

Advice

Restrictions to the use of “meat-related terms” under the Common Market Organisation of Agricultural Products – Potential impact on the market of fishery and aquaculture products

Brussels, 17 December 2025

1. Background

On 16 July 2025, the European Commission adopted a legislative proposal to amend the Common Market Organisation for Agricultural Products Regulation¹. In accordance with the explanatory memorandum, “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”.

The proposal foresees a list of names that shall be reserved for products derived exclusively from meat at all stages of marketing. According to the proposal, ““Meat” means exclusively the edible parts of an animal”. In preparation for the interinstitutional negotiations, the European Parliament adopted a mandate that aims for the inclusion of further designations to the list as well as a more explicitly exclusion of cell-based products from the use of the mentioned terms².

¹ [Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation \(EU\) No 1308/2013 as regards the school fruit, vegetables and milk scheme \(‘EU school scheme’\), sectoral interventions, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties, rules on the availability of supplies in time of emergencies and severe crisis and securities](#)

² [Press release of the European Parliament](#)

2. Potential impacts on the market of fishery and aquaculture products

Several of the terms restricted under the legislative proposal are traditionally and commonly used in the marketing of fishery and aquaculture products (e.g., “loin”). Depending on the language, there could be further restrictions on terms generally used by the fisheries and aquaculture supply chain (e.g., “filet” in the French translation). The mandate of the European Parliament introduces additional restrictions to commonly used designations (e.g., “steak”, “escalope”, “sausage”, “burger”).

The legislative proposal of the European Commission clearly did not aim to cover fishery and aquaculture products in the restrictions, as demonstrated by the focus on “edible parts of an animal” in the proposed definition of “meat”. Nevertheless, it is important to consider that, under the EU legislative framework, the common market organisation of fishery and aquaculture products has a separate regulation³. Furthermore, Annex I of Regulation (EC) No 853/2004⁴ provides a definition of “meat” that does not include fishery and aquaculture products, while providing separate definitions for “live bivalve molluscs” and for “fishery products”. Article 2 of the Food Information to Consumers Regulation⁵ follows the definition of “meat” provided by Regulation (EC) No 853/2004.

Therefore, from a legal perspective, the amendments to the Common Market Organisation of Agricultural Products could be inadvertently introducing restrictions to the marketing of fishery and aquaculture products. In the view of the MAC, these restrictions would cause significant market disruptions for the fisheries and aquaculture supply chain and, contrary to the

³ [Regulation \(EU\) No 1379/2013 of the European Parliament and of the Council of 11 December 2013 on the common organisation of the markets in fishery and aquaculture products](#)

⁴ [Regulation \(EC\) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin](#)

⁵ [Regulation \(EU\) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers](#)

legislation's intent, would likely confuse consumers who are accustomed to the mentioned designations.

3. Recommendations

The MAC believes that, in the context of the interinstitutional negotiations on the legislative proposal to amend the Common Market Organisation of Agricultural Products, the European Commission and the Member States should:

- a) With due consideration for other pieces of legislation on the marketing of food products, explicitly exclude fishery and aquaculture products from the scope of the proposed restrictions on the use of “meat-related terms”;
- b) In the case of future legislative initiatives with an impact on labelling, marketing, and consumer information of food products, ensure a close collaboration between the relevant Commission services (e.g. DG MARE, DG AGRI, DG SANTE), to promote a consistent approach to food policy and to maintain coherence across food sectors;
- c) Take into account our previous advice on labelling of plant-based imitations of fisheries and aquaculture products⁶, and on cell-based protein of aquatic animals⁷.

⁶ [MAC Advice on “Improving the Labelling Legislation for Plant-Based Imitations of Fisheries and Aquaculture Products” \(8 May 2023\)](#)

⁷ [MAC Advice on “Cell-Based Protein of Aquatic Animals” \(20 September 2023\)](#)