



## Joint Statement:

**The EU must not change the comitology system to the detriment of innovation and the single market**

13 February 2017










**We, European Associations representing a wide number of economic sectors affected directly or indirectly by comitology rules, consider that science-based decisions must be central to comitology to allow for legal and regulatory certainty in the EU.**




Therefore, we urge the EU Commission:

- to ensure proper and efficient implementation of existing EU legislation on comitology and improve legal certainty and predictability thus increasing the confidence of economic sectors in the EU system and allowing a better functioning of the single market and access of economic operators all along the chains to innovative products;
- to keep science-based decision-making as a fundamental aspect of the areas ruled by comitology;
- to consider the impact that moving away from a science-based system would have on research, innovation and investment in Europe;
- to avoid any additional complexity in the comitology system that would risk increasing the number of steps required before a final decision is taken.

We fully agree with President Juncker that *“Jobs, growth and investment will only return to Europe if we create the right regulatory environment and promote a climate of entrepreneurship and job creation. We must not stifle innovation and competitiveness with too prescriptive and too detailed regulations (...)”*.

**For this very reason, we need decision-making processes based on the best available science to promote growth, innovation, investment as well as consumer confidence and safety in the EU. Comitology rules have the potential to ensure the proper functioning of the EU internal market, and to boost innovation, jobs and growth.**

<p><b>AESGP</b> The Association of the European Self– Medication Industry represents the manufacturers of food supplements, non-prescription medicines and self-care medical devices all over Europe.</p>	
<p><b>AMFEP</b> The Association of Manufacturers and Formulators of Enzyme Products.</p>	
<p><b>AVEC</b> a.v.e.c. represents the European poultry meat business that is producing and trading poultry meat. More than 300,000 citizens are employed in the sector with a turnover of more than 32 billion Euros.</p>	
<p><b>CELCAA</b> The European Liaison Committee for Agricultural and Agri-Food Trade, is the umbrella organisation representing at European level associations and companies active in the sector of agricultural and agri-food trading.</p>	
<p><b>COCERAL</b> The European association representing the trade in cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply. COCERAL is the voice of collectors, distributors, exporters, importers and agribulk storers of the above mentioned commodities.</p>	
<p><b>COPA-COGECA</b> The united voice of farmers and their cooperatives in the European Union. COPA – representing over 23 million farmers and their families and COGECA – representing over 22.000 European agri-cooperatives speak with the same voice through a common Secretariat in Brussels.</p>	
<p><b>ECPA</b> The European Crop Protection Association represents the crop protection industry in Europe.</p>	
<p><b>EDE</b> Energy Drinks Europe (EDE) is an association that represents the interests of European producers of energy drinks.</p>	
<p><b>EFFA</b> The European Flavour Association represents flavouring companies that manufacture or blend flavours within the countries of the European Economic Area, comprising national associations from across the European Union, the European Free Trade Association (EFTA) as well as those countries that have applied for EU-membership.</p>	

<p><b>EMFEMA</b></p> <p>The European Manufacturers of Feed Minerals Association groups EU-located producers of minerals, trace element compounds and specific minerals for use in animal nutrition.</p>	
<p><b>ESA</b></p> <p>The European Seed Association is the voice of the European seed industry, representing those active in research, breeding, production and marketing of seeds.</p>	
<p><b>EuropaBio</b></p> <p>The European Association for Bio-industries represents the biotechnology industry in agriculture (seeds), pharmaceuticals and industrial biotech.</p>	
<p><b>EUVEPRO</b></p> <p>EUVEPRO is the European Vegetable Protein Association, representing the interests of manufacturers and distributors of vegetable proteins for human consumption (food) in the European Union.</p>	
<p><b>FEDIOL</b></p> <p>FEDIOL, the EU vegetable oil and proteinmeal industry association, represents the interests of the European seed and bean crushers, meal producers, vegetable oils producers, refiners and bottlers.</p>	
<p><b>FEFAC</b></p> <p>The European Feed Manufacturers' Federation is the voice of the European feed industry.</p>	
<p><b>FEFANA</b></p> <p>The EU Association of Specialty Feed Ingredients and their Mixtures represents manufacturers and traders of feed additives, functional feed ingredients, premixes and other mixtures of specialty ingredients.</p>	
<p><b>IFAH-Europe</b></p> <p>International Federation of Animal Health - Europe is the voice of manufacturers of veterinary medicines, vaccines and other animal health products in Europe.</p>	
<p><b>UECBV</b></p> <p>The European Livestock and Meat Trades Union (UECBV) represents national federations of livestock traders, meat industry, and meat traders. Through its 52 national member federations, UECBV is the voice for some 20,000 trading and industrial companies.</p>	