

European Economic and Social Committee Hygiene Rules and Artisanal Food Processors

Alan Lacey represented The Society at a meeting held on 15th September to consider a report by the Section for Agriculture, Rural Development and the Environment on the impact of new hygiene legislation on artisanal food producers. The draft report had already been discussed at a public meeting

Main outcomes of the discussion were as follows

* There was considerable debate about the meaning of the term "artisanal" - while there was general agreement that essentially it would cover "traditional" food production the Spanish contingent suggested that some cheeses were produced to traditional recipes and processes in large factories. There was general consensus that the term covered small businesses producing limited amounts of product to traditional methods.

A point of interest here is that many TSOs would consider that use of the term traditional should prevent the use of any ingredient or process even if it increased product safety.

There was a great deal of emphasis on farmers and butchers who traditionally slaughtered animals in small numbers and then processed the meat in some way and there was reference to the large number of such producers in Germany.

* One of the main strands of the debate had been that social, economic and cultural issues should be given due consideration. However while it was agreed that while it was important that traditional food products and production methods should be retained if there was ongoing demand, public health and food safety must remain the most important consideration.

* The committee made an assertion that EU legislation was not to be interpreted as too prescriptive and that it was up to Member States to implement local legislation that was flexible enough to ensure that small enterprises were not unfairly disadvantaged while having regard to the overall spirit of EU decisions to ensure food safety.

* It was suggested that it was unreasonable to apply the same standards of, for instance temperature control, that would be essential in mass production of foodstuffs to a small producer with entirely different levels of production volume and distribution. Once again the principle of appropriate measures to protect public health should apply.

* There was a general comment that some local enforcement agencies established standards for procedures and documentation for ease of enforcement rather than any identifiable need in respect of food safety. This point was made most forcibly by the British representative on the Committee.

With a few minor amendments the draft report was accepted and the committee will meet again on November 9th. The rationale of *appropriate* controls for small businesses which do not place an excessive practical and commercial burden on them is an important one for the Society's membership.

I suggest that while there is no great necessity to be actively involved, the progress of the report should be monitored closely

Alan Lacey
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