

## Working Group 3: EU control and sanitary issues, consumer rules

### Minutes

Tuesday, 5 June 2024 (09:00 – 12:30 CET)

Copa Cogeca (Meeting Room A), Rue de Trèves 61, 1040 Brussels

Interpretation in EN, ES, FR

#### Welcome from the Chair, Benoît Thomassen

Click [here](#) to access the Chair's presentation.

**Adoption of the agenda and of the last meeting's minutes (02.04.24):** adopted

#### Action points

- **State-of-play of the action points of the last meeting - information**
- Substantiation and Communication of Explicit Environmental Claims:
  - Members to send written questions on the European Parliament's position to the Secretariat, which will forward these to the office of MEP Engerer.
    - Pending
- Product Environmental Footprint Category Rules (PEFCR) for Marine Fish Products:
  - Focus Group on PEFCR for Marine Fish Products to be reactivated to prepare a contribution to the Second Open Consultation of the Technical Secretariat, while also taking into account the ongoing work of STECF on sustainability criteria for fishery products.
    - Pending
- "Taste the Ocean" Campaign:
  - DG MARE to be invited, at a future opportunity, for an update on the results of the fourth edition of the campaign.
    - Agenda point scheduled (11:00 CET)

#### Transition Pathway for a More Resilient, Sustainable and Digital Agri-Food Ecosystem

- **Presentation of the final report by Jonas Lazaro Mojica (GROW F3)**

Click [here](#) to access the presentation.

Jonas Lazaro Mojica (DG GROW) presented the final report on the Commission's transition pathway for the agri-food industrial ecosystem, which was published on 11 March 2024 and includes a Staff Working Document and action plan. Mr Lazaro Mojica explained that the transition pathway does not constitute new policy, but instead is based on a number of EU agri-food initiatives, including the EU Code of Conduct on Responsible Food Business and Marketing Practices and the new EU Industrial



Strategy. The Commission representative emphasised that agri-food is a critical component of this industrial strategy and a key industrial ecosystem in the EU. He emphasised that the agri-food industrial ecosystem includes both the agricultural and fisheries industries, encompassing all supply chain operators as well as input and service suppliers. Mr. Lazaro Mojica stated that the agri-food transition pathway, however, places a significant emphasis on the processing sector.

Mr Lazaro Mojica explained that the transition pathway is not intended to generate new policies, but rather to present a joint vision for the future of the EU agri-food ecosystem, addressing the tools and gaps that the ecosystem requires. He highlighted the pathway's co-creation process, mentioning stakeholder workshops held in October and November 2023 with a focus on technology adoption, investment, funding, and SME support. Mr Lazaro Mojica stated that, with the transition pathway officially launched in March 2024, work is now underway to implement the pathway's code of conduct and create the Transition Pathway Stakeholders Support Platform (TPSSP), a tool that will allow stakeholders to pledge submissions, share best practices, and access information on funding and legislation.

Mr Lazaro Mojica stated that the transition pathway is made up of eight building blocks, each of which represents a chapter in the report. The Commission representative emphasised that the pathway addresses all aspects of sustainability, including environmental, social, and economic factors. He provided detailed on the chapter on investment and funding, emphasising the importance of sharing information about funding opportunities and providing support from the bottom up. The pathway aims to be a comprehensive resource for the industry in overcoming financing barriers, and it has identified numerous EU investment and funding opportunities, as well as incorporated European Investment Bank (EIB) investment plans.

In outlining next steps, Mr Lazaro Mojica stated that a three-year budget has been allocated for the creation of the TPSSP as well as a two-year budget to support contractor content development. Furthermore, DG GROW intends to align the transition pathway with DG SANTE's EU Code of Conduct and to foster synergies across Directorates-General and on an international scale. On the TPSSP, the Commission representative stated that the platform's functionality will remain unchanged under the new Commission. The platform will accept memberships, allowing for custom criteria and filter tags. He stressed the importance of receiving feedback from fisheries and aquaculture stakeholders when the tool is launched in February 2025.

- **Exchange of views**

Garazi Rodríguez (APROMAR) encouraged Mr Lazaro Mojica to include explicit references to aquaculture production in the transition pathway. Ms Rodríguez wanted to know whether the platform would be established per food sector.

Jonas Lazaro Mojica (DG GROW) responded that aquaculture falls within the scope of the pathway and will be included in the TPSSP. The transition pathway refers to food production in general. He emphasised the platform's two-way nature by stating that stakeholders will be able to provide feedback if there are any missing tags or information.



Katarina Sipic (AIPCE) drew attention to the issue of investments by SMEs, since sustainability can be quite expensive. Ms Sipic wondered why the transition pathway referred to “agri-food” and not to “fish”. In the context of the discussions on the Sustainable Food System and of the EU Agri-Food Chain Observatory, titles also referred to “agri-food”, overly focusing on agricultural products and the Common Agricultural Policy (CAP), giving the impression that these instruments are only applicable to agricultural products. She pointed out that the Strategic Agenda adopted by the Council referred to food security, but then developed into agriculture and the CAP, which was misleading, since fishery and aquaculture products and the Common Fisheries Policy were also relevant.

Ms Sipic highlighted that, in the market of fishery and aquaculture products, the self-sufficiency rate was only of 35%. For the competitiveness of EU fishers, major investments in sustainable production were needed. Furthermore, a strategy on external dependence was lacking. In the context of food and health policy, the relevancy of quality and nutrition value must be considered, including through a strategy on access to quality food.

Gerd Heinen (DG MARE) recognised that Ms Sipic’s points on the title of the initiative were fair. The term “agri-food” is a globally accepted term that includes all kinds of aquatic food, but that is indeed not obvious from the term. DG MARE will in any event ensure that fishery and aquaculture products are properly covered and will continue to advocate for initiative titles that are less misleading.

Jonas Lazaro Mojica (DG GROW) explained that DG GROW focuses on food systems. Mr Lazaro Mojica highlighted that it could be difficult to find a term that is acceptable for all stakeholders. In the State of the Union address, President Von der Leyen referred to “food systems”.

Katarina Sipic (AIPCE) agreed that it could be difficult to find the appropriate term, but that would not excuse the use of an inappropriate term. In her view, it would be preferable to refer to “food systems” as an overarching title than to focus solely on “agri”.

Szilvia Mihalfy (FEAP) inquired about the transition pathway’s concrete targets or goals as well as any indicators for measuring its impact, for example on the decrease or reliance on imports. Ms Mihalfy also inquired about how the pathway would be promoted to Member States’s authorities and at the national level, since it would be difficult for the Commission to reach SMEs.

Jonas Lazaro Mojica (DG GROW) replied that the document contains Key Performance Indicators (KPIs) for tracking progress and impact. Mr Lazaro Mojica also mentioned that DG GROW has an internal monitoring tool called EMMI that evaluates competitiveness, which also maps indicators, for example on the number of start-ups, investments.

Regarding raising awareness amongst Member States and stakeholders about the document, Mr Lazaro Mojica stated that the document is being promoted through the industrial forum, a network of Member State authorities and industry stakeholders, as well as DG GROW clusters. The Commission hoped to reach SMEs through the federations of associations.

Bruno Guillaumie (EMPA) explained that, in the context of his inter-professional association of shellfish farming, he offered to present the document to its board, but that, due to the lack of references to aquaculture and to inter-professional associations, the board members felt that it would



not be relevant. Furthermore, there were concerns that the Code of Conduct on Responsible Food Business and Marketing Practices could be seen as “greenwashing”. As for the involvement of SMEs in the change of food systems, Mr Guillaumie warned that the use of unclear language and “jargon” would make it difficult for aquaculture operators to understand the document.

Jonas Lazaro Mojica (DG GROW) recognised the complexity of the language and used terminologies. Mr Lazaro Mojica emphasised that the pathway's goal is to highlight available tools that can be useful to access funding for all operators. He mentioned that, in the context of the public consultation, input from all stakeholders was welcomed.

### Consumer Behaviour

- **Presentation of GlobeScan’s survey on “seafood consumer insights 2024” by Richard Stobart (MSC)**

Click [here](#) to access the presentation.

Richard Stobart (MSC) presented the results of GlobeScan’s survey on “seafood consumer insights 2024”, a joint effort with the Marine Stewardship Council to study consumer perceptions of seafood (hereafter the MSC survey). He also presented data from GlobeScan’s 2023 Healthy and Sustainable Living Survey, mainly for comparisons. Mr Stobart explained that the former, conducted biennially, covers around 27,000 individuals, of which approximately 20,000 are seafood consumers, across 23 countries. His presentation focused on European countries, covering 15 markets with about 14,500 individuals, of which around 12,000 consume seafood.

Drawing on data from the Healthy and Sustainable Living Survey, Mr Stobart highlighted that the top global concerns for consumers in 2023 were war and conflict, climate change, and water pollution. When asked about issues affecting them personally, respondents mentioned they were most worried about the increased cost of living and climate change. Climate change also topped the list of the MSC survey, followed by extreme weather events. Healthy oceans and declining fish populations ranked fifth, with the issue ranking higher in coastal areas and places with a natural affinity to the ocean.

Mr Stobart explained that survey respondents had expressed increased worry about the ocean and pessimism about the future availability of seafood. He stated that 91% of seafood consumers felt concerned about the state of the world’s oceans, and 43% believed their favourite seafood would not be available in 20 years. Mr Stobart also highlighted that optimism about the possibility of saving the oceans from irreparable damage had decreased across the board since 2023. Concerns about ocean health had also evolved since 2022, with growing apprehension regarding general fishing practices, including illegal, unreported, and unregulated (IUU) fishing, overfishing, and accidental catch. These concerns generally overshadowed broader environmental issues.

Mr Stobart highlighted consumer choice challenges for 2024, noting a general dietary shift. He explained that vegetarianism was slowly increasing, alongside a rise in flexitarians and evolving consumer tastes. The survey indicated that, between 2022 and 2024, 44% of respondents ate less red meat. In terms of seafood, most people reported consuming the same amount. Those eating more fish were generally eating less red meat, while those eating less fish were consuming more



vegetables, beans, and legumes. Health and diet quality were the primary reasons for increased fish consumption, while health and cost savings drove reduced fish consumption, as fish is perceived as an expensive protein source.

Mr Stobart also mentioned that the frequency of seafood purchases had declined since 2022, with 80% of people claiming they buy seafood at least once every two months in 2024, a 2% decrease. However, consumption of canned products and health supplements/fish oils had increased, while dining out on fish had decreased, with Spain being an exception where seafood dining out had risen.

Mr Stobart went on to explain what the industry could do to engage customers. He highlighted that, when asked about who they trust most to deliver on protecting the oceans, respondents stated that they perceived NGOs, scientists, and independent certification organisations to be contributing “very well” to protecting the ocean environment. On average, about 3 in 10 consumers believed certifications contributed well to ocean protection. Mr Stobart highlighted that trust in large companies and national governments had dropped since 2022.

Mr Stobart described the top purchasing motivators for consumers, stating that respondents ranked quality (freshness and taste), health, and price as highly important. Respondents said they would eat more seafood if prices were lower.

Taking a closer look at consumer awareness of certifications and eco-labels, Mr Stobart noted that the MSC was one of the most well-known, with 50% of consumers globally recognising it and 40% understanding what it entails. He stated that younger consumers were more aware of eco-labels, and that MSC awareness was higher than other labels such as ASC, FairTrade, and FSC. Mr Stobart explained that consumers indicated they were more likely to buy products with the MSC label because they saw MSC's role as protecting fish populations, safeguarding ocean wildlife, and raising awareness. Generally, environmental concerns overshadowed social ones.

Mr Stobart stated that trust in eco-labels influenced trust in the MSC label: as overall trust in eco-labels fell, so did trust in the MSC label. He highlighted that price had a negative impact on trust in eco-labels, shifting consumers' focus to costs. However, health and sustainability were strongly associated with label trust, with strict labelling requirements increasing this trust.

Mr Stobart concluded by recommending ways to engage consumers, including addressing rising price concerns, promoting seafood at various budget levels, emphasising seafood's health benefits, and connecting healthy oceans to healthy seafood. He emphasised the value of promoting sustainability credentials.

- **Exchange of views**

Guus Pastoor (AIPCE/CEP) thanked Mr Stobart for the very valid points, and emphasised the importance of promoting seafood as a healthy protein source. He noted that industry data shows a shift in healthy diet behaviour but that seafood does not seem to dominate people's minds when considering a healthy diet. Referring to Mr Stobart's presentation, Mr Pastoor asked why health had both positive and negative correlations with seafood consumption trends.



Richard Stobart (MSC) explained that health is changing dietary consumption. Young consumers typically switch from meat to vegetables, while older consumers tend to shift from red meat to seafood. Young consumers see vegetables as the healthiest option and are willing to avoid animal proteins, highlighting significant age differences. Mr Stobart stated that there were significant differences across age groups and countries, but there was a shift in Europe towards flexitarian diets.

Bruno Guillaumie (EMPA) argued that, since MSC covers wild fish, the survey can give the impression that “seafood” corresponds to wild caught products, even though, historically, humans consume aquaculture products too. As the output from fisheries is reducing, there should be a comparison with aquaculture of molluscs and algae. Mr Guillaumie noted that, in the survey, there was a distinction of the types of meat, but no distinction of aquatic products. He highlighted that the oceans were affected by land-based pollution, which also affected land-based animals and vegetables through pollution to the soils.

Richard Stobart (MSC) explained that the survey covers both fisheries and aquaculture productions. Many consumers did not understand the meaning of “aquaculture” and were unable to differentiate between products from fisheries and from aquaculture. Consumers tend to indicate a preference for wild caught products, perceiving these as healthier and of higher quality. Consumers failed to understand algae products.

Nicolás Fernández Muñoz (OPP72), in line with Mr Pastoor’s intervention, expressed concern about consumers’ perception of seafood, since it is a very relevant product for health in general. Fishery and aquaculture products should be the first reference for health. Mr Fernández argued that fishery products suffered from too much negative media coverage. Furthermore, there was a lack of awareness on the work of fishers. He highlighted that MSC certification did not cover the social and economic pillars of sustainability and wondered about their future inclusion, which would reflect global concerns.

Richard Stobart (MSC) argued that, in the context of seafood marketing, the health benefits should be a priority element for the industry, in order to remind of the benefits. Mr Stobart emphasised that there were complexities linked to the cost-of-living crises, as consumers perceive fishery and aquaculture products as expensive or even luxury products. Mr Stobart stated that fishers were increasingly perceived as stewards of the ocean, which was a more positive image. On the certification of social elements, consumers did not express significant concerns about social issues in the seafood value chain, focusing more on the environmental aspects.

Erin Priddle (MSC) stated that MSC looked into social elements and incorporated some auditing on major labour abuses, such as child labour. Nevertheless, there were other institutions with more expertise on the matter of social sustainability. The MSC was following the developments regarding the proposed due diligence legislation.

José Manuel Beltrán (OPP Burela) emphasised the evident decrease in seafood consumption and enquired whether studies had been conducted on the increased consumption of plant-based products imitating seafood and its impact on actual seafood consumption.



Richard Stobart (MSC) responded that, despite dietary changes, the consumption of plant-based alternatives continued to not be very high among mainstream consumers. Mr Stobart highlighted that there had been news articles showing that these products were ultra-processed, which would likely create a negative image of plant-based products in the future.

Erin Priddle (MSC) added that some plant-based alternatives have a high carbon footprint, which further contributed to the lack uptake in diets. Ms Priddle argued that there was a role for public policy and the educational curricula to emphasise the health benefits of seafood.

Richard Stobart (MSC) underscored that the seafood industry needs to undertake effective campaigns, in a similar manner to the ones done by the vegetables industry.

The Chair suggested that, in the next survey, the MSC could include a question about consumer perceptions of aquaculture versus wild-caught seafood in the next survey.

### Awareness Campaigns

- **Update on the fourth edition of the “Taste the Ocean” campaign by Charlotte Gugenheim and Alessandra Portis (MARE E2)**

Click [here](#) to access the presentation.

Alessandra Portis (DG MARE) provided a brief overview of the fourth edition of the “Taste the Ocean” campaign, emphasising that the goal was to demonstrate that cooking sustainable seafood is simple and quick. The campaign included a contest that ran from 15 April to 29 April 2024, promoted through influencers on Instagram and Facebook. An influencer from each Member State (except Belgium, which was assigned two influencers – one French-speaking and one Flemish) was given all of the necessary campaign assets and contractually bound to promote the campaign website.

Ms Portis stated that the campaign received over 90 entries from across Europe, showcasing a diverse range of fish used in recipes. The European Parliament's PECH Committee also contributed to the campaign with a recipe. The top 20 entries were chosen based on a variety of criteria, including the type of seafood used and the recipe's simplicity. Six winners were chosen at random from among these twenty entries. Ms Portis stated that the campaign was backed by a paid campaign across all Member States, with a reach of around 1 million people. She stated that the influencer campaign had a total reach of approximately 1.9 million users, with Instagram reels generating 1.83 million views.

Charlotte Gugenheim (DG MARE) informed that it was unclear whether DG MARE would proceed with a fifth edition of the campaign, since two HORIZON projects on awareness on sustainable consumption of seafood products has been launched: VeriFish and Mr. Goodfish 3.0, which would also cover both campaigns and their application. DG MARE would be closely following the development of these projects.

- **Exchange of views**



Christine Absil (GoodFish) informed that she was a member of the VeriFish consortium and expressed availability to provide more information about the project.

The Chair suggested inviting the two projects, VeriFish and Mr.Goodfish 3.0, to deliver presentations and provide information at the next meeting.

Nicolás Fernández Muñoz (OPP72) praised the Commission for increasing awareness around fishery and aquaculture products and encouraging consumption. Mr Fernández argued that there should be more dissemination of the campaign, as only influencers would be insufficient. DG MARE should make use of the Fisheries Local Action Groups and include rural communities. Mr Fernández requested information on the cost of the “Taste the Ocean” campaign. He drew attention to an initiative launched by his Producer Organisation, the “Chef Marinero Infantil”, a cooking competition for children, which received over a hundred entries. He also called on DG MARE to look at the campaigns launched by the Spanish government, in order to ensure more creativity in the dissemination.

Charlotte Gugenheim (DG MARE) explained that the dissemination process included contacts with the Advisory Councils, Commission’s delegations in the Member States, Fisheries Attachés of the Member States, FAMENET, and the EMFAF national authorities. Ms Gugenheim expressed availability to further dissemination at the local level. In terms of costs, she explained that the campaign was mostly done “in house”, so there was a cost of 140.000€ for the dissemination by the influencers. In terms of audience, the campaign had specific targets, which could be scaled up in the next initiative.

Alessandra Portis (DG MARE) expressed interest in the initiative launched by OPP72, as it was important to raise awareness about the use of sustainable ingredients and to encourage informed consumers choices.

The Chair reminded members that the Commission had informed them about the campaign and the competition at the previous meeting, prior to its launch. The Chair also recalled that local initiatives were eligible for funding under the EMFAF.

Szilvia Mihalfy (FEAP) welcomed the initiative and informed that her organisation was involved in two HORIZON projects about consumer awareness. Ms Mihalfy mentioned that, as demonstrated by the GlobeScan’s survey, consumers have limited knowledge about fish, seafood, and aquaculture products. Consumers are overwhelmed with information, and face trust issues. Therefore, in her view, in schools, it was necessary to inform children about the importance of healthy sustainable diets. With a long-term perspective, these topics should be included in the school curricula.

Charlotte Gugenheim (DG MARE) welcomed the information about the HORIZON projects, adding that the Commission was also developing an awareness campaign about aquaculture. Ms Gugenheim highlighted that the undertaking of actions at school must take place at the national level, as the Commission does not have competence over school curricula. Therefore, even though the Commission recognised the importance of educating children, the awareness campaigns were focused on the parent. She mentioned that, in the context of an EMFAF project, a roadshow with children had taken place in Ireland ([BIM – The ARC](#)).



Alessandra Portis (DG MARE) explained that the “Taste the Ocean” campaign focused on social media, so children were not the target. The focus was on parents. Ms Portis emphasised the importance of a dialogue at home between parents and children about seafood and healthy diets.

Szilvia Mihalfy (FEAP) mentioned that HORIZON projects were allowed to reach schools. Funding to schools can influence priorities. Ms Mihalfy argued that, even without legislation, the communication from the Commission to Member States was already impactful, including via expert groups and other cooperation platforms.

Charlotte Gugenheim (DG MARE) expressed interest in the tool kits developed under the mentioned HORIZON projects. Ms Gugenheim mentioned that a meeting of the Aquaculture Assistance Mechanism would take place soon, so further exchanges could take place.

The Chair encouraged the Commission, when launching the next campaign, to consult the MAC to receive recommendations. The Chair called for further efforts to disseminate the campaign.

### Valorisation of by-products

- **Consideration of joint AAC-CCRUP-MAC-NSAC draft advice on the valorisation of fisheries and aquaculture by-products**

The Chair recalled that the MAC expressed interest in participating in the development of a joint advice on the valorisation of fisheries and aquaculture by-products. It was an initiative from the Secretariat of the North Sea Advisory Council (NSAC), which followed with an invitation to other Advisory Councils to participate. A first draft had been finalised and circulated to the members.

The Secretary General explained that the draft was based on the outcomes from several scientific projects about valorisation of by-products. It includes several case studies, such as the BlueBioChain, MariGreen, and AquaHealth projects. The draft also focuses on facilitating the circularity of aquaculture of feed as well as of sides streams and waste.

The Secretary General outlined the specific recommendations foreseen in the draft, including calling for a foresight approach, seeking more sound scientific advice, determining acceptable additives and processing methods, considering operational scenarios, revisiting the Animal By-Product Regulation, and promoting collaboration between decision-makers, the research community, and industry. The draft also provides general recommendations on knowledge exchange, capacity building, financing, synergies, and systematic engagement.

Guus Pastoor (Visfederatie) expressed support for the draft. Mr Pastoor emphasised that existing market activities should not be overlooked, pointing out that several processing companies were already engaging. He called to also include larger companies, in addition to targeting SMEs, and suggested that the scope of the advice be expanded to include larger processing companies.

The Secretary General suggested to include a general recommendation for the Commission and the Member States to continue encouraging and facilitating EU processing companies in the research and development of the valorisation of byproducts.



Szilvia Mihalfy (FEAP) expressed satisfaction with the quality of the document. Ms Mihalfy drew attention to the work of the European Sustainable Phosphorus Platform (ESPP), which had contacted the Commission about the legal obstacles to nutrient recycling from aquaculture waste. Her organisation also exchanged with DG MARE on the issue. In the past, DG MARE did not consider the circularity for fish manure to be relevant enough for a legislative change. She expressed how that the work of the ESPP would elevate the priority of the topic, and suggested to include a reference to the work of the ESPP in the draft advice.

The Secretary General suggested to include a general recommendation for the Commission to keep in mind the ongoing work of the ESPP concerning amendments to EU legislation to facilitate the valorisation of byproducts.

*The Working Group expressed agreement with the amended AAC-CCRUP-MAC-NSAC draft advice on the valorisation of fisheries and aquaculture by-products.*

- **Way forward**

The Secretary General proposed to put forward the draft advice to the Executive Committee for consideration. Once there was support from the various involved Advisory Councils, the draft advice would be considered adopted.

### Consumer Information

- **Update on the work of the joint MAC/AAC Focus Group on Consumer Information in the HoReCa Sector by Pedro Reis Santos, Secretary General**

The Secretary General provided an update on the work of the MAC/AAC Focus Group on Consumer Information in the HoReCa Sector. The Focus Group invited external associations representing the sector and consumer interests to participate as active observers in the work. BEUC, the umbrella organisation for consumer organisations, did not accept the invitation due to lack of capacity to address fisheries and aquaculture topics. HOTREC and FoodServicesEurope, associations representing European hospitality and mass caterers, respectively, agreed to participate. The Focus Group met on 22 February and 28 May 2024.

The Secretary General explained that, after the second meeting, a questionnaire about Article 35 of the CMO Regulation was circulated to the members of the Focus Group. Based on the responses, the Chair of the Focus Group prepared a first working document. He informed that working document included six sections: 1) Introduction, 2) Policy Initiatives from the European Commission, 3) Previous advice/recommendations of the AAC and the MAC, 4) Products and segments covered by Article 35 of the Common Market Organisation (CMO), 5) The core issues, and 6) Recommendations.

The Secretary General outlined the draft recommendations, adding that these were intentionally general, in order to facilitate consensus among the membership. The first recommendation focuses on facilitating access to consumers of information about products under Chapter 16 of the Combined Nomenclature. The second recommendation encouraged the Commission to consider that in the



context of the ongoing evaluation of the Common Fisheries Policy, and in the planned revision of the Food Information to Consumers Regulation. The third recommendation called on the Commission to draft a guidance to retailers, mass caterers and Member States on how to distinguish between products classified as Chapter 03 and as Chapter 16 of the Combined Nomenclature.

The Secretary General highlighted that the work of the Focus Group was still ongoing, so the draft recommendations were likely to suffer significant changes. The next meeting would take place at the end of July 2024.

Guus Pastoor (Visfederatie) requested information on the scope of the draft advice. According to the title, the text is about the HoReCa sector, but the recommendations, by referring to Chapter 16 of the Combined Nomenclature, went beyond and included the retail sector.

The Secretary General responded that, in line with the Terms of Reference, the primary focus was on the HoReCa sector. Nevertheless, the provision of consumer information under the CMO Regulation was essentially based on the classification of the product, not on the sectorial segment. The HoReCa sector is essentially excluded from the provision of information to consumers under Article 35 of the CMO Regulation because this sector provides prepared products, meaning that these are products under Chapter 16 of the Combined Nomenclature. At the same time, some Member States required the HoReCa sector to provide consumer information to certain unprepared products that fall under Chapter 03 of the Combined Nomenclature, such as live oysters.

Bruno Guillaumie (EMPA) highlighted that the Comité National de la Conchyliculture (CNC) was a member of EMPA and included both processors and restaurants. Therefore, the CNC could assist in testing the recommendations provided by the MAC and the AAC. The members of the CNC could also provide their views on the recommendations.

The Secretary General agreed to inform the Chair of the Focus Group of these suggestions.

Pierre Commère (PACT'ALIM) expressed doubt about the relevance of the categorisation of the products as falling under Chapter 03 or 16 of the Combined Nomenclature. In his view, it was necessary to find common ground on the information to provide to consumers.

Gerd Heinen (DG MARE) explained that Article 35 of the CMO Regulation foresaw an obligation to provide mandatory information to the final consumer and to mass caterers. The obligation covers products under Chapter 03 of the Combined Nomenclature. Since the HoReCa sector predominantly provides prepared products (reflected under Chapter 16), these are outside of the scope. Mr Heinen stated that it would be difficult to ensure the provision of further consumer information in the HoReCa sector without a legislative amendment.

Iñigo Azqueta Ruiz-Gallardón (FEICOPESCA) expressed support for the interventions of Mr Pastoor and Mr Commère. Mr Azqueta argued that prepared and preserved products were different from live and fresh products, so should, accordingly, be treated differently.



Bruno Guillaumie (EMPA) stated that he understood the concerns of the HoReCa sector about new obligations. In his view, the recommendations to the Commission should be about the future of the legislation and about the implementation of the existing legislation. Furthermore, there could be suggestions of voluntary actions, such as the voluntary provision of information. There are good practices on the provision of additional information that could be highlighted. Mr Guillaumie argued that these could meet the increasing societal interest in more information.

The Secretary General took note of Mr Guillaumie's suggestion. The Focus Group discussed the possibility of guidance for the voluntary provision of information, but the active observers representing the HoReCa did not seem to be pleased with that approach.

Janne Posti (Conxemar) argued that both products under Chapter 03 and Chapter 16 of the Combined Nomenclature were placed in the EU market and competed with each other. Therefore, these products should be under the same traceability and consumer information requirements.

Christine Absil (GoodFish) expressed agreement with Mr Guillaumie. Even when HoReCa operators want to voluntarily provide more information, frequently the information is not available to them. As an example, breaded products sometimes referred merely to "white fish" without further specification. Therefore, it was necessary to stimulate the voluntary provision of information.

## AOB

- **Focus Group on PEFCR for Marine Fish Products**

The Secretary General recalled that the Working Group agreed to reactivate the Focus Group on PEFCR for Marine Fish Products while maintaining the same structure and membership. The Secretary General informed that MSC and Conxemar requested to become members of the Focus Group. Furthermore, ASC, which was previously an observer, also requested to become a member.

*The Working Group agreed with the inclusion of ASC, Conxemar, and MSC as members of the Focus Group on PEFCR for Marine Fish Products.*



### Summary of action items

- Valorisation of by-products
  - o AAC-CCRUP-MAC-NSAC draft advice on the valorisation of fisheries and aquaculture by-products to be put forward to the Executive Committee for consideration.



## Attendance List

Representative	Organisation	Role
Adrien Simonnet	Union du Mareyage Français (UMF)	Member
Alessandro Piccione	EU Fish Processors and Traders Association (AIPCE)	Member
Alonso Abreu Lozano	OPP80 Punta del Moral	Member
Amélie Laurent	Oceana	Member
Anna Rokicka	Polish Association of Fish Processors (PSPR)	Member
Benoît Thomassen	Federation of European Aquaculture Producers (FEAP)	Chair
Bruno Guillaumie	European Molluscs' Producers Association (EMPA)	Member
Christine Absil	Good Fish Foundation	Member
Dominic Rihan	Killybeg Fishermen's Organisation (KFO)	Member
Emiel Brouckaert	European Association of Fish Producers Organisations (EAPO)	Member
Gerd Heinen	European Commission	Expert
Guus Pastoor	Visfederatie / EU Fish Processors and Traders Association (AIPCE)	Member
Iñigo Azqueta Ruiz-Gallardón	FEICOPECA	Member
Janne Posti	Conxemar	Member
Javier Barón Fernández	Spain	Observer
Jean-Marie Robert	Les Pêcheurs de Bretagne	Member
Jens Høj Mathiesen	Danish Seafood Association	Member
John Lynch	Irish South and East Fish Producers Organisation (ISEFPO)	Member
José Beltrán	OPP Burela	Member
José Carlos Escalera	Federación de Cofradías de Pescadores de Cádiz (FECOPECA)	Member
Juan Manuel Trujillo Castillo	European Transport Workers' Federation (ETF)	Member
Julien Daudu	Environmental Justice Foundation (EJF)	Member
Julien Lamothe	ANOP	Member
Katarina Sipic	EU Fish Processors and Traders Association (AIPCE) / European Federation of National Organizations of Importers and Exporters of Fish (CEP)	Member



Representative	Organisation	Role
Louis Lambrechts	WWF	Member
Mariano García García	Cofradía “Virgen del Carmen” de Isla Cristina	Member
Maximilian Schwarz	Market Advisory Council (MAC)	Secretariat
Nicolás Fernández	Organización Productores Pesqueros Artesanales Lonja de Conil (OPP72)	Member
Pauline Prent	Visfederatie	Member
Pedro Luis Casado López	Asociación de Armadores Punta del Moral (OPP80)	Member
Pedro Reis Santos	Market Advisory Council (MAC)	Secretariat
Pierre Commère	PACT’ALIM	Member
Roberto Alonso	ANFACO-CECOPECA	Member
Rosalie Tukker	Europêche	Member
Szilvia Mihalfy	Federation of European Aquaculture Producers (FEAP)	Member
Yobana Bermúdez Rodríguez	EU Fish Processors and Traders Association (AIPCE)	Member

