



**POSITION PAPER ON QUALITY AND LABELLING –  
RESEARCH AND INNOVATION – MEETING OF THE HIGH LEVEL EXPERT GROUP  
ON MILK – 16 MARCH 2010**

**1) Marketing standards for dairy products**

From the point of view of Eucolait, the current marketing standards for milk and dairy products have proven to work well and should consequently be maintained. Marketing standards in general promote the production and trade of uniform high quality products. The provisions contained in Annexes XII, XIII and XV of the single CMO and for instance in directives 2001/114 and 83/417 laying down conditions on the placing on the market of respectively preserved milk and lactoproteins, provide a level playing field for European traders and producers whilst guaranteeing an effective functioning of the internal market and promoting transparency. Additionally, the reserved terms for milk products ensure that consumers are not misled by imitation products. Where necessary, existing standards may be modernised or new standards set up. However, in view of the growing global economic integration we feel that all future standards should be as far as possible in line with international standards such as the standards developed by the Codex Alimentarius Commission.

Concerning the enforcement of marketing standards, there is room for improvement in the accurate labelling of imitation products. For example, cheese analogues in which dairy ingredients are wholly or partially replaced by non-milk based alternatives should not be sold as cheese.

**2) Origin and place of farming**

In line with our position on marketing standards, Eucolait is satisfied with the current rules on labelling of origin. We firmly believe that the indication of the place of farming and/or country of origin should remain voluntary in the future. It is the responsibility of food business operators to respond to possible consumer demands.

Our opinion is that any form of mandatory origin labelling is contrary to the spirit of the single market and the principle of free movement of goods. Such measures constitute a step backwards towards national markets and are to be seen as a form of “food nationalism”. The precise origin of a food produced within EU borders should neither be seen as a quality, nor as a safety trait unless the product is subject to one of the EU quality schemes.

We are particularly opposed to so-called place of farming labelling which requires the indication of the place of provenance of primary products or ingredients. Especially the obligation to label the provenance of individual (main-) ingredients of a multi-ingredient food would cause severe operational difficulties and substantially increase administrative burden. Companies can process and mix milk deriving from different countries and the origin of an ingredient can change from one day to the other subject to availability and seasonal fluctuations. It would make no sense to change the label each time this happens. It goes without saying that this problem would be amplified if not only the country but the region of production was requested, as currently promoted by certain Members of the European Parliament. Place of farming labelling at regional level would also undermine the benefits of

the PDO and PGI schemes as consumers might confuse the protected designations with simple information on provenance.

Thorough studies and impact assessments should be carried out before introducing any mandatory requirements. There is no actual evidence that a significant part of consumers sees origin as important information. In particular for food ingredients this is very doubtful. If there was substantial consumer demand in this regard, market players would have taken it into account to a wider extent until now.

If origin labelling was to be made mandatory, we would certainly prefer that origin refers to the site of last substantial processing, not the place of farming. As regards the geographical level, a simple distinction between EU and non-EU would be the most preferable option although we fear that this would lead to more detailed requirements in the future. Similarly, national level would be better than regional level. The worst case scenario would be to open the door to national initiatives in this field, as put forward recently by Greece and Italy in particular. That would be very detrimental to the internal market. Finally, origin labelling should preferably be dealt with separately in each sector. A horizontal solution in the context of the food information proposal would make it harder to take into account particularities of the nevertheless very different product categories falling under the scope of the provision.

### **3) Research and innovation**

Innovative products have a key function in boosting the competitiveness of the European dairy sector. More specifically, innovation is important for dairy trade as it offers the possibility to fulfil the requirements of customers by delivering tailor-made ingredients such as milk protein concentrates.

The competitiveness of the EU dairy sector should not only be assessed with regard to third country competitors. Continuous research and innovation also have crucial role in ensuring that we remain competitive with other sectors.

To encourage innovation, the regulatory framework at EU level should refrain from creating additional barriers to products that already comply with food safety rules and marketing standards. In this respect, we see nutrient profiles and colour coding (traffic lights) as oversimplified instruments which can limit innovation and even mislead the consumer. The envisaged categorisation is so broad that there are often no incentives to improve product qualities. If for instance light butter receives the same red on the label as standard butter, there is little interest to reformulate. Similarly, we see nutrient profiles as arbitrary political thresholds which cannot take into account the variety of foodstuffs and would prevent many dairy products important for a balanced diet from making health and nutrition claims. If profiles are set, dairy products should at least have specific nutrient profiles as recommended by EFSA.