

**UEAPME statement
on
Country of Origin Labelling for Foodstuffs**

NOT VERY CoOL

Foodstuff in the EU is safe, no matter where it comes from.

The draft “Regulation on the Provision of Food Information to Consumers”, introduces a lot of additional requirements for food producers.

In addition to the requirements which follow the intentions of the European Commission, the European Parliament introduced one for an indication of the “country of origin” of meat and dairy products. The consequences which would follow are far reaching and not tested at all in practice.

Arguments for “CoOL”	Arguments against additional “CoOL”
<ul style="list-style-type: none"> - A “better feeling” based on national chauvinism - “nice to know” 	<ul style="list-style-type: none"> - Information requirements must be based on a “need to know” - no traceability advantage - promoting anti European atmosphere - conflicts with the spirit of the WTO - protectionism and red tape - discouraging food suppliers outside the EU - false information about food - generic information like “origin from different countries” - tremendous costs for business - impractical procedures for SMEs - reduction of food variety and choice - no impact assessment was made for this far reaching requirement

Country of Origin Labelling already exists

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.

This has been amended by the Parliament in June 2010 by a new proposal for meat, poultry, dairy products, fresh fruit and vegetable and for meat and poultry when used as an ingredient in processed foods. For meat and poultry the countries of birth, rearing and slaughter would need to be declared. The justification for this amendment is that consumers should have a right to this information.

Summary

UEAPME opposes the European Parliament's amendment in its present form on the grounds that

- it is not a safety requirement
- it would generate a huge cost on many small businesses
- it would reduce consumer choice
- it would be impractical in many cases
- it is based on the surmise that foods from other countries may not be as wholesome
- it is chauvinistic leading to nepotism by favouring one's own country¹
- it is unnecessary as the information is available to authorities through the traceability regulation (EC 178/2002)

UEAPME demands that an impact assessment is carried out before any decisions are taken as we have evidence that the costs to SMEs could be very high.

UEAPME points out that the proposal applies only to pre-packed foods. There is no obligation to declare countries of origin on loose foods or catering meals under the present form of the draft Regulation. UEAPME would fiercely oppose any suggestion to extend the proposal to loose foods.

Some practical examples:

Meat

UEAPME strongly opposes the requirement to declare the countries of birth, rearing, slaughter and processing as being impractical, overly expensive and unnecessary.² Country of slaughter is immaterial to food safety³ and such declarations may encourage welfare issues to the stock. This case becomes stronger with composite products where meat from different species may be present in a pie (e.g. chicken and ham). Mandatory declarations for each meat would obscure the relevant information.

In practice many processors obtain supplies from different sources depending on price, availability and quality.

It would be impractical to keep changing the labels on the finished product every time a new batch of raw material went through the line.

- Restriction of purchase of raw materials by reason of nationalisation of the meat market
- Problems with the supply of raw materials at national level, in particular in small EU Member States
- Impairment of exports due to redirection of raw materials and threat of the built up export markets
- Ascertained practice problems with traceability concerning several necessarily needed origins within an enterprise particularly during the manufacture of meat products
- Practice problems, since various information has

to be passed, if country of birth/fattening/slaughter are in different EU Member States

Dairy products

All dairy regulations have been harmonised in the EU. There is therefore no safety concern for imported raw material. Single products such as milk and cream could be labelled as "Product of the EU". Greek yoghurt made in Greece from milk produced in Greece would be just "Greek Yoghurt". But if produced using milk from another EU state, then it should say so rather than mislead the consumer into thinking it was wholly Greek.

Fish

Most fish are caught at sea which is not part of the EU. Processed products cannot be labelled with country of origin but only with country of processing. E.g. "Fish Cakes produced in Norway".

General

Mandatory food labelling is about safety and consumer protection. Voluntary labelling seeks to promote the product and encourage purchase. Preliminary figures and estimates of the cost of complying with the proposed amendment by small businesses indicate a very high cost. Not only that, but some suppliers tell us that they would adhere to seasonally available foods and not try to provide year-round supply with imports. This would inconvenience consumers.

UEAPME would be prepared to assist with the impact assessment of any proposal.

Members of UEAPME, the small food producing and processing enterprises like bakers, confectioners, butchers etc., producing 50% of all food in the EU, refuse the introduction of additional country of origin labelling.

Members of the European Parliament and the European Council are asked to look at the consequences and to refuse respective amendments.

Brussels, 8 September 2010

Note 1 This is contrary to the objective in Recital 1 of EC 178/2002.

Note 2 Until recently there was no supplier of certain breeds of poultry in UK. Thus day old chicks were imported from France. All the rearing, slaughter and dressing were done in UK. The fact that the birds lived one day of their lives in France does not make them French.

Note 3 Country of slaughter does not make an animal a native of that country. Thus sheep born and reared in UK and shipped live to France should not make the resulting gigot and mouton French. Similarly game shot in one country could not imply that the animal had lived all its life in that country.

UEAPME is the employers' organisation representing the interests of European crafts, trades and SMEs at EU level. UEAPME is a recognised European Social Partner. It is a non-profit seeking and non-partisan organisation. As the European SME umbrella organisation, UEAPME incorporates 85 member organisations from 34 countries consisting of national cross-sectorial SME federations, European branch federations and other associate members, which support the SME family. UEAPME represents more than 12 million enterprises, which employ around 55 million people across Europe. www.ueapme.com