



# Labelling of Caviar

**Recommendation – September 2018**



The Aquaculture Advisory Council (AAC) gratefully acknowledges EU funding support.

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# 1 Current situation and open issues

EU aquaculture is the world leader in sturgeon farming and caviar production. The current rules on caviar labelling are mainly related to compliance with the rules governing the movement and marketing of species and their products subject to CITES, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (Reg. EC n. 338/1997), which provide, in the case of caviar, a specific identification string/code to be affixed to the label to ensure that traded caviar comes from licit sources. The goal is to allow control by authorities, but the rules do not allow consumers to obtain clear and complete information about the origin of the animals and/or caviar. Traceability under the CITES legislation is fulfilled, but correct information to consumers is lacking. This also makes things extremely difficult for EU sturgeon farmers and producers of caviar in terms of valorisation of the product and unfair competition.

## 2 Consumer information rules and caviar

We recall two EU regulations on correct information to consumers highlighting both problems related to the application of caviar.

**Regulation (EU) N. 1379/2013** in the Common Organization of the Markets for Fisheries and Aquaculture products among the fundamental precepts specifies:

*In order to enable consumers to make informed choices, it is necessary for them to be provided with clear and comprehensive information on, inter alia, the origin and the method of production of the products. (recital 21)*

The same regulation (Article 35) establishes that the following mandatory information must be provided to consumers, among others:

- (a) the commercial designation of the species and its scientific name;*
- (b) the production method, in particular by the following words "... caught ..." or "... caught in freshwater ..." or "... farmed ...";*
- (c) the area where the product was caught or farmed, and the category of fishing gear used in capture of fisheries*

**Currently, caviar is not covered by the consumer information requirements established by Regulation (EU) 1379/2013. The inclusion of this aquaculture product within the scope of the regulation is required.**

**Regulation (EU) 1169/2011** requires the country of origin or place of provenance of the food to be indicated where the failure to indicate such information could mislead consumers as to its origin or place of provenance.

**The regulation does not specify the exact wording to be used when providing information on the country of origin or place of provenance of foods. Such specifications may be imposed by member states in accordance with national law.**

In addition, we propose that the following indications be **clearly** specified on the boxes.

On the front side:

- a) the origin of production or fishing and the country of repacking
- b) the species (common and scientific name)
- c) the type of production (eggs ovulated or not)

On the back side, on the label in addition to the CITES number (which is *not* consumer friendly):

- a) the production or fishing date (month/year) and the date of repacking
- b) thermal treatments: fresh, pasteurized flash, or pasteurized

### 3 Conclusion

We stress the importance of AAC/MAC representing to all EU institutions this problem for producers and the repercussions regarding the traceability of caviar.

This issue becomes increasingly stringent considering the large amount of caviar produced by sturgeon farmers in developing countries, repackaged in EU plants and placed on the market without providing clear indications to consumers about its true origin.

To protect EU aquaculture products, such as caviar, specific measures must be adopted to guarantee correct information on all types of food, including this aquaculture product, through the implementation of the aforementioned regulations in all the EU member states.



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