



The Consumer Voice in Europe

BEUC comments on the revision of the Hygiene Package following DG SANCO's presentation on 6th March

Letter sent to Mr Koen Van Dyck - Head of Unit G4 - Food,
Alert system and training – European Commission

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Contact: **Ruth Veale** – food@beuc.eu

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Dear Mr Van Dyck,

Further to the working group meeting of 6th March on the revision of the Hygiene Package and meat inspection rules, BEUC wishes to thank DG SANCO for the presentation on the state-of-play of the impact assessment on the Hygiene Package and for the opportunity to raise any points we had, both at the meeting itself and via written comments, which we would like to take up with the present letter.

Regarding the various policy options outlined at the meeting, we found it sometimes difficult – without seeing the detailed impact assessment – to understand the rationale behind the decisions that were made on the “preferred” options. In particular, we wonder whether the same criteria were examined in each case and, if so, why this was not presented at the meeting. Based on the presentation last week, the justifications appear in part inconsistent (economic impact was mentioned on some occasions, consumer perception on others) and we would welcome any clarifications the Commission may have in this respect.

Regarding the clarification of certain product definitions such as MSM, we were pleased to hear that the Commission intends on having a further look at consumer perception of these products before proposing any change that could affect products’ labels and potentially result in misleading consumers.

On the other hand, when it comes to the sensitive issue of meat inspections, we are particularly concerned about the Commission’s decision to include a proposal on delegating certain tasks (to be defined at a later stage) to slaughterhouse staff. Meat inspections are key to building and maintaining a high level of consumer trust in EU meat (which has repeatedly been damaged over the recent years, notably with the BSE crisis). As already stated in our reply to the questionnaire on the review of meat inspections (enclosed), the delegation of certain tasks to slaughterhouse staff could severely undermine consumers’ confidence in meat safety as controls would be perceived as less independent and transparent.

The public health risk associated with such delegation should also be carefully assessed (our understanding of the EFSA opinions on meat inspections is that they address the way meat inspections should be conducted to cover nowadays’ most relevant hazards, and not who should be conducting them). Consumer safety should come first and we fear that some unscrupulous operators might be tempted to put profit before public health. In any event, if at all envisioned, we firmly believe that any proposal on delegating certain tasks should only be made once the Commission is in a position to specify the exact tasks that would be concerned.

Likewise, we are concerned with the proposed “status quo” when it comes to hygiene rules applying to retail. It is increasingly common practice for retail to e.g. cut, slice and re-wrap meat that is then sold at a “self-service” counter and in that case we believe that, for the sake of consumer safety (and consistency), the specific hygiene requirements of Reg. 853/2004 should apply to retail. Granting a specific treatment to retail on the ground that it would otherwise result in increased costs (based, we understand, on limited data from the UK) also means running a risk that other operators might question the more stringent rules they are (rightly) being subjected to.

We would appreciate it very much if the above comments could still be taken into account. We would also welcome the opportunity of a meeting to discuss the above issues further (we would be grateful if you could suggest a few dates).

Looking forward to receiving your reply.

Sincerely,



Ruth Veale
Head of the Food, Health,
Environment and Safety Department



Camille Perrin
Food Policy Officer