

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

Minutes

Wednesday, 18 September 2024 (09:00 – 12:30 CET)

Copa Cogeca (Meeting Room A), Rue de Trèves 61, 1040 Brussels

Interpretation in EN, ES, FR

Welcome from the Chair, Benoît Thomassen

Click [here](#) to access the Chair's presentation.

Adoption of the agenda and of the last meeting's minutes (05.06.24):

Action points

- **State-of-play of the action points of the last meeting – information**
- Valorisation of by-products:
 - AAC-CCRUP-MAC-NSAC draft advice on the valorisation of fisheries and aquaculture by-products to be put forward to the Executive Committee for consideration
 - Advice adopted by the four Advisory Councils on 3 September 2024

Food Security

- **Presentation of the European Parliament's study "Workshop on the European Green Deal – Challenges and opportunities for EU fisheries and aquaculture – Part III: Food security aspects" by Rod Cappell (Poseidon Aquatic Resource Management)**

Click [here](#) to access the presentation.

The Chair explained that, in 2023, the European Parliament's PECH Committee commissioned a study exploring how initiatives within the European Green Deal may impact food security in fisheries and aquaculture.

Rod Cappell (Poseidon Aquatic Resource Management) explained that the study was produced at the request of the European Parliament's PECH Committee and that it was presented at one of the Committee's meetings. The study covered the main policy instruments of the European Green Deal, an analysis of the overall, challenges, opportunities and solutions for EU fisheries and aquaculture, two case studies ("EU dependence on seafood imports" and "EU aquaculture production") plus policy recommendations to the European Parliament. He highlighted that there are several EU policy initiatives that impact food security, directly and indirectly.

Mr Cappell highlighted the impact of climate change on fisheries and aquaculture. There are severe consequences for fisheries, including redistribution of fish stocks and loss of catch potential. In a low-



emission scenario, there would be a -6.4% catch predicted by 2100. In a high-emission scenario, it would be -25% and 50% or more in some regions by 2100. The tropic oceans would be the most impacted, especially Western Central Pacific Ocean, Eastern Central Atlantic Ocean, and the Western Indian Ocean. The decreasing global catch would also impact aquaculture, as 2/3 of production is currently dependent on food from wild fisheries, plus increased disease risk and storm damage. Therefore, action from fisheries and aquaculture stakeholders is needed.

Mr Cappell provided an overview of the main policy instruments under the European Green Deal. The Farm to Fork Strategy has the most direct implications for food security. Even though the strategy is focused on agriculture, it also promotes an acceleration towards sustainable fisheries and aquaculture production. Through a strengthened Common Fisheries Policy, it would also be possible to tackle Illegal, Unregulated, Undocumented fishing and support low trophic aquaculture. He highlighted that seafood species are relatively low-carbon food. Blue Farming promotes the expansion of shellfish and algae production in the EU. The “Fit for 55” package has implications for fuel intensive fisheries, as 32% of EU landings are from bottom trawl. The EU Biodiversity Strategy for 2030 may impact fisheries activity damaging seabed habitats and areas available for aquaculture production. He explained that there were efforts to supply clean affordable and secure energy, which would mainly come via offshore wind with associated impacts on fishing displacement and increased labour shortages. A zero pollution for a toxic-free environment could be positive for EU production with higher environmental standards, if imports are required to meet the same standards or there is market distinction. The acceleration of the shift to sustainable, smart mobility can support shorter supply chains with less reprocessing in Asia and doing more at point of landing. Reduced air freight can encourage a shift to frozen over fresh / live seafood.

Mr Cappell outlined the first case study “EU dependence on seafood imports”. EU consumers consume twice as much seafood as is locally produced. The EU produces five million tonnes of seafood a year, representing 2% of global production, being the 7th largest globally. Four million tonnes go for direct EU consumption. There is a growth in the EU consumption supplied by extra-EU imports, often via intra-EU exchanges. Asia is a major re-processing centre for EU seafood, but there was some decline since the COVID-19 pandemic. The recommended level of seafood supplies is only met in 13 of 31 European countries with large coastline / fish-eating cultures. Therefore, encouraging healthier diets through fish consumption would mean a greater reliance on imports with the current production. He underscored that science-led management works, as, worldwide, assessed fish stocks have a greater relative abundance than unassessed stocks. Sustainable fisheries models are well-understood but must be applied to all EU production and its imports. The overcapacity in global fishing fleets is exacerbated by fleet subsidies. The EU’s Sustainable Fisheries Partnership Agreements with non-EU countries contribute around 9% of the EU’s production. Therefore, these agreements can have a positive action for food security, local markets and communities, as is the case with the agreements with Mauritania and Guinea-Bissau.

Mr Cappell also outlined the second case study “EU aquaculture production”. EU aquaculture contributed around 1.1 million tonnes of seafood in 2021, half of which were low-trophic species. The recent Strategic Guidelines for Sustainable EU Aquaculture focus on building resilience, encouraging innovation and participating in the green transition. Therefore, EU aquaculture needs to diversify in



terms of species and production methods. There should be a greater focus on low and multi-trophic aquaculture, the use of circular materials, like insect meal in aquafeed, and a holistic, ecosystem approach to aquaculture.

Mr Cappell delivered an overview of the policy recommendations:

- 1) Improve food security from EU fisheries through sustainable, science-based fisheries management; reduction in emissions from the EU fishing fleet; and addressing the environmental impacts of fisheries production.
- 2) Improve food security from EU aquaculture through formal adoption of the ecosystem approach to aquaculture; encouragement of low-trophic aquaculture and healthy consumption; recognition and use of ecosystem services from aquaculture; innovative technology and approaches to reduce the environmental impact of aquaculture; and the encouragement of circularity in feed, equipment and techniques.
- 3) Improve food security of imported seafood through the support for sustainable non-EU production, including regional management, national support, and knowledge-sharing; ensuring a level-playing-field for EU producers, such as equal standards, clear labelling, and improved traceability.
- 4) Improve food security in the seafood supply chain through the improvement of the efficiency of supply chains; and the promotion of sustainable diets and consumption.

- **Exchange of views**

Patrick Murphy (IS&WFPO) asked whether the study provided information on the continuous decline of fishing vessels and fishers in the EU.

Rod Cappell (Poseidon Aquatic Resource Management) confirmed that the study included information on the decline of fishing vessels and fishing effort.

Pierre Commère (PACT'ALIM) commented that the studies presented in the European Parliament tend to blame imports and external sources, but that the presented study was more balanced, as it showed the link between EU production and the market's dependency on imports.

Javier Ojeda (FEAP) expressed preference for the term “aquatic food” instead of “seafood”, since most of the EU's aquaculture production came from freshwater systems. Mr Ojeda expressed disagreement that the concept of “blue farming” would include only algae and shellfish, emphasising that it was important to provide details on the assumptions made. On the reference to 2/3 of aquaculture production being dependent on feed from wild fisheries, he highlighted that the sources came from EU production and there were efforts for increased circularity. He recognised that efforts could be made to lower the carbon footprint of these products, but that, in comparison, with other food products, aquatic food products were on the low range of carbon production. The EU was not encouraging rice producers to shift to peas production, he exemplified.



Mr Ojeda complimented the policy recommendations but added that there was always a challenge in balancing sustainable production of food, carbon emissions, and the provision of healthy food. Regarding the recommendation to establish an ecosystem approach in EU aquaculture, Mr Ojeda argued that such an approach should be compulsory for all activities taking place in the coast, but that, in practice, not all sectors are encouraged to develop such an approach. On the use of the term “low trophic aquaculture”, he informed that his organisation was not favourable to this term, as it consisted of an ecology definition applied in a production context. The focus should be on the origin of the feed, so “low impact aquaculture”. As for the promotion of the production of low-trophic species, he argued that, if the EU produced exclusively these species, there would be even greater dependency on imports.

Rod Cappell (Poseidon Aquatic Resource Management) informed that the PECH Committee had commissioned another study to provide an overview on the latest developments for EU aquatic food policy initiatives, which would be presented in the near future.

Daniel Voces (Europêche) expressed disagreement with the negative perspective on bottom trawling in the study. Mr Voces highlighted that there was a very significant decline in the quantity of bottom trawling fishing vessels. Following investments by fishing vessel owners, the fish stocks in many EU sea basins are in a good state. He argued that, while there was an impact from bottom trawling, stating it was “damaging the environment” was too negative. He highlighted that, according to data from the United Nations’ Trade and Development (UNCTAD), EU fishing fleets undertook a 52% reduction in emissions, meaning that the sector was almost reaching the “Fit for 55” objectives.

Regarding the decline in EU production and the self-sufficiency rate, Mr Voces asked Mr Cappell whether the impact of EU policies on production had been analysed, since the actions of the legislators seemed to shift more and more towards imports. He argued that the price of fuel had an impact on the energy transition. The replacement of the energy supply remained a challenge. If all EU producers changed their energy supply, there would be price increases in the products. He added that it was necessary to innovate, but that there were no easy solutions available.

Rod Cappell (Poseidon Aquatic Resource Management) emphasised that the aim was to reflect on the impact of the European Green Deal on food security, through various environmental targets, including the impact of the reduction of emissions on food production. Mr Cappell recognised the changes undertaken by the bottom trawling fishing industry. He also recognised that the transition to clean energy sources would be quite expensive, adding that the European Maritime, Fisheries and Aquaculture Fund would play a role.

Nicolás Fernández Muñoz (OPP72) expressed general concern about reports commissioned by the EU institutions on the production from fisheries and aquaculture, since EU producers seemed to be continuously framed as the source of problems. In practice, despite the efforts undertaken by the fishing sector, the Commission services seemed to be going for a step-by-step eradication of the sector, as there were very significant decreases in the number of EU fishing vessels and fishers. In his view, the EU fishing sector was an “endangered species”, as the sector was being sacrificed by the European Commission in the context of the energy transition. He emphasised the importance of balance, as the recreational fleet continuously increased without adequate controls.



Mr Fernández stated that, while the fishing sector was continuously framed as not caring for sustainable ecosystems, the sector cared about having a healthy marine environment and ensuring future resources. He argued that the empirical data from fishers should be taken into account and that there should be alignment with scientific data, which was an aspect missing in the study. Mr Fernández exemplified that the expansion of wind energy in Spain was having a very significant impact on the fishing sector, but that no questions seemed to be raised on the impact of this industry on the marine biodiversity.

In his view, in the context of the 2030 Agenda, protective measures and Marine Protected Areas were necessary. Nevertheless, as is the case in Spain, these should allow for protection measures combined with controlled sustainable activities. Mr Fernández exemplified that, in the Mediterranean Sea, bluefin tuna was in a critical situation and measures were taken to face the illegal catches and sales. Through improved controls, there was a recovery of the stock, so now there was an abundance of bluefin tuna, which was leading to problems with other species. This demonstrated the slow reaction from scientists and policy authorities. He underscored the importance of a healthy diet and of a viable fishing sector in the EU.

Rod Cappell (Poseidon Aquatic Resource Management) responded that, in the study, the importance of fisheries management based on science is emphasised. The study mentions the importance of co-management and of working with operators, including the importance of knowledge from fishers. Mr Cappell underscored the importance of the fishing sector combatting a negative image on environmental impacts, drawing attention to an initiative between the Shetland University and the fishing sector to combat misinformation on the topic.

Vanya Vulperhorst (Oceana) commented that the study was providing an important message to the PECH Committee. Ms Vulperhorst emphasised that the rebuilding of fish stocks took place through effective management with sacrifices from the fishing sector. In her view, it was important to promote co-management with fishers, together with marine protected areas, increasing resilience of the sector to prices, and the promotion of higher standards for imports. It was also important to promote a level-playing-field in the EU market, including through increased import controls by the Member States to check the legality of imported products.

Jean-Marie Robert (Les Pêcheurs de Bretagne) highlighted that, according to forecasts from the United Nation's Food and Agriculture Organisation, by 2050, food production would need to increase 60% to feed the growing population. Therefore, it was important to continue to improve food production, while safeguarding biodiversity. Mr Robert wondered if this described aspect had been considered in the study.

Rod Cappell (Poseidon Aquatic Resource Management) responded that Mr Robert raised a valid point. The issue of increasing food production was considered in the study. In terms of projected food production increases, there were relatively marginal gains to be made in EU fisheries production, since sustainability concerns were already considered. Gains could be made in foreign wild-caught fisheries. In the EU, growth would come primarily from aquaculture.



Patrick Murphy (IS&WFPO) asked about potential risk assessments due to the introduction of offshore renewable energy, including impact assessment of Marine Protected Areas and the impact of the displacement of fishers. In his view, the report did not cover in detail the various methods of fishing. Mr Murphy also wondered if impacts, such as the COVID-19 pandemic, and the Russian war of aggression against Ukraine had been considered.

Rod Cappell (Poseidon Aquatic Resource Management) drew attention to the relevance of the ongoing forecast exercise of DG MARE “Fishers of the Future”. Mr Cappell informed that the study under discussion did not include risk assessments, and that these do not account for cumulative effects on the displacement of the fishing sector. He mentioned that there was another study commissioned by the European Parliament on the impact of the expansion of offshore and other marine renewables on EU fisheries. He added that the study “The EU oceans and fisheries policy - Latest developments and future challenges”, which would be presented the following week to the PECH Committee, did cover geopolitical tensions, such as the Russian war of aggression against Ukraine, and ongoing tensions with China.

Packaging and Packaging Waste Regulation

- **Presentation on the impacts of the package reuse targets for the EU fisheries, aquaculture, and fish processing industries by Lea Salihovic (EUMEPS)**

Click [here](#) to access the presentation.

Jürgen Lang (EUMEPS) introduced his organisation, explaining that EUMEPS, the Association for European Manufacturers of Expanded Polystyrene, serves as the leading voice and advocate for the EPS industry across Europe. It embodies the collective interests of the entire EPS value chain, ranging from raw material suppliers and converters to recyclers, including both large companies and small- and medium-sized enterprises (SMEs). Through its network of 23 national associations and an array of recycling initiatives, EUMEPS is committed to promoting the use of EPS as a sustainable and efficient choice for insulation and packaging solutions. Mr Lang added that, in the presentation, the relevance of polystyrene packaging for fishery and aquaculture products would be highlighted.

Lea Salihovic (EUMEPS) highlighted that her presentation would focus on the negative impacts of the package reuse targets under the Packaging and Packaging Waste Regulation (PPWR) for the fisheries and aquaculture sectors. Ms Salihovic informed that, previously, everything started with a letter which was co-signed by the EU fishing, fish farming and fish processing industry, and manufacturers of fish boxes, EPS associations, fisheries stakeholders, and recyclers organisation requesting support for exemptions from the PPWR.

Mounir El’Mourabit (EUMEPS) explained that the majority of the boxes used in Norway are made of expanded polystyrene, which support the cold keeping process and are lightweight, ensuring the quality of the products. The material from the boxes is recycled. The majority of the used material goes towards insulation boards for houses, which is in line with the EU’s objectives of 0-emission houses. Mr El’Mourabit emphasised the importance of the circular emission aspects of the boxes and the overall economic, social, and environmental aspects.



Lea Salihovic (EUMEPS) explained that the aim of the PPWR was to ensure that all packaging in the EU market is reusable or recyclable in an economically viable manner by 2030. The fish boxes including EPS will be affected in three different ways: new recyclability standards, minimum percentage of recycled content in plastic packaging, and reuse targets. The boxes will need to comply with the design for recycling criteria, to be adopted by 2028, and criteria for recyclability at scale, to be adopted by 2030. Fish boxes will need to have 10% recycled content by 2030, and 25% by 2040. Exemptions are possible if plastic packaging intended to come into contact with food in case the amount of recycled content poses a threat to human health and results in non-compliance of packaged products with Regulation (EC) 1935/2004. Ms Salihovic highlighted that from EPS side there is no problem with any of affected parts in PPWR except challenges for reuse targets.

On the reuse targets, Ms Salihovic highlighted that, under the regulation, transport packaging in form of boxes shall ensure that at least 40% of such packaging used is reusable packaging within a system for re-use. . During the EU's interinstitutional negotiations, the exemption for rigid transport packaging was removed, while the exemption for flexible packaging in direct contact with food was maintained. All cardboard boxes are exempt. The obligations and responsibilities are on the operators to clean the boxes and report to the authorities. She provided an overview of the different types of packaging affected by the PPWR.

Ms Salihovic emphasised that the reuse targets and mandatory reuse systems would impact the entire fisheries and aquaculture supply chain, including the wild capture fisheries, the aquaculture farmers, the processors, and the distributors. The backhauling of empty boxes to fish slaughterhouses is expected to increase transport costs by 125 to 130%. The reuse system will increase the need for personnel and space for cleaning and storage. The system will also need to ensure compliance with several standards. The boxes will need to be tracked, which means that comprehensive IT systems must be created. She argued that the reuse system would not necessarily be more environmentally friendly, since tonnes more water will need to be used. Specific detergents will also need to be used. She added that, due to the fattiness of fish products, it would be difficult to maintain food safety standards under the reuse systems.

Ms Salihovic argued that the fisheries and aquaculture industry could act for the provision of exemptions from the reuse targets for extended polystyrene fish boxes and other fish transport boxes through the upcoming delegated acts of the PPWR. She outlined the timeline of the adoption and implementation of the PPWR. The PPWR was expected to be adopted in November 2024 and to enter into force in 2026. She informed that her association was in contact with DG ENV informing them about coordinating work for a delegated act on fish boxes. In that context, EUMEPS was collecting studies, impact assessments and best examples from the industry. The strategy was to establish an advocacy group with three sub-groups. Her organisation hoped to find a balance between environmental goals, sustainability, and the necessary safety of the fishing and fish processing industry. She also drew attention to several initiatives from the extended polystyrene industry to improve their sustainability.



Mounir El'Mourabit (EUMEPS) emphasised that fish in extended polystyrene boxes does not lose its quality for over 16 days. Mr El'Mourabit highlighted that the United Nation's Environmental Programme recognised extended polystyrene packaging as recyclable in practice and at scale.

- **Exchange of views**

Adrien Simonnet (UMF) thanked Ms Salihovic for the relevant presentation. Mr Simonnet stated that his organisation was familiar with the potential consequences. He highlighted that the use of extended polystyrene boxes was strongly linked to the economic model of the fishing industry and provided many benefits, such as high variety of boxes and easy handling. In his view, the PPWR would be too complex to implement in the fishing industry, so he expressed availability to works towards an exemption for the industry.

María Luisa Álvarez Blanco (FEDEPESCA) expressed satisfaction with the quality of extended polystyrene boxes, as these maintain the products well and are light. Ms Álvarez highlighted her own experiences with the Spanish association of extended polystyrene, as retailers participate in the retake system for the boxes. Under Spanish law, the recycling of the packaging is compulsory and there are sanctions for those disposing of the boxes together with the general waste, but the polystyrene boxes were not being recycled effectively. She argued that, if the EU law would impose a reuse target, it was necessary to avoid that these boxes become a problem for retailers and for consumers. In practice, retailers had to have their own ways to transport the boxes, since, for many years, there an adequate system for collection was not available. She requested more information on the exemption sought by EUMEPS.

Lea Salihovic (EUMEPS) thanked Ms Álvarez for the information on the situation in Spain. Ms Salihovic explained that, in order to meet the recyclability requirements under the PPWR, it would be necessary to invest in a system for collection, sorting, and recycling. EUMEPS would not be seeking an exemption from recyclability requirements, opposite EUMEPS is in CEN standardisation working groups to create DfR criteria as well as methodology for recyclability at scale. For EPS industry it is super important to get EPS material for recycling because it can be easily recycled and used in new products. The majority of countries in EU as well as outside of EU, have good EPS collection and aimed to contribute to high recycling goals and targets. The collected material is upcycled for construction materials. EUMEPS was aiming only for an exemption from reuse targets.

Mounir El'Mourabit (EUMEPS) emphasised that the industry was focused on collecting the extended polystyrene boxes as much as possible, adding that Spain was one of the main collectors. Mr El'Mourabit added that the efforts for recycling would continue.

Aodh O'Donnel (IFPO) expressed support for the initiative presented by Ms Salihovic.

Vanya Vulperhorst (Oceana) expressed concern about the scheduling of a presentation on the topic exclusively by a representative of the packaging industry, since there were other points-of-view available. It would have been relevant to, for example, to hold a presentation by a scientist to counterbalance. Ms Vulperhorst argued that very significant quantities of plastic was being used to transport fish products, but that there were reusable options available. She drew attention to a



project to develop light, reusable rigid boxes. The use of these boxes had been implemented by a significant number of fishmongers in Belgium.

Lea Salihovic (EUMEPS) responded that the purpose of her presentation was to present the legal implications of the PPWR, including logistics and IT systems, on the fisheries and aquaculture sector. Ms Salihovic added that she was not opposed to the use of alternative packaging highlighting that those alternatives need to be in reuse system as well.

Paulien Prent (Visfederatie) expressed scepticism about the viability of the recycling targets, since it was not possible for a food contacting material to be safe and be recyclable. Ms Prent asked for the views of the European Commission on the matter.

Gerd Heinen (DG MARE) replied that the file was quite technical, and that DG ENV was the lead on it. Mr Heinen expressed availability to contact DG ENV about a potential exchange at a future meeting.

Niall Gerlitz (DG MARE) informed that, in a previous occasion, DG MARE met with EUMEPS, so they were aware of the situation. Mr Gerlitz drew attention to the possibility of exemptions, which would account for the size of the enterprises, the recycling targets of the Member States, plus impacts on the economy, food hygiene, and food safety. He expressed support for Mr Heinen's suggestion.

Paulien Prent (Visfederatie) suggested that the Working Group should prepare advice on the topic, since options for recyclable material that was safe to contact food were lacking.

The Chair expressed support for Ms Prent's suggestion.

Javier Ojeda (FEAP) emphasised the importance of the topic for aquaculture producers. Mr Ojeda stated that it would be relevant further discuss on the topic, while also welcoming other views. He argued that, during the interinstitutional negotiations, the European Parliament appeared to have lost focus of the aim of the Commission's legislative proposal.

Szilvia Mihalfy (FEAP) commented that the developments related to this legislative proposal seemed to have been missing by the fisheries and aquaculture industry. Ms Mihalfy thanked Ms Salihovic for the overview of the potential impacts on the sector. She encouraged DG MARE to look into the topic, including through exchanges with the other relevant Commission services.

Pierre Commère (PACT'ALIM) expressed support for Mr Simonnet's intervention. Mr Commère agreed that work should be done on a derogation. Otherwise, without a derogation, there would essentially be a ban on this material. He added that, even if derogations were granted, it should not stop the industry from researching alternatives.

Katarina Sipic (AIPCE-CEP) expressed agreement with Mr Commère and Ms Mihalfy.

Lea Salihovic (EUMEPS) emphasised that the PPWR would have impacts on the fisheries and aquaculture sector, so members should be aware of these.



Patrick Murphy (IS&WFPO) stated that the use of plastic posed problems that could not be ignored. Mr Murphy wondered whether the Commission services had undertaken any secondary study on implications of the PPWR, for example on water use, cleaning materials, and capacity. He argued that it was important to discuss the topic in the context of the MAC.

Mounir El'Mourabit (EUMEPS) stated that the introduction of recyclable content in food packaging was a challenge. The industry kept track of where most of the boxes go. Further investments on this matter would take place, in order to ensure environmental sustainability.

The Chair encouraged the members to send their views on the topic to the Secretariat in writing. The Chair asked Ms Salihovic whether the European Food Safety Agency had undertaken any studies on the food safety impacts of the upcoming rules.

Lea Salihovic (EUMEPS) responded that the European Food Safety Agency had not undertaken studies on the matter. To comply with the new rules, the industry was expected to undertake significant investments. Ms Salihovic underscored the possibility of the Commission adopting additional delegated acts, which could take place during the transition period.

Jürgen Lang (EUMEPS) stated that, from the perspective of the environmental footprint, rescue was not always the best option for boxes. Recycling could be a better option. Mr Lang emphasised that the aim of the presentation was to outline the concerns of the entire industry.

Isabel Alonzo Cabezas (Spain) expressed agreement with Mr Murphy's intervention. Ms Alonzo highlighted that the sector needed to use boxes, which meant that the impact on water availability needed to be considered. Furthermore, the materials used were sometimes flammable. She underscored that it was necessary to adapt to the realities of the different Member States.

- **Way forward**

The Chair proposed for the Secretariat to launch a one-month deadline for members to provide their views on the topic, so that a draft could be considered at the January 2025 meeting.

Horizon Europe

- **Presentation on the project “Mr. Goodfish 3.0: Empowering Sustainable Seafood Choices” by Clara Boissenin (ECSITE) and H  l  ne Buisson (Nausicaa)**

Click [here](#) to access the presentation.

H  l  ne Buisson (Nausicaa) explained that the Mr. Goodfish programme was launched in 2010 by three aquariums. The aim was to launch an awareness campaign to increase awareness among consumers about overexploited fish stocks, to reduce pressure on these stocks through changes in consumption. The programme aimed for a positive approach, focusing on promoting sustainable choices and alternative, through a “green list” of species. During the development of the programme, work is undertaken together with the entire seafood value chain. The programme also facilitates learning



where the consumers buy and taste seafood, for example in the context of HORECA, distributors, and fishmongers.

Ms Buisson outlined the criteria of the project for wild fish: state of the resource, size, and season. For the first criteria, data from ICES and from IFREMER is used. For the second criteria, the minimum recommended size is the size at first sexual maturity. For the third criteria, the recommended seasons are those outside the species' peak reproduction. She also outlined the project's criteria for aquaculture: feed, breeding practices, and environmental impact. Overall, the existing labels and certifications for aquaculture production were considered. There were specific focuses on the use of antibiotics, the size of the fish pen, and the ecosystem around the farm. She added that, under the programme, a website and a mobile app were created.

Clara Boissenin (ECSITE) explained that the Mr. Goodfish 3.0 project would run from 1 May 2024 to 30 April 2027. The project received a grant of two million euros under the Horizon Europe's call "Choose your fish: a campaign for responsible consumption of products from the sea". Ms Boissenin highlighted that the goals were: to develop the programme in other European countries; to prepare recommendations for all major EU sea basins, freshwater and aquaculture; to upgrade the app and website with new functionalities for professionals and consumers; to make the app available in all EU languages; and to roll-out a large-scale European awareness campaign.

Ms Boissenin mentioned that the data intake process would need to be improved. An advisory board and stakeholders from each sea basins would be involved to validate each season's data. An open-access and reusable campaign package would be made available. She drew attention to synergies with other EU-funded initiatives, such as DG MARE's "Taste the Ocean campaign", the sister project VERIFISH, the Mission Ocean & Waters collaborative platform, the EU4Ocean coalition, the Food2030 Project Collaboration Network, among others.

- **Exchange of views**

Jennifer Reeves (MSC) requested more information about how coherence and synergies were ensured between the Mr. Goodfish 3.0 project and the other parallel initiatives. Ms Reeves that the use of three criteria for wild caught products was an oversimplification. She wondered whether the criteria were meant to cover only locally sourced fresh products or whether imports were covered.

Clara Boissenin (ECSITE) explained that the Mr. Goodfish 3.0 project was working closely with the VERIFISH project in the development of indicators, including by finding agreement or clarifying data and datasets. The project was also working with the Mission Ocean & Waters collaborative platform, when relevant, to avoid contradictory communication.

Justine Delettre (Nausicaa), concerning the issue of oversimplification, stated that the purposed was to communicate with consumers. When exchanging with producers, it was not as simplified. Ms Delettre emphasised that the programme was based on the best available science. The project gave



priority to local practices and local products through a sea-basin approach. At the same time, the project also considered imported species with relevant presence in the market.

Javier Ojeda (FEAP) expressed concern about the use of the term “sustainable seafood choices”, since the three criteria were insufficient to cover such an ample concept as “sustainability”. Mr Ojeda exemplified that the project did not cover issues related to life cycle assessments, such as carbon footprint, freshwater use, and land use, or social aspects, such as fair trade, affordability, and social fairness. In his view, it would be more appropriate for the project to refer to “responsible choices” than “sustainable choices”. He also mentioned that the name of the programme could lead to confusion with the Good Fish Foundation.

Clara Boissenin (ECSITE) responded that the project is usually framed as “co-creating responsible seafood solutions”, since there were many ongoing discussions on the concept of sustainability.

Hélène Buisson (Nausicaa) expressed willingness to further develop the programme, such as on the issues mentioned by Mr Ojeda, with further input, including from stakeholders.

Jennifer Reeves (MSC) expressed agreement with the importance of consumer awareness campaigns, adding that these should consider the three pillars of sustainability. Ms Reeves requested information on the level of engagement between the project and the European Commission. She wondered if the Green Claims Directive was accounted for in the project.

Clara Boissenin (ECSITE) responded that a dedicated DG MARE official was involved in the team of the project, ensuring that they were aware of the latest policy developments.

Patrick Murphy (IS&WFPO) underscored the importance of reputation in the industry. Mr Murphy argued that the project should focus more on the story of the catching sector and the work undertaken by fishers.

Clara Boissenin (ECSITE) responded that was one of the main elements of the campaign. There was involvement from business across the supply chain, which allowed for increasing visibility of the project and for the showcasing of business practices.

Hélène Buisson (Nausicaa) emphasised that the project aimed to provide advice to the different actors in the supply chain, including to training of restaurant staff. Ms Buisson recognised that the co-creation of materials was essential. It was important to connect different actors and to provide a platform to share good practices.

Stefan Meyer (Fischverband) stated that the project appeared to be somewhat discriminatory concerning imported products, which was understandable due to the use of public funding. Mr Meyer highlighted that not many aquaculture products were covered in the project’s list. In his view, the positive impacts of pond and land-based aquaculture should be accounted for. He argued against the



project developing a commercial ecolabelling scheme, adding that it should instead be a platform to showcase that biodiversity and sustainable use can coexist.

Justine Delettre (Nausicaa), on the coverage of aquaculture species, stated that the most consumed species in the French market were covered. Further work on imported products would be undertaken.

Consumer Information

- **Update on the work of the joint MAC/AAC Focus Group on Consumer Information in the HoReCa Sector by Brian Thomsen, Chair of the Focus Group**

The Chair recalled that, following a proposal from the Aquaculture Advisory Council, a Joint Focus Group on Consumer Information in the HORECA Sector was established.

Brian Thomsen (AAC) recalled that, in February 2024, the Aquaculture Advisory Council and the Market Advisory Council adopted the Terms of Reference for the Joint Focus Group. Three meetings among the members of the Focus Group took place, which also included representatives from the European Commission and other stakeholders from the HORECA sector. Mr Thomsen highlighted that there were two key topics addressed: the interaction between the provision of the Common Market Organisation Regulation and of the Food Information to Consumers Regulation, and the potential relevance of amending the legal framework. Due to the differing views on the relevance of extending the scope of Article 35 of the Common Market Organisation Regulation, the draft advice includes an annex outlining the various positions and subscribing organisations.

Mr Thomsen informed that general agreement on the draft text was reached by the Focus Group on 2 September 2024, which meant that the original timeline was respected. To meet the commitments made by the Aquaculture Advisory Council under its annual strategic plan, the advice would need to be adopted by the end of October 2024. He thanked the members of the Focus Group for their contributions and availability for consensus, HOTREC and FoodServiceEurope for their active participation as observers, and DG MARE for the clarifications. He also thanked Mr Reis Santos for his assistance in the work of the Focus Group.

- **Consideration of draft advice on consumer information on fishery and aquaculture products, particularly in the context of the HoReCa sector**

The Secretary General outlined the draft advice on “consumer information on fishery and aquaculture products, particularly in the context of the HoReCa sector”, including the various sections. The Secretary General highlighted that the recommendations were consensual, while the annex listed the different views among the membership on the relevance of amending the legal framework.

The Secretary General explained that, prior to the meeting, as preliminary feedback, ANFACO-CECOPESCA requested changes to the references, under sections 7 and 8, to the study on feasible traceability systems and procedures for prepared and preserved fishery and aquaculture products foreseen under the revised Fisheries Control Regulation. FEDEPESCA had requested for fishmongers being usually microenterprises, instead of SMEs, in section 8.



The Secretary General emphasised the tight timeframe for adoption due to the commitments made by the Aquaculture Advisory Council. Therefore, amendments should take place during the meeting.

Paulien Prent (Visfederatie) requested for her organisation and for AIPCE-CEP to be identified in section b) of the Annex.

Vanya Vulperhorst (Oceana), concerning the preliminary feedback from ANFACO-CECOPESCA, called for the use of the exact language of the revised Fisheries Control Regulation.

The Secretary General expressed availability to check the wording on that point with Oceana and with ANFACO-CECOPESCA prior to the formal consideration by the Executive Committee.

Pierre Commère (PACT'ALIM) requested for his organisation to be identified in section b) of the Annex.

Iñigo Azqueta Ruiz-Gallardón (ANFACO-CECOPESCA) also requested for his organisation to be identified in section b) of the Annex.

Jennifer Reeves (MSC) stated that her organisation would likely favour option b), but that she would discuss internally, to allow her to take a position at the next meeting of the Executive Committee.

The Working Group expressed agreement with the amended draft advice on “consumer information on fishery and aquaculture products, particularly in the context of the HoReCa sector”.

- **Way forward**

The Chair proposed to put forward the draft advice to the Executive Committee for consideration and potential approval.

AOB

- **EU-Level Targets for Food Waste Reduction**

Javier Ojeda (FEAP) highlighted that, in the letter of reply from DG MARE to the advice on “proposal on EU-level targets for food waste reduction & good practices in the fisheries and aquaculture market”, questions remained on whether “food waste” included pre-harvest losses. The Secretariat followed-up with a written question via email to the Commission services. The reply to the question clarified that pre-harvest losses are not food waste, even though these can be classified as “waste”. Nevertheless, it was up to the Member States to determine the limits of the concept of “food waste”.

Gerd Heinen (DG MARE) expressed availability to further follow-up on the topic, in case of additional written questions.

The Chair asked Mr Ojeda whether he believed that an interpretation note from the European Commission was needed, since implementation of the legislation should be horizontal.



Javier Ojeda (FEAP) expressed satisfaction with the reply sent via email by DG MARE, adding that, in his view, it was not necessary to proceed with further actions.



Summary of action items

- Packaging and Packaging Waste Regulation:
 - Secretariat to launch a one-month consultation for members to share their views on the impacts of the package reuse targets, so that draft advice can potentially be considered at the January 2025 meeting.

- Consumer Information:
 - Draft advice on “consumer information on fishery and aquaculture products, particularly in the context of the HoReCa sector” to be put forward to the Executive Committee for consideration and potential approval.



Attendance List

Representative	Organisation	Role
Adrien Simonnet	Union du Mareyage Français (UMF)	Member
Alessandro Piccione	EU Fish Processors and Traders Association (AIPCE) / European Federation of National Organizations of Importers and Exporters of Fish (CEP)	Member
Alonso Abreu Lozano	OPP80 Punta del Moral	Member
Amélie Laurent	Oceana	Member
Àngels Segura Unió	AECOC	Member
Anna Rokicka	Polish Association of Fish Processors (PSPR)	Member
Aodh O'Donnell	IFPO	Member
Asermouh Amine	SNCE	Member
Benoît Thomassen	Federation of European Aquaculture Producers (FEAP)	Chair
Brian Thomsen	Aquaculture Advisory Council (AAC)	Observer
Catherine Pons	Federation of European Aquaculture Producers (FEAP)	Member
Clara Boissenin	Ecsite, the European Network of Science centres & Museums	Expert
Daniel Voces de Onáindi	Europêche	Member
Falke De Sager	European Association of Fish Producer Organisations (EAPO)	Member
Gaetane Le Breuil	European Fishmeal	Member
Gerd Heinen	European Commission	Expert
Hélène Buisson	Nausicaá Centre National de la Mer	Expert
Iñigo Azqueta Ruiz-Gallardón	FEICOPESCA / ANFACO-CECOPESCA	Member
Isabel Alonso Cabezas	Spain	Observer
Janne Posti	Conxemar	Member
Javier Ojeda	Federation of European Aquaculture Producers (FEAP)	Member
Jean-Marie Robert	Les Pêcheurs de Bretagne	Member
Jennifer Reeves	Marine Stewardship Council	Member
Jens Mathiesen	Danish Seafood Association	Member



Representative	Organisation	Role
João Pereira	FRUCOM	Member
José Carlos Escalera Aguilar	FECOPESCA	Member
Juana Parada	OR.PA.GU.	Member
Juliette Marguerite	European Salmon Smokers Association (ESSA)	Member
Julien Lamothe	ANOP	Member
Jürgen Lang	EUMEPS	Expert
Justine Delette	Nausicaá Centre National de la Mer	Expert
Justine Marrot	Aquaculture Advisory Council (AAC)	Observer
Katarina Sipic	EU Fish Processors and Traders Association (AIPCE) / European Federation of National Organizations of Importers and Exporters of Fish (CEP)	Member
Laure Guillevic	WWF	Member
Lea Salihovic	EUMEPS	Expert
Linda Zanki Duvnjak	Ribarska Zadruga Friška Riba	Member
María Luisa Álvarez Blanco	FEDEPESCA	Member
Mariano García García	Cofradía “Virgen del Carmen” de Isla Cristina	Member
Massimo Bellavista	COPA COGECA	Member
Maximilian Schwarz	Market Advisory Council (MAC)	Secretariat
Mounir El’Mourabit	EUMEPS	Expert
Niall Gerlitz	European Commission	Expert
Nicolás Fernández	Organización Productores Pesqueros Artesanales Lonja de Conil (OPP72)	Member
Patrick Murphy	Irish South & West Fish Producers Organisation	Member
Pedro Luis Casado López	Asociación de Armadores Punta del Moral (OPP80)	Member
Pedro Reis Santos	Market Advisory Council (MAC)	Secretariat
Pierre Commère	PACT’ALIM	Member
Pim Visser	NOVA	Member
Quentin Marchais	ClientEarth	Member
Rod Cappell	Poseidon Aquatic Resource Management	Expert



Representative	Organisation	Role
Rosalie Tukker	Europêche	Member
Sergio López García	OPP7 Burela	Member
Stefan Meyer	Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.	Member
Szilvia Mihalfy	Federation of European Aquaculture Producers (FEAP)	Member
Teis Knudsen	EUMEPS	Expert
Thomas Kruse	Danish Fishers Producer Organisation / Danish Pelagic Producer Organisation	Member
Vanya Vulperhorst	Oceana	Member
Yannis Pelekanakis	Hellenic Aquaculture Producers Organisation (HAPO)	Member
Yobana Bermúdez Rodríguez	EU Fish Processors and Traders Association (AIPCE)	Member

