



**Fishing industry response to the proposal for a revision of Regulation (EU) No 1169/2011 on the provision of food information to consumers inception impact assessment**

03 February 2021

EP(21)10/ EAPO21-13

**EU Transparency Register number of Europêche: 2312395253-25 / EAPO: 46491656228-65**

The fishing industry appreciates the possibility to comment on the Roadmap Communication concerning revision of Regulation (EU) No 1169/2011 on the provision of food information to consumers (FIC Regulation) as announced under the Farm to Fork Strategy.

Fishing is the very definition of the 'Farm to Fork' strategy since it is the most efficient, climate-smart system that provides healthy and sustainable food, while securing a decent living for EU fishermen. Hence, applying the fisheries equivalent of the Farm to Fork Strategy - from Sea to Plate – towards a sustainable food system cannot be done without reinforcing and ensuring the traceability of the fishery product throughout the entire value chain.

In that vein, Europêche and EAPO's highlight a few points.

**Summary**

**Europêche and EAPO are of the opinion that the revision of the FIC regulation should fall within the remit of the Farm to Fork, Sea to Plate Strategy. Therefore, it should ensure that the environmental, socio-economic, and nutritional qualities of wild caught EU seafood products are recognised and put forward on front-of-pack nutrition labelling. These qualities are essential for reaching the EU climate and biodiversity targets, as well as reaching SDGs (specifically 2, 3, 8, 13, and 14) and should thus be recognised and made clear to the consumer. Subsequently, the FIC regulation should allow consumers to benefit from appropriate geographical information on the origin of the products bought regardless of whether these are fresh, frozen, canned, processed, and imported. The EU regulations guarantee socio-economic and environmental sustainability of EU products, consequently, the (*flag state vessel and catch area*) information on origin of products have to be made mandatory, empowering consumers to choose EU seafood products achieving high sustainability requirements.**

### **Healthy food choices are made difficult**

Europêche and EAPO believe it important that the nutritional and health benefits of fish are made clear for consumers in a straightforward and easily understandable way. EU consumers have a clear interest in the country of origin and the traceability of fishery products. However, existing EU legislation does not oblige to provide the origin in the final prepared or preserved product, while this is mandatory for the EU catch industry according to Article 35 of the Common Market Organisation Regulation (EU) No 1379/2013. Information on traceability and the sustainable way of production is thus lost in the food value chain.

### **Food labelling reflecting nutritional and sustainability benefits of wild caught fish**

Especially regarding the overall objectives of the European Green Deal, which include making better choices towards the threats of climate change, greenhouse gas emissions, lack of fresh water supply, and biodiversity loss, it should be clear for EU consumers that wild caught seafood is a better and smarter choice to make when it comes to animal protein.

The EU fishing industry is working hard, also during catastrophic events such as the current COVID-19 pandemic, to provide consumers globally with seafood which is nutritious, has a high energetic efficiency (tonne of fish per litre of fuel), does not require being artificially fed, nor the use of fresh water supply, antibiotics or pesticides. Eating wild caught fish is climate protection as it is by far the animal protein with the lowest carbon footprint and thus the best option also in terms of food security. Europêche and EAPO would like to reiterate that replacing seafood with land-based protein would cost the world far more deforestation and biodiversity loss. Besides, no marine fish has ever gone extinct due to commercial fishing.

Nonetheless, the fishing sector is still perceived by the wider civil public as harmful, and not as the solution to many of the issues we all together are facing nowadays. Seafood labelling should at least illustrate and recognise the nutritional and sustainability value from an economic, social, and environmental point of view. **The rich nutrients fish contains (iodine, vitamin D, omega-3) should not be graded as of low or negative nutritional value, as is often the case now, while these nutrients are associated with recognised high health benefits. Also, the traceability of the product should be made available to the consumer, as well as an indication of a standard for decent work, in order for consumers to make their best informed choice possible.**

In this respect, The EU fishing industry is welcoming the launch of the European Commission campaign 'Taste the Ocean' with the objective to involve consumers in sustainable fisheries and seafood, encouraging sustainable seafood consumption, and boosting the recovery of economies by promoting local seafood consumption.

### **Mandatory origin indication**

There is a growing demand for consumers to know the origin of seafood for which Europêche and EAPO strongly feel the need for extended mandatory origin indication. Consumers base their purchasing choice

on information such as the country of origin as a substitute indicator of quality. The origin of fishery products is in fact reflected as the third most frequently mentioned aspect by EU consumers when purchasing, after the product's appearance and the cost. Though information on the country of origin and the traceability of fishery products is of importance to consumers, **existing legislation permits to combine both EU and non-EU products in the EU factories' production lines without the obligation to declare the origin of the final prepared or preserved product** (flag state vessel and catch area). Additionally, **prepared, processed and preserved fishery products are exempted from mandatory origin provisions** (Article 35 of Regulation (EU) No 1379/2013). Moreover, **the current marketing standards apply to 75% of EU landings, but to less than 10% of imports (excluded filets and frozen fish) (as stated by DG MARE), hereby again indicating an unlevel playing field for the EU fishing fleet**. Firstly, among EU and non-EU producers. Secondly, among the EU catching industry and processors as the first have to declare relevant information that must accompany the fish lot throughout all the stages of the value chain to the final delivery (including the fishing trip, flag state, and fishing area), which may be lost during the processing stage and thus for the consumer.

The abovementioned deprives the industry and consumers from obtaining a level playing field as to the information that is affixed to the products placed on the market. Moreover, labels may be misleading or lacking information which is available but not mandatory to provide on the label. Henceforth, traceability and the sustainable way of production is not guaranteed throughout the entire production chain as required by the CFP since when it reaches the final consumer, this information is lost. **Therefore, more precise minimum requirements for origin of fish products should be put in place in the EU, including processed products containing more than 50% of fish ingredients.**

**Mandatory origin labelling provided at EU and non-EU level should be the way forward as it improves the efficiency and simplicity of understanding for the consumer, and as the EU fisheries are facing similar requirements as managed under the CFP. Thereby, it is of utmost importance that the high socio-economic and environmental sustainability standards of EU seafood products established by the EU regulations are recognized by allowing consumers to differentiate those from imported non-EU fisheries products.**

#### **Necessary FIC revision and expected impacts**

**The FIC Regulation and Article 35 of Regulation (EU) No 1379/2013 should be revised so that prepared or preserved fish, crustaceans, molluscs and caviar - under codes 1604 and 1605 - fall under consumer information mandatory requirements.** This has been a constant request from the EU fishing fleet.

This is of major importance not only to the EU fishing fleet, but also to the Farm to Fork strategy in enhancing the food system's sustainability, as EU efforts in making fishing sustainable are incompatible with importing products from certain countries with little concern for sustainability.

**Europêche and EAPO believe it necessary to revise the FIC Regulation in line with the objectives pursued under the Farm to Fork Strategy.**

Concerning the expected impacts when adjusting the FIC Regulation, it is important for consumers to be able to distinguish between the EU and non-EU fish products because of the huge difference that might exist between EU and non-EU fisheries sustainability standards. The EU CFP and other European regulations ensure that seafood production is sustainable. This clear distinction between the two groups (and not allowing products to indicate 'EU and non-EU' origin) would have a positive socio-economic and environmental impact and favour EU production.

Furthermore, at EU level Council directive 2017/159 ensures a high level of social sustainability standards in the seafood supply chain. This should be reflected in the FIC Regulation in a way enabling consumers to be informed about the social sustainability of EU seafood products. Even more when human rights and labour issues have been found to take place at different stages of fish value chains in third countries, which are frequently coupled with illegal fishing, hence jeopardizing all three pillars of sustainability.

In practical terms, for instance, front-of-pack nutrition labelling provided to the consumer should differentiate between social standards and environmental standards. This would avoid confusion and provide the consumer with clear information about the social and environmental sustainability of the product.