EFFL EUROPEAN FOOD AND FEED LAW REVIEW

Food regulations have increased considerably in the last few years and national law is more and more being overruled by European law. At the same time, food and feed law is evolving in international organisations, such as WTO and the Codex Alimentarius Comission, in a worldwide dimension. This increasingly uniform legal framework is not always interpreted and applied uniformly in the individual Member States. National courts and public authorities pursue here – against the background of the respective national legal culture – very much their own path.

To achieve the harmonisation of the European legal area, a joint public forum is required, in which, at a scientific level, discussion and information exchange can take place about national and international developments. This forum is the European Food and Feed Law Review (EFFL). The aim and purpose of EFFL is to generate, with current EU country reports, specialist essays from science and everyday practice, information on national and European legislation and court decisions, the necessary public discussion and hence a forum for jurisprudence and the application of the law.

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EU and US Labelling of Formed and Mechanically Tenderised Beef
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Editorial

Meat is a very popular food, which is consumed in substantial amounts in all countries. In Germany alone, the consumption is estimated to be around 60 kilograms per capita per year. The meat most appreciated by meat lovers is often beef. The food safety risk of two types of invasively processed beef products, namely mechanically tenderized meat and restructured meat products, is the focus of the first article, *"A Comparative Legal Analysis of Labelling Requirements in the EU and US for Restructured and Mechanically Tenderized Beef"*, by *Nathan Meijer, Yannick Weesepoel, Rob de Jonge, Bernd van der Meulen, Leo van Raamsdonk* and *Saskia van Ruth*. It includes an analysis of the respective legal frameworks in both the EU and in the US. Since consumers are often unaware of the possibility of contamination, labelling requirements should be amended to highlight the risk this meat may pose.

The next article, *"VCI-Guide for good hygiene practice in food additives manufacture"*, by *Bernd Haber, Matthias Rheinheimer, Dietmar Richter* and *Ulrike Zimmer*, will not only be of particular interest to business operators manufacturing food additives but also for those who deal with foods or are concerned with food law in general. The members of the "Sector group food additives within the German Chemical Industry Association" (VCI) have developed a guide on the interpretation and implementation of the food law requirements regarding the manufacturing of food additives. The guide is valuable because the manufacturing of food additives differs significantly from the production processes of conventional foodstuffs, and the transfer of food safety and hygiene principles can therefore be very complex.

Following the article on the existing regulations and labelling of bioengineered food in the US that was published in the last issue, the current edition includes a contribution on the regulation of genetically modified organisms within the EU. In *"Issues in EU Regulation of GMOs: Legal Uncertainties in Plant Breeding Techniques"*, *Artem Anyshchenko* reproduces the uncertainties that can come along with plant breeding techniques. For genetically modified plants, the term "green gene technology" has claimed an independent meaning. The main purpose of the European GMO legislation is to protect human beings, animals and the environment against possible negative effects due to gene technology. Still, *Anyshchenko* concludes that EU Regulation should respond to the needs of plant breeding in an efficient manner.

China is increasingly determining the world order and is, from an economic point of view, one of the global players for the foreseeable future. Addressing e-commerce, which will play a key role in the economic global order, *"The Enactment of the E-commerce Law in China and Its Impact upon Food E-commerce"*, by *Pinghui Xiao* and *Xiaoman Liu*, introduces this emerging sector as well as the enactment of the e-commerce law in China. The first e-commerce law in China was promulgated in the summer of last year. As it is often the case, difficulties and challenges have arisen, which are discussed in this contribution.

The article *"Balancing Agro-fuels and Food Security on the Tightrope towards Sustainability,"* by *Eden Tafesework* and *Margherita Paola Poto*, completes our selection of contributions. Biofuels are mainly CO2 neutral and therefore make an important

contribution to climate protection. Agricultural crops are used as feedstock for such biofuel, and the demand for their utilisation has risen strongly recently. The reasons for this are being analysed. Secondly, *Tafesework* examines the individual implications which may arise from it, such as rising crop prices. The need for environmentally sustainable sources, on the one hand, and the consequential difficulties, on the other, requires balancing ethical values.

Maria Kietz
Managing Editor

A Comparative Legal Analysis of Labelling Requirements in the EU and US for Restructured and Mechanically Tenderised Beef

*Nathan Meijer, Yannick Weesepoel, Rob de Jonge, Bernd van der Meulen, Leo van Raamsdonk and Saskia van Ruth**

Meat is processed to various degrees before it reaches the consumer. The surface of a piece of meat may be contaminated with pathogenic bacteria during processing. Sufficiently heating the product is therefore often required to ensure safe consumption. The focus of this article is on the food safety risk of two types of invasively processed beef products: (i) mechanically tenderised meat and (ii) restructured meat products. If such a product is undercooked because the consumer believes it to be an un-processed whole piece of meat, then these types of products may be unsafe to eat because any potential pathogenic contamination in the product core will not be eliminated. Risk factors of mechanically tenderised and restructured beef have been examined, and the sufficiency of the corresponding legal protection of consumers in the European Union (EU) compared to those in the United States (US) was evaluated. We conclude that deep tissue contamination of invasively processed beef may occur more often and at higher concentrations than estimated, and that consumers are not adequately made aware of this. Although certain microbiological criteria are in place to mitigate the risk from the producer's side, outbreaks in the US have shown that these measures are insufficient. We therefore recommend that labelling requirements in the EU be changed for this type of meat.

I. Introduction

Meat is processed in various ways before it reaches the consumer. This may involve relatively simple steps such as dividing the carcass in parts or in pieces, like in the case of steak. It may also involve a higher degree of processing, like in the case of, for instance, a sausage. The surface of a piece of meat may be contaminated with pathogenic bacteria during cutting or other types of processing. Sufficiently heating the product – either by the producer or consumers themselves – is thus often required to ensure safe consumption. In the case of a steak, heating the meat surface only is sufficient to deactivate the pathogenic bacteria, which is why such products can be safely eaten with the centre only partially cooked – i.e. 'rare' or 'medium' cooked. On the other hand, the ground meat that forms a sausage may have been contaminated throughout, with the implication that a sausage should be fully cooked in order to be safe.

Generally speaking, consumers are conscious of these differences, or they are adequately made aware

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indicate on the label of prepacked food the manufacturing or, if different, packaging site. That judgment, even if delivered only on a provisional basis, is to be welcomed.

The inapplicability of Legislative Decree No 145/2017 is also based on further reasons which are not mentioned in the judgment itself.

Article 38 (1) of Regulation (EU) No 1169/2011 provides that:

> As regards the matters specifically harmonised by this Regulation, Member States may not adopt nor maintain national measures unless authorised by Union law.

The adoption of national labelling requirements is therefore subject to strict conditions. It is true that Article 39 (1) of Regulation (EU) No 1169/2011 provides that in addition to the mandatory indications referred to in Articles 9 (1) and 10 of that Regulation, Member States may, in accordance with the procedure laid down in Article 45, adopt provisions requiring additional indications for certain types or classes of foodstuffs where those are justified on the grounds set out in Article 39 of that Regulation. However, in our opinion, this provision cannot be used in the present case because Legislative Decree No 145 imposes labelling requirements for all types and classes of pre-packaged foods and is not limited to specific foods.

Taking into account the supremacy of Community law, I therefore believe it is correct to argue that Legislative Decree No 145 of 15 September 2017 is not applicable, not only due to a breach of the notification obligations; but also due to a breach of the principle of the primacy of EU law, according to which the latter prevails in the event of a conflict between EU law and Member States' law. As already mentioned above, Regulation (EU) No 1169/2011 regulates which mandatory information must be placed on pre-packaged foodstuff labels. The declaration of the manufacturer or packaging site is not an obligation, but a voluntary declaration. National regulations are only possible in very narrow exceptional cases foreseen in Regulation (EU) No 1169/2011 itself. Such an exception does not exist in the present case.

According to the primacy of EU law, primary and secondary law (such as the rules of Regulation (EU) No 1169/2011) takes precedence over the law of the Member States. This means that national authorities and courts are obliged to apply the provision of EU law, even if a provision of national law determined something to the contrary. Therefore, the Italian authorities and courts must give precedence over national law to the rules in Regulation (EU) No 1169/2011, according to which the indication of the producer or packaging site is not an obligation but a voluntary indication.

It follows that also for these reasons, food control authorities must refuse to apply Legislative Decree No 145/2017 and are not allowed thus to impose fines on economic operators who decide to omit the indication of the production/packing site on their food packages. Rather, to provide such information is voluntary; and companies may decide to reveal it in a spirit of transparency towards the consumer.

Slovakia

Food Companies Reporting of Corporate Social Responsibility in the Slovak Republic

*Renáta Pakšiová and Kornélia Lovciová**

I. Introduction

Food sovereignty is an important element of sustainability for every society and a primary bearer of the healthy lifestyle of the general population. Therefore, the food industry, as a tool for securing food, is under stricter control than any other sector.

In the past, the Slovak Republic was characterized by food sovereignty with traditions, developed agriculture and the processing industry. However, it is currently characterized by lack of sovereignty, low levels of food security, a low level of domestic raw material processing and an importer of finished products with value-added that remains abroad.

In April 2018, the Food Chamber of Slovakia (FChS) drew attention to the declining trend of the food industry in all indicators, which is a consequence of the onset of low-cost trade systems and restrictions in Slovakia. Commencement of business practices of big stores significantly contributed to the decline in domestic food share on the domestic market. In other words, Slovak food has been pushed out of sale by imported food.[1] This fact, which is negatively reflected in the negative development of the food industry in Slovakia, persists, and the position of food exports is moving, unlike imports, in a less favourable direction. As a result of this situation, the share of Slovak products on the market in 2011 was 50%, while in 2017 it was only 37.2% of all food products offered.[2] Orientation on product or employees and other social aspects are currently becoming a significant dilemma in most industries, not only in Slovakia. New views from stakeholders are very important there.[3]

As FChS points out the unsatisfactory food sovereignty of Slovakia, Slovakia should set the optimum level of country dependence on food imports. Another negative aspect pointed out by the Slovak economy and the Slovak consumers themselves is that imported food is more often of average quality rather than top quality. The issue of double food quality in EU countries is at the forefront of food security, especially their lower quality in Central and Eastern European countries.[4] Nowadays, the European Commission is seeking to remove double standards of food products. Food safety can be defined as a state where all people have physical and economic access at any time to sufficient, safe and nutritious food that meets their nutritional needs and food preferences for an active and healthy life.[5]

The concept of food industry development is made of measures designed to contribute to the fulfilment of the strategic goals and objectives of the food industry as effectively as possible, and to identify the positive impacts on food security, food safety and quality.

Financial health indicators are not the only data providing a holistic picture on the condition of the

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1 Teraz.sk. Potravinári: Potravinársky priemysel na Slovensku sa prepadá. Available online at: <https://www.teraz.sk/ekonomika/potravinársky-priemysel-na-Slovensku-sa/321189-clanok.html> (last accessed on 31 January 2019).

2 Zachar, P. Potravinárska komora uvítala vstup SR do eurozóny, jej obavy z negatív sa však naplnili. Available online at: <https://www.hlavnespravy.sk/potravinarska-komora-slovenska-uvitala-vstup-sr-eurozony-jej-obavy-z-negativ-sa-vsak-naplnili/1436382> (last accessed on 31 October 2018).

3 Krejčí, P.; Šebestová, J. (2018). "Social innovation ties: A dilemma of product and employee orientation". *Polish Journal of Management Studies*, 17(2), 123-133.

4 Vaqué, L. G. Possible Unfair Practices in the Marketing of Differentiated Food Products in the Single Market. The Concept of the „lLegitimate Expectations" of Consumers. European Food and Feed Law Review 2017, 12(6), 482-490.

5 Kollár, V. (2015). "Bezpečnosť a kvalita potravín". In *Zborník z XV. Medzinárodnej vedeckej konferencie "Manažérstvo životného prostredia"* in 17.-18.4.2015, Bratislava; pp. 132-134. ISBN 978-80-89753-02-4.

company.[6] At present, the interest in information on companies in the food industry is constantly increasing and in the social, environmental and economic fields it is important to identify the reporting specifics in the food industry for sustainable development. Corporate Social Responsibility (CSR) can be seen as an attribute to help meet the goals of companies in the food industry and increasingly recognized as a critical tool for companies seeking to integrate CSR into day-to-day operations and strategies.[7]

The nature of social responsibility as a starting point for sustainability expresses the company's focus on goals and strives to meet the economic, social and environmental aspects of activities in which the company manages responsibly beyond legal standards.[8] For this reason, food companies should implement CSR in their strategies in order to achieve the objectives of the company as well as the subsequent achievement of state targets in the food industry.

Disclosure of non-financial information (mostly information about CSR) by companies in every respect can serve as a completion of business image and is one of the most important communication tools between the company and its stakeholders.[9] Nowadays, companies' reporting of non-financial information is more in their own interest than the reporting of financial information.

The aim of this report is to create an image of the approach of food industry companies settled in Slovakia to the disclosure of information regarding CSR through the means required by Slovak law. The content analysis of corporate annual reports for 2017 have been made in every company with the main business from food industry in classification according to SK NACE. Based on this analysis we will identify the priority areas of interest of this sector of industry.

II. CSR Reporting in European Legislation

The European Union is interested in issues of environmental, social and economic sustainability. Among other things, it expresses its clear stand towards the support of socially responsible companies in its program priorities of the Horizon 2020 program for 2018-2020, as well as while identifying cross-cutting priorities — measures in the field of climate and sustainable development; gender equality and humanitarian sciences — SSH[10,11] Modern European integration is indeed inseparably linked to a single internal market with its digital dimension, pursuing the commitment of smart, sustainable and inclusive growth.[12]

In terms of sustainability, in particular CSR, the key legal act currently in force is Directive 2013/34/EU of the European Parliament and of the Council on the annual financial statements, consolidated financial statements and related reports of certain types of companies, amending Directives 2006/43/EC and 83/349/EEC.[13] More detailed reporting in the field of CSR was amended by Directive 2014/95EU of the European Parliament and of the Council of 22 October 2014, amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large companies and groups.[14] While the inclusion of financial and non-financial statements in the management report for certain large enterprises and groups falls within the scope of Directive 2013/34/EU, the mandatory disclosure of related information and documents refers to Directive 2017/1132/EU concerning certain aspects of law of the business companies.[15] Directive 2013/34/EU of the European Parliament and of the Council reads as follows:

> The management report and the consolidated management report are important elements of financial reporting. A fair review of the development of the business and of its position should be provided, in a manner consistent with the size and complexity of the business. The information should not be restricted to the financial aspects of the undertaking's business, and there should be an analysis of environmental and social aspects of the business necessary for an understanding of the undertaking's development, performance or position.

In 2014, the European Commission[16] launched a public consultation on non-binding guidelines on the methodology for reporting of non-financial information under the Article 2 of Directive 2014/95/EU on disclosure of non-financial information and diversity information through certain large enterprises and groups. The aim of this public consultation was to gather stakeholders' opinions. The consultation was part of the Commission's work on preparing non-binding guidelines on the methodology for reporting of non-financial information. The European Commission drafted a reporting guidance on non-financial reporting methodology, including non-financial general and sectoral key performance indicators, to facilitate relevant, useful and comparable disclosure of non-financial information for companies in the Official Journal of the EU on 5 July 2017 as Non-Financial Reporting Guidelines (methodology for reporting of non-financial information).[17]

III. CSR Reporting in Slovak Legislation

Information on the business published in the annual report meets its importance only when it is useful for users in deciding all important practices and relationships with the company. As there is no uniform reporting approach for non-financial information as there is for financial information, it is difficult to compare this information.

The information published in the annual report varies in terms of its extent and order in the annual report, by various words and interpretations, which raises a question or assessment as to whether or not the company is reporting correctly.

Despite efforts to reconcile and compare non-financial information in the Member States of the European Union, for example by issuing a Guide to Disclosure of Non-Financial Information (methodology for disclosure of non-financial information), there are obstacles arising from differences in legislation, terminology or information presentation.

Under the Accounting Act in Slovakia[18] the annual report is required to be prepared only by accounting entities that have a mandatory auditing of their financial statements. Food industry companies are mostly included in this category of businesses:

Individual financial statements must be audited in a company, which is required to create share capital, or a cooperative, if, as at the date of financial statements and for the immediately preceding accounting period, at least two of the following conditions have been met:[19]

1. The total amount of the assets exceeds €1,000,000, whereas the amount of the assets is the amount of the assets reported in the balance sheet in measurement not modified by items of impairment of assets;
2. Net turnover exceeds €2,000,000;
3. The average recalculated number of employees in one accounting period exceeded 30.

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7 Chandler, B. D. (2017). "Accountability". In *Strategic Corporate Social Responsibility: Sustainable Value Creation*, 4th ed.; Stanley, M., Rickard, A., Ancheta, K., Dallal, N., Haenel, J., Fleming, P. L., SAGE Publications, Inc.: United States of America, 180-198.

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12 MacGregor Pelikánová, R. (2013). "Internet My Dearest, What Type of European Integration Is The Clearest?" *Acta Universitatis Agriculturae et Silviculturae Mendelianae Brunensis*, 61(7), 2475-2481. Available online: <http://dx.doi.org/10.11118/actaun201361072475> (last accessed on 31 January 2019).

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14 Directive 2014/95/EU. Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups. OJ EU L 330, 15 November 2014, p. 1.

15 MacGregor Pelikánová R., MacGregor, R. (2017). "European e-Justice Portal – Reality of Electronic One-Stop-Shop for Publication of Financial Statement in the EU". In *Conference: 5th International Scientific Conference on IFRS – Global Rules and Local Use* Location: Anglo Amer Univ, Prague, Czech Republic, IFRS: Global Rules & Local Use, 98-111. ISBN 978-80-906585-3-0.

16 European Commission. Non-IFRS financial statements. Available online: <https://ec.europa.eu/info/business-economy-euro/company-reporting-and-auditing/company-reporting/financial-reporting_en> (last accessed on 31 October 2018).

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18 Accounting Act. Act No 431/2002 Coll. on Accounting, as amended. Available online: <https://www.finance.gov.sk/en/taxes-customs-accounting/accounting/laws/> (last accessed on 28 February 2019).

19 See Article 19 (1) (a) of Act No. 431/2002 Coll. on accounting, as amended. The obligation to disclose information, include data on environmental and social relations refers to companies having a mandatory audit of their annual financial statements. Available online: <https://www.finance.gov.sk/en/taxes-customs-accounting/accounting/laws/> (last accessed on 28 February 2019).

Businesses whose securities have been admitted to trading on a regulated market and those who draft their financial statements in accordance with the International Financial Reporting Standards (IFRS) must have their financial statements audited and they shall draft an annual report too.

The information in the annual report is provided in the form of a balanced and comprehensive analysis of the condition and forecast of the development, and includes important financial and non-financial indicators, including information on the environmental performance of the entity's activities and employment, by reference to the financial statements.

The requirements for the content of the annual report under the Accounting Act[20] state that the annual report has to include:

- Financial statements for the financial year for which the annual report is prepared;
- Auditor's report on these financial statements, unless otherwise provided in a separate regulation; and
- In particular, information on the accounting entity's development, the condition in which it is situated, and the significant risks and uncertainties to which the accounting entity is exposed:
  - Events of special importance that occurred after the end of the accounting year for which the annual report is prepared;
  - Expected future development of the accounting entity's activity development;
  - Operating costs in the field of research and development;
  - Acquisition of own shares, temporary letters, business shares of stocks, temporary letters and business shares of the parent accounting entity;
  - Profit-sharing proposal or loss settlement,
  - Data required under special regulations; and
  - Whether the accounting entity has an organizational entity abroad.

According to the Accounting Act, these general requirements represent the basic content framework to be complied by the accounting entities that are required to have audited financial statements and thus have an obligation to prepare and disclose an annual report. The information disclosed in the annual report is subject to audit by the auditor, who is required to express the opinion:

- As to whether the annual report is in accordance with the financial;
- On the information on the description of the main internal control and risk management systems in relation to the financial statements, the data on the qualifying participation in the capital under a special regulation, on the holders of securities with special control rights, and a description of these rights, on the limits of these rights, the rules governing the appointment and dismissal of members of its statutory body and the amendment of the statutes, the powers of the statutory body, in particular its power to decide on the issue of shares or the redemption of shares;
- Whether the annual report contains information under a special regulation;
- State whether, based on the knowledge about the accounting entity and the situation, it has identified material misstatements in the annual report and indicate the nature of any such material misstatements.

IV. The Structure of SK NACE of Food Companies in Slovakia

Based on the analysis carried out, it may be stated that out of a total of 1577 food companies, 142 enterprises were selected for a more detailed analysis because only companies subject to the audit of the financial statements are required to prepare an annual report.[21] As of 31 December 2018, we may state that all 142 food companies with this obligation disclosed their annual reports.

From the companies' structure point of view, according to SK NACE (Figure 1), in 2017, the majority of companies — namely 217 companies operated in SK NACE 10890 sector — Manufacture of other food products.

In particular, within the food industry SK NACE 10710 — Bread making, the production of fresh pastry and cakes, the largest number of companies — namely 25 out of 50 were subject to the obligation to disclose the annual report, whereas this obligation was fulfilled and the information were disclosed by all 25 companies. Another major industry in the food industry, with the obligation of auditing, and therefore the publication of the annual report, is the sector SK NACE 10510 — Operation of Dairies and Cheese Production, where 14 food companies were required to audit their annual reports.

20 See Article 20 (1) (a-h) of Act No. 431/2002 Coll. on accounting, as amended. The obligation to disclose information, include data on environmental and social relations refers to companies having a mandatory audit of their annual financial statements. Available online: <https://www.finance.gov.sk/en/taxes-customs-accounting/accounting/laws/> (last accessed on 28 February 2019).

21 Subjects of our research were all published annual reports of undertakings operating in the food industry in 2017. When we analysed the reporting of food industry companies, we used companies' annual reports published through the Register of Financial Statements administered by the Ministry of Finance of the Slovak Republic. Available online: <http://www.registeruz.sk/cruz-public/domain/accountingentity/simplesearch>.

V. Content Analysis of Annual Reports of Food Companies in Slovakia for 2017

In case of implementation of the CSR strategy, food companies are becoming keys for life of society and therefore, in the qualitative analysis of their annual reports, the content also focused on reported non-financial information. The content analysis was based on the information contained in the annual reports from the areas specific to CSR – social, environmental and economic issues, while following the structure of the general and specific aspects of the Global Reporting Initiative (GRI) standards proved helpful. When choosing the appropriate keywords, we mainly focused on the terms typical of the food industry.

Within the individual categories of the GRI general guidelines (Strategy and Analysis, Company Profile, Stakeholder Involvement, Ethics and Integrity), we analysed which non-financial information was disclosed in the annual food company reports.

In the Strategy and Analysis category, 55 companies out of 142 companies published information about the strategy in general terms, which is 38.73%.

In more detail:

- Strategy information also focused on other aspects of sustainability than the economic ones were published by 13 companies (9.15%),
- Information on the key impacts, risks and opportunities of the company on the environment and vice versa were published by 15 companies (10.56%) and
- Information about the key impacts, risks and opportunities of the business on the environment and vice versa also contain other fields of sustainability than the economic area were published by 10 companies (7.04%).

According to the analysis of environmental information in the annual reports, food companies report on environmental protection, as evidenced by information on ongoing monitoring of environmental impacts of production. Several food companies also commented on the draft act on depositing of plastic bottles and cans in their annual reports for 2017. Information on water use in several stages of the production process, e.g. the production and use of water vapor in food production is also often included in the annual reports. The companies address the waste policy by implementation of waste management systems focused on correct sorting and high level of waste recovery.

The social category (Social environment) within the analysed item Local Communities includes information on development programs of local communities based on their needs. The essence of such program is, e.g. the grant project Šariš region to People whose contributions were focused on revitalization of monuments and other symbols of the Prešov region. These projects were supported by companies from the sectors SK NACE – 10130, SK NACE – 10610, SK NACE – 10720, SK NACE – 11020, SK NACE – 11050.

The most important information deals with the structure of markets that are relevant to the problem.[22] In the Company Profile category, a large number of food companies have published information about their main products, services they provide, key locations of their operations, or key markets, employee structure in their annual report. The most common information in this category was information on major products and services.

With regards to information from the aspect Employment, almost 59 selected companies disclosed this information, which represents the largest share of 41.55%. This information was not disclosed by 83 companies out of 142, which is 58.48% in relative terms.

In more detail of the qualitative analysis of information in the Company Profile Category:

- Company profile – general information – data disclosed by 88 companies out of 142 (61.97%);
- Main products and services – data disclosed by 82 companies out of 142 (57.75%);
- Locations of operation – data disclosed by 36 companies out of 142 (25.35%);

22 Wiesmeth, H. (2012) Environmental economics: theory and policy in equilibrium. With contributions by: Judith Marquardt. Berlin : Springer, 307. ISBN 978-3-642-27042-0.

- Key markets – data disclosed by 22 companies out of 142 (15.49%);
- Other – data disclosed by 2 companies out of 142 (1.41%);
- Information on the business size – data disclosed by 5 companies out of 142 (3.52%);
- Information on employees and structure of employees – data disclosed by 59 companies out of 142 (41.55%);
- Information on the customer-supply chain of the company – data disclosed by 30 companies out of 142 (21.13%);
- Significant changes in size, structure, ownership or supply chain – data disclosed by 3 companies out of 142 (2.11%).

Based on the content analysis, we can say that food companies do their best to meet ISO quality standards in environmental protection, product quality standards, and services provided or logistics. Up to 1/3 of the total number of analysed companies disclosed information on obtaining the relevant standard or certificate, representing 43 companies and 30.28% in relative terms.

More detailed results from our qualitative analysis of information concerning the Involvement of Stakeholders Category read as follows:

- Overview of externally developed economic, environmental and social documents, principles, standards or other initiatives to which the company is committed (ISO, certificates, standards) – disclosed 43 companies out of 142 (30.28%);
- Other types of stakeholder relationships (additional category) – data disclosed by 15 companies out of 142 (10.56%);
- Application of the principle of environmental prevention – data disclosed by 9 companies out of 142 (6.34%);
- List of associations in which the business is a member or otherwise participates in – data disclosed by 4 companies out of 142 (2.82%);
- Cooperation with educational and research institutions – data disclosed by 5 companies out of 142 (3.52%);
- Overview of important stakeholder groups and their selection – data disclosed by 2 companies out of 142 (1.41%);
- Organizational approach to stakeholder involvement – data disclosed by 1 company out of 142 (0.7%);
- Key topics addressed within the stakeholder involvement – data disclosed by 1 company out of 142 (0.7%);
- Stakeholders training – data disclosed by 1 company out of 142 (0.7%).

In the Ethics and Integrity category, 10 companies (7.04%) commented on this subject in general terms, only 7 (4.93) companies are committed to the ethical principles and 6 companies (4.23%) commented on Consulting and Reporting.

In our opinion, low reported information from category Ethics and Integrity is mainly due to the fact, that under the Accounting Act businesses are not obliged to create and comply with a code of ethics because they are not companies that have issued securities and they have been admitted to trading on a regulated market. Similarly, the companies analysed did not provide information on the publication of the Code of Ethics in a different place than the annual report.

VI. Conclusion

The food industry in the Slovak Republic occupies an important position, but is characterized by lack of self-sufficiency and a low level of food safety. The concept of food industry development, together with the concept of corporate social responsibility, is a suitable tool for meeting the strategic objectives of food companies connected to the strategic objectives of the state. The annual report provides the basic source of information on the activities of companies, the content of which is regulated by the Accounting Act in Slovakia. There is a significant number of companies with different food production, different volume and impact on the environment within the food industry in Slovakia, which increases demands on the stakeholders´ skills to understand the disclosed information. Their gradual standardization can contribute to optimal solving of the issue of incomparability of annual reports, although it cannot be assumed that it would reach the level of financial reporting standards within a short time.

The Food Industry Development Concept is a measure designed with the aim to contribute to the strategic goals and objectives of the food industry in Slovakia as effectively as possible. One way how to support the food industry is also to support the interest in information related to food companies. At present, the interest in information on companies in the food industry is increasing and in the social, environmental and economic fields it is important to identify the reporting specificities in the food industry for sustainable development. For these reasons, we focused our research on the content analysis of the annual reports of companies operating in this sector.