

DG SANTE and DG GROW

European Commission

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Prot. 109

## EU Code of Conduct for Responsible Food Business and Marketing Practices

Dear madam, sir,

SMEunited, the Association of Crafts and SMEs in Europe, represents 65 member organisations from over 30 European countries. We are a recognised employers' organisation and European Social partner. SMEunited speaks on behalf of the 22,5 million SMEs in Europe.

We contributed to the work elaborating with different stakeholders the Code of Conduct for Responsible Food Business and Marketing Practices. Since the beginning we have highlighted that it is fundamental that this Code of Conduct is based on the Think Small First principle, taking the capacity of small and medium sized enterprises as criterion, allowing them to focus on doing business in a competitive way.

SMEunited is pleased to inform you that we can sign the Code of Conduct to unite on a common aspirational path towards sustainable food systems. We commit to respect the roles and responsibilities defined in the section 1.4 of the Code of Conduct. We will promote and disseminate this Code towards our membership and encourage them to take up actions to further improve sustainability. SMEunited already developed a [leaflet on greening SMEs in the food chain](#) and will continuously support exchange of best practices among members in this field.

Nevertheless we have concerns on several elements of the Code of Conduct. In particular, members of SMEunited question which support measures SMEs will be able to count on, as the description of enablers in the Code of Conduct remains very vague. Moreover, multiple parallel initiatives concerning sustainability reporting requirements are being prepared and put in place by Commission services. These risk to create an overlap and to increase administrative burdens for SMEs. Therefore, SMEunited along with its member organisations will assess the functioning of the Code of Conduct within one year.

We will continue our constructive contribution to the objectives of the Code of Conduct and look forward exchanging with you to further improve the framework.

Yours sincerely,

Véronique Willems  
Secretary General