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EUROPEAN ASSOCIATION RECOGNISED BY ROYAL DECREE

HOTREC
Hotels, Restaurants & Cafés in Europe

L-1003-129-EB

By courier and e-mail

Mr. Coleman Robert
Director General
Health and Consumer Protection
DG SANCO
European Commission
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CC:

Ms. Testori Coggi Paola, Director
Directorate D “Food safety: production and distribution chain”

Mr. Deboyser Patrick, Head of Unit
Unit “Food law and Biotechnology”

Ms. Venes Maria, National Expert
Unit “Food law and Biotechnology”

Brussels, 23 October 2003

RE: Revision of Regulation 1760/2000 on beef labelling

Dear Sir,

HOTREC, Hotels, Restaurants and Cafés in Europe¹, understands that DG SANCO is presently reviewing a report prepared by DG Agriculture on the possible extension of Regulation 1760/2000 to cover beef products served by restaurants.

At its last meeting in September, the HOTREC Working Group on food related matters reviewed the discussion paper of 7 May 2003 by the DG AGRI experts working group and were pleased to note that they suggested that the Regulation was not to be extended to the food service sector, given the difficulties that the application of such labelling rules to restaurants would entail.

¹ HOTREC is the spokesperson of hotels, restaurants and cafés at European institutional level in all matters affecting the sector. HOTREC projects the voice of hotels, restaurants and cafés in the European Union, an industry that boasts 1,5 million businesses and provides 6 million jobs in the EU alone. HOTREC brings together 34 National Trade and Employer Associations representing the interest of the sector in 20 different European countries.

We would like to draw your attention to the serious difficulties that such extension would cause for restaurants. In the simplest case, where the country of birth, fattening and slaughter is the same, the mention of “origin” would have to be indicated in relation to each dish composed of beef. In the case where the countries of birth, fattening and slaughter differ, all three elements would have to be mentioned.

This would be unworkable with menu-cards, which would need to be re-written/re-printed every time one of the three elements mentioned above varied. Many restaurants do not use single sources of supply and the labelling requirements could change on a daily basis. To change or alter menu-cards in such case would be almost impossible. Beyond the cost element, these requirements would also make menu-cards overly complicated and, therefore, much less attractive for the customers.

Most restaurant customers are seeking a leisure experience that goes beyond simply buying food. They want to enjoy a good meal, presented in an attractive way, in an appealing atmosphere as part of an enjoyable social experience. A well-presented menu-card contributes to this experience. Masses of statutory information does not appeal to the customer.

We would also add that our members report that there is very little demand from customers for such information. Where a customer requests specific information on the composition of a dish, the staff or the chef are available to explain what foodstuffs are used.

We include for your further information a leaflet entitled “*Restaurants serve meals; retailers sell food*”, recently issued by EMRA, FERCO and HOTREC which addresses the issue of labelling in the catering sector.

HOTREC would be very much opposed to the extension of mandatory beef labelling into the restaurant sector where it would be unnecessary, overly bureaucratic and unhelpful. We would very much appreciate being informed of and being kept involved in the development of any measures relating to labelling of foodstuffs in restaurants.

Yours sincerely,

Marguerite Sequaris
Secretary General of HOTREC

Annex:
- Leaflet “*Restaurants serve meals; retailers sell food*”