# Public consultation - Review of the marketing standards framework for fishery and aquaculture products

Fields marked with * are mandatory.

## Introduction

European Union (EU) marketing standards define specific quality requirements for EU and non-EU fishery products that are sold in the EU's single market.

The EU set marketing standards in 1989 (for canned sardines), 1992 (for canned tuna) and 1996 (for fresh fish), with a focus on quality criteria.

A recent evaluation of those standards showed that the overall impact has been positive but limited, identifying a number of technical issues. More generally, the evaluation pointed to the limited scope of the standards in terms of the products they cover and to the absence of criteria related to sustainability (including environmental, social and economic aspects). Meanwhile, trade in seafood products (wild and farmed fish, molluscs and crustaceans, in fresh, frozen or processed form) has evolved and imports (particularly farmed fish and processed products) from non-EU countries that are not covered by EU standards have increased. This has also led to a reduction in the contribution of marketing standards to fair competition in the single market.

Sustainability is at the heart of the Commission's farm to fork strategy. The strategy aims to make food systems fair, healthy and environmentally friendly.

While there are a number of private sustainability schemes (e.g. logos or eco-labels) for wild and farm fish, there is currently no EU legal framework to regulate or harmonise information on sustainability aspects specifically for seafood products. The current revision of the marketing standards could be a potential opportunity to address this.

This public consultation seeks to gather views from all relevant stakeholders on the revision of marketing standards and the potential impact on the value chain and on consumers.

Respondents can choose to answer a technical part for specialists and professionals working in the sector (estimated time to answer: 10 minutes) and/or a part for consumers and the general public (estimated time to answer: 5 minutes).

## About you

\* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)

○ Public authority

○ Trade union

○ Other

\* First name

```

```

\* Surname

```

```

\* Email (this won't be published)

```

```

\* Scope

○ International

○ Local

○ National

○ Regional

Are you active:

○ In the EU only?

○ Outside the EU?

\* Organisation name

*255 character(s) maximum*

```

```

\* Organisation size

○ Micro (1 to 9 employees)

○ Small (10 to 49 employees)

○ Medium (50 to 249 employees)

○ Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](). It's a voluntary database for organisations seeking to influence EU decision-making.

---

\* Country of origin

Please add your country of origin, or that of your organisation.

| | | | |
|---|---|---|---|
| ○ Afghanistan | ○ Djibouti | ○ Libya | ○ Saint Martin |
| ○ Åland Islands | ○ Dominica | ○ Liechtenstein | ○ Saint Pierre and Miquelon |
| ○ Albania | ○ Dominican Republic | ○ Lithuania | ○ Saint Vincent and the Grenadines |
| ○ Algeria | ○ Ecuador | ○ Luxembourg | ○ Samoa |
| ○ American Samoa | ○ Egypt | ○ Macau | ○ San Marino |
| ○ Andorra | ○ El Salvador | ○ Madagascar | ○ São Tomé and Príncipe |
| ○ Angola | ○ Equatorial Guinea | ○ Malawi | ○ Saudi Arabia |
| ○ Anguilla | ○ Eritrea | ○ Malaysia | ○ Senegal |
| ○ Antarctica | ○ Estonia | ○ Maldives | ○ Serbia |
| ○ Antigua and Barbuda | ○ Eswatini | ○ Mali | ○ Seychelles |
| ○ Argentina | ○ Ethiopia | ○ Malta | ○ Sierra Leone |
| ○ Armenia | ○ Falkland Islands | ○ Marshall Islands | ○ Singapore |
| ○ Aruba | ○ Faroe Islands | ○ Martinique | ○ Sint Maarten |
| ○ Australia | ○ Fiji | ○ Mauritania | ○ Slovakia |
| ○ Austria | ○ Finland | ○ Mauritius | ○ Slovenia |
| ○ Azerbaijan | ○ France | ○ Mayotte | ○ Solomon Islands |
| ○ Bahamas | ○ French Guiana | ○ Mexico | ○ Somalia |
| ○ Bahrain | ○ French Polynesia | ○ Micronesia | ○ South Africa |
| ○ Bangladesh | ○ | ○ Moldova | ○ South Georgia and the South |

French Southern and Antarctic Lands

Sandwich Islands

- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon

- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland

- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia

- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia

5

- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia

- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho

- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha

- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

| Democratic Republic of the Congo | | Saint Kitts and Nevis |
|---|---|---|
| ○ Denmark | ○ Liberia | ○ Saint Lucia |

\* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

Only your contribution, country of origin and the respondent type profile that you selected will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

○ **Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☐ I agree with the [personal data protection provisions](#)

\* In what capacity would you like to respond to this questionnaire?

○ As a stakeholder/specialist with an interest in seafood products

○ As a consumer/member of the general public

## Questions for stakeholders/specialists with an interest in seafood products

In which fields is your organisation active (several choices possible):

☐ Production (fisheries)

☐ Production (aquaculture)

☐ Processing (fisheries)

☐ Processing (aquaculture)

☐ Distribution/wholesale

☐ Retail

☐ Label or certification scheme

☐ Consulting

☐ Other

If other, you can provide more information here:

[                                                                    ]

**Technical aspects**

The recent evaluation found that common marketing standards for fresh seafood products had led to Member States using common terms for these products. However, the evaluation also found that implementation of these standards by Member States and at auctions within Member States remains inconsistent. What impact do you think a more harmonised implementation of existing marketing standards by Member States would have on the following issues?

| . | Very positive | Positive | Neutral | Negative | Very negative |
|---|---|---|---|---|---|
| Cross-border sales within the EU | ○ | ○ | ○ | ○ | ○ |
| First sale distance selling | ○ | ○ | ○ | ○ | ○ |
| Comparability among EU products | ○ | ○ | ○ | ○ | ○ |
| Comparability between EU and non-EU products | ○ | ○ | ○ | ○ | ○ |
| Administrative burden | ○ | ○ | ○ | ○ | ○ |
| Production costs | ○ | ○ | ○ | ○ | ○ |

The evaluation of marketing standards found that the terms 'superior' and 'extra' are commonly used in the aquaculture sector to describe the superior quality of a product without clearly defining them, which can be misleading for consumers. This problem could be addressed by defining these terms in the regulation, through marketing standards. What impact do you think that such a measure would have on the following aspects?

| . | Very positive | Positive | Neutral | Negative | Very negative |
|---|---|---|---|---|---|
| Functioning of the EU single market | ○ | ○ | ○ | ○ | ○ |
| Fair competition | ○ | ○ | ○ | ○ | ○ |
| Profitability of producers | ○ | ○ | ○ | ○ | ○ |
| Production costs | ○ | ○ | ○ | ○ | ○ |
| Administrative burden for producers | ○ | ○ | ○ | ○ | ○ |
| Consumer information | ○ | ○ | ○ | ○ | ○ |
| Information for stakeholders along the supply chain | ○ | ○ | ○ | ○ | ○ |
| Quality of products | ○ | ○ | ○ | ○ | ○ |

| | Very positive | Positive | Neutral | Negative | Very negative |
|---|---|---|---|---|---|
| Level playing field | ○ | ○ | ○ | ○ | ○ |
| Price competitiveness | ○ | ○ | ○ | ○ | ○ |

The evaluation of marketing standards found that, for certain stakeholders, it would be desirable to extend the criteria for freshness and size to additional species such as turbot, halibut, catfish and witch. This problem could be addressed by including these species in a revised version of the marketing standards. What impact do you think that such a measure would have on the following aspects?

| . | Very positive | Positive | Neutral | Negative | Very negative |
|---|---|---|---|---|---|
| Functioning of the EU single market | ○ | ○ | ○ | ○ | ○ |
| Fair competition | ○ | ○ | ○ | ○ | ○ |
| Profitability of producers | ○ | ○ | ○ | ○ | ○ |
| Production costs | ○ | ○ | ○ | ○ | ○ |
| Administrative burden for producers | ○ | ○ | ○ | ○ | ○ |
| Consumer information | ○ | ○ | ○ | ○ | ○ |
| Information for stakeholders along the supply chain | ○ | ○ | ○ | ○ | ○ |
| Quality of products | ○ | ○ | ○ | ○ | ○ |
| Level playing field | ○ | ○ | ○ | ○ | ○ |
| Price competitiveness | ○ | ○ | ○ | ○ | ○ |

The evaluation of marketing standards found that differences between Member States in the minimum amount of fish content in frozen fish fingers led to quality problems across the single market. This problem could be addressed by establishing a standard for the minimum fish content in frozen fish fingers at EU level. What impact do you think that such a measure would have on the following aspects?

| . | Very positive | Positive | Neutral | Negative | Very negative |
|---|---|---|---|---|---|
| Functioning of the EU single market | ○ | ○ | ○ | ○ | ○ |
| Fair competition | ○ | ○ | ○ | ○ | ○ |
| Profitability of producers | ○ | ○ | ○ | ○ | ○ |
| Production costs | ○ | ○ | ○ | ○ | ○ |
| Administrative burden for producers | ○ | ○ | ○ | ○ | ○ |

| | | | | | |
|---|---|---|---|---|---|
| Consumer information | ○ | ○ | ○ | ○ | ○ |
| Information for stakeholders along the supply chain | ○ | ○ | ○ | ○ | ○ |
| Quality of products | ○ | ○ | ○ | ○ | ○ |
| Level playing field | ○ | ○ | ○ | ○ | ○ |
| Price competitiveness | ○ | ○ | ○ | ○ | ○ |

**Sustainability (environmental, social, economic) aspects**

To what extent do you consider the following information on sustainability to be relevant for seafood products?

| . | To a great extent | To some extent | To a small extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Impact on fish stocks | ○ | ○ | ○ | ○ | ○ |
| Impact on carbon footprint | ○ | ○ | ○ | ○ | ○ |
| Impact on food waste | ○ | ○ | ○ | ○ | ○ |
| Other impacts on the environment | ○ | ○ | ○ | ○ | ○ |
| Impact on working conditions | ○ | ○ | ○ | ○ | ○ |
| Other social impacts | ○ | ○ | ○ | ○ | ○ |
| Impact on profitability of producers | ○ | ○ | ○ | ○ | ○ |
| Other economic impacts | ○ | ○ | ○ | ○ | ○ |

If you chose other environmental, social or economic impacts, please specify:

How important is information about sustainability aspects of seafood for the different stakeholders in the supply chain?

| . | Of great importance | Of some importance | Of little importance | Of no importance | Don't know |
|---|---|---|---|---|---|
| Catching sector | ○ | ○ | ○ | ○ | ○ |
| Aquaculture sector | ○ | ○ | ○ | ○ | ○ |
| Wholesalers | ○ | ○ | ○ | ○ | ○ |
| Canning industry | ○ | ○ | ○ | ○ | ○ |

| | | | | | |
|---|---|---|---|---|---|
| Other processing industry | ◯ | ◯ | ◯ | ◯ | ◯ |
| Importers | ◯ | ◯ | ◯ | ◯ | ◯ |
| Exporters | ◯ | ◯ | ◯ | ◯ | ◯ |
| Retail | ◯ | ◯ | ◯ | ◯ | ◯ |
| Consumers | ◯ | ◯ | ◯ | ◯ | ◯ |

If the Commission were to incorporate certain sustainability aspects[1] (environmental, social or economic) in EU marketing standards, what impact do you think it could have?

[1] *Illustrative examples would be the condition of a certain fish stock for an environmental aspect or labour conditions for a social aspect.*

| . | Very positive | Positive | Neutral | Negative | Very negative |
|---|---|---|---|---|---|
| Impact on supply of sustainable products | ◯ | ◯ | ◯ | ◯ | ◯ |
| Impact on consumer attractiveness of the product | ◯ | ◯ | ◯ | ◯ | ◯ |
| Impact on competitiveness of EU operators | ◯ | ◯ | ◯ | ◯ | ◯ |
| Impact on SMEs | ◯ | ◯ | ◯ | ◯ | ◯ |
| Impact on operators in non-EU countries | ◯ | ◯ | ◯ | ◯ | ◯ |
| Impact on margins along the supply chain | ◯ | ◯ | ◯ | ◯ | ◯ |
| Impact on level playing field | ◯ | ◯ | ◯ | ◯ | ◯ |
| Impact on achieving the objectives of the common fisheries policy | ◯ | ◯ | ◯ | ◯ | ◯ |

You can provide additional information on the above or other types of impacts here:

Does your company have in place a formal sourcing policy on any of the options below? (Mark all boxes that apply to your company)

☐ Use of a sustainability statement/label/logo

☐ Blacklist of species

☐ Fishing gear

☐ Preference for wild caught fish

☐

Preference for farmed fish

☐ Production methods for aquaculture

☐ Carbon footprint/pollution

☐ Waste water guidelines

☐ Food waste

☐ Use of GMOs

☐ Use of antibiotics

☐ Preferred collaboration with companies certified under sustainable standards (e.g. ISO 26000)

☐ Traceable supply chain

☐ Fair wages

☐ Other

If other, please specify:

[ ]

You have reached the end of the technical part of the questionnaire. The next questions are aimed at consumers and the general public to gather information on their consumption habits.

Do you want to provide answers to the consumers/general public questionnaire?

◉ Yes

◉ No

**Document upload and final comments**

You can upload further relevant information (e.g. a position paper, report) here. *Uploaded documents will be published alongside your response to the questionnaire. You are not required to upload any documents, but if you choose to do so, they will be used as additional background information to better understand your position.*

The maximum file size is 1 MB
Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

You can raise specific points not covered by the questionnaire here:

[ ]

As a follow-up to this questionnaire, would you be willing to answer more detailed questions on sustainability criteria that could be proposed in the revision of marketing standards?

◉ Yes

◉ No

If yes, your phone number and/or email address should be noted here:

[                                                                    ]

## Questions for consumers/the general public

**Consumption**

How often do you buy seafood products (wild and farmed fish, molluscs and crustaceans, fresh, frozen or processed)?

◉ Never or almost never

◉ Less than once a month

◉ At least once a month

◉ At least once a week

*In the following questions, 'sustainability' covers the environmental, social and economic aspects of sustainability.*

As a consumer, to what extent do you pay attention to information on sustainability when buying seafood?

◉ To a great extent

◉ To some extent

◉ To a small extent

◉ Not at all

◉ Don't know

How do you identify sustainable products when buying seafood?

*at most 3 choice(s)*

☐ Species

☐ Eco-labels and logos

☐ Organic fish farming

☐ Geographical catch area

☐

    Country of origin

☐ Locally fished or farmed

☐ Fishing gear

☐ Farmed fish

☐ Wild fish

Other, not listed above:

>  

To what extent do you consider the following information on sustainability to be relevant for seafood products?

| . | To a great extent | To some extent | To a small extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Impact on fish stocks | ○ | ○ | ○ | ○ | ○ |
| Impact on carbon footprint | ○ | ○ | ○ | ○ | ○ |
| Impact on food waste | ○ | ○ | ○ | ○ | ○ |
| Other impacts on the environment | ○ | ○ | ○ | ○ | ○ |
| Impact on working conditions | ○ | ○ | ○ | ○ | ○ |
| Other social impacts | ○ | ○ | ○ | ○ | ○ |
| Impact on profitability of producers | ○ | ○ | ○ | ○ | ○ |
| Other economic impacts | ○ | ○ | ○ | ○ | ○ |

If you chose other environmental, social or economic impacts, please specify:

>  

As a consumer, are you prepared to pay more for products that are more sustainable than standard products?

○ Yes

○ No

○ Would rather not say

If yes, how much more?

○ Marginally more (1-5%)

○ Slightly more (5-15%)

○ Considerably more (15-50%)

○ Substantially more (above 50%)

**Existing sustainability schemes/potential role of EU**

To what extent do you agree with the statements on seafood products below?

| . | Strongly agree | Agree | Disagree | Strongly disagree | Don't know |
|---|---|---|---|---|---|
| I pay attention to sustainability logos and labels | ○ | ○ | ○ | ○ | ○ |
| I trust the sustainability logos or sustainability information on seafood products managed by private companies and organisations | ○ | ○ | ○ | ○ | ○ |
| I trust the sustainability logos or sustainability information on seafood products if they are regulated by public authorities | ○ | ○ | ○ | ○ | ○ |
| I appreciate the number and variety of sustainability logos | ○ | ○ | ○ | ○ | ○ |
| I find the number and variety of sustainability logos confusing | ○ | ○ | ○ | ○ | ○ |
| There should be a common approach to sustainability statements across the EU for seafood products | ○ | ○ | ○ | ○ | ○ |
| I would like to have sustainability information on all seafood products | ○ | ○ | ○ | ○ | ○ |
| I would trust sustainability claims more if I could easily access information about the basis for these claims | ○ | ○ | ○ | ○ | ○ |

Could the EU play a stronger role in relation to information on sustainability and labels for seafood products?

○ Yes

○ No

○ Would rather not say

Do you have any specific ideas about how the EU could play a stronger role?

**Thank you for your contribution.**

**Document upload and final comments**

You can upload further relevant information (e.g. a position paper, report) here:

*Uploaded documents will be published alongside your response to the questionnaire. You are not required to upload any documents, but if you choose to do so, they will be used as additional background information to better understand your position.*

The maximum file size is 1 MB
Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

You can raise specific points not covered by the questionnaire here: