

# Position Paper

## UEAPME<sup>1</sup> position on the Discussion Paper on the REFIT Fitness Check of Regulation (EU) N° 178/2002 and proposal for a study

### General comment

Most of the criteria relate to provisions which are more appropriate to large food companies. The impact on the craft (SMEs) are more peripheral part of the evaluation and should be considered stronger.

### Specific Comments

- **„achievement of objectives and level of prescription taking into account the unique nature of Member States markets and different cultures;“**: We would like to add an additional criterion such as „taking into account the unique nature of manufacturing processes such as traditional craft manufacturing“.
- **„comprehensive and integrated approach of the food chain and scope;“** so wie **„specific concerns and burdens to business (particularly SMEs) and public authorities in the implementation of the General Food Law;“** and **„potential actions (legislative, non-legislative) for simplification and reduction of regulatory costs and burdens that could be implemented;“** : We wish to add a specific criterion „this should especially consider the characteristics of SMEs since they are characterized by a short food chain, commodity flows and a regional market; criteria for the verification of a high food safety and the General Food Law should bear in mind the aforementioned characteristics in the SME“.
- **„European Added Value: additional value resulting from EU activities, compared to what could be achieved by MS at national and/or regional levels as well as international (Codex, OIE) level“**: We wish to add the following: *„the added value of European legislative framework must carefully be considered in terms of added value to SMEs, which could often and better benefit from regional or*

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<sup>1</sup> UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

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*national law*“ perhaps an additional criterion should be created „European added value“: additional value for SMEs resulting from possible exemptions for SMEs to European Law“.

- „**Relevance: correspondence of original objectives to current needs**“ could mention „Current needs: More exemptions or at least more consideration of the specific needs and position of SMEs“.

- **Placing safe food/feed on the market, verification, traceability** (as define in article 18 of Reg. n. 178/2002 and with reference to the “internal traceability/passport-system”), withdrawal/recall, notification.

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