



COMMISSION OF THE EUROPEAN COMMUNITIES

Brussels, 20.9.2006
SEC(2006) 1164

COMMISSION STAFF WORKING DOCUMENT

Document accompanying the

**COMMUNICATION FROM THE COMMISSION TO THE COUNCIL AND THE
EUROPEAN PARLIAMENT**

Better training for safer food

EXECUTIVE SUMMARY of the IMPACT ASSESSMENT

{COM(2006) 519 final}
{SEC(2006) 1163}

1. PURPOSE OF THIS DOCUMENT

This document is the executive summary of the Impact Assessment for the Commission's Communication "Better training for safer food"¹.

2. GENERAL BACKGROUND

European law² provides for the Commission to organise training courses for the staff of the competent authorities in the Member States in charge of verifying compliance with EU food and feed law, animal health and animal welfare requirements, and with plant health requirements. These training activities are also open to participants from third countries and in particular from developing countries.

The purpose of such training is to establish a good understanding of Community rules and standards and to create a fair level of uniformity of the controls carried out and of the decisions taken by the controlling authorities pursuant to such controls. More uniformity and expertise with regard to official controls is expected to lead to a high level of consumer protection across the EU and to more certainty for food businesses by creating a level playing field.

The involvement of participants from third countries in EU training is expected to lead to a better understanding of EU Sanitary and Phytosanitary (SPS) standards and import procedures, which should be beneficial to third countries importing food, feed, live animals and plants into the EU. Better insight in EU rules and procedures is also expected to lower the hurdle, in particular for developing countries, to place goods on the EU market and to lead to better compliance with EU food standards. That in turn will lead to fewer and more simplified sanitary and phytosanitary controls at import.

3. TRAINING AT PRESENT

The Commission's Health and Consumer Protection Directorate General started organising training courses in 2006, during which year close to 1 500 participants were trained. For that purpose, the Commission issued a number of calls for tender covering a range of issues such as food import control procedures at Border Inspection Posts, the implementation of food safety management systems and the auditing of such systems, the proper handling and elimination of animal by-products, and the welfare standards concerning stunning and killing of animals (in slaughterhouses or disease control situations). Certain courses were organised to assist in particular developing countries. These courses covered import procedures for fruit, vegetables and fishery products and were addressed to participants from Africa, Asia and Latin America. Another training course addressed control matters with regard to Avian Influenza for participants from South-East Asia.

¹ See document COM(2006) 519.

² Article 51 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules (OJ No L 191, 28.5.2004, p. 1).

From the experience in 2006, it appears that the initiative of the Commission is highly appreciated by Member States and third countries. It is therefore important that the training efforts are reinforced and that a proper management and execution of a training programme is ensured.

4. TRAINING IN FUTURE

The Commission has had reflections on certain options with regard to its future policy on organising training in the areas of concern:

1. **Do nothing.** This is not considered to offer an appropriate solution. A lack of a harmonised approach at EU level may lead to a heterogeneous implementation of Community law across the EU. This is likely to lead to differences of the level of protection with a possible negative impact on the internal market. In addition, the quality and consistency of import control procedures may be affected with a negative impact on trade with third countries.
2. **Exchanging experience between national training bodies.** Certain Member States have a tradition of organising training courses for their control staff. Whilst training is not developed to the same level in all Member States, it appears that some Member States have one or more training bodies with highly qualified training staff. The creation of a system of cooperation should be further examined but it is unlikely that it will cover all the needs. It may therefore not be seen as a stand alone option.
3. **To organize and develop a Community training strategy for safer food.** There is a large agreement amongst Member States that training at EU level is essential. This attitude is inspired by the need to have a horizontal approach to certain issues that require a common and equal understanding by all. There is also the need to provide training for third countries, and in particular for developing countries, which should be provided through a Community system ensuring uniformity and consistency.
4. **To improve the legislative framework.** The broad objectives of the White Paper on Food Safety have been achieved. Experience in the coming years with the new rules will show whether there is room for further improvement. If further improvements are needed, these will concern amendments to detail without there being a need for major new legislative initiatives. Further new legislation can certainly not replace the need for training activities, and is therefore not an option to be considered in defining the forthcoming EU training strategy.

The Commission believes that there is a need to provide training at EU level and to develop a training strategy that is complementary to training efforts that can be better developed at national level.

An average level of training 6 000 trainees (around 10% of the potential trainees) seems to be an appropriate amount of training, technically feasible and offering a fair basis for ensuring training to address “a representative number of the target population”. To reach this objective, some implementing options have been analysed: contracts managed by the Commission, a specialised Commission service, a regulatory agency and the execution of training activities by an Executive Agency.

The Commission will further explore the possibility of a training programme to be executed by an Executive Agency. This would allow the Commission to concentrate on its core tasks, i.e. fixing training priorities, establishing a training programme and verifying the quality of the training. This idea is inspired by the need for the Commission not to relinquish control over the training activities, to ensure that the European dimension of training is guaranteed and to use its resources in an economic way. In view of the high need for human and financial resources, other alternatives for the organisation of training (a specialised service of the Commission or a regulatory agency) seem not appropriate.

5. FINANCIAL CONSIDERATIONS

Based on the experience gained during the starting up phase of the training activities organised in 2006, the total cost of an annual training programme is estimated to vary between €19.8M (during the first years of training) and €13.2M, taking into account certain parameters such as the number of participants per year, the average duration of a course, and the number of participants per course. The higher cost at the onset of the training activities is explained by the expected high number of requests for participation during that period, in particular from third countries, whereby the number of trainees may reach a level of 9 000. After an initial two years, it is envisaged that there would be a reduction in the number of requests for participation.

As from 2011, with an expected number of 6 000 trainees per year, the total estimated cost for the implementation of a training programme by an executive agency is expected to be at a level of around €14 767 000. The impact assessment also indicates that an executive agency is likely to enable a training programme to be executed at a lower cost than other management formats: €15 168 000 in the case of contracts managed by the Commission, and €17 141 143 in the case of a specialised Commission service.