

Rec. no.	Author of the suggestion	Problematic regulation	Problem description	Suggestions	DG
159	The Federation of Swedish Farmers	Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes Council Directive of 19 November 1991 laying down minimum standards for the protection of calves (91/629/EEC) Council Directive 91/630/EEC of 19 November 1991 laying down minimum standards for the protection of pigs Council Directive 1999/74/EC of 19 July 1999 laying down minimum standards for the protection of laying hens	The current legislation regarding animal protection is too rigid and complicated. Adequate animal protection depends on the knowledge, competence, interest and ambition of the keeper.	The Directives regulating animal welfare and protection should be simplified and modernised. Instead of detailed rules, there should be minimum standards and functional requirements. Legislation must facilitate, rather than hinder, the development of animal protection work and the competitiveness of the sector.	SANCO
42	UEAPME	Directive 94/35/EC Sweeteners for use in Foodstuffs	The European regulations and directives on labelling lack a proper and coherent structuring. For the owner of a small enterprise, it is not clear arranged, which requirements he has to fulfil according to which Directive or Regulation.		SANCO
43	UEAPME	Directive 95/2/EG on food additives other than colours and sweeteners	The European regulations and directives on labelling lack a proper and coherent structuring. For the owner of a small enterprise, it is not clear arranged, which requirements he has to fulfil according to which Directive or Regulation.		SANCO
48	UEAPME	Regulation (EC) No 258/97 of the European Parliament and of the Council of 27 January 1997 concerning novel foods and novel food ingredients	The European regulations and directives on labelling lack a proper and coherent structuring. For the owner of a small enterprise, it is not clear arranged, which requirements he has to fulfil according to which Directive or Regulation.		SANCO
74	BDI, BDA	Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods	According to the EU Health Claims Regulation which came into effect in July 2007, Europe-wide terms relating to nutritional value and health like "low-fat" or "roughage-rich" must fulfil specific conditions of use. All terms which are not expressly permitted are forbidden. This can be a burden especially for small and medium-sized enterprises, since these product innovations with health benefits may only be communicated after completion of the costly European registration procedure.	The less bureaucratic and innovation-friendlier approach by far is non-definitive lists, which can be expanded via reporting procedures following scientific assessment by the European authorities for food safety (EFSA). If the current order remains, scientific grounds are required for formulating the nutritional value profile, which take into consideration the importance of individual foodstuffs in relation to nutrition as a whole.	SANCO
75	BDI, BDA	Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods Statements of nutritional value on foodstuffs Abandoning compulsory statements of nutritional value	According to an EU Commission Regulation proposal, EU-wide, detailed statements of the nutritional value are becoming compulsory on foodstuffs. A compulsory statement of nutritional value forces manufacturers to have their products examined, so that they can make precise statements on the quantities of existing nutrients and revise the appropriate labels. This is associated with a considerable bureaucratic burden and adaptation costs especially for smaller manufacturers	A compulsory regulation should be abandoned. The German way forward should rather be adopted, to put expanded statements of nutritional value on packaged foodstuffs on a voluntary basis per manufacturer.	SANCO

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160	The Federation of Swedish Farmers, BusinessEurope	Regulation (EC) No 178/2002 of the European Parliament and the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs	The legislation concerning traceability - article 18 Regulation (EC) No 178/2002 - and the Hazard Analysis and Critical Control Point (HACCP) - article 5 Regulation (EC) No 852/2004 – imposes considerable costs on business. The measurements of administrative costs carried out in Sweden with the use of the Standard Cost Model shows that these two Directives are the most expensive for business of the measured regulations related to food. Guidance from the Commission on various aspects of the food safety and hygiene of foodstuffs legislation is unclear and has been interpreted differently by enforcing authorities and business in different Member States.	Guidance should be improved to explain how the Directives could be implemented and complied with in the simplest and most efficient way.	SANCO
23	UEAPME/ BDI, BDA	Regulation (EC) 530/1999 Statistical survey on the cost of labour, on the structures of workers in enterprises	Should only be carried out in enterprises with more than 20 workers or simplify the number and the content of the questions The EU labour cost survey, which is conducted every four years, asks questions on a multitude of characteristics. Yet it is not just a question of the wages and salaries to be counted, but also the inclusion of all additional personnel costs, whether set by law or agreement or granted voluntarily. These are for instance social insurance contributions, payment for working hours lost, extra payments, expenditure for occupational training and company pension schemes, and even the employer's canteen subsidies. The inclusion of this data is very labour-intensive and time-consuming and is an excessive burden, particularly for smaller companies. Hitherto companies with fewer than 10 employees were exempt from the survey.	Should only be carried out in enterprises with more than 20 workers or simplify the number and the content of the questions The labour cost survey arranged by the EU Commission must be restricted to companies with 20 or more employees. This threshold value also conforms to the cut-off limit for many industry statistics.	ESTAT
177	iROLA GMBH&co forwarded by the chair of HLG	Council Regulation (EC) No 1207/2001 of 11 June 2001 on procedures to facilitate the issue of movement certificates EUR.1, the making-out of invoice declarations and forms EUR.2 and the issue of certain approved exporter authorisations under the provisions governing preferential trade between the European Community and certain countries and repealing Regulation (EEC) No 3351/83	At the end of every year all of my customers send us a blank form by the name of "Long-term supplier's declaration". Each business has to complete this form with the details of which products they will supply to their customer in the following year and from which country these products originate. You have to have clairvoyant capabilities if you want to answer this question truthfully. At the start of the year we mostly don't even know which products we will be supplying in the following year, and certainly not where they are produced. You also have to sign to say that you comply with the rules of origin governing preferential trade of any state. Well, how should a company know this and how can this be checked. So each year we send around 100 of these declarations to our customers, which have been completed with a suitable level of effort, and request the same declaration from all of our suppliers. After that, everything is filed nice and neatly in a folder and then absolutely no one is ever interested in this nonsense again, not even the tax inspector during an inspection, if he even thinks about	From my point of view, you could save a lot of money if you finally got rid of this regulation	TAXUD

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24	UEAPME	Directive 91/533/EC relating to the obligation of the employer to inform the worker of the conditions applicable to the contract or employment relationship	<p>The information obligations contained in the directive do not take account of the functioning of SMEs.</p> <p>The employer is obliged to hand the employee within 2 months after starting work a written document with the important content of the employment conditions. For employees active abroad additional conditions apply. Alterations in the employment conditions are to be indicated in writing within one month.</p> <p>These regulations create major burdens.</p> <p>The administration burden caused by these regulations particularly affects small and medium-sized enterprises, which must undertake major technical-administrative efforts, in order to be able to fulfil these heavy requirements before the deadline. It creates a bureaucratic expenditure, which is often unsuitable for the fabric of SMEs. The purpose of the regulation – employee information – can in the aforementioned SMEs, due to their manageable structure and size with lower bureaucratic expenditure, in fact be achieved in a</p>	<p>SMEs should be excluded from the field of application of the directive because of too heavy obligations for SMEs.</p> <p>The company could be helped most effectively by the total abolition of the Directive. As a help, the scope of the Directive should at least be so defined that small and medium-sized enterprises are not included.</p>	EMPL
26	UEAPME	Directive 2002/14/EC on the information and consultation of workers	<p>The thresholds in terms of members of enterprises (50) or establishment (20) are too low and pose problems for SMEs</p> <p>The obligation to create workers representation structures in enterprises with more than 50 workers to cope with the new information and consultation obligation of workers creates new burdens and difficulties for SMEs</p>		EMPL
152	The Federation of Private Enterprises - Sweden, Business Europe	Council Directive 1999/70/EC of 28 June 1999 concerning the framework agreement on fixed-term work concluded by ETUC, UNICE and CEEP	Employers shall under the rule 'information and employment opportunities' (clause 6) in the Directive inform fixed-term workers individually of vacancies of employment. To SMEs that, for example, often have variations in number of employees due to seasonal changes, this obligation is extra burdensome. This is an unnecessary rule. If the employer is interested in employing someone that already is a fixed-term worker, this person will, of course, be asked.	Abolish the rule.	EMPL
154	Confederation of Swedish Enterprise	Council Directive 2000/79/EC of 27 November 2000 concerning the European Agreement on the Organisation of Working Time of Mobile Workers in Civil Aviation concluded by the Association of European Airlines (AEA), the European Transport Workers' Federation (ETF), the European Cockpit Association (ECA), the European Regions Airline Association (ERA) and the International Air Carrier Association (IACA) (Text with EEA relevance)	The requirement for health checks in civil aviation included in the Directive 2000/79/EC duplicate the industry standards already in place. These standards were agreed before the Directive came into force and more than fulfil the requirements of the Directive.	Remove the requirement for health checks from the Directive.	EMPL