



**Fecc**  
EUROPEAN ASSOCIATION OF  
CHEMICAL DISTRIBUTORS

# EU Consultation: Food safety - amended rules on food fraud controls

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European Association of Chemical Distributors (Fecc)

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[www.fecc.org](http://www.fecc.org)

Fecc acknowledges the consultation to amend [Regulation \(EU\) No 2019/1715](#) on the integrated management system for official controls (IMSOC). Fecc would like to raise the following points in this consultation:

**1. On the Trade Control and Expert System for exchanging data, information and documents ('TRACES')** - Fecc welcomes the continued approach of the Commission and the national competent authorities to examine data submitted by interested business operators, provided that it is in accordance with the following premises of the articles of this regulation:

- [Article 134 thereof, section 1](#) - That the national competent authorities will ensure the notification to other member states without undue delay, as stipulated in Article 21 on (Fraud notifications). Operators should also be provided a reasonable time period for data collection and reporting for food products under notification.
- [Article 134 thereof, section 5](#) - We support the initiative to be included in implementing regulation (EU) 2019/1715, with respect to the links that are necessary between the Animal Diseases Alert (ADIS) system and TRACES. This is in view of ensuring that relevant data concerning union notifications are automatically exchanged or made available in both systems, and providing relevant information to network members.

**2. On the Animal Diseases Alert (ADIS) system** - Fecc supports the Article 29 amendments and we encourage the Commission to take into account the following:

- [Article 29a](#) - We support the 29a amendment that that personal data from union notifications and union reports referred to in Article 29(1) will be stored in ADIS for no more than 10 years, provided that it complies with [Article 5\(1\)\(e\)](#) of the Directive 95/46/EC (General Data Protection Regulation)
- [Article 29b](#) - With regards to contingency arrangements, we support the amendment that where ADIS is unavailable, the ADIS network contact points shall submit the data and information concerning union notifications and union reports referred to in Article 29(1) via email or by other means specified on the Commission's website.

**3. On the issuance of electronic certificates for consignments** - Fecc also seeks that the Commission to provide clear recommendations in terms of action points in the event that a third country's or an international organisation's electronic certification system is not compatible with that of TRACES, or is not GDPR compliant.

As the association that represents food and food ingredient distributors, most of which are SMEs, we believe that food safety and a sound regulatory framework go hand-in-hand. We would be happy to engage further with the Commission in the pursuit of sustainable, future-oriented solutions in this area.

To access the Fecc's response on the EU Commission's website, please click [here](#).