire on the part of many consumers to buy regionally, would be desirable. Especially the general regional advertising without a regional window is frequently non-transparent and sometimes misleading. Here manufacturers are encouraged to use the regional window and thus ensure greater transparency in the larger offering of regional claims on the market.
- The requirements of the regional window should be improved in respect of the minimum proportion of regional ingredients, the definition of the size of the region and the use of additional claims. The VZBV and the consumer associations will provide support on the advisory board for consumer-friendly solutions in further developing the regional window.
- The regional window provides transparency on the origin of foods within the guidelines. However, due to self-defined region sizes and marketing locations by companies, there can be no identity marks for the purchase of foods in an area surrounding the place of residence that accords with the view of the consumer (see Section 1).
- Providers and retailers should ensure that additional advertising that is on the label, on the shelf or in advertising flyers in conjunction with the regional window does not contradict the information in the regional window.
- In the case of products without a regional window, carrying out process steps in regions other than that of the advertised origin or production, in the view of the consumer associations, does not accord with consumer expectations of a regional product. If processing takes place in a region other than that of the origin, this must also be clearly indicated on products without a regional window.
- Faulty labelling due to false, unverifiable or non-transparent regional claims must be eliminated by the food retail trade and the providers.
- In future, better statutory requirements at a European and national level are required, as well as neutral controls and sanctions. Only this way can the flood of dubious advertising be stopped. A first step would be if advertising using regionality were subject to clear information on region, origin of ingredients and place of processing. However, this is opposed by the current statutory framework.

The important purchasing criterion of "regionality" should not be allowed to be an empty advertising phrase for marketing purposes or a greenwashing strategy!

verbraucherzentrale