Market Advisory Council

Advice

Sustainable Food System – Setting Up an EU Framework

Brussels, 13 December 2022

1. Background

In the context of the European Green Deal[1], the European Commission adopted the Farm to Fork Strategy[2] to comprehensively address the challenges of sustainable food systems and to recognise the links between healthy people, healthy societies and a healthy planet.

The Farm to Fork Strategy announced the adoption of a horizontal framework law to accelerate and facilitate the transition and ensure that foods placed on the EU market increasingly become sustainable. The framework aims to establish new foundations for future food policies by introducing sustainability objectives and principles based on an integrated food system approach. A proposal for a sustainable food labelling framework to empower consumers to make sustainable food choices will also be part of this intervention.

Under the Work Programme for Year 6 (2021-2022), the MAC committed to work on the Commission's proposal for a legislative framework for sustainable food systems, considering its effect on the EU market of fisheries and aquaculture products. On 28 September 2021, the European Commission published an Inception Impact Assessment on the initiative, which was

[1] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – The European Green Deal

[2] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system

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open to feedback until 26 October 2021[3]. On 15 February 2022, the MAC adopted an advice welcoming the initiative and expressing general agreement with the identified problems and objectives[4]. On 28 April 2022, the European Commission launched a public consultation, which would be open to feedback until 21 July 2022. The adoption of a legislative proposal by the Commission is planned for the fourth quarter of 2023.

2. Introduction

The Market Advisory Council (MAC) welcomes the ongoing developments of the initiative on a Sustainable Food System Framework. The MAC generally agrees that:

1) The existing EU food system is not sustainable in the long-term;
2) There is a strong interplay and interdependence between the environmental, social (incl. health and nutrition) and economic dimensions of sustainability – The future framework must consider the three pillars of sustainability;
3) Sustainability is fundamental for food security and for the resilience of the food system in the long-term;
4) Consumers do not have sufficient information on the sustainability of foods[5] and it can be difficult to summarise the different dimensions of sustainability in a simple label, yet despite this complexity, a more informative tool would be useful. Even when information is available, there can be a lack of interest from consumers, as not all of them are equally

[3] Accessible on the European Commission's Better Regulation website: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13174-Sustainable-EU-food-system-ew-initiative_en.
[4] Advice and corresponding reply from the Commission are available online: https://marketac.eu/sustainable-food-system-framework-initiative/
[5] In past opportunities, the MAC provided comprehensive views on consumer information. For example, concerning the revision of the Food Information to Consumers Regulation: https://marketac.eu/public-consultation-on-revision-of-eu-regulation-on-the-provision-of-food-information-to-consumers/ and, previously, more generally on consumer information on fishery and aquaculture products: https://marketac.eu/consumer-information-on-fishery-and-aquaculture-products/.

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interested in sustainability information. This can be due to a lack of understanding[6], as consumers are not familiar with all aspects, so information available to consumers should provide a holistic picture;

5) The current food system is facing a range of major challenges that it will need to overcome (e.g., climate change, preserving natural resources, reversing biodiversity loss) – important efforts have already been made and are continuing to improve and meet current and future challenges, but these also require further support from public authorities. In the case of fisheries and aquaculture products, the question of the sustainable exploitation of resources has been integrated in the production methods at an early stage of the ongoing transition by several actors, particularly when compared to other food branches; continuous work and further progress is however needed, and, for example, in the frame of energy as this dimension of the industry is not yet ready for the transition (e.g., transition to fossil-free fuels);
6) In order to be successful, food systems sustainability must be ensured both in the EU and at global level – In the current global market, all food producers should be subject to the same sustainability standards, ensuring a level-playing-field, while considering that a significant proportion of the food consumed and of the inputs used in the EU food chain are imported from third countries. As such, the EU cannot work in isolation and global agreements are needed, while aiming for global cooperation for a smooth transition to sustainability.

The biological status of fish stocks, sustainable fishing practices by EU operators, fisheries management, pressures of climate change[7], pollution, changes to sea space uses, and the

[6] As demonstrated by the Special Eurobarometer 505 Report "Making our food fit for the future – Citizens' expectations": https://health.ec.europa.eu/publications/making-our-food-fit-future-citizens-expectations_en.
[7] The 2019 IPCC Special Report on the Ocean and Cryosphere in a Changing Climate highlighted the significant pressure on fisheries and seafood systems worldwide due to climate change: https://www.ipcc.ch/srocc/.

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resilience of marine ecosystems are important factors in the sustainability of the system[8], which can impact catch potential, food security and food safety. Despite the socio-economic objectives foreseen in the Common Fisheries Policy (CFP), the socio-economic dimension of EU fisheries remains generally overlooked[9]. As such, the transition to sustainable fishing alongside securing quality livelihoods and economic efficiency in EU fishery operations is incomplete.

3. Most important / impactful actors to foster the transition to a sustainable food system

In relation to actions to foster the transition to sustainable food systems, all actors along the supply chain have an important role to play, including through public-private and private-private partnerships. However, there should be proportionality in obligations for all operators and all economic operators need to be on board. Large retailers also have an important role to play in selecting products that are sustainably sourced, thereby supporting the need for more informative labels. The EU should place obligations on all businesses, while supporting smaller actors to transition towards more sustainable models, for example capacity building and funding. That being said, all actors have a responsibility in this process, while it may be more difficult for SMEs to implement sustainable measures, they should not be exempt from important initiatives towards a sustainable food system framework.

Along the fisheries and aquaculture supply chain, fishers and aquaculture farmers play an important role in the provision of healthy, nutritional and sustainably produced animal proteins with a relatively low carbon footprint[10], including locally sourced products. Processors and

[8] Communication from the Commission to the European Parliament and the Council - Towards more sustainable fishing in the EU: state of play and orientations for 2023

[9] Under Article 2 of the CFP Regulation, the socio-economic objectives include committing to economic viability of the industry, a fair standard of living for those who depend on fishing activities, an efficient and transparent internal market, and the promotion of coastal fishing activities. Further views on this matter can be found on the WWF EPO report "Socio-Economic Impacts of the EU Common Fisheries Policy".

[10] In the past, the MAC adopted advice on the recognition of the health and environmental value of seafood products: https://marketac.eu/health-environmental-value-of-seafood/.

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traders can play an impactful role through the demand and facilitation of sustainability and transparency throughout the chain. Retailers and wholesalers have a very impactful role, as they translate the demand from consumers to suppliers and are key players in encouraging consumers towards healthier and more sustainable choice and support market growth for sustainable and healthier products.

For consumers, it can be difficult to make adequate sustainable food choices under the current food environments, as the healthiest and most sustainable options are not always the most affordable. Therefore, new sustainability initiatives cannot solely rest on consumers. Consumers are radically changing their food consumption patterns with a steady increase in the demand for sustainable food, as reflected in the increasing offer of "sustainable" ranges by most major retailers. Further research on consumer understanding and preferences and determining remaining barriers will help to pinpoint the best approach to help further increase demand for healthy and sustainable products.

The actions of other actors (e.g., EU institutions, national/regional/local governments, educational system, NGOs, financial institutions, researchers) are also relevant. EU institutions must ensure that the same workable rules are applicable to all EU food actors. National, regional and local authorities have a responsibility to ensure that overarching EU-level principles and objectives are correctly implemented[11]. Financial institutions could play a more influential role in the future, by making sure that newly decided funds are consistent with the objectives of a sustainable food system.

[11] In the view of the European retail and wholesale sector, it is difficult to rate each and every stakeholder outside its own sector. Moreover, it is not clear how to rate the institutions (EU, national etc.) for "choice" and whether this question refers to choice for public procurement or for policy making.

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4. Factors potentially preventing food system actors from making sustainable choices

The MAC generally agrees that the following factors are potentially preventing food system actors from making sustainable choices in the production/processing/distribution/consumption of food products:

1) The long-term cost of producing fisheries and aquaculture products that strive to meet sustainability accreditation under environmental and social goals, while at the same time endeavouring to return a sustainable economic return to the producer, is not always attained by the price paid by the consumer. At the same time, the real environmental costs are not reflected in the price of food;
2) Increasing competition on global markets – Although it may have an incentivising effect through globally recognised ecolabels as it is the case in fisheries and aquaculture;
3) Unbalance of market power in the food system, weakening the ability of certain actors;
4) Behavioural biases and habits of food system actors, including consumers;
5) Food environments which predispose to unsustainable choices by consumers[12];
6) The regulatory framework (lack of systematic sustainability objectives, definitions etc.);
7) Lack of targeted incentives to produce sustainable food (e.g., financial, R&I).

Thus, for some actors in the supply chain, the lack of reflection of long-term/real costs of food in the price of food, exacerbated by global competitiveness, leads to choices primarily based on short-term costs. To avoid the pitfall of short-term economic policies, it is imperative to ensure actors' confidence in institutions and to ensure that actors are supported in their efforts. The focus on low price competitiveness can make it difficult for some actors to integrate long-term

[12] On the other hand, in the view of the European retail and wholesale sector, it is difficult to see how food environments, for which there is no agreed definition, can prevent consumers from making sustainable choices. The sector highlights that there are many channels from which consumers can buy food including from corner shops, markets hypermarkets, farm shops, etc. Therefore, such a factor does not really affect food system actors from making sustainable choices.

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costs into their production. The economic equilibrium of the sectors must consider the costs of sustainability all along the chain. In some cases of intense competition, the economic room for manoeuvre left for upstream operators may not sufficiently allow for these costs to be accounted for. Currently, promotions often tend to focus on low prices, and rarely on sustainability.

As an example, a case study on seafood sold by Carrefour[13] suggests profit yields in the store were lowest for the most-overfished species. The research found significant financial benefits to be gained from sustainable sourcing and transparent fisheries and aquaculture supply chains. Still, this is not the case for all products. For most products, the environmental costs are not enough reflected in the price of a product.

It is important to note that the lack of EU-wide sustainability assessment for food products is also a factor preventing food system actors from making sustainable choices. In the case of fishery and aquaculture products, it is important to keep in mind the mandatory information requirements foreseen in Article 35 of the CMO Regulation[14]. As detailed in previous advice[15], the MAC believes that fishery and aquaculture products fit for consumption, where the primary ingredient is seafood, should include and adapt the information said in Article 35 of the CMO Regulation.

[13] Mosnier, François, How retailers can be sustainable and profitable in seafood – a Carrefour Case Study, Planet Tracker, 2022. Available online: https://planet-tracker.org/publications-library/.

[14] Regulation (EU) No 1379/2013 of the European Parliament and of the Council of 11 December 2013 on the common organisation of the markets in fishery and aquaculture products

[15] The MAC Advice on Consumer Information on Fishery and Aquaculture Products was adopted in 5 August 2020 and is available online: https://marketac.eu/consumer-information-on-fishery-and-aquaculture-products/. In pp. 13-16, detailed views are provided on Article 35 of the CMO Regulation. Essentially, the European catching sector, the aquaculture producers, the small traditional fish retailers, and the environmental NGOs, believe that prepared and preserved fish products which are containing a minimum of 50% of seafood, thus a primary ingredient, should be included and subject to an adaptation of Article 35 of the CMO Regulation. On the other hand, the European processing sector drew attention to the report from the European Commission to the European Parliament and the Council regarding the mandatory indication of the country of origin or place of provenance for unprocessed foods, single ingredient products and ingredients that represent more than 50% of a food.

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The Sustainable Food Systems Framework must set overarching principles and objectives, including time-bound quantitative targets, which will frame and direct other food policies and legislation towards truly sustainable food systems. Common definitions are important for alignment and harmonisation among Member States and with global food systems. Currently, the lack of common understanding of sustainability among food system actors in the EU market and at global level prevents some actors from making sustainable choices. The framework should tackle all levels of the food supply chain: production, processing, trade, retail, and consumption. The law should explore how to make the price of the more sustainable food options more affordable, as well as appropriate labelling. The transition to sustainable food systems should include all actors. Alignment and coherence among EU policies that influence the availability, affordability and desirability of sustainable food is crucial.

5. Appropriate level of government to accelerate the transition

In the transition to a sustainable food system, all levels of government – global (international organisations), EU, national, regional, local – must be involved. As an example at global level, Regional Fisheries Management Organisations (RFMOs) play an important role through the setting of measures to ensure a sustainable use of marine resources, to fight IUU fishing, and to support better traceability and transparency. At EU level, the Common Fisheries Policy (CFP) Regulation is an example of legislation that enables the recovery of fish stocks[16].

Decisions and agreements at the global and EU levels are essential to make a real impact as well as to ensure a level-playing-field for all food system actors. The harmonisation of EU legislation on sustainability of food systems is beneficial for both economic operators and consumers, since

[16] The CFP Regulation remains a good legal framework, but there is scope for improved implementation, control and enforcement. As determined by Article 49 of the CFP Regulation, the Commission shall report on the functioning of the CFP by 31 December 2022. Comprehensive views on the current functioning of the CFP are available here: https://marketac.eu/advice-on-the-functioning-of-the-cfp/.

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the application of different systems at Member States' level can cause market disruption and confusion among consumers. National governments can play a key role in the enforcement and control. At the same time, central, regional and local authorities can contribute by providing financial incentives for the development of a market of more sustainable products (e.g., organic and local products, packaging free or recyclable / reusable packaging, eco-cheques).

6. Framework for the transition to a sustainable EU food system

In relation to the framework to encourage and accelerate the transition to a sustainable EU food system, the MAC generally agrees that:

1) It is necessary to establish EU-wide general objectives, principles and definitions relevant for the sustainability of the food system – This is very important to ensure a level-playing-field, while local characteristics must also be accounted for. The lack of a common understanding, agreement and definition on what constitutes a sustainable food (system) hampers operators and consumers to collectively contribute to the transition and affects transparency;
2) At all levels, including EU, national level, regional and local levels, competent authorities should ensure that sustainability is mainstreamed in all food related policies;
3) EU trade policy should be consistent with the objectives of the transition – Providing local sustainable food at lower costs must be rewarded. The EU trade policy can play a crucial role in ensuring a level-playing-field between internal products and imported goods;
4) Business operators active in the food system should monitor operations/processes and/or products to ensure they satisfy any sustainability-related requirements of EU law – Applicable rules should take into account to the size of the enterprises, especially considering the burden on SMEs;

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5) Sustainability objectives for the EU food system should be translated into specific sectorial requirements - It should be acknowledged that the sustainable exploitation of resources by a number of fishing fleets, in principle, has been integrated in the sector, even if significant progress is still needed in practice and the requirements do not apply all fisheries and aquaculture products sold in the market. Moreover, there is a need for product-related objectives and standards and to avoid duplication/inconsistency with other horizontal rules under development, which would apply to all businesses (not only food chain actors);
6) A sustainability analysis in the form of a sustainability profile of a product or operation is needed to accelerate the transition to sustainable food systems– It is important to define the type of analysis and who would pay for the global analysis and if it is cost-effective to undertake it for each product/operation;
7) Business operators of different sizes should have different levels of responsibility – Considering all actors have a responsibility to do their part on sustainability, including through the undertaking of appropriate due diligence and compliance with the law, but that smaller operators have fewer resources and may suffer increased difficulty in adapting to cost impact and extra administrative burden, there should be a proportionate level of responsibility (not exceptions per se);
8) Best practices contributing to achieving a sustainable EU food system should be shared across the EU and nationally – The sharing of best practices is positive, but should also respect national specificities and allow for good local adaptation.

The main aim of the new framework should be the establishment of key principles and overarching objectives to which all other policies touching on food systems, at every governance level, must conform to, including through alignment clauses and policy coherence. Measures should not be limited to ensuring the sustainability of individual products or processes, but of the

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whole system, addressing the main drivers of unsustainability at all levels of the chain, considering all actors. Business operators and public actors should be held accountable for ensuring products and processes comply with EU sustainability requirements to avoid unfair competition.

The new framework should be coherent with the various food related policies and legislative initiatives, while accounting for the lessons learnt in the implementation of the General Food Law, which was largely achieved through a clear division of responsibilities between relevant actors in the supply chain. This division should not, however, prevent crucial information (e.g., species, catch location, fishing method, sustainability criteria) from being transferred effectively throughout the whole supply chain. To safeguard adequate traceability of fisheries and aquaculture products, a digital traceability system is therefore crucial and would permit such a division of responsibilities to exist. As one of its main objectives, the new framework should strengthen the single market, allowing free circulation of sustainable food and preventing legal uncertainties and national initiatives.

7. Consumer information, including sustainability aspects for empowerment

To empower consumers in their decision to make sustainable food choices, information to consumers should cover environmental, social, and economic sustainability, including the state of resources (e.g., state of the stock for fisheries products) and the environmental impacts of food production, such as climate impact, working conditions, and remuneration of producers. Information on nutrition is also very important, which is linked to the social aspect of sustainability, especially health.

Consumers declare that more attention is paid to the sustainability of the food they buy, but their purchasing behaviour demonstrates that price remains paramount, and, as such, it is necessary

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to ensure that the price of the most sustainable food products remains attractive to all consumers.

Sustainability information currently provided to consumers for fisheries and aquaculture products, when provided, is generally reliable. However, at the same time, there can also be occurrence of misleading information, lack of transparency in the sourcing, mislabelling and lack of information on compliance with CFP rules.

With regard to fisheries and aquaculture products, current consumer information that can be related to sustainability (e.g., species, fishing gear, area) is too generic and generally quite difficult for consumers to understand. However, third party certification schemes (e.g., MSC, ASC, Bio, etc.), if reliable, science and evidence based, and using high quality sustainability assessments, can provide information of certain dimensions of sustainability.

In the current cases that sustainability information is provided on food products, depending on the sustainability criteria selected and emphasised (i.e., environmental, social, economic), it could theoretically allow consumers to orient their choices toward more sustainable products; however, in practice, the generic, diverse and partial information is preventing them from making fully informed choices. The provision of information to consumers about the sustainability of food, which can involve the use of relative information systems, can be a useful tool and contribute to the acceleration of the transition, even though agreement is needed on which aspects of sustainability and which information are to be integrated.

Fishery and aquaculture products should be subject to the same rules on sustainability information to consumers across the entire EU, ensuring a level-playing-field.

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8. Sustainability labels, including a potential EU label

8.1. Voluntary sustainability claims in the market of fisheries and aquaculture products

In the market of fisheries and aquaculture products, there are multiple certification schemes, which is a situation that can quite confuse for consumers, particularly due to the lack of a common definition for sustainability and the lack of minimum requirements for voluntary sustainability claims and certification schemes. Minimum requirements for voluntary sustainability claims, including certification schemes, would be helpful[17].

Reliable and evidence-based certification of food products can help incentivise operators to supply more sustainable products, even though the significant costs and administrative burden for producers, which are not always reflected on the prices, must be kept in mind, demonstrating the importance of voluntary approaches[18].

8.2. EU dedicated sustainability label for food products

Without having seen the specific criteria of the potential EU dedicated sustainability label, it is rather difficult for MAC members to have a definitive position on this matter. Nevertheless, there is general interest to ensure appropriate consumer information. Below the preliminary views of the members are made available:

Concerning the potential development of an EU sustainability scoring system ("EU dedicated sustainability label"), in the view of the environmental NGOs, the EU fishers, the EU shellfish

[17] This would be in line with the conclusions of the report from the Commission to the European Parliament on options for an EU eco-label for fishery and aquaculture products. See: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52016DC0263. The MAC also adopted views on the matter in the advice on empowering the consumer for the green transition, adopted on 6 October 2022: https://marketac.eu/empowering-consumer-in-green-transition/.

[18] In the past, the MAC adopted advice on voluntary sustainability claims on fishery and aquaculture products, including ecolabels and certification schemes: https://marketac.eu/voluntary-sustainability-claims/.

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farmers, the EU workers unions, and the Spanish retail sector for fish and frozen products, if the goal is to incentivise producers to adopt more sustainable practices, such a system is only useful if it is mandatory across the entire chain of custody and informs on the sustainability of all EU and imported food products – this is particularly important considering the amount of imported products on the EU market. It would be useful if the system was relative, comparable to the EU energy scoring system.

In the view of the EU fish farmers, and the EU processors and traders, such a label should be harmonised and voluntary, informing on the sustainability of all EU and imported food products, so that operators can derive market value from it. In their view, there is already a proliferation of labels in the market, which could potentially cause misunderstandings amongst consumers. In case the label is made mandatory, it must cover both EU and imported products, to ensure a level-playing-field, and be given a unified format – preferably only on sustainable food products.

Whether a dedicated system will help consumers make sustainable food choices will depend on the sustainability aspects covered, data requirements, and governance structure. Furthermore, consumers will have to be able to understand the information.

The design and governance of sustainability information systems have to be based on thorough consumer research. Whatever the system developed, it should not allow for greenwashing in the market. A scoring system and an information system could potentially cohabitate. In any case, any developed system must be applicable to all food products in the EU market, not specifically to EU fisheries and aquaculture products.

9. Role of public procurement in the transition

At present, public procurement in schools and public institutions can play a role, but are not the most relevant in leading the transition. Their volumes, in terms of fisheries and aquaculture

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products, are rather limited. Consumers in public canteens received limited information on the consumed products and their sustainability. It can also be difficult to check upon the correct implementation of public procurement rules.

Schools and public institutions, through the public procurement of food, can play a role in the transition, ensuring that canteens provide healthy, nutritional, and sustainable fisheries and aquaculture products. In some countries (e.g., The Netherlands), public procurement already considers eco-labelling, animal welfare, and other factors, when making a choice. However, enforcement is not sufficient. Also, public awareness is limited, as prepared food (e.g., in canteens) usually has less detailed information. Schools and public institutions have limited budgets, so public procurement is generally driven by financial evaluation of the offer, meaning that the cheapest option often wins over a more sustainable and more expensive option.

In this context, taste and enjoyment, accessibility and affordability, provision of local and traditional products, nutrition, respect of high animal welfare standards, social impacts (e.g., human rights, labour rights), environmental impact, and the provision of information in canteens are all important factors that should be considered in public procurement.

10. Sufficient knowledge and skills for the transition among food system actors

Since a common definition of sustainability is lacking, it becomes difficult to determine whether food system actors have sufficient knowledge and skills for the transition to a sustainable food system. In the fisheries and aquaculture supply chain, the sustainable exploitation of resources is generally integrated; knowledge and skills are increasing, but need further improvement especially on others aspects of sustainability. Some operators are better prepared for the transition and the business models used may play a role in accelerating the process. Furthermore, it might be particularly difficult for non-EU producers placing their products on the EU market

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because of knowledge gaps. This should not be a reason to exclude non-EU products from the EU sustainability ranking system for food products, if developed.

11. Recommendations

In the context of the ongoing initiative on a sustainable food system framework and the setting up of an EU framework for the transition to a sustainable food system, the MAC believes that the European Commission should[19]:

a) Maintain the ongoing close cooperation between DG MARE and other co-lead DGs (DG SANTE, DG AGRI, and DG ENV), ensuring that the aspects relevant for the fisheries and aquaculture products market are adequately reflected;
b) Recognise the important role of all food system actors and other actors in the transition, while supporting smaller actors trying to transition to more sustainable models;
c) Ensure the involvement of all levels of government (global, EU, national, regional, local), particularly through harmonised legislation on sustainability by the EU, enforcement and control by national authorities, plus financial incentives by central, regional, and local authorities;
d) Concerning the framework for the transition, proceed with the establishment of EU-wide general objectives, principles and definitions relevant for the sustainability of the food system as well as the other aspects described in sections 4 and 6;
e) When determining the aspects of sustainability, ensure that consumers have access to information on sustainability, covering environmental, social, and economic sustainability, including on state of the resources and environmental impacts of food production, climate, good working conditions, and fair remuneration of producers -

[19] The recommendations are not necessarily listed in order of priority or importance.

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consider, however, the complexity of aggregated information that should cover several aspects, and keep the food labelling easily readable and understandable by consumers;

f) Increase awareness to consumers about how the market of fisheries and aquaculture products is regulated, for example through information and communication campaigns, so that consumers can better understand the information presented to them when purchasing these products;

g) Consider existing difficulties related to consumer information, such as prioritisation of price over sustainability, transparency and truthfulness of information, and level of understanding. Furthermore, the Commission should guarantee that businesses in the fisheries and aquaculture industry are subject to the same rules on sustainability information to consumers for fishery and aquaculture products across the entire EU, ensuring a level-playing-field;

h) Take into account existing difficulties related to sustainability labels, such as multiplicity of labels, lack of a common definition of sustainability, lack of minimum requirements for voluntary sustainability claims and certification schemes, financial costs and administrative burden, aspects covered, data requirements, governance structures, and consumers' preferences and understanding;

i) In the context of optimisation of voluntary information, further explore the relevance of informing interested consumers digitally, even though the use of digital means and choice of technology should remain voluntary and flexible to allow innovation and avoid excessive burden on SMES;

j) Consider the different views on the relevance of a mandatory EU sustainability label. If an EU label is developed, the label must cover both EU and imported products, plus it must cover all food products in the market (not specifically fisheries and aquaculture products), including the same/equivalent monitoring and compliance checks, to ensure a level-

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playing-field in the market. Any EU label should be based upon an agreed, science-based, and practical methodology;

k) Encourage schools and public institutions to contribute through public procurement, while accounting for different important factors, such as taste and enjoyment, accessibility and affordability, provision of local and traditional products, nutrition, animal welfare, social and environmental impacts, and the provision of information in canteens;

l) Promote the increase of knowledge and skills amongst actors of the fisheries and aquaculture supply chain for the transition to a sustainable food system.

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