



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE/A4/CVW (2021)

**Subject: MAC Recommendation on Health and Environmental Value of Seafood**

Dear Mr. Pastoor,

Thank you for your effort in providing the Commission with valuable scientific advice on the health and environmental benefits of fishery and aquaculture products. You will find below our comments to your different recommendations prepared in close cooperation with the relevant Commission's Directorates-General for agriculture and health.

Recommendation a): Improving the sustainability of primary production, as well as stimulating a shift towards healthy and sustainable diets, are important objectives of the Farm to Fork strategy<sup>1</sup>. The Strategy sets ambitious targets and puts forward both regulatory and non-regulatory initiatives at all stages of the food chain. To develop these initiatives, please note that the Commission always takes into account solid scientific evidence.

Recommendation b): the legal framework governing consumer information of fishery and aquaculture products (the CMO and FIC regulations) already offers latitude for seafood merchants and retailers to promote nutritious characteristics of their products, including through certification, while ensuring that consumers are protected from misleading or erroneous information. It is indeed the intention of the Commission to reinforce the sustainability aspect of marketing standards on fishery and aquaculture products. While we cannot prejudge the outcome of this initiative, it will potentially empower consumers and operators along the chain to make informed choices when buying fishery and aquaculture products.

The Commission is also working on a sustainability labelling initiative. It will create the overall framework governing the provision of information to consumers on the

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<sup>1</sup> COM(2020) 381

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sustainability performance of food products. It will be part of the general framework legislation for a sustainable food system planned for end of 2023.

Recommendation c): The Commission is supporting Member States in reaching WHO targets on non-communicable diseases by providing financial and administrative support to Member States to implement best practices. Furthermore, to protect children from aggressive marketing of food products high in fat, sugar and salt, we will continue to encourage and support Member States to strengthen their national regulatory and non-regulatory measures (e.g. code of conducts) transposing the revised Audio-visual Media Services Directive that has been adopted in November 2018. This Directive is a minimum harmonisation directive setting thresholds, which national legislation must meet, and that national law may exceed.

Recommendation d): The Farm to Fork Strategy announces that the Commission will prepare a proposal for harmonised mandatory front-of-pack nutrition labelling at EU level by the end of 2022. As set out in the Farm to Fork Strategy, the Commission wants to empower consumers to make informed, healthy food choices. The Strategy does not recommend any specific type of front-of-pack nutrition labelling scheme and, at this stage, no choice has been made.

The Commission will prepare its proposal taking into account the results of an impact assessment<sup>2</sup>, the consultation of Member States and stakeholders and scientific advice. The Commission requested the Joint Research Centre to update the previous literature review<sup>3</sup>. In addition, it has mandated the European Food Safety Authority (EFSA) to provide scientific advice on: nutrients of public health importance for European populations, including non-nutrient components of food; food groups which have important roles in the diets of European populations and subgroups; and criteria to guide the choice of nutrients and other non-nutrient components of food for nutrient profiling. As announced by EFSA<sup>4</sup>, experts assessed in this context recent scientific information, including published reviews on dietary recommendations for healthy diets based on evidence from studies on humans, EFSA's own work on dietary reference values and nutrient profiles, and national food-based dietary guidelines in European countries. EFSA's scientific advice will inform the Commission's work on harmonised front-of-pack nutrition labelling.

Recommendation e): The Commission took the initiative to carry-out a Eurobarometer in 2021, in order to assess to what extent consumers' habits may have possibly been altered by the Covid crisis (results are available [here](#)). The findings suggest that consumers remain generally loyal to seafood with no substantial changes. The situation will be surveyed again in a couple of years.

Recommendation f): We agree that it is important to raise awareness about the diversity of aquatic products, in particular sustainably caught or produced. In terms of ways that sustainable aquaculture production can contribute to this goal, the Commission has

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<sup>2</sup> The Commission has launched an impact assessment on the different possible options for front-of-pack nutrition labelling (<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12749-Revision-of-food-information-to-consumers>)

<sup>3</sup> <https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/front-pack-nutrition-labelling-schemes-comprehensive-review>

<sup>4</sup> <https://www.efsa.europa.eu/en/news/efsas-scientific-advice-inform-harmonised-front-pack-labelling-and-restriction>

envisaged some activities related to communication on aquaculture, in the new [Strategic guidelines](#) for a more sustainable and competitive EU aquaculture for the period 2021 to 2030 adopted in May this year.

The Commission is planning to develop tools for a coordinated EU-wide campaign on EU aquaculture, to be used at national and regional level. The main objectives of the campaign are to bring more attention to the sector and inform citizens about the benefits of EU aquaculture, as well as to inform them about the commitment of the EU, its Member States and the sector to ensure high quality food, and development of this activity in a way that is respectful to the environment and animal welfare.

We rely on dissemination of such campaign by Member States, the Aquaculture Advisory Council, producer organizations and other interested stakeholders, with a view to raise awareness among general public for this sector and its potential to play an important role in the green transition. Better informed EU citizens and consumers should also be able to make informed choices in favor of EU aquaculture products compared to products not offering similar guarantees of sustainability.

Furthermore, a new [brochure](#) on aquaculture has recently been published to inform the citizens on the benefits of EU aquaculture. It is currently available in English, soon to be published in all official EU languages as well.

We encourage you to advertise this brochure, and hope we can rely on your support to disseminate the campaign on EU aquaculture once it is developed.

Recommendation h): Fishery and aquaculture products that are listed in Annex I to Regulation (EU) No 1379/2013 are eligible under the Union promotion policy for agricultural products<sup>5</sup>. As Regulation (EU) No 508/2014 on the EMFF provides for the promotion of fishery and aquaculture products, the information provision and promotion measures under the promotion policy are limited to fishery and aquaculture products when they are associated with another agricultural or food product.

MAC's Advice on the Roadmap on the EU Promotion Programme for Agricultural and Food Products has been taken into account in the context of the public consultation carried out to gather policy positions from the stakeholders. The impact assessment that is being prepared by the Commission services pay regard of the consultations in the examination of the different options outlined in the [roadmap](#). Depending on the validation of the impact assessment by the Regulatory Scrutiny Board, new legislative proposals for the new EU agri-food promotion policy could be presented in the course of 2022.

Recommendation i): Food prices play also an important role. Healthy and safe diets must not only be sustainable but also affordable for everyone. As demand for sustainable foods increases, economies of scale can reduce related production costs.

To support the transition, policy approaches could focus on transferring costs (at the level of the producer or supplier) from sustainable, including healthy choices, to less sustainable options. Over time, fiscal policies should ensure that the environmental and health costs for society of unsustainable food are reflected in consumer pricing.

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<sup>5</sup> Regulation (EU) No 1144/2014 on information provision and promotion measures concerning agricultural products implemented in the internal market and in third countries

Recommendation j): Due note is taken of your suggestion to extend the coverage of the EU School fruit, vegetables and milk scheme to include healthy and sustainable fishery and aquaculture products. The Commission will review the scheme, as announced in the Farm to Fork strategy, taking into account the results of an impact assessment<sup>6</sup>, stakeholders' consultation and scientific advice. The public consultation for this review is planned in the first quarter of 2022.

Finally, in addition to the replies to the specific recommendations made, let me draw your attention to the need for ACs to stay within the remit of the CFP and the tasks defined in the CFP Regulation, also when drafting recommendations. While of course many policy developments are of importance and relevance for your and our work, it is important to also look at prioritisation and carefully consider the topics and focus of meetings and recommendations.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils ([Pascale.COLSON@ec.europa.eu](mailto:Pascale.COLSON@ec.europa.eu); +32.2.295.62.73), who will forward them to relevant colleagues.

Yours sincerely,

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<sup>6</sup> Inception impact assessment and feedback received: Review of the EU school fruit, vegetables and milk scheme (europa.eu)