

**Flavio Coturni**

Head of Unit - Agriculture, Food, and Sanitary and Phytosanitary Matters  
European Commission, DG Trade

Brussels, 25 May 2026

**Subject: Trade implications of changes to EU health and identification marks**

Dear Mr Coturni,

On behalf of the European Dairy Association (EDA), Eucolait (the European Dairy Trade Association), the European Livestock and Meat Trades Union (UECBV), and AVEC - the Voice of Europe's Poultry Meat Sector, we would like to draw your attention to our concerns regarding the implementation of Delegated Regulation (EU) 2024/114, which introduces changes to the identification and health marks applied to products of animal origin.

Under the new requirements, the abbreviation "EC" will be replaced by "EU", reflecting the European Community's replacement by the European Union. A transition period applies until 31 December 2028, during which both abbreviations may be used.

Although this change is administrative and has no implications for food safety, it poses significant operational challenges for our members and operators. We are particularly concerned that insufficiently coordinated implementation could lead to unintended trade disruptions and create de facto barriers to EU exports of dairy, meat, and poultry products to third-country markets.

While the measure originates in EU hygiene legislation, the concerns set out below relate primarily to market access and acceptance by third-country authorities. They therefore fall squarely within the scope of DG Trade's external engagement.

Exports to third countries depend on strict alignment between the information shown on health or identification marks, export certificates, and establishment approval numbers. Any inconsistency between these elements may result in delays or the rejection of consignments, with potentially serious consequences for operators, including blocked exports, additional costs, legal uncertainty, and disruption across the dairy, meat, and poultry supply chains.

During the transition period, products bearing "EC" and "EU" markings will coexist. This is likely to complicate export procedures, particularly in countries that require products of animal origin to originate from establishments approved by their competent authority and that maintain lists of authorised foreign establishments for this purpose. Where the numbers on the health or identification mark do not match the relevant approved-establishment list, consignments may be rejected. Updating registrations and ensuring alignment across systems will be challenging, time-consuming, and resource-intensive for operators.

In view of the significant economic interests at stake, we would welcome DG Trade's support in ensuring a smooth and coordinated transition. In particular, we would ask DG Trade to consider the following actions:

- Encourage a pragmatic and flexible approach to the implementation of the new marking requirements.
- Support coordinated communication with third-country authorities, for example, through an official Commission letter signed at the appropriate level, clarifying the administrative nature of the change and facilitating acceptance during the transition period.

- Continue, and where appropriate strengthen, dialogue with key trading partners to ensure that the transition is properly reflected in their requirements and does not disrupt EU exports.
- Promote coordination between Member States and third countries to address practical challenges related to certification, registration, and acceptance during the transition period.
- Provide regular information, where possible, on third countries that have been informed of the change and have confirmed acceptance of the transition arrangements.

We would particularly value continued exchange with DG Trade on how this transition can be managed in practice to avoid unintended disruption to EU exports. Given the external dimensions of the identified challenges, DG Trade's engagement will be essential to ensure that implementation does not inadvertently affect the EU's export performance.

We remain at your disposal for any further industry input and would welcome the opportunity to discuss this matter with you at your convenience.

Yours sincerely,

AVEC - The Voice of Europe's Poultry Meat Sector - [avec-poultry.eu](http://avec-poultry.eu)

EDA - European Dairy Association - [eda.euromilk.org](http://eda.euromilk.org)

Eucolait - European Dairy Trade Association - [www.eucolait.eu](http://www.eucolait.eu)

UECBV - The European Livestock and Meat Trades Union - [uecbv.eu](http://uecbv.eu)