

Mr Guus Pastoor
President
AIPCE/MAC
Avenue de Tervueren 188A, box 4,
B – 1150 Brussels

By e-mail

Brussels, 2 July 2020

Re: EuroCommerce suggestions for the MAC Workplan year 5

Dear Guus,

As you know, we have been reviewing our future involvement in the Market Advisory Council (MAC) due to the limited resources at the EuroCommerce secretariat and among members. We decided to stay engaged, in particular since you and the MAC agreed to have topics that are relevant for the retail & wholesale sector on the meetings' agendas and in the next workplan.

As such, we have carefully reviewed the draft workplan for year 5 and confirm that many of the issues proposed in the draft workplan, including the Revision of Control Regulation (1.2), Ecolabels and Certification Schemes (1.4) and Farm-to-Fork Strategy (7.), are of importance for our sector and I would like to thank you for your efforts in this respect.

To finalise the workplan, we would submit three further suggestions.

To avoid overlap between of topics, we propose to re-structure the document in line with the Commission strategies and actions. We, therefore, suggest that Nutritional labelling (point 5) and Health and Environmental Value of Seafood (point 9) is added to the Farm-to-Fork strategy (point 7).

Secondly, at this stage, we object to the development of a MAC advice to the Commission or member states on specific front-of-pack schemes, such as Nutri-score. Instead, we support the provision of objective and independent scientific advice, including current and new development, to be governed by an independent scientific body.

Finally, regarding point 6 on "Labelling of vegetarian and vegan products that imitate seafood products", we do not think that this deserves a separate discussion in the MAC. The reasons for limiting the terms used for vegetarian and vegan products would be similar to those applied to other product categories, such as meat or dairy products, which could then simply be endorsed for seafood, should a position be required.

I hope you will consider these points as useful for the finalisation of the plan. Els Bedert is available to provide you with further background or details, if necessary.

Best regards,



Christian Verschuere
Director-General

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