

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

Tuesday, 24 November 2020

09:30 - 12:45 CET

Zoom online meeting

Welcome from the Chair, Benoît Thomassen

Adoption of draft agenda and minutes of last meeting (23.09.20): adopted

EU promotion programme for agricultural and food products

- Presentation on policy review and evaluation support study by Commission representative

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

Christina Gerstgrasser (DG AGRI) provided an overview of the evaluation and review of the promotion policy. The evaluation has found the policy to be overall effective and efficient in its implementation. The Commission's own initiatives are considered to be particularly effective. The external evaluation has found that the policy overall is coherent with other EU policies. Coherence with the Common Fisheries Policy is considered very good. However, the coherence with environmental, health and development policies could be strengthened. On EU added-value, the policy is considered to have particular added value, since it provides promotion in key export markets and raises awareness on the quality of EU standards.

One of the key priorities to take into account in the policy review is sustainability, as put forward by the Farm to Fork Strategy. One of the objectives is to increase organic production. The promotion policy is well suited to promote consumption of organic products. Organic aquaculture is covered by the EU's organic logo, so it can benefit from this promotion. Participation of seafood products is possible when part of a basket of promoted products. Another objective is the promotion of sustainable production and consumption.

The Farm to Fork Strategy also prioritises future food labelling systems. The Commission will examine the possibility of an animal welfare system. These labelling systems would be new, so not yet covered by the promotion policy. The promotion policy raises awareness of EU quality schemes (EU organic logo and geographical indications). Therefore, the promotion policy can contribute to the Farm to Fork Strategy, but there are some elements missing.



- **Exchange of views**

The Chair highlighted that the promotion policy was identified as Farm to Fork Strategy priority by the Executive Committee. The Chair wondered about how Working Group 3 could contribute.

Christina Gerstgrasser (DG AGRI) explained that there were no contributions from seafood sector associations to the open public consultation. The external evaluation study did not find any inconsistencies with the Common Fisheries Policy. The representative encouraged the MAC to submit a position paper under the future open consultation for the inception impact assessment. According to the evaluation study, for proposing organisations from the seafood sector, it can be difficult to find partners to participate in a basket of products. Therefore, the MAC's membership could explore the potential difficulties and proposals to facilitate the inclusion of seafood products. The promotion policy is financed by agricultural funds, which is why other food products must be included in a basket.

Nicolás Fernández (OPP72) thanked the representative for the presentation and the explanation on the participation of seafood sector associations. They highlighted that, when conceiving the Farm to Fork Strategy, the Commission focused on the aquaculture and farming sectors, but that catch fisheries were not included enough. They stressed that most EU fisheries are already sustainable, which also needs to be taken into account in the labelling of sustainable products.

Wouter van Zandbrink (Dutch Mussel Traders Association) wanted to know if the seafood sector was likely to have a similar position as fruit as vegetables under the EU healthy school lunch programme.

Christina Gerstgrasser (DG AGRI) explained that DG AGRI actively contributed to the Farm to Fork Strategy, but was not the lead service. The lead service is DG SANTE. The promotion policy contributes to the Farm to Fork Strategy. Wild caught fisheries products can be part of baskets of products, but not benefitting specifically from promotion for organic logo products.

Sean O'Donoghue (KFO) recalled that, about three years ago, DG MARE presented the promotion policy to the seafood sector. At that time, seafood associations seriously considered participation in the campaigns. Even though participation by seafood associations is possible, in practice, the association must be a very large SME or PLC, plus you need actors in the agricultural sector. Taking into account the differences between the sectors, they expressed doubt that seafood companies could really participate. It also requires significant amount of time and effort, even though support is not guaranteed.

Christina Gerstgrasser (DG AGRI) recognised that the promotion policy is over-subscribed. There is a lot of competition for the co-financing. Many agricultural companies are smaller, so it is also a significant effort for them. The basket approach is the most appropriate for the seafood sector.



- **Way forward**

The Chair proposed that the MAC should wait for the launch of the next consultation.

Plastics

- **Exchange of views on Commission's reply to Multi-AC Advice on the Implementation of the Single Use Plastics Directive and Fishing for Litter**

The Chair provided an overview of the main issues covered by the Commission's reply.

- **Consideration of draft advice on Plastics and the Seafood Supply Chain**

The Working Group proceeded to analyse, paragraph by paragraph, the main text of the draft advice, in order to reach agreement.

Emiel Brouckaert (EAPO) suggested the inclusion, in the introduction, of a reference to the Commission's reply to the Multi-AC Advice.

Sean O'Donoghue (KFO) argued that the recommendations directly related to market issues should be listed first.

Bruno Guillaumie (EMPA) suggested that scientific research should cover animal health risks too.

Emiel Brouckaert (EAPO) argued that market issues, such as packaging and consumer information, should be listed before marine issues.

Bruno Guillaumie (EMPA) suggested that the recommended awareness campaign should also draw attention to the impacts on animal health.

Sean O'Donoghue (KFO) emphasised that the awareness campaign should be proactive and go beyond a dedicated webpage. The campaign should be at the EU and national level using media and social media outlets.

Bruno Guillaumie (EMPA) emphasised the importance of social media, particularly to reach young people.

Matthias Keller (Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.) suggested the inclusion of a reference to waste exported to third countries.



Sean O'Donoghue (KFO) proposed a rephrasing of the draft recommendation on the undertaking of a study on the economic impact of EPR schemes.

Pim Visser (VisNed), taking into account the variety of EPR schemes, proposed the inclusion of a reference to harmonisation at European level.

Sean O'Donoghue (KFO) requested the addition of a clarification that the provision of funds would be under the next EMFAF.

Bruno Guillaumie (EMPA) proposed the inclusion of a reference to the EMFAF national programmes, since it will be up to the Member States to determine the distribution of the funding. They also proposed an additional recommendation on the need for coherence between regulations on the use of plastic, exemplifying that aquaculture farmers resort to plastic sleeves to comply with conservation rules under the Birds Directive.

Sean O'Donoghue (KFO) wondered about the relevance of including the Annex.

The Secretary General explained that the Annex makes the scientific references that substantiated the recommendations available to the European Commission. These references were based on the workshop report.

The Working Group agreed to put forward the draft text, with the integration of the proposed amendments, to the Executive Committee under written procedure.

DG ENV's Legislative proposal on substantiating green claims

- **Exchange of views on the Secretariat's questionnaire**

The Chair explained that a questionnaire was previously circulated by the Secretariat. There was feedback from AIPCE-CEP, EuroCommerce, EAPO and MSC. The Secretariat prepared a draft text based on this feedback, which was circulated in advance of the meeting.

The Working Group proceeded to analyse the draft advice, in order to reach agreement.

Bruno Guillaumie (EMPA) stated that EMPA was not against the PEF method. They participated in the inception of the method, but decided to leave the pilot phase, since it was exclusively in English. The PEF methods is good, but highly complex, so there should be an online technical support system for SMEs in the different EU languages.

Erin Priddle (MSC) proposed a reference to "unverifiable and unreliable claims". They proposed, in relation to issue-specific indicators and labels, the inclusion of the reference "without imposing



disproportionate requirements on their users to report and label on all environmental impacts not covered by the scheme”.

Els Bedert (EuroCommerce) expressed support for the changes proposed by MSC.

Erin Priddle (MSC) proposed the inclusion under draft recommendation i) of a reference to the recognition of best-in-class labels as a legitimate way to substantiate claims.

The Working Group agreed to put forward the draft text, with the integration of the proposed amendments, to the Executive Committee under written procedure.

Focus Group on Voluntary Sustainability Claims

- **Consideration and potential approval of draft Terms of Reference**

The Chair recalled that Working Group 3 agreed to establish a Focus Group on this topic. Draft Terms of Reference were prepared and circulated in advance of the meeting.

Sean O’Donoghue (KFO), in relation to the purpose and proposed outcomes, emphasised that the Focus Groups should be composed of experts with specific tasks to fulfil. The draft Terms of Reference were too broad, which means that the Focus Group would be replacing the Working Group. The purpose and outcomes need to be strictly defined. The Working Group should agree on specific tasks, for example putting together an overview of previous work on sustainability claims. If there are no technical issues to be analysed, then it should be left to the Working Group.

Katrin Poulsen (WWF) expressed agreement with the previous intervention.

Guus Pastoor (Visfederatie) emphasised that the Terms of Reference need to be specific.

Pierre Commère (ADEPALE) stated that the potential role of standardisation bodies, such as CEN and ISO, should also be covered. They agreed that the terms of reference should be specific.

In the Chat, María Luisa Álvarez Blanco (FEDEPESCA), Katarina Sipic (AIPCE-CEP), Emiel Brouckaert (EAPO), and Quentin Marchais (ClientEarth) expressed interest in joining the Focus Group.

- **Way forward**

The Chair proposed to work together with the Secretariat to come back with a new and more specific draft at a later stage.



Front-Of-Pack Nutrition Labelling

- **Presentation by Commission representative**

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

Jan Wollgast (JRC) presented a literature review by the EC Joint Research Centre on Front-Of-Pack nutrition labelling schemes.

- **Exchange of views**

Bruno Guillaumie (EMPA) wanted to know if the JRC representative knew any labels covering live products, since the literature review focused on labels for processed products.

Jan Wollgast (JRC) explained that the labels on nutrition labelling are connected to the rules on more information to consumers for packaged products. To his knowledge, there is no label for unprocessed products.

Erin Priddle (MSC), in relation to the research undertaken by the JRC, wanted to know if there were any high level outputs that could be applied to other front-of-pack labels, for example in the sustainability sector. They drew attention to a recent MSC study on the rise of the conscious consumer. Consumers rate health as a high priority, which closely followed by sustainability.

Jan Wollgast (JRC) explained that the study did not make extrapolations for other labelling systems. The Farm to Fork Strategy covers sustainability and healthy diets, so it is clear that future discussions will include sustainability aspects. There is also a behavioural aspect on how consumers react to front-of-pack nutrition and sustainability labelling, so further studies and literature reviews will be needed.

Sabela Pérez Máiz (DG MARE) highlighted that the JRC literature review will be used under one of the Farm to Fork Strategy's initiatives related to Front-Of-Pack information and labels. DG SANTE is taking the lead on the file and DG MARE is associated. DG SANTE is preparing an inception impact assessment, which will be published and the MAC will be able to provide feedback. The inception impact assessment includes different policy scenarios with initial analysis on the subject. DG MARE will inform the MAC on the publication of the inception impact assessment. Later, there will be an open consultation carried out with an external consultant. The initiative by DG SANTE covers Front-Of-Pack nutrition labelling, but also nutrition profiles and the definition of the best-before date. The inception impact assessment is undergoing internal validation.

- **Exchange of views**

The Chair proposed to follow the publication of the inception impact assessment by DG SANTE.



Nutri-Score Labelling on Fish Products

- **Exchange of views**

The Chair recalled that the draft was previously circulated under a written consultation. Comments were submitted by AIPCE-CEP, EAPO and EuroCommerce. The Secretariat prepared a new version of the draft based on these comments, which was circulated in advance of the meeting.

- **Consideration of draft advice**

The Working Group proceeded to analyse the draft advice, in order to reach agreement.

Pierre Commère (ADEPALE) expressed satisfaction with the new version of the draft advice.

Els Bedert (EuroCommerce) expressed satisfaction with the new version. The text should focus on Nutri-score's algorithm for fish products, instead of the competences. There will be the opportunity to delve more deeply into Front-Of-Pack nutrition labelling at a later stage. The MAC should keep in mind that there will be legislative changes.

The Chair, following the deletion suggested by EuroCommerce of the sentences on competence, proposed to put forward the draft text to the Executive Committee.

The Working Group agreed to put forward the draft text, with the integration of the proposed amendments, to the Executive Committee under written procedure.

AOB

None.



Summary of action points

- EU promotion programme for agricultural and food products:
 - o Working Group 3 to wait for the publication of the impact assessment
- Plastics:
 - o Draft text to be put forward to the Executive Committee through written procedure
- DG ENV's Legislative proposal on substantiating green claims:
 - o Draft text to be put forward to the Executive Committee through written procedure
- Focus Group on Voluntary Sustainability Claims:
 - o Secretariat and Chair to prepare new version of the draft Terms of Reference
- Front-Of-Pack Nutrition Labelling:
 - o Working Group 3 to wait for the publication of the inception impact assessment
- Nutri-Score Labelling on Fish Products
 - o Draft text to be put forward to the Executive Committee through written procedure



List of attendees

Representative	Organisation
Andrew Kuyk	CEP
Angeles Longa	EMPA
Arnault Chaperon	FEAP
Astrid Baeten	FRUCOM
Benoît Thomassen (Chair)	FEAP
Bruno Guillaumie	EMPA
Carla Valeiras	EuroCommerce
Catherine Pons	FEAP
Cécile Fouquet (observer)	Aquaculture Advisory Council's Secretariat
Christina Gerstgrasser	European Commission
Cristina Fernández (observer)	United Kingdom
Daniel Voces de Onáindi	Europêche
Daniel Weber	European Fishmeal
Decebal Padure	APAR
Els Bedert	EuroCommerce
Emiel Brouckaert	EAPO
Erin Priddle	MSC
Federico Facchin	COPA-COGECA
Frangiscos Nikolian	European Commission
Georg Werner	Environmental Justice Foundation
Guillaume Carruel	EAPO
Guus Pastoor	Visfederatie
Jan Wollgast	European Commission's Joint Research Centre
Javier Ojeda	FEAP
Jean-Marie Robert	Les Pêcheurs de Bretagne



Representative	Organisation
Jens Mathiesen	Danish Seafood Association
José Basilio Otero Rodríguez	Federación Nacional de Cofradías de Pescadores (FNCP)
José Carlos Escalera Aguiar	Federación de Cofradías de Pescadores de Cadiz (FECOPESCA)
Juana María Parada Guinaldo	OR.PA.GU.
Katarina Sipic	AIPCE-CEP
Katrin Vilhelm Poulsen	WWF
Malgorzata Kieliszewska (observer)	Poland
María Luisa Álvarez Blanco	FEDEPESCA
Matthias Keller	Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.
Mirta Novak (observer)	Croatia
Monika Kołodziejczyk (observer)	Poland
Nicolás Fernandez Muñoz	OPP72
Patrick Murphy	IS&WFPO
Paulien Prent	Visfederatie
Pedro Luis Casado López	OPP80
Pedro Reis Santos	Market Advisory Council
Pierre Commère	ADEPALE
Pim Visser	VisNed
Purificación Fernández	OPPC-3
Roberto Carlos Alonso Baptista de Sousa	ANFACO-CECOPECA
Rosalie Tukker	Europêche
Sabela Pérez Máiz	European Commission
Sean O'Donoghue	Killybegs Fishermen's Organisation Ltd (KFO)
Sergio López Garcia	OPP LUGO
Sofia Kyriakidou	FRUCOM
Stavroula Kremmydiotou	Market Advisory Council



Representative	Organisation
Thomas Wenzel Kruse	Danish Fishermen PO
Vanya Vulperhorst	Oceana
Wouter van Zandbrink	Dutch Mussel Traders Association
Yobana Bermudez	Conxemar

