

**Farmhouse and
Artisan
Cheese & Dairy Producers
European Network**

Comment on proposed amending Annexes II et III of Regulation (EC) No 853/2004 of the European Parliament and of the Council on specific hygiene requirements for certain fresh meat, fishery products, dairy products and eggs.

Referring to the proposed changes in Annex III, Section IX, Chapter II, Part II, point 1(a).

We welcome the intention of the Commission to introduce alternatives to alkaline phosphatase testing. However, as it is now mentioned in the proposal, it is unclear for FBO's what is expected from them to prove effectiveness of the heat treatment. Therefore, we suggest to add examples like the ones mentioned in the 'European Guide for Good Hygiene Practices in the production of artisanal cheese and dairy products', (https://food.ec.europa.eu/document/download/589df643-14af-4ded-b62f-e21ecd1a9161_en?filename=biosafety_fh_guidance_artisanal-cheese-and-dairy-products_en.pdf) page 82: e.g. determination of *Enterobacteriaceae* or use of thermograph.

Referring to proposed changes in Annex III, section IX, Chapter I, part I, point (3) and Chapter II, Part II, point 1(a).

We would like to ask the attention of the Commission to stay in line with the flexibility principles. The requirement of retaining documents needs to be flexible in order to avoid undue burdens for small businesses. Therefore we suggest to add at both places behind 'and keep associated records' the words 'according to their decision'.

Referring to procedure

To conclude, as representative of producers associations we would appreciate it to be involved earlier stage in proposed modifications of legislation. This would help to prevent the introduction of practical problems when legislation is modified. We also consider the time for reaction to this public consultation quite short.

25/05/2023