

Brussels, 1st February 2018
UECBV Ref: 12803

Draft COMMISSION IMPLEMENTING REGULATION (EU) .../... laying down rules for the application of Article 26(3) of Regulation (EU) N° 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers, as regards the rules for indicating the country of origin or place of provenance of the primary ingredient of a food where different to that given for that food

UECBV Position

For UECBV, also a member of CELCAA, it is crucial that the EU single market is protected against any national protectionism attempt. Therefore, we welcome this draft Implementing Act in view to harmonize the practices around voluntary origin labelling.

We understood that one of the aims of the draft will be to replace national schemes by this EU system. UECBV supports strongly this aim. It considers that the draft should expressly preclude the possibility of such co-existence between current (and even future) Member State mandatory COOL measures, and the voluntary EU COOL regime the EC is proposing. At least an assessment on its effect on discouraging (or not) national schemes, should be foreseen.

In addition, UECBV would like to make the following more specific comments:

- Identification mark: Recital 9 says that identification marks should not be considered as an indication of the country of origin. There is nothing about that in the Articles.
- Customary and generic names containing geographical indications: Recital 8 says that those should not be covered by this Regulation – also not mentioned in the Articles.
- Article 2: the Article leaves out the possibility that some parts of the primary ingredient may come from the named area and some may not. That case should also be included in the possible declarations.
- Article 4 on transition period stipulates that the new provisions should apply as from 1st April 2019. Traders of EU agri-food products unanimously call for a longer transition period. Food Business Operators (FBO) need a longer period of time to be able to introduce and roll in the labelling changes throughout their operations, at an affordable cost. Therefore, UECBV calls for a transition period of two years.
- On Article 3 on the presentation of information, UECBV believes that the provisions for the font size for the indication of the origin or provenance of the primary ingredient should be the same as for all other mandatory particulars and foreseen in Article 13 of Regulation 1169/2011.

The **European Livestock and Meat Trades Union (UECBV)**, founded in 1952, is the EU voice of national federations representing livestock markets, livestock traders (cattle, horses, sheep, pigs), meat traders (beef, horsemeat, sheepmeat, pigmeat), and meat industry (slaughterhouses, cutting plants and meat preparation plants).

Brought together within the UECBV are:

- ✚ an international association i.e. the **European Association of Livestock Markets (AEMB)**;
- ✚ a **Young European Meat Committee (YEMCo)**;
- ✚ the **European Natural Sausage Casings Association (ENSCA)**
- ✚ the **Organisation of European Shippers (OCEAN)**
- ✚ fifty-three national or regional federations in twenty-four of the twenty-eight Member States of the European Union, as well as Japan, Norway, Russia, Switzerland, Turkey and Ukraine.

In total, some 20,000 firms of all sizes and 230,000 jobs are represented within the UECBV through its national member federations.

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