

Brussels, 10 March 2025

Harmonised rules on precautionary allergen labelling (PAL) are essential to foster a consistent understanding and uniform application across the European Union



Flour milling is the leading food industry in grain processing in Europe, with more than 3 800 mills and a large majority of SMEs using around 47 million tonnes of wheat, rye and oats each year. A resilient, competitive and sustainable flour milling sector is crucial for ensuring food security and supporting rural economies in Europe.

European Flour Millers wish to express their serious concerns regarding the proposed Dutch policy rule on precautionary allergen labelling (PAL). We believe this rule, in its current form, presents significant challenges to the functioning of the EU Single Market and creates undue burdens for flour millers.

Fragmentation of the single market and harm to competitiveness

The proposed Dutch order threatens to fragment the EU Single Market by introducing divergent PAL requirements. This will harm the competitiveness of European industry and create confusion for consumers. Establishing varying threshold levels for PAL across Member States will inevitably lead to products requiring different labelling for different markets, resulting in increased costs and logistical complexities for flour millers, like any other food business operators. This sets a detrimental precedent for further fragmentation of essential food information topics.

Clarity on mutual recognition

We request clarification on the application of the mutual recognition principle. While the notification message mentions mutual recognition, this is absent from the draft law itself. This discrepancy creates significant uncertainty. Furthermore, the precise scope of the legislation requires clearer definition.

Significant economic impact

The Dutch authorities' assessment of the economic impact (ranging from €50 000 to €200 000 per company) fails to account for the comprehensive costs. This assessment only considers products intended solely for the Dutch market. It neglects the substantial costs associated with relabelling or applying stickers to products intended for multiple EU markets. This oversight represents a clear breach of the principle of proportionality, as the measure is neither necessary nor appropriate.

Conclusion

We believe that harmonised rules on precautionary allergen labelling (PAL) are essential to foster a consistent understanding and uniform application across the European Union.