



DANISH AGRICULTURAL COUNCIL

NOTE

28 July 2008

To whom it may concern

From: The Danish Agricultural Council

Recommendations for the High Level Group on the Competitiveness of the Agro-Food Industry: Knowledge & Research and Innovation Policies: Food Law

Harmonisation

The internal market is a huge benefit to the European Agro-Food Industry. Access to one market with 500 million consumers governed by the same rules in relation to e.g. hygiene, labelling, food safety and animal welfare ease the access to the different countries within the internal market. The strong internal market furthermore strengthens the global players within the European Union in the competition with third countries.

In recent years an unfortunate development away from true harmonisation in EU Food Law has taken place. The latest example is the Commission proposal on Food Information, where the Commission presents a “new legislative culture” that should strike a balance between flexibility and prescription and between action at national level and action at EU level. The difficulties in reaching a strong compromise within EU have increased with the number of EU member states, but introduction of flexibility and the nationalisation of important aspects of EU Food Law should be avoided.

The strength of the internal market is already weakened by the extensive use of national guidelines and different interpretation and implementation of EU Food Law in the various member states resulting from unclear and in some cases ambiguous EU legislation.

In order to strengthen the competitiveness of the European agro-food industry, international rules and standards agreed upon in an international forum such as the Codex Alimentarius should furthermore to the widest possible extent be implemented in EU Food Law.

Cutting the red tape

We need to continue the work of cutting the red tape and reduce the administrative burdens on the European agro-food industry, but we need to involve the stakeholders to a further extent in order to safeguard that actions taken are truly doing the job as reducing the administrative burden would reduce cost and thereby increase the competitiveness of the European agro-food Industry.

Quality policy

We need to revise the European Food Quality Policy. The one-sided focus - both politically and economically - on origin quality is unacceptable. The existing Food Quality Policy does not benefit the European Food Industry as a whole and is clearly not in line with the general European Food Policy, which is future oriented and focusing on e.g. competitiveness, innovation, nutrition, environment, climate change, food supply and food safety. We underline that the involvement of all internal and external stakeholders in the process of the development of the future European Food Quality and a close coordination with other relevant policy initiatives is a precondition to secure a successful European Food Quality Policy.

We see quality as a tool to differentiate and add value to the product. In our view a definition of quality should therefore be broad and kept in general terms. Our aim is to secure a future oriented European Food Quality in line with the overall challenges faced by the European food sector and contributing in making the European agro-food industry as a whole more competitive on the world market.

Country of origin labelling

Obligatory origin labelling is contrary to the idea of and the rules governing the internal market. The idea of the internal market is to ease the exchange of goods and raw materials. The introduction of obligatory labelling would be a move away from the idea for an internal market and backwards toward nationalization. As the principle of country of origin is a global principle it should be based on international rules.

Food Safety

In relation to Food Safety the importance of a risk orientated approach must be stressed. The need for simple and horizontal rules must be balanced with the need for a sector based approach based on the risk associated with the individual sector. The current legislation on food production provides in general sufficient flexibility to cover all food production/food business operators and in our view there is no pressing need of changing this specific legislation, including the provisions on HACCP. However, it is always beneficial to evaluate whether the

structure of the food and veterinary legislation is supporting competitiveness in the most optimal way. The regulatory framework should be simple and more proportionate and support global competitiveness in the agro-food industry.

Official controls

As regards legislation on official controls performed to ensure verification of compliance with existing regulation there is a general approval of the current principles. There is however an urgent need to look into the structures of collecting fees for official controls and to start harmonising efforts in this specific area, as member states have different approaches toward this matter. A harmonisation of the fees for control of meat is long overdue, and needs to be on a level which is competitive on a global scale.

Private standards

We suggest that the Commission looks into the setting up of private standards. Many food business operators are met with additional requirements when dealing with customers, etc. To this end a discussion on better cohesion between official control and third party control is much needed. Discussions on private standards are performed also in international organisations such as the Codex Alimentarius.

Improvement of the authorisation procedure is needed

The authorisation procedures should be less lengthy in order to secure return in investments and to ensure access to raw materials, especially regarding GMO and biotechnology. A fast track and mutual recognition should be considered as part of the solutions. One of the goals of the CAP is a secure food production. In a situation with high food prices and a growing 'food supply crisis' it is counter productive if the GMO authorisations are not fastened. Not having enough feed is damaging to the competitiveness of the European agro-food industry.

Better regulation approach endorsed

In general we approve of the Commission's "better regulation approach". Even though it seems that the proposal put forward by the Commission on SMEs and HACCP was indeed poorly justified.