BEUC The European Consumer Organisation

The Consumer Voice in Europe

## Response to consultation

# Food and feed safety – simplification omnibus

October 2025

## Why it matters to consumers

Food standards ensure that consumer access food and feeds that are safe. They cover a wide variety of issues ranging from additives to animal welfare considerations. Not only do they protect consumers, helping them making safe and informed choices, but they also provide trust in the EU food systems.

The European Commission's plans to reduce corporate bureaucracy and reporting standards must maintain the same consumer protection levels, ensuring EU food laws still delivers for the world's safest market.

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**Contact** | Food@beuc.eu
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**Document coordinator** | Samuele Tonello
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**BEUC, The European Consumer Organisation**
Bureau Européen des Unions de Consommateurs AISBL | Der Europäische Verbraucherverband
Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45

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BEUC, the European Consumer Organisation, thanks the Commission for the opportunity to provide feedback to this call for evidence. BEUC recognises that the Commission aims to reduce bureaucracy and support competitiveness, and stresses that this aim must not undermine consumer protection, public health, or the environment. This can be achieved by:

## BEUC RECOMMENDATIONS

### 1 Adopting a precautionary principle

Increasing efficiency and fostering simplification of regulatory processes should never come at the expense of consumer safety. Decisions taken too quickly – or without sufficient scientific assessment – risk undermining public trust in the EU food system. To reach the correct balance between simplification and consumer protection, **the precautionary principle should remain the cornerstone** of EU decision-making when regulating food and feed.

In situations of scientific uncertainty, **robust data must guarantee that consumer health is protected before moving forward with any simplification procedure**. Importantly, this assessment should be comprehensive and independent. Only in this way will it be possible that decisions follow the highest scientific rigour rather than sectorial interests.

### 2 Digital labelling cannot replace physical labelling

Labels must guarantee clear information, and effective food safety enforcement. Modernising the way consumers access product information preferably on the package but also digitally can be considered, but forms of digital labelling can only complement and not replace physical labelling. Digital labelling should function as a supplementary mechanism rather than a substitute for on-pack labelling, and it should never reduce the level of information currently available on the packaging of feed or food. Therefore, essential health, safety, environmental, and animal-welfare information **must always be present physically, in a legible and durable form**. In any case, the use of digital labels should be neutral from a data protection perspective. In particular, no tracking of the consumer should be allowed in connection with the use of digital labels.

For complementary information, digital labels must be designed in a way that makes it accessible to all users. More vulnerable groups may have limited digital skills or disabilities. If not properly designed, digital labels could exclude these users from important information, thus hindering their

freedom of choice. The same applies to consumers with limited internet access, as they will not be able to access key information about the products they are buying. At the same time**, it is important that these labels are privacy-friendly**, as transparency in food and feed safety must not come at the cost of digital surveillance or loss of user autonomy.

Policymakers should pay particular attention to the **enforcement and monitoring** of these measures. National Enforcement Bodies should have adequate resources to monitor adopted labels. Otherwise, missing or incorrect information, and data-privacy breaches could damage consumer rights.

This point is particularly relevant for Genetically Modified Microorganism (GMM) fermentation products/Genetically modified organisms (GMOs), as consumers must not lose transparency or traceability of GMOs due to definitional shortcuts. **A clear physical label is essential to guarantee that all consumers can immediately identify whether a product contains or derives from GMOs at the point of purchase**. These safeguards will guarantee transparency, informed choices, and traceability throughout the food chain, without undermining consumer trust in the EU's high safety standards.

## 3 Maintaining Bovine Spongiform Encephalopathy (BSE) surveillance

Past problems clearly showed how damaging gaps in BSE surveillance could be for consumers. For this reason, it is essential to **maintain strict monitoring, even though the current incidence is low**. It is necessary to guarantee early detection of BSE, preventing its recurrence. If BSE surveillance is reviewed, a rigorous scientific assessment should structure the process, and decisions taken only if robust evidence to move towards a simplified procedure is established.

## 4 Improving feed additives approval

Under current legislation, feed additives are subject to reassessment and reapproval every ten years, whereas no analogous systematic reapproval process exists for food additives, novel foods, or flavourings. The reapproval process is highly resource-intensive for both competent authorities and feed additive applicants. While we recognise that flexibility may be warranted, it is essential that the European regulatory framework **retains a mechanism for EFSA to reassess substances**, considering emerging scientific

evidence, without in this specific case necessitating systematic periodic reapprovals.

## 5 Upholding border control regulations

Border controls simplification must not compromise the high level of consumer protection guaranteed by EU law including food safety or traceability. Official controls play a crucial role in ensuring that only compliant and safe food enters the EU market. The proposal to allow partial clearance to reduce delays and costs for operators could create enforcement and traceability gaps. When only part of a shipment is released before all checks are completed, there is a real risk that non-compliant or contaminated products could reach consumers. Furthermore, traceability could become more difficult, as it would make it harder for authorities to trace back batches in the event of contamination, fraud, or recall.

Simplification should instead focus on **risk-based prioritisation, better use of IT systems, and improved coordination among border authorities** - not on lowering the level of control.

## 6 Checks and balances on pesticides and biocides

From a consumer perspective, a certain degree of innovation is necessary. For instance, regarding obsolete pesticide substances, extending the timeframe for subsequent reapprovals of newer substances could be accepted if necessary to ensure thorough reassessment of older ones. Moreover, there could be potential consumer interest in new and better pesticides.

However, new classes of pesticides, including biopesticides, must undergo a strict risk assessment responding to a high level of scientific rigour. Any procedure streamlining for plant protection products or biocides must continue to guarantee **full, independent, and transparent risk assessment of active substances, including their cumulative and long-term effects**. For example, the designation “bio” does not automatically obviate potential hazards to humans, animals, or the environment. Equally, **no simplification should weaken maximum residue levels (MRLs) regulations**, as this would introduce ambiguity that would eventually reduce consumer safety and protection.

Given pesticides and biocides’ technical complexity, a specialist expertise is indispensable to identify regulatory efficiencies without compromising safety or environmental standards. Simplification should not be a backdoor

to prolonging corporate control over safety data, which means that any extension of data protection periods must not compromise public access to safety studies. On the contrary, the EU should **strengthen transparency obligations, ensuring that safety dossiers are proactively published in user-friendly databases where civil society and academia can scrutinise them**.

Finally, allowing pesticide application by drones can only be acceptable if accompanied by strict safeguards to prevent drift, ensure traceability, and guarantee that consumer and environmental exposure is reduced.

## 7 Guaranteeing Animal Welfare

Consumers expect robust animal welfare protections. Any simplification should ensure that existing high standards are upheld and not diluted. In this regard, reporting obligations provide transparency and public accountability, so they should not be framed as "burdensome reporting". Removing these obligations could cause less oversight into animal welfare at slaughter.

Annual reports on depopulation operations provide critical information about animal health and welfare practices and are beneficial. If these reports are no longer submitted, consumers and public watchdogs may lack insight into how and why animals are being culled, which reduces accountability. Authorities use these reports to track trends in depopulation, assessing compliance with animal welfare and disease control regulations. Without this data, authorities would find it more difficult to identify systemic issues such as welfare problems or any mismanagement of disease outbreak.

**Consumers trust that the food they consume is safe. Reporting and monitoring provide a crucial guarantee to maintain this**. Given that depopulation operations often occur in response to outbreaks, limiting the reporting would make trends in animal health less visible, which could in turn delay authorities' ability to detect risks to food safety.

Finally, consumers care about how animals are treated. Removing this reporting would limit their opportunity to know about animal welfare, which would decrease trust in the system.

# Conclusion

While simplification may reduce  administration for some commercial actors, many of the rules currently in place, including reporting obligations and operational safeguards, are essential consumer protections. BEUC calls on the European Commission to uphold the precautionary principle, ensuring that any changes to the regulatory framework prioritise consumer protection over economic convenience for other stakeholders. Therefore, any safeguards or reporting requirements reduction should be considered only if scientific evidence can demonstrate beyond doubt that it will not adversely affect consumer health, environmental sustainability, animal welfare, and food.