



Fecc
EUROPEAN ASSOCIATION OF
CHEMICAL DISTRIBUTORS

EU Consultation: Sustainable EU Food systems

European Association of Chemical Distributors (Fecc)
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Fecc acknowledges the consultation for the upcoming initiative on Sustainable EU Food systems ([link](#)). At the same time, we would like to raise the following points in this consultation:

1. Food safety and sustainability must go hand-in-hand: In line with the objectives of the farm to fork strategy, we urge the Commission to put food safety and a science-based approach at the forefront of the sustainable food system initiative. This should be based on the successes and lessons learnt from the general food law's implementation. Food safety should never be jeopardised and the outstanding progress made in this area. Thanks to the collaboration of all essential supply chain actors must be preserved. As previously discussed in the Fecc feedback on the TRACES database, for example ([link](#)), competent national authorities must ensure a reasonable period for implementing food safety and sustainability regulations.

2. A clear definition of the roadmap is paramount to ensure optimal implementation: At the moment, the divergences in understanding and consensus on what defines a sustainable food system within and outside the EU result in unaligned views regarding regulation implementation. As a result, companies that operate in more than one country within the EU may need various implementation plans to reduce food waste during food production and distribution.

Vital information exchanged through Rapid Alert System for Food and Feed (RASFF) have resulted in products being recalled from the market, and rightfully so. A robust system, which has matured over the years, RASFF continues to show its value to ensure food safety in the EU and beyond.

However, despite establishing the RASFF, the approach on food recalls from third countries differs from each Member State. Some countries carry out direct disposal, while others maintain possibilities for a non-food utilisation or are given the option to bring it back to either the supplier or third countries with different thresholds. We request the Commission also consider streamlining the process for food recalls and ensuring that implementation is aligned across all Member States.

3. The role of the industry in this initiative must be clearly defined and supported. Fecc advocates for a long-term supply chain and business model that is robust and resilient. The EU and other national governments currently offer various incentives for "green initiatives," particularly for academic stakeholders and start-ups. Community support must embrace a broader sector of the industry to ensure that mass-produced sustainable products are valued. Due to overlapping requirements, the expense to producers and distributors is a major concern for the European food and feed wholesale sector. Fecc requests the Commission to consider the effects of these overlaps on the level playing field for industry, for SMEs, with the target to clear them to reduce complexity in line with the Commission's Better Regulation agenda.

As the association representing food and 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 to pursue sustainable, future-oriented solutions in this area.

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