

Commissioner for Health and Food Safety
Stella Kyriakides

Executive Vice-President
Valdis Dombrovskis

Cc: DG SANTE: Mrs. Anne Bucher, Mrs. Sabine Juelicher,
Mrs. Alexandra Nikolakopoulou, Mrs. Sabine Pellser, Mrs. Fruszina Nyemecs,
Mrs. Yvette Azzopardi

Brussels, 23rd March 2020

Subject: Covid-19 Outbreak impact on the food supplement sector - request to stop the clock for the consultation on the draft regulation on Hydroxyanthracene Derivatives – Ares (2020)1357432 & of other measures that would require the involvement of stakeholders.

Dear Commissioner Kyriakides,
Dear Commissioner Dombrovskis,

EHPM gathers the National trade organisations representing the food supplement sector in 13 Member States including IT, FR, DE, BE, NL, IRL, PT, GR, RO, BG, LT, HU, PL and UK.

The Covid-19 outbreak in Europe and the measures implemented by Member States to limit the spread of this virus are causing major difficulties for companies, even the ones we represent, active in the food supplement sector, the large part of which are SMEs.

Companies priorities at the moment are twofold: from one side, they have to protect their workers and make sure all the necessary measures are in place to guarantee their safety; on the other hand, they need to maintain the production in order to satisfy consumers' demand and revenue. Keeping up with the production is extremely difficult due to the significant scarcity of raw materials nowadays, while production faces the limitations of physical presence work in factory. Thus, most of the companies are implementing business continuity plans in order to survive. In this respect, we would like to highlight the critical importance of preserving the Single Market to secure a stable and safe food supply chain and also helping European SMEs to maintain their important contribution to the social-economical model of the EU. Also, given the dependence of European companies on global supply, it is extremely important to maintain the cross-border value chains.

Therefore, given the urgent priorities companies have to address and the scarcity of resources it is not possible for the majority of the sector to engage at the public consultation that DG SANTE launched on the 4th of March 2020 on the draft implementing act restricting or prohibiting foodstuffs containing hydroxyanthracene derivatives (HAD's) – Ares (2020) 1357432.

Given the extremely tight deadline for the feedback mechanism of the above mentioned procedure, 1st of April, and in light of the measures taken across the EU to address the fast spreading Corona virus, we call on the European Commission to enable a meaningful public consultation process by 'stopping the clock' for this consultation and other measures that would require an active involvement of stakeholders and companies. Interrupting the consultations would allow companies the time for preparation, until they will be all fully operational again and be in a position to dedicate the relevant resources to submit high-quality input and analyses to the Commission.

EHPM therefore calls upon the Commission to pause the consultation for the time needed to companies to cope with such an unprecedented force majeure.

We believe that our request is in line with that from other stakeholders and refer to the call made by SMEUnited last week to extend the consultation period for ongoing consultations and postpone the launch of new consultations.

Dear Commissioners, we really hope that you will take into account our request and we thank you for your attention and consideration.

Yours Sincerely,



Michel Horn
EHPM Chair



Alban Maggiar
SMEUnited President

About the EHPM: EHPM was created in 1975 and represents 1600 health-product manufacturers in 14 European countries. Through our member associations EHPM aims to provide consumers with safe, science-based, high quality products as well as accurate and helpful information about their nutritional value and use and to assure a fair European regulatory framework for our sector.

About SMEUnited: SMEUnited, formally known as UEAPME, is the association of crafts and SMEs in Europe with above 70 member organisations from over 30 European countries. As a recognised employers' organisation and European Social Partner, SMEUnited acts on behalf of crafts and SMEs in the European Social Dialogue and in discussions with the EU institutions. SMEUnited represents national cross-sectoral Craft and SME federations, European SME branch organisations and associate members. We are a non-profit seeking and non-partisan organisation.