

ROADMAP

Title of the initiative: **Communication to the EP and the Council on Better Training for Safer Food**

Lead DG: SANCO E.2

Expected date of adoption (month/year): 4th quarter 2009

Initial impact assessment screening & planning of further work

A. Context and problem definition

What is the political context of the initiative? How does this initiative relate to past and possible future initiatives, and to other EU policies?

In order to reach a high standard of consumer protection across the EU as concerns food safety it is necessary to strengthen and improve the efficiency of Community and National control systems along the entire food chain. Most of the food consumed in the EU is imported from third countries, including many developing countries. It is, therefore, also important to ensure that imports are subject to adequate controls and that initiatives are taken to improve cooperation with and provide assistance to EU trade partners.

On 29 April 2004, the European Parliament and the Council adopted Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules. The Regulation identifies **training** as a key issue to ensure a more harmonised approach to building and developing Community and national control systems.

Article 51 of the Regulation empowers the Commission to develop training programmes for staff of competent authorities of Member States involved in official control activities so as to keep them up-to-date with all aspects of Community law in the areas specified above and ensure that controls are carried out in a more uniform, objective and adequate manner across the EU. Training courses may be open to participants from third countries, in particular developing countries, with a view to familiarising them with EU food standards and assisting them in organising official controls on products exported to the EU.

With this in mind, DG SANCO launched the Better Training for Safer Food initiative in 2006. This initiative trains national authority staff from the EU and candidate, associated and selected third countries

In 2008 this initiative will complete its third year of activities and it is now appropriate to carry out an initial evaluation of the outcomes of training and outline the future goals to develop a comprehensive community training strategy which takes into account the need to better integrate training facilities available at EU and national level and to improve the external dimension of the initiative.

What are the main problems identified?

Deficiencies in national safety control systems present a considerable danger to public and animal health. This has been highlighted in the past by food safety emergencies. A harmonised

approach to the design and development of national control systems is thus vital to rectify such deficiencies and to guard against emergencies. Appropriate training of control staff is a key factor in reaching the goal of effective harmonised controls throughout the EU.

Explain how EU action is justified on grounds of subsidiarity

The initiative is intended to complement rather than to replace training organised at Member State level. Training within the initiative is thus only organised to cover areas where a need has been identified at Community level which cannot be catered for by the individual Member States and where Community added value can accrue from the training.

Such needs are identified in close collaboration with Member State competent authorities, particularly via the network of National Contact Points for the training already established by DG SANCO, and stakeholders in general.

B. Objectives of EU initiative

What are the main policy objectives?

The main aim of the communication is to provide information on the development of the initiative following three years of concrete training activity. This will cover the training programmes which have run and their outcomes as well as the organisational developments linked to the adoption of the initial Communication on Better Training for Safer Food and the resulting cost-benefit analysis. It will also draw on the findings of the intermediate evaluation of the initiative taking place during the second half of 2008. The Communication should allow for formation of ideas and the laying of the foundations for the future structural and strategic development of the initiative.

Does the objective imply developing EU policy in new areas or in areas of strategic importance?

The communication will not modify the main areas of focus of the initiative; namely food and feed law, animal health and welfare rules and plant health rules. These are areas in which EU policy is already well developed and there is thus unlikely to be any extension into new policy areas.

C. Options

What are the policy options? What legislative or 'soft law' instruments could be considered? Would any legislative initiatives go beyond routine up-date of existing legislation?

Option A Supplement the body of legislation in the areas covered by the training in order to create more detailed rules and requirements on official control and inspection techniques.

Option B Do nothing.

Option C Continue the organisation of training courses in the areas in question as a way to promote a Community harmonised approach to official controls and increase standards of food safety by raising awareness and competence of control personnel involved in official control systems.

Does the action proposed in the options cut across several policy areas or impact on action taken/planned by other Commission departments?

Areas of common interest exist with other DGs, particularly within the framework of the third country training organised under the initiative. Cooperation has thus been undertaken with other

DGs in order to ensure the relevance of the subjects covered and to prevent overlap between the training/technical assistance organised by SANCO and that run by other DGs.

Explain how the options respect the proportionality principle

Proportionality is maintained through a thorough consultation of all available sources within the Commission and at national level (colleagues within SANCO and other DGs, FVO reports, RASFF notifications, National Contact points, stakeholders, etc.) in order to correctly ascertain training needs. Proper and exhaustive needs assessment enables the formulation of a response which is directly proportionate to the existing needs.

In addition, as stated above, the aim of the training is to complement national-level training by intervening only in areas where Community added value can accrue. In this way the action is limited to that which is strictly necessary in order to achieve the objectives of the Treaties.

D. Initial assessment of impacts

What are the significant impacts likely to result from each policy option (cf. list of impacts in the impact assessment guidelines), even if these impacts would materialise only after subsequent Commission initiatives?

- i) Further adding to the body of legislation in the areas covered by the training runs the risk of creating excessive burdens and confusion for the people charged with the practical implementation of the legislation. It would therefore be advisable to refrain from launching further legislative initiatives or limit such initiatives to those which are strictly necessary.
- ii) Doing nothing would not allow national-level control staff the opportunity to further enhance their competences in a wide range of areas and would preclude or undermine the further harmonisation of the national control systems and raising of standards of official controls. The lack of a harmonised approach could also have a negative impact on the development of the internal market and on business. Doing nothing would also reduce the scope for information exchange between personnel of different national authorities within the EU and around the world.
- iii) Continuation of the training programmes would build on the work carried out during the first three years of the initiative. This would be done on the basis of the conclusions of the intermediate assessment so as to render the training even more effective. Such a continuation should contribute further to improving Community and National control systems, and increasing understanding of EU standards and imports procedures amongst those responsible for their implementation. In this way, it would promote the internal market and the international trade in safe food and lower barriers to third, in particular developing countries accessing the EU market for their products.

The expected impact of the long-term training strategy is as follows:

Impact on competitiveness, markets, trade and investments flows:

Training plays an important role in spreading knowledge and awareness of Community legislation and in promoting harmonisation and uniformity of control activities and procedures across the EU. All food businesses should benefit from this harmonisation which contributes to creating a level playing field, developing fair trade and boosting competitiveness.

Impact on third countries and international relations:

Training is important to promote uniform procedures for the control of animals, food and feed imported from third countries. This is an essential factor in guaranteeing that imports respect Community law and that EU businesses are in an equal competitive position in relation to their non-EU counterparts.

Participation of staff from third countries in Community training programmes plays an important role in promoting Community standards at international level, thus enhancing international trade of safe food, and providing EU businesses with easier access to world markets.

Training is a powerful instrument to assist developing countries in meeting Community requirements and thus gain access for their products to the EU market. Aside from the positive effect on trade, this action would have a political impact, both in its support of the commitments made by the EU at international level (e.g. under the WTO SPS Agreement in terms of technical assistance) and in enhancing the EU's relationship with its trading partners.

Impact on public authorities

Although much of the responsibility for information and training of staff performing official controls rests with the national competent authorities (Article 6 of Regulation 882/2004), continuation of the Community training strategy is essential, in particular to pursue harmonisation of national control systems and to address specific issues of common interest.

Continuation of the Community training strategy should optimise resources and determine scale economies to the advantage of both Community and national public authorities.

Could the options have impacts on the EU-Budget (above 5 Mio €) and/or should the IA also serve as the ex-ante evaluation, required by the Financial Regulation?

The annual budget for the training activities taking place 2008 is 9 Mio €. In the long term, with the continuation of training activities, it is expected that this budget should increase to an annual average of 15 Mio €. An additional 10 M€ has been obtained from DG DEV via DG AIDCO to implement a 3-year programme (2008-2010) to enhance food safety and security in Africa.

Could the options have significant impacts on simplification/administrative burden or on relations with third countries?

As stressed above, the community training strategy plays a role in the simplification and reduction of administrative burdens by increasing awareness, improving understanding of EU legislation, by disseminating best practices and experience related to official controls along the food chain. Training has also an evident impact on relations with third countries and particularly developing countries by raising the profile of the EU and promoting EU standards as an international point of reference. In addition, training is a powerful instrument to assist third countries, in particular developing countries to better understand and implement EU requirements thus contributing to overcoming the perception that the EU places barriers to international trade.

Who is affected?

The main target audience consists of competent authority staff of Member States and participants from third countries/developing countries. As appropriate, certain training

initiatives, may also involve stakeholders, including producers, industry associations and food business operators.

E. Planning of further impact assessment work

What information and data is already available? What further information needs to be gathered? How will this be done (e.g. internally or by an external contractor) and by when? What type and level of analysis will be carried out (cf. principle of proportionate analysis)?

- Initial impact assessment (see Annex to the Communication (519) 2006 on better Training for Safer Food. This study was carried out internally.
- Data from the training activities is collected and summarised in annual reports (see reports 2006 and 2007).
- Cost-benefit analysis of the Public Health Executive Agency, for the part related to food safety training issues. The study, concluded end 2007, was carried out by an external contractor.
- Intermediate impact evaluation on Better Training for Safer Food related to the first 2 years of activity (2006-2007). The study, which has been contracted externally, is underway. Results are expected early 2009.

Which stakeholders & experts have been/will be consulted, how and at what stage?

No specific consultation is envisaged at this stage apart from those activities outlined above.