

Open Public Consultation on EU marketing standards for fishery and aquaculture products

Fields marked with * are mandatory.

Introduction

EU marketing standards define specific **quality requirements for EU and non-EU fishery products** that are placed on the EU internal market. Their objectives are as follows:

1. Ensuring that the EU market is supplied with sustainable products
2. Applying uniform and transparent criteria throughout the single market
3. Guaranteeing fair competition on the single market, and
4. Improving the profitability of production.

The current marketing standards cover some fresh and chilled products, preserved tuna and bonito and preserved sardines and sardine-like products. EU marketing standards are mandatory requirements along the supply chain (between producers, retailers and potential intermediaries) but they do not reach consumers.

For ***fresh products***, marketing standards define minimum sizes and quality, as well as freshness grades (Extra, A and B) and size categories (1, 2, 3, ..., depending on the species). Freshness grades are based on organoleptic criteria (e.g. skin colour, eye, texture).

For ***preserved tunas and bonitos and for sardines and sardine-like products***, EU marketing standards include: (1) authorized species, (2) detailed description of commercial presentation (e.g. for tuna: solid, chunks, fillets, flakes, shredded; for sardines: without bones, without skin, fillets, chunks...), (3) definitions for culinary preparation (in olive oil, natural, in vegetable oil, tomato sauce, marinade...), and (4) minimum ratio between the weight in the container after sterilization and the net weight.

The current evaluation of EU marketing standards seeks therefore to assess the extent to which the existing marketing standards are still fit for purpose.

This Public Consultation aims to gather input from all relevant stakeholders, including consumers. It provides the opportunity to discuss and gather feedback on the marketing standards as a tool to ensure supply of sustainable products to the EU market, fair competition and improved profitability of the sector as well as a level-playing field between operators.

Profile

* You are replying:

- ☐ as an individual in your personal capacity
- ☐ in your professional capacity or on behalf of an organisation

* Your first name:

* Your last name:

* Your email address:

If you do not have an email address, please write "Not available".

* Your country of residence:

* Your first name:

* Your last name:

* Your professional email address:

* Name of the organisation:

* Postal address of the organisation:

* Type of organisation

Please select the answer option that fits best.

- ☐ Private enterprise
- ☐ Professional consultancy, law firm, self-employed consultant
- ☐ Trade, business or professional association
- ☐ Non-governmental organisation, platform or network
- ☐ Research and academia
- ☐ Churches and religious communities
- ☐ Regional or local authority (public or mixed)

- ☐ International or national public authority
- ☐ Other

* If other, please specify:

* How many employees does the company have?

- ☐ More than 250 employees (Large enterprise)
- ☐ Between 50 and 250 employees (Medium-sized enterprise)
- ☐ Between 10 and 49 employees (Small enterprise)
- ☐ Less than 10 employees (Micro enterprise)
- ☐ Self-employed (Micro enterprise)

* Please specify the type of organisation.

- ☐ Chamber of commerce
- ☐ Business organisation
- ☐ Trade Union
- ☐ Representative of professions or crafts
- ☐ Other

* If other, please specify

* Please specify the type of organisation.

- ☐ Think tank
- ☐ Research institution
- ☐ Academic institution

* Please specify the type of organisation.

- ☐ Regional public authority
- ☐ Local public authority
- ☐ Public-private sub-national organisation
- ☐ Network of public sub-national authorities
- ☐ Other

* If other, please specify

* Please specify the type of organisation.

- ☐ Intergovernmental organisation
- ☐ EU institution, body or agency
- ☐ National parliament

- ☐ National government
- ☐ National public authority or agency

* Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- ☐ Yes
- ☐ No
- ☐ Not applicable

* Country of organization's HQ

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ United Kingdom
- ☐ Other

* If other, please specify

* Your contribution

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N°1049/2001](#)

- ☐ **can be published with your personal information** (I consent the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- ☐ **can be published provided that you remain anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication)

* Is your company/organisation in the fishery and aquaculture sector?

- ☐ Yes
- ☐ No

* Please check all the relevant sub-sectors for your company/organisation:

- ☐ Catching industry
- ☐ Aquaculture
- ☐ Processing of fishery and aquaculture products
- ☐ Trade and marketing of fisheries and aquaculture products

What do you look at the most when you buy fresh seafood products?

	1 - not important	2 - rather not important	3 - neutral	4 - rather important	5 - very important	Don't know
* Size	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Species	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Data of capture / slaughter	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Freshness (appearance)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Environmental certification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Price	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Method of production (fishery or aquaculture)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

To what extent do you agree or disagree with the following statements?

	1 - strongly disagree	2 - disagree	3 - neither agree nor disagree	4 - agree	5 - strongly agree	Don't know
* I understand what EU marketing standards for fishery products are	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fresh seafood available in my country is of good quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fresh seafood available in the EU is of good quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fresh seafood available in my country comes from sustainable fishery and aquaculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fresh seafood available in the EU comes from sustainable fishery and aquaculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Canned seafood available in my country comes from sustainable fishery and aquaculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Canned seafood available in the EU comes from sustainable fishery and aquaculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Information on seafood products quality is easily accessible	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* I trust the points of sales to be able to assess the quality of fresh fish without relying on standard definitions						
* The information on EU quality grades should be available to consumers						
* It is necessary to have standard definitions of quality grades along the supply chain (from the producer to the point of sale) for fresh products						
* Standard definitions of quality grades for fresh seafood products should be established at EU level						
* It is necessary to have standard definitions for the content of canned seafood (species names, definitions of culinary preparations such as "in olive oil", minimum weight ratio, etc.)						
* Standard definitions for canned seafood should be established at EU level						
* EU marketing standards for seafood products guarantee that non-EU products have to meet the same quality standards as EU products						

* Standard definitions related to the quality of seafood products should be established by the industry itself	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Standard definitions related to the quality of seafood products should be established by public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I trust public authorities to control the implementation of marketing standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I trust private certification bodies to control the implementation of marketing standards (e.g. national organisations for standardisation, ISO, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*Do you deal with?

Check all relevant answers

- ☐ Fresh and chilled products covered by EU marketing standards
- ☐ Canned tunas and bonitos and/or canned sardines
- ☐ None of the above
- ☐ Don't know

Relevance

In your view, how useful are the criteria used for EU marketing standards for fresh products?

	1 - not at all useful	2 - rather not useful	3 - neutral	4 - rather useful	5 - very useful	Don't know
*Size	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Freshness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your view, how useful are the criteria used for EU marketing standards for preserved products?

	1 - not at all useful	2 - rather not useful	3 - neutral	4 - rather useful	5 - very useful	Don't know
*Detailed description of commercial presentation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Culinary preparation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Ratio between the weight in the container after sterilization and the net weight	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Effectiveness

To what extent do you agree or disagree with the following statements: EU marketing standards contribute to...?

	1 - strongly disagree	2 - rather disagree	3 - neither agree nor disagree	4 - rather agree	5 - strongly agree	Don't know
*Ensure the harmonisation of trade description and composition provision for preserved products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Improve the quality of seafood products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Protect consumers against the marketing of products unfit for consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensure the sustainability of seafood marketed in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Avoid fraudulent practices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensure fair competition between EU products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensure a level-playing field between EU and non-EU products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Contribute to improving the profitability of EU production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* In your experience, are there any other effects of EU marketing standards?

- ☐ Yes
- ☐ No
- ☐ Don't know

If so, please specify:

In your opinion, how could marketing standards be improved?

Have you experienced or are you aware of any difficulty in implementing or controlling the use of marketing standards? If so, can you explain?

Efficiency

To what extent do you agree or disagree with the following statements?

	1 - strongly disagree	2 - rather disagree	3 - neither agree nor disagree	4 - rather agree	5 - strongly agree	Don't know

* On balance, the marketing standards improve your profitability in the short-term or in the long-term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On balance, the marketing standards reduce your profitability in the short-term or in the long-term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It would be possible to simplify freshness and size criteria without compromising the effectiveness of marketing standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It would be possible to simplify freshness and size criteria to improve the effectiveness of marketing standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It would be possible to simplify EU marketing standards for preserved products without compromising their effectiveness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Can you explain why they improve or reduce your profitability?

Could you please provide concrete examples of how criteria on freshness and size could be simplified?

Could you please provide concrete examples of how EU marketing standards for preserved products could be simplified?

Coherence

To what extent are EU marketing standards for fishery products coherent with...?

	1 - very incoherent	2 - rather incoherent	3 - neither coherent nor incoherent	4 - rather coherent	5 - very coherent	Don't know
* International standards (e.g. CODEX)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Hygiene rules for food of animal origin (Regulation 853/2004)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Consumer information rules (Regulation (EU) No 1169/2011 and Chapter IV of the CMO Regulation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Control system for marketing standards established in Regulation (EC) No 1224/2009 and Regulation (EU) 2017/625	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Do you use other quality-related norms or standards?

☐ Yes

☐ No

If yes, could you please specify which other quality-related norms or standards you use?

* In your experience, do these other standards...?

☐ Complement EU standards

☐ Contradict EU standards

☐ It depends on the standard

☐ Don't know

Can you explain your answer?

If it depends, which norm(s)/standard(s) are complementary?

If it depends, which norm(s)/standard(s) are in conflict?

EU added value

Do you agree or disagree that the following rules could replace EU standards with the same results for operators?

	1 - strongly disagree	2 - rather disagree	3 - neither agree nor disagree	4 - rather agree	5 - strongly agree	Don't know
* National standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Codes of practice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Private standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Why (not)?

To what extent would you support the establishment of common marketing standards for

	1 - not at all	2 - to some extent	3 - to a moderate extent	4 - to a large extent	5 - completely	Don't know
* Fresh and chilled fish currently not covered	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Frozen products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Processed products (other than canned tunas, bonitos, sardines and sardine-type products)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Products from aquaculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For each of these classes of product, could you please say why you think it is - or isn't - important?

Conclusion

Do you have other comments you'd like to share?

Thank you very much for your help!