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**UEAPME position on Country of Origin Labelling for foodstuffs,
introduced into to the proposal for a regulation on the provision of
food information to consumers COM(2008) 40 final**

The current regulation on Country of Origin labelling is contained in Article 3 of Directive 2000/13/EC where it says that the place of origin or provenance shall be given where failure to do so might mislead the consumer.

Identical wording is contained in Article 9 of the draft Regulation on the Provision of Food Information to Consumers dated 30.1.2008.

The effect of this wording is that country of origin labelling is voluntary unless an indication is given in the name of the food or its advertisement that it comes from a particular place. Thus a yoghurt labelled "Greek style yoghurt" would have to have a statement as to its country of origin if it were not from Greece.

UEAPME supports this position for the following reasons:

1 Mandatory food labelling is to do with the safety of the consumer. Origin is not a safety issue.

2 Mandatory origin provisions would cause severe difficulties for manufacturers who buy ingredients from multiple sources, according to factors such as availability or seasonal variations.

3 Mandatory origin declaration would not increase safety for consumers.

4 Country of origin labelling ultimately denies the market reality of a highly integrated European food production in small and bigger enterprises. It will restrict trade to the detriment of a single European market.

5 Mandatory origin labelling for all foods would be impractical as well as being very expensive. For instance a bag of mixed nuts may contain the produce of several countries depending on season and availability.

6 Customary names for products should not be taken as indications of the place of origin or provenance. That is unless the products are registered as Protected Designation of Origin (PDO), Protected Geographical Indication (PGI) or Traditional Speciality Guaranteed (TSG). Such customary names could be Bakewell tarts, Quiche Lorraine etc.

7 In the event of a safety incident Article 18 of Regulation 178/2002 makes it mandatory that all foods can be traced to their origin. Therefore this information is available for food safety purposes without it necessarily being on the label.

It is proposed to change the current and draft legislation with thirty two amendments tabled at the recent ENVI committee. The effect of these amendments if accepted would be to make country of origin labelling mandatory for all foods and an indication of origin would be required for composite and processed products both pre-packed and non-pre-packed.

UEAPME urges Parliament to reject the amendments that would make it mandatory for all foods.

UEAPME accepts that in many cases country or region of origin can be a useful marketing ploy. In these circumstances the label must be accurate and not mislead the consumer into thinking the product is local when in fact it has come from another country. The current UK Code of Practice for pig meat is welcomed as it insists that if a product is labelled "Produced in UK" it would be ambiguous if the origin were not also stated. Similar practice for all foods is recommended for all member states.

Small food producers are committed to providing consumers with clear and simple food information that they need in order to be able to make an informed choice. Flexible supply chains, guaranteeing continuous supply of fresh raw materials, are crucial to maintain consumer confidence. HACCP and traceability requirements ensure that food can be traced and tracked, regardless of origin. Manufacturers are able to identify an immediate supplier if need be. Traceability guarantees that adequate procedures are in place to withdraw products from the market where a risk to consumer health is posed. Origin must remain part of enterprises' responsibility to provide safe food instead of contributing to information overload on pack which is counterproductive.

Brussels, 4 May 2010