13.10.2025

Finnish Food and Drink Industries' Federation welcomes the opportunity to provide feedback.

To simplify food safety legislation, a comprehensive approach is needed—one that promotes competitiveness, innovation, and investment across the European food chain. Key elements include realistic risk assessment, clear and consistent regulations, flexibility, and thorough impact evaluation.

EU-wide harmonized regulations and guidelines should be prioritized over fragmented national rules. New legislation should be based on solid scientific evidence, add clear value, support the internal market, and avoid unnecessary administrative burdens or barriers to innovation.

Feed labelling: There is a need for an EU-wide approach to digital labelling as a complementary mean to provide mandatory product information to consumers and in B2B-sales through digital means. This applies to both food and feed labelling, in particular for multilingual labels for products marketed in several Member States. For feed additives and premixtures, for example, the amount of information that the legislation requires to be put on the label is excessive. Labelling in a digital form like a QR-code would significantly reduce the burden on operators.

Coordinated EU-level response is necessary in crisis to permit temporary flexibility in food labelling, while still ensuring food safety. Such flexibility should involve allowing changes in ingredient lists and origin labels, reflecting the need to adapt quickly to shifting sources of supply. The EU should also issue guidance on effective ways to communicate these differences in product composition or characteristics to consumers, for example by using digital resources like websites, electronic labels, or digital shelves, as well as through retailers—whether at the point of sale, with signage in or outside stores, or via online shops.

Pesticide Residues (Regulation 396/2005): The term "pesticide residues" should be limited to residues originating from plant protection products, in alignment with Regulation 1107/2009. Substances with multiple sources should be regulated under contaminants legislation when more suitable. Harvest seasons should be considered in setting transition periods. Products legally produced under previous rules should be allowed to be sold until the end of their shelf life to help prevent unnecessary food waste. Risk assessments should reflect the real levels of residues found in food, rather than relying solely on maximum residue limits (MRLs), which may not represent current exposure due to degradation over time.

TSE-(Regulation 999/2001): EU should harmonise its legislation with the WOAH Terrestrial Animal Health Code (TAHC). The Commission should proceed with the following relaxations of EU-legislation:

1. The current volume of BSE testing (nearly 1,000,000 tests annually in the EU, ~10,000 in Finland) is not proportionate to the risk based on the current disease status. Testing could be limited only to cattle showing clinical symptoms (as per WOAH TAHC).

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2. The definition of specified risk material should be reviewed, especially for Member States with negligible BSE risk. In addition, the categorization of specific risk material as category 1 material should be reviewed since upholding the status quo is not sustainable but very cost intensive. If this alignment is implemented, the volume of by-products classified as BSE risk material in countries with negligible BSE risk (which includes nearly all European countries) would decrease significantly. This would open the possibility of allowing the use of bovine protein in feed, organic fertilizers and soil improvers., which—except for special cases—is currently prohibited under BSE legislation. The internal EU ban also prevents exports to third countries.

A reasonable transition period should be provided for the potential change.

In addition to the topics covered in this consultation, other simplification needs should be addressed (see appendix below).

ANNEX

Food and feed safety – simplification omnibus

Finnish Food and Drink Industries' Federation welcomes the opportunity to provide feedback to the European Commission on the simplification of food and feed safety legislation.

Contaminants (Regulation 2023/915)

Contaminants should be regulated either in raw materials or in finished products, but not in both simultaneously. Regulating both simultaneously creates unnecessary administrative burden and may lead to conflicting situations. Maximum levels (MLs) should only be set once reliable and validated analytical methods are widely available. Products that were legally produced before new limits should be allowed to remain on the market until the end of their shelf life and a standard two-year transitional period is proposed for composite products to help prevent unnecessary food waste. The process for submitting data to EFSA should be simplified, and datasets must be representative across the EU. At the moment small companies are unable to submit data because of limited resources and know-how.

Food Information to Consumers (Regulation 1169/2011)

- Salt substitutes – Annex VII, Part B: A more consumer-friendly labelling approach could facilitate the reduction of sodium content in foods. Similarly, in Part E of the annex, a simplified label "iodized salt" would be a more understandable expression for consumers.
- Providing food information by means other than "on the package" or "on the label" – Article 12(3): The European Commission should explore new ways to provide information to consumers through digital means.
- Conversion factors for vitamins and minerals – Article 31(2): Conversion factors for vitamins should be harmonized at the EU level.
- Precautionary allergen labelling – Article 36(3)(a): The European Commission must harmonize the application of allergen labelling.
- When developing the enzyme list, it must be ensured that enzymes are labelled in a simple and functional way when required by law. The use of the word "enzyme" as a generic term increases clarity and consistency for consumers. Food business operators should also be able to use specific names when necessary (for example, when consumers are familiar with certain generic names, such as rennet or lactase).
- Hydrogenation was previously required to be declared when partially hydrogenated fats with high trans fat content were used. The EU regulated in 2019 that the amount of trans fats may

be a maximum of 2%, but still, full hydrogenation (fully hydrogenated) must be declared. Since there is now a limit for trans fats, the labelling requirement for hydrogenated fats could be removed.

- ANNEX III, Foods for which the labelling must include one or more additional particulars. 5. Foods with added phytosterols, phytosterol esters, phytostanols or phytostanol esters: The additional labelling requirements need to be revised. They are too extensive, outdated, and in some parts, overlap with Regulation No. 1924/2006 on Nutrition and Health Claims made on foods. The labelling requirements from FIC put foods with added phytosterols, phytosterol esters, phytostanols, or phytostanol esters in a disadvantageous position compared to other food products carrying health claims. Further, fitting all the text on small packages is very difficult.

Nutrition and Health Claims (Regulation 1924/2006)

- ANNEX 1: The use of a nutrition claim for reduced nutrient content (e.g., sugar) requires that the product contains at least 30% less sugar (or 25% less in the case of salt) and that the energy content of the product is either the same or less than the average content of comparable products on the market. Such a strict requirement hinders product development towards healthier alternatives, as changes must be made gradually due to consumer acceptance. Additionally, in situations where reformulation has been ongoing for a long time, making such large reductions becomes increasingly difficult. Companies should have the opportunity to communicate smaller but meaningful changes in nutritional content to consumers. This would serve as a strong incentive for innovation across the EU food industry and would also improve public health.
- The regulation should be revised so that the approval process for new health claims is accelerated to promote product reformulation.
- The use of general health claims should be permitted, ensuring that widely accepted and scientifically substantiated health messages can be effectively communicated to the public.
- The wording of health claims should be made more understandable for the average consumer. The approval process for health claims should be made more transparent, and approvals and rejections should be carefully justified.

Food improvement agents (Regulation 1333/2008), detailed descriptions of food groups, Commission guidance

The current additive legislation does not adequately take into account plant-based protein products. The raw materials of plant-based protein products have a high microbiological load, and the processing steps allow for microbial growth. As it stands, additive legislation significantly hinders product development and innovation. At the same time, there is increasing

pressure to use more plant-based products. From a food safety perspective, plant-based protein products should be treated in additive legislation in the same way as milk and meat products. The descriptions of food groups and Regulation (EC) 1333/2008 should be updated in this respect to enable product innovation.

The EU novel food legislation should be developed to fully support innovation

For example, production trials in a controlled environment (a so-called *regulatory sandbox*) should be permitted. Additionally, the data and testing requirements of the Novel Food Regulation should be reviewed for simplification opportunities—particularly when the production is based on an existing method (e.g. fermentation or enzyme use).

Approvals granted elsewhere in the world should be taken into account. If a product has been approved for markets such as the United States or Singapore, this should facilitate the novel food application process in the EU.

Minimum food safety requirements should be defined, and a trial period for new products should be allowed, along with the possibility of withdrawal if necessary. The list of required safety data has expanded significantly compared to earlier practices.

Crisis mechanism

A toolbox to address exceptional situations and perturbations should be developed, including e.g. temporary derogations in maximum residue levels (MRLs), maximum levels (MLs) and labelling requirements.

Finnish Food and Drink Industries' Federation represents 250 Finnish food companies and most of the food industry's production in Finland. The members cover all food industry sectors ranging from dairy, meat, beverages, and bakery to processed fruits and vegetables, oils and fats, grain mill, animal feeds and fish products.