Prot. Num. 0129/LF
Bruxelles, 2 March 2011

Members of the European Parliament's ENVI committee
60 Rue Wiertz
B-1047 Bruxelles

Food Information to Consumers Regulation

Dear MEPs, members of the European Parliament's ENVI committee,

The UEAPME food forum represents *small* food businesses in all the member states. For some years we have been advising the European Commission on the proposed Food Information to Consumers Regulation that is now almost ready to be passed.

What the European Parliament achieved according to UEAPME:

NO LABELLING OF UNPACKED FOOD
Against the wish of the European Commission ("it would be a step back not to introduce full mandatory labelling for unpacked food") the majority of the European Parliament's members understood very well the danger for the food variety in Europe this demand would have caused. UEAPME thanks all deputies for refusing this impractical approach.

NO COLOUR CODING
Against the wish of some members of the European Parliament ("it would be nice to have a simple labelling scheme") the majority of the European Parliament's members understood very well that a "traffic light system" is not informing consumers but confusing them with confusing information. UEAPME thanks all deputies for refusing this unpractical approach.

NO DIRECT LABELLING OF ALLERGENS ON UNPACKED FOOD
Against the wish of some members of the European Parliament the majority of the European Parliament's members understood very well that different ways of information can be used to inform consumers about the presence of potentially harmful ingredients. UEAPME thanks all deputies for refusing this impractical approach.
The EU-Commission: "*The present food labelling legislation and the new Commission proposal deal only with labelling of ingredients and allergens intentionally added in the food production. Accidental contamination is not covered.*"

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What the European small food businesses expect from you:

NO LABELLING OF DEFROSTED *COMPONENTS*
UEAPME made clear that such a rule could cost up to 300 000 € because of the compulsory labelling of "defrosted" requested by Annex 5 of the new proposal. UEAPME has made a proposal to the Commission that would satisfy all safety aspects but not disadvantage small business practice. The EU-Commission: "*The compulsory indication of "defrosted" was added by the Council in spite of the Commission's reservations*."

DEFINITION FOR NON-PREPACKED-FOOD / EXEPTION FOR FOOD PACKED AT PLACE OF SALE DIRECTLY BEFORE SALE
A definition for non-prepacked food is necessary to define food which is (pre)packed at the place of sale before sale for immediate consumption after sale. "Non-prepacked food" is food which is offered to the consumer non-packed and is packed at point of sale, or food which is (pre)packed at the place of sale before sale for immediate consumption after sale (under the permission of the regulations to Art 9 for non-prepacked food).

AUTHORISATION OF SALES-BY-NUMBER
A sale-by-number declaration is necessary. Sales by number of certain bakery wares have a long tradition in most member states (e.g. rolls, buns, croissants etc.). The quality of these products is not depending on weight but on the recipe and the manufacturing process. Most bakeries have no equipment for weighing each bun, roll or croissant. This especially applies for handcraft bakeries.

NO COUNTRY OF ORIGIN LABELLING
Contrary to the good understanding the European Commission recognising the impracticality of blanket country of origin declaration, some members of the European Parliament asked for it to be re-instated, supporting nationalistic and protectionist tendencies.
Compulsory labelling of the country of origin on all products made with meat is impractical. The consequences which would follow are far reaching and not tested at all in practice.

The reality is that in Europe animals may be born, reared, slaughtered and processed in different countries. For instance many chicks and turkey poults may be hatched in one country and transferred at a day old to another for rearing.
We accept that some consumers may want to know the welfare standards applied during rearing. Thus we would not object to the country of rearing for meats and the country of processing becoming mandatory. For instance the label could read "Bacon made in UK from Danish pork" or "Parma ham made in Italy using Polish pork".

IMPACT ASSESSMENT
UEAPME urges Deputies to not make final decisions on these points until the full impact assessment is known. UEAPME will co-operate fully with the Commission and the Parliament to provide potential costs of the various alternatives.

For the UEAPME food forum

Ludger Fischer

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