



**Independent
Retail Europe**

**INITIATIVE AMENDING THE ANNEXES TO REGULATION (EC)
No 852/2004 ON THE HYGIENE OF FOODSTUFFS AS
REGARDS FOOD ALLERGEN MANAGEMENT, REDISTRIBUTION
OF FOOD AND FOOD SAFETY CULTURE
- COMMENTS OF INDEPENDENT RETAIL EUROPE -**

5 AUGUST 2020



COMMENTS OF INDEPENDENT RETAIL EUROPE

Independent Retail Europe represents groups of independent retailers. These groups are usually organised as business cooperatives, i.e. the retailers are operating under one brand name while maintaining their independence as individual businesses. Members of a group can assist each other, engage in joint purchases of goods and services to achieve economies of scale and steer the management of the group in a cooperative manner. This way, individual retail entrepreneurs are able to grow their businesses and compete with large integrated chains on the market. The consumer is the ultimate beneficiary as this widens consumer choice, leading to lower prices. What is more, small independent retailers are characterised by their “local touch” and can directly respond to the specific needs of their consumers, e.g. by integrating regional products into their range.

We welcome the draft legislation to clarify EU rules on food safety, allergies & food waste. However, we would like to make two points that regard the phrasing of the new section on “food safety culture”.

The new Chapter XIa in Annex II asks “management and all employees” of food business operators to commit to an appropriate “food safety culture” which includes a clear distribution of responsibilities, continuous controls, appropriate training and supervision etc.

While we find this commitment laudable, we consider this rather *soft* term to be somewhat ambiguous, and propose to make a reference to the fact that this commitment is linked to the proper implementation of the Hazard Analysis and Critical Control Points (HAACP) requirements. Putting in place a culture of food safety is more important than ever in the time of COVID-19, but it should be based in concrete measures such as ensuring that appropriate resources are spent on the cleaning and the preparation of stores during regular working hours.

Furthermore, the text states that “the implementation of the food safety culture shall take account of the nature and size of the food business”. We consider that this wording may be interpreted as allowing for a less ambitious level of food safety commitment for smaller food businesses. We, therefore, suggest rephrasing the wording to clarify that this sentence is mirroring the flexibility built in the HACCP framework for smaller food business operators (so that the measures to implement this commitment can be tailored to the size of the operator or to the nature of its activities), but that it does not mean that the commitment to food safety culture can be lower. The commitment to food safety should be the same for all operators – from hypermarkets to farmers’ markets.

- rephrase the passage on the “**food safety culture**” and include a **link to the HAACP**;
- adjust the wording regarding small food businesses to clarify that the **measures to implement the food safety culture** – but not their **commitment** – can be tailored to the size and nature of the activities of an operator.

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*Established in 1963, **Independent Retail Europe** (formerly UGAL – the Union of groups of independent retailers of Europe) is the European association that acts as an umbrella organisation for the main groups of independent retailers in the food and non-food sectors.*

Independent Retail Europe represents retail groups characterised by the provision of a support network to independent SME retail entrepreneurs; joint purchasing of goods and services to attain efficiencies and economies of scale, as well as respect for the independent character of the individual retailer.

Our members are groups of independent retailers, associations representing them as well as wider service organizations built to support independent retailers.

Independent Retail Europe represents 25 groups and their 380,980 independent retailers, who manage more than 757,000 sales outlets, with a combined retail turnover of more than 971 billion euros and generating a combined wholesale turnover of 291 billion euros. This represents a total employment of more than 6,486,000 persons.

More information about Independent Retail Europe at <http://www.independentretailleurope.eu>