

**UEAPME statement
provision of food information
to consumers**



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Who is UEAPME

European representation of 12 million enterprises, which employ around 55 million people across Europe. About 300.000 of these enterprises provide 50% of all food consumed in the EU.

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executive summary

UEAPME supports the intention to summarise and to simplify the existing labelling provisions

However

- the proposal is a complication, not a simplification for small business
- labelling on non-pre-packed foods is impractical
- a minimum font size of 3mm not feasible
- the cost to SMEs could be as high as 6 billion €uro per year

Almost 90% of food businesses
in Europe have **less than
ten employees**



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Most of these businesses are specialist craft enterprises



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They produce a wide variety of products according to season and availability



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The structure of typical European food enterprises is not considered by the proposal



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The variety depends on seasonality, customer expectations and skills available on the day



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Small craft producers, retailers and caterers may never make the same product twice as they are **producing to individual customers' requirements in small quantities**. That means that it is quite impossible to declare nutritional information in terms of costs and personnel.



The Austrian example



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Austrian Federal Economic Chamber



WIRTSCHAFTSKAMMER ÖSTERREICH

Estimation of costs for the Austrian food sector

- Case 1 (handcraft food producers and pre-packed food)
- Case 2 (handcraft food producers and unpacked food without nutrition information)
- Case 3 (handcraft food producers and unpacked food + nutrition information)
- Case 4 (all food enterprises [food producers, catering, food trade] and allergen labelling)

Estimation of costs for the Austrian food sector

- **Case 1 (handcraft food producers and pre-packed food)**
 - Nearly 6.000 enterprises, **2.000** enterprises are producing pre-packed food.
 - Each enterprise produces **100** different labels for pre-packed food
 - Costs of labelling expertise: **56,26 €** per label
 - Costs of nutrient information expertise: **343,75 €** per label

 - The multiplication of all factors: **80 Mio €**

Estimation of costs for the Austrian food sector

- **Case 2 (handcraft food producers and unpacked food without nutrition information)**
 - Number of enterprises: **6.000**
 - Number of products per enterprise: **200**
 - Costs of labelling expertise: **56,26 € per label**

 - Multiplication of all factors: **67,5 Mio €**

Estimation of costs for the Austrian food sector

- **Case 3 (handcraft food producers and unpacked food + nutrition information)**
 - Number of enterprises: **6.000**
 - Number of products per enterprise: **200**
 - Costs of labelling expertise + nutrient information expertise: **400,01 €**
 - The multiplication of all factors: **480 Mio €**

Estimation of costs for the Austrian food sector

- Case 4 (all food enterprises [food producers, catering, food trade] and allergen labelling)
 - Number of enterprises: 60.485
 - 3 h/month for an experienced employee - minimum salary according to the collective treaty: 654,12 € per year
 - For all food enterprises employee costs for allergen labelling: 39,6 Mio €

Conclusion

- Already enormous costs for food labelling

- Possible results of the planned regulation:
 - Allergen labelling costs for all Austrian food enterprises:
39,6 Mio €
 - Additional costs for Austrian handcraft food producers :
between **80 Mio €** (case 1) and **560 Mio €** (case 1 and 3)

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	enterprises	%	employees
Meat and meat products	46100	15.6%	10390000
Processing fish and products	4000	1.3%	1287000
Dairy products	12500	4.2%	4000000
Bread, sugar, confectionary and other food products	181300	61.2%	20431000
Miscellaneous food products	30000	10.1%	6000000
Beverages	21800	7.4%	4796000
Tobacco products	3000	0.1%	101000
Total	296100	100%	47721000

probably even more!

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The number of products produced in SMEs:

Austria 100-200

The Netherlands 162-180

UK 20- 300

A conservative estimate would be 50 products per
business.

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The cost of changing a label is put at € 56.

Thus the cost to small businesses of **changing the labels** alone would be

$56 \times 50 \times 296100 = 829 \text{ million } \text{€}.$

The cost of providing nutritional information is put at € 400.

The cost of providing **nutritional information** for small businesses would be

$400 \times 50 \times 296100 = 5920 \text{ million } \text{€}.$

Conclusion:

If the Regulation were to come into force in its present form, the European culture reflected in the many small food businesses would be seriously damaged.



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