

Ms Charlina Vitcheva
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CC:
Ms Elisabeth Werner
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Ms Sandra Gallina
Director-General, DG SANTE
Rue Breydel 4, 1040 Brussels

Brussels, 21 October 2025

Subject: State-of-play on labelling and consumer information concerning plant-based imitations of fishery and aquaculture products

Dear Director-General Vitcheva,

As you are aware, plant-based products are increasingly popular amongst EU consumers and plant-based imitations of fishery and aquaculture products are gaining market share.

On 22 July 2021, our Advisory Council provided you with advice on “Labelling of Vegetarian and Vegan Fish Imitations”¹, which outlined the existing applicable legal framework, the lack of specific legislation on the labelling of plant-based imitation products, the discrepancy between labelling of unprocessed fishery products and other foodstuffs, and examples of unclear labelling practices. The MAC recommended the undertaking of a study on the level of consumer understanding of these products, a study to analyse the economic potential in the EU market and the impact on the operators of the fisheries and aquaculture supply chain, the assessment of the need to potentially amend the legislative framework, and to consider the development of guidance documents similar to the ones developed by Germany and France.

In your letter of reply, dated 5 October 2021, you recalled that, while the consumer information provisions of the Common Market Organisation Regulation² do not generally apply to plant-based imitations, these products must comply with the Food Information to Consumers Regulation³, particularly Article 7 on fair information practices. You concluded that, considering

¹ <https://marketac.eu/labelling-of-vegetarian-and-vegan-fish-imitations/>

² [Regulation \(EU\) No 1379/2013 on the common organisation of the markets in fishery and aquaculture products](#)

³ [Regulation \(EU\) No 1169/2011 on the provision of food information to consumers](#)

the existing regulatory framework, the legislation in place regulates sufficiently the labelling and presentation of plant-based imitation products and, thus, your services would not launch further work or a study on the matter.

On 8 March 2023, our Advisory Council provided you with new advice on “Improving the Labelling Legislation for Plant-Based Imitations of Fisheries and Aquaculture Products”⁴, which outlined new examples of unclear labelling practices. The MAC recommended that you reassess whether the legal framework sufficiently regulates the labelling and presentation of plant-based imitations, assess the relevance of specific rules to regulate the sector of plant-based products, guarantee the presence of fair competition in the EU market, the commissioning of a study on the development of these products, and to take into account national developments on the labelling of foodstuffs.

In your letter of reply, dated 19 December 2023, you emphasised that the current EU rules already provide a solid framework to ensure that EU consumers receive accurate, clear and easy-to-understand food information. You recalled that it is for Member States to enforce the applicable EU rules, notable to ensure that EU consumers are not exposed to misleading food information. You added that the assessment of whether or not a given term can mislead consumers has a linguist and cultural dimensions and that national authorities are best placed to carry out such an assessment in light of the existing provisions.

On 18 January 2024, the European Parliament adopted a resolution⁵, which twice mentions the issue of labelling of plant-based imitations of fishery products. The Parliament “(...) recalls that labelling must provide an accurate description of fishery and non-fishery products, avoiding fraud and misleading advertising that is harmful to consumers and fishers, in particular when mentioning substitute products, as in many cases images are used that make consumers think certain products are fishery products when they are not; is concerned that some products on the market, such as plant-based products, use terms exclusively used by fishery products even though they are not fishery products; considers that the Commission should further investigate this issue based on the reports received”, and “considers, therefore, that the trade name ‘fish’ or ‘fish species’ should be reserved for fishery or aquaculture products of animal origin on the single market; calls, in this regard, on the Commission to revise the existing legislation on the labelling and presentation of plant-based products that imitate fishery and aquaculture products in order to ensure that consumers are given accurate and precise information that avoids any misunderstandings and maintains equal opportunities in the EU market”.

⁴ <https://marketac.eu/improving-the-labelling-legislation-for-plant-based-imitations-of-fisheries-and-aquaculture-products/>

⁵ [European Parliament resolution of 18 January 2024 on the implementation of the Common Market Organisation \(CMO\) Regulation in fisheries and aquaculture – Regulation \(EU\) No 1379/2013](#)

In June 2025, at the request of the Committee on Fisheries, the European Parliament published a study titled “Labelling of plant-based seafood substitutes”⁶. The study outlines the development of plant-based seafood substitutes, the main types of substitutes, and labelling issues. The study recommends an update to the legal framework to accompany the changes in the products supplied on the EU market, including an update of the Food Information to Consumers Regulation through a specific additional chapter dedicated to plant-based food substitutes, the development of specific detailed guidelines at EU-level, forbidding the use of the commercial designation of aquatic species for products that does not contain seafood, additional information requirements for products using invented names, the imposition of the name of the main ingredient(s) on the package, and indication of the level of processing.

At the 23-24 June 2025 meeting of the AGRIFISH Council, Czechia, Austria, Hungary, Italy and Slovakia, with support from France, Ireland, Luxembourg, Malta, Portugal, Romania, and Spain, introduced an item on “The protection of traditional names of animal origin food”⁷. The mentioned Member States stressed that plant-based foods are very often labelled with the names belong to meat, eggs, honey, fish and products made from them. These Member States called on the European Commission to submit a legislative proposal to protect the names of food of animal origin, providing them with the similar long-standing protection as milk and dairy products. In their view, “this would ensure the protection of meat, eggs, honey, fish and selected products made from them, the protection of consumers from misleading information and the prevention of regulatory fragmentation in the EU by adopting different arrangements in Member States”.

On 17 July 2025, the European Commission published a new legislative proposal to amend the Common Market Organisation for agricultural products⁸. The proposal introduces restrictions to the use of designations associated with meat products. According to the proposal, “specific legal provisions should be introduced to protect meat-related terms in order to enhance transparency in the internal market as regards food composition and nutritional content and ensure that consumers can make well-informed choices, particularly for those seeking a specific nutritional content that is traditionally associated with meat products”⁹.

Taking into account the developments described above, including legislative ones, the MAC would like to request information on whether your services are considering new initiatives on the labelling of plant-based imitations of fishery and aquaculture products. Information on

⁶ [https://www.europarl.europa.eu/thinktank/en/document/CASP_STU\(2025\)759336](https://www.europarl.europa.eu/thinktank/en/document/CASP_STU(2025)759336)

⁷ <https://data.consilium.europa.eu/doc/document/ST-10489-2025-INIT/en/pdf>

⁸ [https://ec.europa.eu/transparency/documents-register/detail?ref=COM\(2025\)553&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2025)553&lang=en)

⁹ As some of the restrictions to the use of “meat-related terms” (e.g., “fillet”, “loin”) could have an impact on current labelling practices of fishery and aquaculture products, the MAC would like to hold an exchange, at a future opportunity, with DG AGRI on the legislative proposal. The MAC maintains the discretion to eventually adopt advice on the described matter.



potential cooperation with other services, such as DG AGRI and DG SANTE, to ensure a common approach to food policy in the EU market, would be particularly appreciated.

We remain available to discuss labelling and consumer information issues in more detail.

Yours sincerely,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke.

Yobana Bermúdez
Chair of the Market Advisory Council