

Study on Common Market Organisation (CMO)

Market Advisory Council – WG 3
17/09/2025

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Agenda

- Objectives and methodology
- Key findings on consumer information requirements

Objectives and methodology

- Background and objectives
- Key questions on consumer information requirements
- Key methodological aspects
- Timeline

Background and objectives

- **2013 reform of the Common Fisheries Policy (CFP)** and CMO aimed to:
 - Strengthen sustainability in EU fisheries/aquaculture.
 - Improve market position of EU producers.
 - Enhance transparency via marketing standards, consumer information, and market intelligence.
- Consumer information requirements were strengthened, in particular by including the scientific name of species, the fishing gear, whether the product was defrosted and the date of minimum durability under mandatory requirements.
- The objectives of the study were to:
 - Feed into the **ongoing CFP evaluation**
 - Provide **concrete and applicable recommendations** / identified **best practices**
 - Identify **possible improvements to the CMO Regulation**

Key study questions on consumer information

Correspondence with consumer needs

Do the rules on mandatory and voluntary consumer information correspond to current consumer needs for fisheries and aquaculture products?

Efficiency

Are the costs incurred to implement the mandatory consumer information requirements proportionate and justifiable to the benefits achieved?

Contribution to the CMO/CFP objectives

To what extent do the current consumer information requirements contribute to achieve the CFP and CMO objectives (incl. market transparency, level-playing field, fair competition, sustainable exploitation of living marine biological resources, etc.) ? Is the scope adequate?

Enforcement and compliance

What is the level of compliance with mandatory consumer information requirements? What may prevent compliance? To what extent is the revised Control Regulation expected to improve compliance?

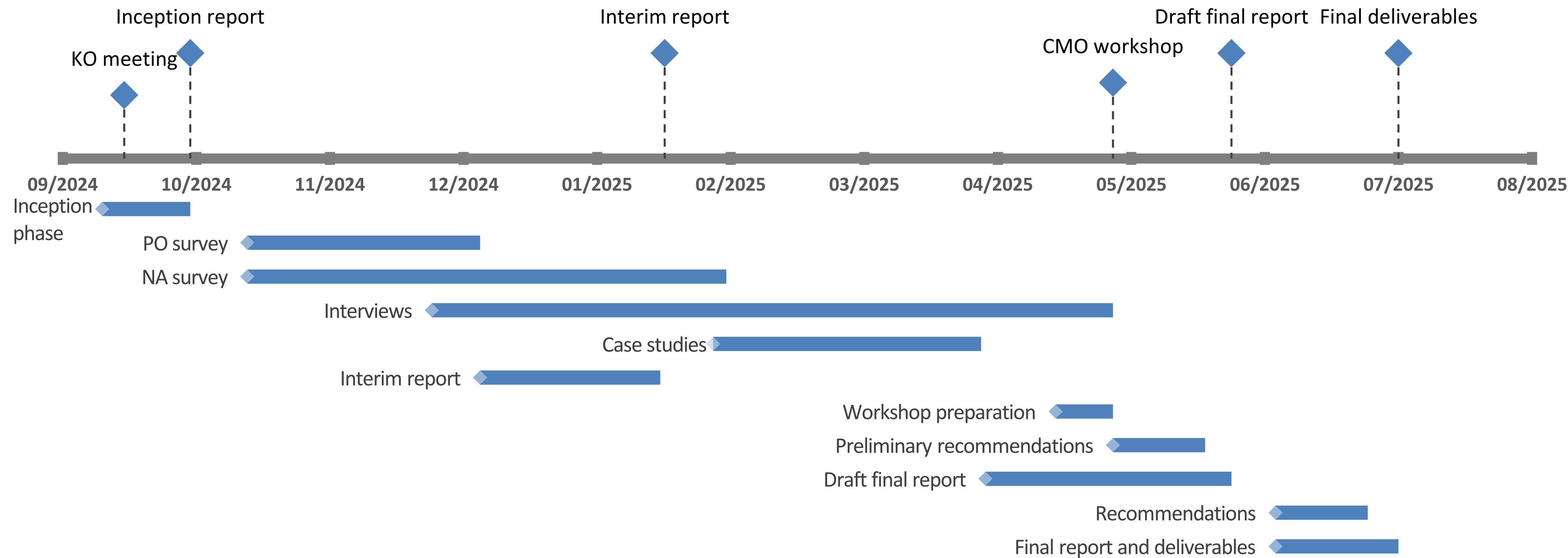
Methodology

Geographical and time scope: EU27 (2013–2025)

Data sources

- Desk research (regulations, STECF reports, Eurobarometer, academic literature).
- Online PO survey (53 respondents from 180 POs/APOs/IBOs).
- National authorities survey (25 MS).
- 37 stakeholder interviews + 15 PO case studies (DK, FR, IE, PL, ES).
- Workshop (April 2025) with 50 stakeholders.

Timeline



Key findings

- Scope of mandatory consumer information requirements
- Relevance
- Impact on consumers' choices
- Impact on market transparency
- Efficiency

Scope of mandatory consumer information requirements

Consumers have direct access to mandatory information only for about ½ of the total seafood consumption

- Prepared and canned seafood represent about ¼ of at-home consumption
- Out-of-home consumption about 30% of all food expenditures
- Recent market trends indicate a declining share of products covered by mandatory consumer information

	2017	2024
Fishery and aquaculture products consumed out-of-home	28%	30%
Fishery and aquaculture products consumed at home, <i>of which</i>	72%	70%
Products covered by CI requirements	78%	73%
Products not covered	22%	27%
Total share of products covered	56%	51%

Source: Eurostat, HICP

Relevance of consumer information requirements

- **Mandatory requirements are generally relevant to consumers**, in particular:
 - the minimum durability date,
 - the production method (wild or farmed),
 - whether the product has been defrosted,
 - the name of the product or species,
 - and the origin
- **Growing expectations about sustainability-related information** are only partially addressed
- **There is little visibility on the actual use of voluntary information**, as defined in the CMO
- **There are indications that it is increasing through:**
 - The use of QR codes, providing very detailed data on the vessel, place and date of landing, etc.
 - Origin-related labels partly relying on this information (e.g. Pavillon France, Origin Green, Från Sverige, etc.)

Impact on consumers' choices

Mandatory information partially enables consumers to make informed choices

- Some information is directly useful (e.g. species name, production method) for consumers
- NGOs and consumer organisations rely on them for their consumer guides, information campaigns, etc.
- Marginal segmentation of the market is observed for some niche products

Current requirements are not always clear to consumers

- Consumers' awareness of FAPs has improved over time but remains low, in particular as regards environmental impacts
- Even for consumers who are “aware”, mandatory information can be difficult to interpret, in particular as regards environmental aspects, and origin

Under the current framework, consumers mainly rely on certification schemes for sustainability aspects, with the following limitations

- Provides unequal coverage, depending on species, production methods, types of fisheries, and MS
- Focus on positive aspects and do not inform on negative ones

Impact on consumers' choices

Mandatory CI requirements	Feedback from stakeholders and desk research
Name	Commercial designation: highly relevant Scientific designations: difficult to understand by consumers, but useful for consumer guides and controls
Production method	Generally relevant, with lower sensitivity of consumers in long supply chain
Area where the fish was farmed or caught	Country of origin for aquaculture is relevant Catch area: difficult to understand by consumers, but useful for consumer guides and controls
Category of fishing gear	Generally not interpretable by consumers, but relevant for sustainability aspects
Defrosted or not	Very relevant, but not always clearly displayed
Minimum durability date	Very relevant, but can be confused with 'use by' date

Impact on market transparency

- **Consumer information generally improves market transparency, with some limitations**
- **Verifiability is ensured in theory, but not always in practice**
 - Consumer information requirements are aligned with traceability obligations
 - In practice, some gaps have been identified in the continuity of information along the supply chain
 - Voluntary information is not fully covered by traceability requirements
- **The level of compliance is difficult to assess**
 - MS generally report a good overall level of compliance
 - **Controls** of labelling requirements are often conducted **as part of broader food law inspections**, with **no specific risk-assessment or reporting** for consumer information requirements
 - Independent studies have identified persistent issues of non-compliance for specific segments, in particular unpacked fresh products

Efficiency of consumer information requirements

- **The economic impact of consumer information requirements for operators is assessed to be very limited overall**
 - Information is collected under traceability requirements already
 - Labelling costs are part of normal business costs for the most part, even if the burden may be higher for some small operators
 - Measurable benefits in terms of market segmentation are rather marginal but exist in small niche markets where price premiums could be achieved
 - Reliable consumer information more generally is crucial for consumer trust
- **Additional costs for national authorities are assessed to be marginal**
 - Consumer information requirements are controlled with other legal requirements, resulting in small or marginal additional costs, assessed between 0 and 2 FTE/year/MS
 - Benefits resulting from the increased transparency in the market are assessed to outweigh these costs

Thank you for your attention!

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