

10 May 2007

**UEAPME position on the  
Draft Instrument 7371/07 and ADDS 1-4 of 14 March 2007**

**Food Safety: Risk-Based 'HACCP' Requirement for Micro-Businesses**

- UEAPME welcomes in principle the Commission proposal to amend the Hygiene of Foodstuffs Regulation (EC) No 852/2004.
- UEAPME fully agrees with the Commission's explanatory memorandum, where it states that the HACCP requirement leads to unnecessary administration burdens and is needlessly time consuming. Because of the diversity of small food businesses it is inappropriate to have a "procrustean approach" to HACCP.
- UEAPME was able to contribute to the extremely helpful "GUIDANCE DOCUMENT on certain key questions related to the practicalities of compliance with the new rules on food hygiene and official food controls", issued by the European Commission on 29 June 2005.
- UEAPME sees the need for a flexible approach to HACCP for small businesses, but we believe that this flexibility should not be limited to micro enterprises. The definition of a micro business does not fit to the reality of the European food producing businesses, where 16-19 people may be employed in a low risk operation, like retailing pre-packed goods and 2-3 in a high risk procedure, like making meat pies. The definition used is too crude.
- This step is not enough to allow for the reality and the needs of the European food producing businesses. UEAPME demands an extension to businesses, which employ up to 19 employees.
- UEAPME would very much welcome the exemption based on the risk on the grounds that it could reduce the level of clerical and bureaucratic burden upon small food businesses.
- Exemptions cannot only be granted to micro enterprises. This would lead to a significant competitive disadvantage for typical small enterprises in the European food business.