

Mr Maroš Šefčovič
Commissioner for Interinstitutional Relations
and Foresight
European Commission
Rue de la Loi 170
1049 Brussels

Brussels, 27 March 2020

COVID-19: dealing with regulatory burdens during the pandemic

Dear Commissioner,

On behalf of the European retail and wholesale sector, of which 99% is made up of SMEs, and employs 29 million Europeans directly, our two associations would ask you to consider the requests below to look at easing the regulatory burden of new regulation and also Commission consultations while the present crisis persists.

Our sector, along with others, is in the front line in dealing with multiple challenges arising from the COVID-19 pandemic. Food retail is challenged daily in keep the supply chain running while facing extraordinary levels of consumer demand, and this requires the time of all those working in the sector, with staff being diverted from other tasks simply to keep the shelves filled. At the same time, non-food retailers, facing plummeting demand and forced closure, are engaged in a vital struggle of survive.

We know that the Commission is keen to keep up the momentum of legislative initiatives set out in the 2020 Work Programme, and we appreciate very much the fact that the better regulation guidelines require each of these to be preceded by a public consultation. In normal times, we are indeed very keen to respond to these. In the present circumstances, however, our companies and national associations are so tied up with the challenges of the pandemic that they are unable to respond sensibly to any new consultation. This means that the Commission is unlikely to obtain the feedback it needs to inform the next steps in producing the draft rules in question. **We therefore ask that the Commission delays any new consultations until after the present pandemic has receded, and at the same time extends the consultation period for pending consultations.**

In addition, there are a number of pending rules requiring major investment or operational process adjustments within companies. Examples are the track-and-trace regulations for tobacco products, labelling the origin of the primary ingredient in food, the ECHA SCIP database under the Waste Framework Directive due to become operational by the end of 2020, and the recently adopted Transparency Regulation covering the food supply chain, coming into force shortly.

We understand that the Commission is indeed considering delaying some of the immediate follow-up proposals in the 2020 Work Programme, which we very much welcome. **We would ask, however, while the present crisis persists:**

- 1) the Commission to look at **deferring the implementation and issuing guidance to member states to delay enforcement of measures** which could deal a final blow to the survival of many shops and wholesalers, and

2) Member States to follow such guidance and take account of the present challenges to the sector in their implementation and enforcement actions

I am copying this letter to Commissioner Thierry Breton and Mr Darko Horvat, Croatian President of the Competitiveness Council, and to Bjoern Seibert in the cabinet of the Commission President.

Yours sincerely,



Christian Verschueren
Director-General
EuroCommerce



Else Groen
Director General
Independent Retail Europe

