



Critical impact of guidelines foreseen under Reg. (EC) 1831/2003 on innovation potential of Feed industry and on animal production in Europe

During a meeting in February 2006, we drew EC's attention to the critical impact of the guidelines foreseen under Regulation 1831/2003 on the innovation potential of the Feed industry and on animal production in Europe.

The Commission tabled a proposal to the Standing Committee and we now enter the most critical phase of the decision process. Although progress was made, the document under consideration is still flawed to a high degree.

The continuous exchange of views between industry and the Commission on the guidelines proposal up to now provides a good illustration of the "Healthy Democracy Process". This dialogue must be continued in this critical phase, particularly given the complexity of the issue.

We have highlighted to your services the most important elements that threaten the EU Feed industry (copy of our last input attached), but to date there has not been adequate resolution.

We in particular miss a real in depth exchange of views with the working group of the Standing Committee which is involved in a decision-making process, which is so far partly divorced from the information upon which it should be based.

While timeliness of decision-making is important, the degree of urgency of the issue does not justify putting aside proper reflection and consultation in order to assure the proposal is sound, proportionate and simple to implement.

We should like some EC's intervention in order to enable us

- to have direct contact and discussion with the Standing Committee to resolve the most threatening points, under adequate time scale.
- to have these aspects properly tackled in the next Commission guideline proposal from the risk management point of view.