

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

Tuesday, 30 March 2021 09:30 - 13:00 CET Zoom online meeting

Welcome from the Chair, Benoît Thomassen

Adoption of draft agenda and minutes of last meeting (27.01.21): adopted

Click <u>here</u> to access the Chair's presentation.

The <u>Chair</u> provided an overview of the state-of-play of the action points of the last meeting.

- Food Information to Consumers:
 - Chair and Secretariat to develop a draft advice, based on the answers to the Secretariat's questionnaire and previously adopted advice
 - o Draft advice to be considered under urgent written procedure
 - Advice adopted on 23 February 2021
 - Voluntary Sustainability Claims on Seafood Products:
 - o Members to have one week to propose additional questions for the questionnaire
 - o New version of the questionnaire to be circulated for two weeks
 - o Secretariat to compile answers and prepare drafting suggestions
 - Dedicated meeting to take place in March
 - Opportunity to provide additional questions: 3 11 February 2021
 - Secretariat's Questionnaire (2nd version): 22 February 9 March 2021
 - Agenda item on questionnaire's results and drafting suggestions
- Food Contact Materials:
 - Chair and Secretariat to develop a draft advice, based on the contributions submitted by FEDEPESCA and AIPCE-CEP
 - Draft advice to be considered under urgent written procedure
 - Advice adopted on 17 February 2021
- Plant-based imitation seafood:
 - Paulien Prent (Visfederatie) to prepare first draft
 - Draft to be considered at an upcoming meeting
 - Draft circulated on 15 March 2021
 - Agenda item scheduled for draft consideration





Voluntary Sustainability Claims on Seafood Products

• Presentation of the results of the recirculation of the Secretariat's questionnaire

The <u>Chair</u> recalled that, ahead of the meeting, the Secretariat circulated a compilation of the replies to the questionnaire. A summary of the replies was also available on the PowerPoint file. The Chair proposed to proceed with the consideration of the draft's recommendations and then the main text.

• Consideration of drafting suggestions

<u>Linnéa Engström (MSC)</u> suggested the inclusion of wording expressing agreement that the proliferation of unsubstantiated (unverifiable, unreliable) environmental claims should be tackled. Proliferation of environmental labels is not the problem, the fact that some are not robust is. Sustainability logos across many product categories relate to different externalities associated with the product, deemed to be most significant sustainability issues at the production/extraction phase of the product lifecycle. The best way to tackle unreliable labels is through the introduction of mandatory minimum requirements for green claims, in line with the initiate led by DG JUST.

The <u>Chair</u> mentioned that the suggestion would be better covered in the main text of the draft.

The <u>Secretary General</u> highlighted that draft recommendation f) mentioned the usefulness of minimum requirements, as an attempt to incorporate MSC's reply to the questionnaire, even though the DG JUST initiative is not mentioned. The reference to the initiative could potentially be added.

<u>Emiel Brouckaert (EAPO)</u>, in relation to draft recommendation c), suggested to remove the reference to "shortcomings of the Common Fisheries Policy". The achievements and shortcomings have not been demonstrated. The text should refer only to increasing awareness on the policy.

<u>Christine Absil (Good Fish Foundation)</u> agreed with the previous suggestion.

<u>Linnéa Engström (MSC)</u> suggested the inclusion of wording expressing that credible robust third-party labels are a legitimate way to substantiate green claims and act in a complementary manner to EU policy, recognising and rewarding best in class.

The <u>Chair</u> stated that the suggested wording would be more appropriate in the main text than in the recommendations.

The <u>Secretary General</u> suggested including it under heading 6 "Credibility, accessibility, and continuous improvement" or heading 8 "Role of private and public initiatives".





<u>Linnéa Engström (MSC)</u> mentioned that the suggested wording was essentially a statement, but that MSC would like to see it included.

<u>Emiel Brouckaert (EAPO)</u> commented that the main text was quite long, so it was better to focus on the recommendations and attempt to reduce the main text.

The <u>Chair</u> agreed with the previous intervention, but proposed to consider the options, once the working group started analysing the main text. The proposed wording could perhaps be included under heading 8.

<u>Carla Valeiras Álvarez (EuroCommerce)</u> agreed with EAPO that the advice should not be too long, but added that the point raised by MSC was very important. Third-party labels are a legitimate way to substantiate green claims can reward best in class. If members do not agree to include it in the main text, then it could be included in the recommendations.

The <u>Chair</u> asked members whether they agreed with the inclusion of a new draft recommendation to reflect MSC's intervention.

<u>Christine Absil (Good Fish Foundation)</u> stated that some members might have reservations with the wording "best in class", so alternative wording should be used.

<u>Patrick Murphy (IS&WFPO)</u> argued that the draft text was too broad, expressing doubts on how best in class would be rewarded and whether there would be an obligation to reward them. The expression "best in class" is also rather undetermined.

The <u>Secretary General</u> suggested the inclusion a new draft recommendation stating: "Take into account the role of credible robust third-party labels can have as a legitimate way to substantiate green claims and act in a complementary manner to EU policy".

Emiel Brouckaert (EAPO) suggested the wording "can be a legitimate way".

Pierre Commère (ADEPALE) suggested "useful" instead of "legitimate".

Patrick Murphy (IS&WFPO) suggested "may be" instead of "can be".

<u>Christine Absil (Good Fish Foundation)</u> expressed preference for "can be", since third-party labels have proved their value, even though it is not the only option.

<u>Katarina Sipic (AIPCE-CEP)</u> suggested that draft recommendation f) should be "take note of the increase in sustainability claims and certification schemes", instead of "take action to face".





The <u>Chair</u> asked MSC if draft recommendation g), which reads "Explore the potential usefulness of minimum requirements for voluntary sustainability claims and certification schemes, be it through EU legislation or through European or international standardisation" appropriately covered their comments.

Linnéa Engström (MSC) expressed agreement with the recommendation.

<u>Patrick Murphy (IS&WFPO)</u>, in relation to draft recommendation j), suggested "economic and environmental benefits", instead of "impact".

<u>Pierre Commère (ADEPALE)</u>, in relation to the layout of the recommendations, suggested to insert the draft recommendations on studies next to each other.

<u>Emiel Brouckaert (EAPO)</u>, in relation to draft recommendation k), stated that the meaning of "global multi-stakeholder initiatives" was not clear.

The <u>Secretary General</u> provided the example of the Global Sustainable Seafood Initiative (GSSI).

<u>Emiel Brouckaert (EAPO)</u> suggested to delete the reference to "engage with multi-stakeholder initiatives" and maintain the rest of the draft recommendation.

<u>Patrick Murphy (IS&WFPO)</u> wondered who the beneficiaries of the collaboration would be, plus with whom harmonisation and coordination would be seek, e.g., suppliers, new entrants to the EU market.

The <u>Secretary General</u> explained that, when drafting the recommendation, the aim was to highlight the existence of large stakeholder initiatives, such as GSSI, that are undertaking non-legislative work to achieve harmonisation and coordination of certification systems. Therefore, the Commission should work with these initiatives or, at least, keep track of their work.

<u>Emiel Brouckaert (EAPO)</u> disagree with a reference to GSSI. EAPO supports the principle of credible, collaborative and transparent sustainability systems throughout the supply chain, as well as harmonisation and coordination of the systems.

<u>Guus Pastoor (Visfederatie)</u> emphasised that the original understanding was that there are developments under current initiatives, which should be taken into account by the Commission, in order to avoid potential conflicts.

<u>Quentin Marchais (ClientEarth)</u> argued that, by removing the reference to "global multi-stakeholder initiatives", the sentence would lose the initial aim.





The <u>Secretary General</u> suggested redrafting as "promote the development of credible, collaborative and transparent sustainability systems throughout the supply chain, as well as to seek harmonisation and coordination of these systems, while ensuring the engagement of stakeholders, including through the existing global public and private multi-stakeholder initiatives, such as under FAO and GSSI".

<u>Jean-Marie Robert (Les Pêcheurs de Bretagne)</u> expressed support for the reference to exploring socioeconomic sustainability in the structure of voluntary sustainability claims and certification schemes, emphasising the importance of this pillar for producers.

<u>Christine Absil (Good Fish Foundation)</u> stressed that the schemes themselves determine whether to include certain criteria and whether to focus on socio-economic sustainability.

<u>Emiel Brouckaert (EAPO)</u> argued that a reference to three pillars of sustainability should be maintained.

The <u>Chair</u> agreed with the previous intervention, adding that many replies to the questionnaire highlighted the importance of socio-economic sustainability.

<u>Patrick Murphy (IS&WFPO)</u> also agreed that the three pillars of sustainability should be mentioned.

<u>Christine Absil (Good Fish Foundation)</u> emphasised that it is not the MAC that determines whether the concept of "sustainable" under a certification scheme must cover the three pillars. The certification schemes are voluntary. The Commission can verify if a scheme is clear and its focus. As long as the scheme is transparent and the focus is clear, then there is no problem. For example, MSC certification only explicitly refers to environmental sustainability, while recognising that there are other sustainability aspects in which they are not experts. Therefore, the MAC should not ask the Commission to require certain aspects in existing schemes.

<u>Quentin Marchais (ClientEarth)</u> agreed with the previous intervention. Socio-economic aspects are important, but it is up to the buyer using a certification scheme to choose. He highlighted that draft recommendation e) on increasing consumer awareness already included a reference to socio-economic sustainability.

<u>Jean-Marie Robert (Les Pêcheurs de Bretagne)</u> emphasised that it is about disseminating information. Socio-economic sustainability is fundamental for EU fishers. There can be certified fisheries with means close to modern slavery. There must be an analysis of labour matters. There should be a focus on socio-economic awareness. The first motivation for stakeholders using ecolabels is the environmental pillar, but the social and economic pillars are equally important.





<u>Patrick Murphy (IS&WFPO)</u> underscored that socio-economic aspects are an integral part of fisheries. The MAC should include the people working in the industry, so that there are some guarantees that they are part of a sustainable system.

<u>Christine Absil (Good Fish Foundation)</u> argued that socio-economic aspects are important, but it is not up to the MAC to say what needs to be included in specific schemes. She expressed satisfaction with the functioning of existing sustainability certification schemes.

<u>Nicolás Fernández Muñoz (OPP72)</u> disagreed with the previous intervention. It is necessary to take into account where the products come from. These can potentially come from vessels where slave labour is occurring. Socio-economic sustainability is key. There should be very clear criteria set on what socio-economic sustainability covers.

<u>Christine Absil (Good Fish Foundation)</u> agreed that there are problems with imported products. Socioeconomic concerns should be addressed, but current certification schemes should not be diluted. Otherwise, the consumer will not know what the label is about.

The <u>Chair</u> argued that sustainability includes all three pillars, so all should be reflected when using the term "sustainable".

<u>Christine Absil (Good Fish Foundation)</u> argued that the development of more fisheries labels on socioeconomic aspects should be promoted. It is not up to the existing environmental labels. For example, the label "Fair Trade Europe" should also cover fisheries products.

<u>Nicolás Fernández Muñoz (OPP72)</u> stated that it is not possible to include all information on labels, but it is possible to include additional information through QR codes. Socio-economic aspects are fundamental and must be included.

<u>Patrick Murphy (IS&WFPO)</u> argued that socio-economic are not covered often, so it is an opportunity for the MAC to curb the trend.

<u>Christine Absil (Good Fish Foundation)</u> stated that the MAC should call to ensure that current socioeconomic certification schemes include fisheries products.

<u>María Luisa Álvarez Blanco (FEDEPESCA)</u> highlighted that the discussion arises due to the evolution of the meaning of "sustainability" over the years. Fishers do not always have the sufficient resources to quality for some of the requirements demanded. Some people are left behind. Sustainability is not only environmental sustainability. It is necessary to recognise that operators are trying to do their job in compliance with norms and legislation.





<u>Quentin Marchais (ClientEarth)</u> highlighted that everyone agreed that the socio-economic pillar is fundamental. The disagreement arises on the inclusion of this pillar under environmental ecolabels, since these do not have the necessary expertise.

Emiel Brouckaert (EAPO) argued that the term "sustainable" should cover the three pillars.

<u>Christine Absil (Good Foundation)</u> emphasised that it is important to not confuse the consumer. It will be sufficient if any scheme is clear on what is referring to. There is no clear definition of sustainability.

<u>Carla Valeiras Álvarez (EuroCommerce)</u> highlighted that there would be other opportunities for the MAC to contribute to the aim and meaning of sustainability, since the Commission will continue working on the matter under the Farm to Fork Strategy.

The Working Group agreed on the draft recommendations as amended, including a reference to the recognition of the importance of the three pillars of sustainability under draft recommendation e) and the addition of a draft recommendation on the insufficient number of certification schemes specialised on socio-economic sustainability for fishery and aquaculture products. The Working Group agreed that draft recommendation f) on the specialisation of certification schemes would need to be redrafted, in order to be clearer and reach consensus.

Plant-based Imitation Seafood

• Presentation of draft proposal by Paulien Prent, Visfederatie

<u>Paulien Prent (Visfederatie)</u> explained that the draft covered labelling of plant-based imitation seafood. The first section is the background, explaining the issue and the increasing availability of plant-based products in the market, but that labelling of these products can lead to misinforming and misleading of consumers. The second section describes the legal framework, including applicable legislation to seafood products and legislation applicable to all foodstuffs, describes the lack of legislation on labelling of plant-based imitation seafood, the discrepancy between labelling of unprocessed fishery products and other foodstuffs, and includes examples of unclear labelling practices. Meat labelling is not included in the draft, since there were recent court cases on the matter, which were not well received. Therefore, it would be preferable to focus only on seafood. The third section covers conclusions and recommendations. Visfederatie puts forward a proposition on how plant-based imitation seafood could be labelled. The draft concludes with several recommendations.

• Consideration of draft proposal

Matthias Keller (Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.) stated that, under page 4, the reference to the German initiative would need to be corrected, since it is a





guidance document and not legislation. He expressed disagreement with the proposal to label plantbased products through the inclusion of "imitation" next to the commercial designation. Instead, he expressed support for the solution provided by the German guidance document. Under the guidance document, commercial designations, such as "tuna", "cod" or "herring" cannot be used for plantbased products. The term "fish" can be used as an unprotected designation. If other members had different views, then he would like for his association's views to be recorded in a footnote. He drew attention to recent complaints in German media regarding a product labelled as fishfingers on the front of the package, placed by the retailer next to fish products, but that the back's nutritional declaration demonstrate it was a plant-based product. There can also be issues of use of designations close to the official list of commercial designations, such as "phuna" instead of "tuna".

<u>Carla Valeiras Álvarez (EuroCommerce)</u> informed that her association would be sending written comments to the Secretariat regarding the draft. She wondered what the real issue, particularly whether it was a consumer confusion issue or a competition one. They would like to know the research that supports the existence of the problem. The tone of the draft should be changed somewhat, in order to avoid being seen as opposing plant-based products, but rather asking the Commission to adopt rules on labelling.

The <u>Chair</u> asked the Secretary General to recall the background of the draft advice.

The <u>Secretary General</u> recalled that the development of advice on labelling of plant-based imitation seafood was foreseen by the Work Programme for Year 5 and that Paulien Prent volunteered to draft it. In his view, Ms Prent tried to maintain both consumer and competition matters in mind. In relation to studies, the draft includes requests to the Commission to undertake those studies, in order to better understand how consumers perceive plant-based imitation seafood. Research has been more focused on the meat and dairy sectors. The draft text recognises that plant-based products are a legitimate development in the market, but suggestions to achieve the correct tone would be appreciated.

<u>Christine Absil (Good Fish Foundation)</u> expressed hope that there would be other opportunities to comment on the draft.

<u>Pierre Commère (ADEPALE)</u> explained the situation in France. The French Parliament adopted a legislative framework that provides general orientation on the labelling of plant-based products. This legislation is expected to be completed by a decree with more details. The decree does not exist yet, so it is difficult to describe the situation in France. His association agrees with the position of Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V., so against the use of commercial designations and against draft recommendation e).

<u>Garazi Rodríguez (APROMAR)</u> explained that they would like the draft to also cover situations where a processor includes a small percentage of seafood, which allows the use of the commercial





designation. There should be a minimum compulsory percentage to allow the use of the commercial designation. The second chapter of the draft should be clearer on when a legislation is applicable. She asked Ms Prent to clarify the reference to "defrosted unprocessed products" in page 7.

<u>Paulien Prent (Visfederatie)</u> explained that the proposal would be for the term "imitation" to be used in a similar manner to the term "defrosted". The FIC Regulation foresees a specific rule on the use of the term "defrosted" on packaging to consumers. For example, the term "defrosted" must be in the same line of sight and same width as the commercial designation.

The <u>Chair</u> suggested explicitly quoting the legislative text in the draft, in order to be clearer. The Chair asked whether members agreed with APROMAR's suggestion to cover products with a small percentage of seafood under the draft advice.

<u>Carla Valeiras Álvarez (EuroCommerce)</u> stated that her association would need to check internally. She asked Ms Prent whether there were studies that demonstrated market impact due to plant-based seafood products.

<u>Paulient Prent (Visfederatie)</u> responded that she was not aware of studies on consumer reactions in relation to plant-based seafood products. These products are quite new to the market, which is why there is a recommendation for the Commission to study the matter.

<u>Carla Valeiras Álvarez (EuroCommerce)</u> asked about the negative impact on the seafood market.

<u>Paulient Prent (Visfederatie)</u> responded that it was the same situation. The development is quite new in the seafood sector, unlike the meat sector.

<u>Pierre Commère (ADEPALE)</u> stated that the issue of minimum percentage was not pertinent. The draft advice is about products without any fish, because these are vegan or vegetarian products.

The <u>Chair</u> exemplified that there were products sold as caviar, which included 10% of sturgeon meat and the rest were plant-based ingredients.

<u>Pierre Commère (ADEPALE)</u> responded that the example provided represented fraud, not a plantbased vegan/vegetarian product.

The <u>Chair</u> wondered whether there were similar situations in the rest of the industry, for example with fishfingers.

Matthias Keller (Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.) argued against the inclusion of composite products, since it is a different matter. It is a matter of imitation. At EU level, there are discussions on dual quality of food, including on the percentage of breadcrumbs





on fishfingers. The focus should be on plant-based products and avoiding the use of the official of commercial designations for fisheries and aquaculture products.

<u>Christine Absil (Good Fish Foundation)</u> agreed that the MAC should address the topic of misleading claims to consumers. For example, the distinction between aquaculture and wild-caught products is not always clear. This would not in the draft advice under discussion, but in a future opportunity.

• Way forward

<u>Carla Valeiras Álvarez (EuroCommerce)</u> suggested that the Secretariat should circulate the draft advice for comments. Based on the level of divergence in the submitted comments, the Chair and Secretariat could determine whether the advice required discussion at the next meeting or whether it should continue through written procedure.

The <u>Chair</u> agreed with the suggestion.

Health and Environmental Value of Seafood

• Presentation of SEAFOODtomorrow project by Marta Santos, Project Manager, IPMA

Click <u>here</u> to access the presentation.

<u>Marta Santos (IPMA)</u> explained that seafood is an important source of nutrition in Europe. It plays a vital role in a balanced diet, as a good source of high-quality protein, vitamins, minerals and omega3 fatty acids, which have many health benefits. Most governments and health organisations recommend two portions of seafood per week. There is growing evidence that supplementation is required, especially for certain population segments, such as pregnant women, children and elderly people, who do not meet the dietary recommendations of eating two portions per week. In recent decades, the seafood sector has become more heterogenous and complex, but it is still conservation. Supermarket chains and large retailers are the key players in setting product requirements, influencing markets, consumer choices, and costs of raw material and seafood products.

The provision of seafood products in the future will be met through a growing supply from aquaculture production. It is critical to find opportunities to advance the European seafood sector and guarantee growth in the upcoming years. Despite the benefits, seafood can also be a source of harmful contaminants, impacting human health negatively. It is crucial to permanently monitor seafood to anticipate hazard outbreaks. As the global demand increases, there is a need for high quality food that is socially, economically and environmentally sustainable.

The SEAFOODtomorrow is an innovation action project. It will end in April 2021. It is composed by 35 partners and 13 third-party affiliate organisations from 19 countries. The project is generating new





knowledge and innovative solutions to meet these increasing demands and to increase the dietary and monetary value of seafood. The results benefit the seafood industry and consumers. On innovative solutions, the project focused on testing new sustainable feed ingredients, which are not dependent on fish or oils, but on algae with a lower environmental impact. Another objective was to demonstrate the benefits of integrated seaweed products for fish when compared to monocultures.

In relation to the processing sector, the project developed new ways of producing two different products: smoked salmon and smoked paté, with reduced sodium, without compromising taste, or quality or food safety. New innovative food dishes were created with sustainable and lesser-known species. Each dish was specifically designed to meet the nutritional needs of pregnant women, children and elder adults. Several national contents were organised in the participating countries. The recipes were presented in a European contest. The dishes were judged by professional chefs on nutritional quality, visibility and scalability for restaurants and catering environments. The winning recipes were collected in a book, which is available for download on the project's website.

In order to reduce water in seafood processing, the project used new technologies, such as thermal and solar energy, radiofrequency, high pressure processing, reflective window drying. The results were excellent, but the economic viability is weak, due to the high costs of the equipment. A change in the costs would contribute to a shift towards more environmentally friendly processing industry. As for a consumer perspective, the projected focused on seafood safety and transparent information on the selected products along the trade chain. The project set up an authenticity reference database that allows identification of the species in the European market. The project also developed methodology for the quantification of seafood species mixed in samples through a fast-screening authentication tool, in order to prevent fraud. This technology is under the process of patenting.

The project developed a benefit-risk communication tool, called fishchoice, to inform consumers about their seafood consumption. It is free to use and available online. An app version will be made available soon. On transparent information and informed decisions, the project worked on the developing a benchmark tool for quality verification. A QR-code quality label was created. The benchmark will help the market be more aware of the nutritional importance, food safety, and food security. The project validated an automated traceability tool that can be linked with the benchmark tool and QR code, enabling stakeholders and consumers to have instant traceability information when purchasing seafood products, plus additional information, such as recipes. This tool will soon have an app. An e-learning course was created to improve professional skills and competences for those working in the seafood industry, particularly managers. A lifecycle analysis was applied to assess the environmental impact of the innovative solutions in comparison with existing solutions. Results show a very low carbon footprint when compared to terrestrial animals. A publication is being prepared on this topic. A document with legislative proposals is being prepared to overcome some of the barriers encountered throughout the project.





- Exchange of views
- Way forward

The <u>Chair</u> asked members if they had ideas of potential recommendations based on the presentation, specifically on the health and environmental value of seafood.

The <u>Secretary General</u> recalled that, under the Work Programme for Year 5, the MAC committed to producing advice on health and environmental value of seafood, including recommendations to the European Commission on how to recognise and value these. The purpose of the presentation was to launch the debate. If members or Ms Santos would have suggestions of potential recommendations, these would be appreciated.

<u>Marta Santos (IPMA)</u> explained that recommendations to the Commission are in the process of being developed. For example, difficulties in the use of tools to detect seafood contamination. One of the project participants, ANFACO-CECOPESCA is presenting a recommendation of legislative proposal to the Spanish authorities, in order to solve this.

The <u>Chair</u> suggested that the SEAFOODtomorrow's list of recommendations could be discussed in the MAC, in order to select relevant ones.

<u>Pierre Commère (ADEPALE)</u> highlighted that the project included many subprojects and perspectives, so it requires some time to follow everything. He wondered if the project could be of assistance, when the MAC developed further recommendations on the nutritional value of seafood. He wanted to know if the project had elements on the nutritional benefits of seafood, such as omega3 fatty acids.

<u>Marta Santos (IPMA)</u> informed that she would need to liaise with partners, but they would likely be available to assist the MAC. A database was developed for the fishchoice tool, so there should not be any problems with providing information.

Dioxins and Dioxin-like Polychlorinated Biphenyls (PCBs) in Fish Oil

• Presentation of proposal to modify EC Regulation by Matthias Keller, Bundesverband der deutschen Fischindustrie und des Fischgroßhandels e.V

Click <u>here</u> to access the presentation.

Matthias Keller (Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.) explained that the presentation was about the use of by-products from farmed products. These products, which are not used for direct human consumption, can be used for fish oil in the feed sector and human sector. Food safety rules require the regularly analysis of these products for dioxins and dioxin-like PCBs. In practice, according to data from several years, the limits are well below the





maximum limit set in the European legislation. Regulations (EC) 277/2012 and 744/2012 determine the frequency and scale of fish oil analyses. There are veterinarian and auditing companies that believe that only one representative analysis per 2000 tons should be required, while other veterinarians and private auditors believe that it must be 100% of the outgoing batches. The industry would like a clarification from the Commission that it is not necessary to analyse 100% of the batches. In the long-term, the regulation should be amended. This is very important for the industry to be able to invest resources in other projects.

• Exchange of views

The <u>Chair</u> suggested the development of a short draft advice, in coordination with the Secretariat, on the matter.

<u>Christine Absil (Good Fish Foundation)</u> expressed support for the proposal, since it is not sensible to have so many expensive analyses when the concentration is consistently quite low. The advice could perhaps suggest other safety mechanisms in the production, in order for the producer to demonstrate to demonstrate that there is no adulteration or mixing with products from other sources. In this presented case, the producer used salmon from aquaculture, but perhaps there are cases that are not as precise.

Matthias Keller (Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.) responded that these companies are producing very specific products. These are under control and all raw material must be traced back. There are traceability protocols for certification. It ensures that there is no mixture. Companies collect raw material by species, in order to avoid problems.

• Way forward

The <u>Chair</u> proposed the circulation of a draft for consideration through written procedure.

AOB

None.





Summary of action points

- Voluntary Sustainability Claims on Seafood Products:
 - Chair and Secretariat to attempt redrafting of draft recommendation f)
 - Secretariat to circulate amended version of the draft to the members
 - \circ $\;$ Continuation of consideration of the draft advice at the next meeting $\;$
- Plant-based imitation seafood:
 - Draft advice to be circulated for comments
 - Chair and Secretariat to determine, based on the level of divergence in the submitted comments, whether the draft requires discussion at the next meeting or whether it should continue through written procedure
- Health and Environmental Value of Seafood:
 - Working Group to wait for the list of legislative recommendations from the SEAFOODtomorrow project
- Dioxins and Dioxin-like Polychlorinated Biphenyls (PCBs) in Fish Oil:
 - Matthias Keller (Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.) to prepare draft proposal in coordination with the Chair and the Secretariat
 - Draft to be considered through written procedure





List of attendees

Representative	Organisation
Anna Boulova	FRUCOM
Annelie Rosell	SPFPO
Benoît Thomassen (Chair)	FEAP
Carla Valeiras Álvarez	EuroCommerce
Catherine Pons	FEAP
Cécile Fouquet (observer)	Aquaculture Advisory Council's Secretariat
Christine Absil	Good Fish Foundation
Daniel Voces	Europêche
Eduardo Míguez	OPP77 Puerto de Celeiro
Elisabetta Maiorano	EuroCommerce
Emiel Brouckaert	EAPO
Erin Priddle	MSC
Garazi Rodríguez	FEAP
Georg Werner	Environmental Justice Foundation
Guus Pastoor	Visfederatie
Jaroslaw Zieliński	PSPR
Javier Ojeda	FEAP
Jean-Marie Robert	Les Pêcheurs de Bretagne
Jens Mathiesen	Danish Seafood Association
Jérémie Souben	FEDOPA
José Basilio Otero Rodríguez	Federación Nacional de Cofradías de Pescadores (FNCP)
Juana María Parada Guinaldo	OR.PA.GU.
Katarina Sipic	AIPCE-CEP
Katrin Vilhelm Poulsen	WWF
Laura Rull del Águila	Spain





Representative	Organisation
Linnéa Engström	MSC
María Luisa Álvarez Blanco	FEDEPESCA
Marta Santos	IPMA
Massimo Bellavista	COPA COGECA
Matthias Keller	Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.
Nicolás Fernández Muñoz	OPP72
Patrick Murphy	IS&WFPO
Paulien Prent	Visfederatie
Pedro Luis Casado López	OPP80 Punta Del Moral
Pedro Reis Santos	Market Advisory Council
Pierre Commère	ADEPALE
Poul Melgaard	Danish Seafood Association
Purificación Fernández	OPPC-3
Quentin Marchais	ClientEarth
Rosalie Tukker	Europêche
Sean O'Donoghue	Killybegs Fishermen's Organisation Ltd (KFO)
Sergio López Garcia	OPP LUGO
Silvia Corral	Conxemar
Søren Anker Pedersen	European Fishmeal
Stavroula Kremmydiotou	Market Advisory Council
Yobana Bermudez	Conxemar

