

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

### Minutes

Wednesday, 17 September 2025 (14:30 – 18:00 WEST / 15:30 – 19:00 CEST)

NH Imperial Playa, C. Ferreras, N.º1, 35008 Las Palmas de Gran Canaria, Spain / Zoom

Interpretation in EN, ES, FR

Welcome from the Chair, Benoît Thomassen

#### Presentation

Adoption of the agenda and of the last meeting's minutes (05.05.25): Adopted

#### Action points

- **State-of-play of the action points of the last meeting - information**
- Vision for EU Fisheries for 2040:
  - Remaining sections of the draft advice on “Vision for Fisheries, Aquaculture and their Market in 2040” to be considered via an urgent written procedure.
    - Advice adopted on 15 July 2025
- Animal Transport:
  - Following informal exchanges with the most interested members, draft advice on “legislative proposal on the protection of animals during transport and related operations” to be considered via an urgent written procedure.
    - Advice adopted 8 July 2025.

#### Common Market Organisation

- **Presentation on the section on consumer information requirements of the study on the Common Market Organisation by Séverine Renault (AND International)**

#### Presentation

The Chair recalled that, following up on the report on the functioning of the Common Market Organisation, DG MARE commissioned a study on the provisions related to professional organisations and consumer information. The study will contribute to the ongoing evaluation of the Common Fisheries Policy.



Séverine Renault (AND International) recalled that the 2013 reform of the Common Fisheries Policy and of the Common Market Organisation sought to strengthen sustainability in EU fisheries and aquaculture, improve the market position of EU producers, and enhance transparency through clearer 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 study, covering the period 2013–2025 across the EU27, aimed to contribute to the ongoing evaluation of the Common Fisheries Policy, provide practical recommendations, identify best practices, and suggest potential improvements to the Common Market Organisation Regulation. The analysis was based on desk research, surveys with producer organisations and national authorities, stakeholder interviews, and a workshop held in April 2025.

Ms Renault, on the scope of the mandatory consumer information requirements, highlighted that the findings revealed that consumers have direct access to mandatory information for only about half of total seafood consumption, as prepared, canned, and out-of-home products generally fall outside these requirements. Recent market trends indicate a declining share of products covered by mandatory consumer information. The mandatory requirements are generally considered relevant by consumers, including the minimum durability date, production method (wild or farmed), defrosting status, species name, and origin. However, growing consumer expectations for sustainability-related information are only partially met. As for voluntary information, there was limited visibility on the actual use, as defined in the Common Market Organisation. The access of details via QR codes or origin-based labels (e.g. Pavillon France, Origin Green, Från Sverige) was expanding, though its visibility and consistency remain limited.

Ms Renault emphasised that 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. At the same time, the current requirements are not always clear to consumers. Consumers' awareness of fishery and aquaculture products 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. Nevertheless, these have limitations, such as unequal coverage, depending on species, production methods, types of fisheries, and Member States, plus a focus on positive aspects, while not informing on negative ones.

Ms Renault, on the impact on market transparency, outlined that 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. Member States 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.

Ms Renault, on the efficiency of consumer information requirements, stated that 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. As for the additional costs for national authorities, she stated that these 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 Full Time Employees per year per Member State. Benefits resulting from the increased transparency in the market are assessed to outweigh these costs.

Ms Renault commented that, overall, while mandatory information requirements remained relevant and useful for ensuring market transparency, these remained difficult for consumer to interpret and do not fully address expectations on sustainability information. She expressed caution on the increasing number of unregulated voluntary claims, especially those relating to sustainability, which risked creating confusion outside established labelling frameworks.

- **Exchange of views**

Christine Absil (Good Fish) asked for Ms Renault's views on how to, in the context of consumer information, address fishing gear categories together with other sustainability aspects. Ms Absil provided the example of the efforts of the STECF Expert Working Group on Sustainability and of the Verifish project that depended on the mandatory information on fishing gear. In her view, the categories foreseen under the Common Market Organisation Regulation were too broad, which meant that it was difficult to make substantial considerations on sustainability. As an example, trawl gears could have very significant differences in practice. Additionally, the catch area would also benefit from being more specific.

Séverine Renault (AND International) agreed that the mandatory information requirements on fishing gear, particularly on trawl gears, were insufficient for information on sustainability. Ms Renault emphasised that the issue was addressed in more detail in the study, which took into account the work of the STECF Expert Working Group.

María Luisa Álvarez Blanco (FEDEPESCA) underscored that transparency was only increased for around 50% of the market of fishery and aquaculture products. In her view, consumers do not understand some of the mandatory information required, for example on fishing gear, so she wondered how, in practice, this



information was relevant for sustainability information. Ms Álvarez emphasised the importance of consumer education and of improving communication efforts. She added that the mandatory dates were only relevant for some categories of products.

Séverine Renault (AND International) recognised that some of the mandatory information was difficult for consumers to understand. Nevertheless, informed consumers could use the information. Additionally, the information was useful for certification label and sustainability guides, contributing to greater awareness.

María Luisa Álvarez Blanco (FEDEPESCA) responded that her organisation also made use of guides. Ms Álvarez underscored the importance of strengthening awareness among consumers. She added that the minimum duration date was only mandatory for some products.

Séverine Renault (AND International) expressed agreement with Ms Álvarez.

Guus Pastoor (Visfederatie) requested information on the number of consumers consulted. Mr Pastoor commented that, even if the labelling costs were assessed to be low, these required increased traceability. He asked for information on the increased costs with traceability. He highlighted that controls on the mandatory information requirements usually take place at the same time as hygiene controls, which varied significantly across the Member States. In his view, the controls at retail's level were rather limited.

Séverine Renault (AND International) responded that the consultants did not carry out a mass consumer survey. The study referred to the Eurobarometer surveys and other existing literature. On the relation between labelling and traceability, the study did not assess the costs of traceability in detail. The study focused on the potential causes from Article 35 of the Common Market Organisation. The traceability costs would exist regardless. As for the data on controls and checks, she explained that the consultants held exchanges with the Member States. It was challenging to isolate the specific control costs related to Article 35. Several Member States indicated that there were no additional costs or very limited costs related to specific actions.

Patrick Murphy (IS&WFPO) drew attention to the issue of non-EU countries setting fishing quotas above the level recommended by scientific advice. In practice, for some species, unsustainable fisheries management by third countries led to a loss of MSC certification by the EU fleet. Mr Murphy asked for Ms Renault's views on such developments impacted sustainability.

Séverine Renault (AND International) responded that sustainability covered the environmental, economic, and social dimensions. The consultants looked into the literature of STECF, and the information provided by the interviewed. The consultants did not develop a definition of sustainability.

Javier Ojeda (FEAP) asked for information on the definition of "consumers", stressing the significant diversity across Member States and consumption channels, which could impact the conclusions of the study. Mr Ojeda argued that the views of consumers changed faster than the EU legislation. In practice, voluntary



information was challenging for producers to implement, providing the example of QR codes in boxes of fresh fish, which could become illegible. The transmission of voluntary information also required the agreement of the upstream parts of the supply chain. He also asked about the amount of consumer information reaching the HORECA channel.

Séverine Renault (AND International) acknowledged that there was diversity among consumers. Differences across Member States were identified in the report. On the evolution of consumer needs, Ms Renault highlighted that the Eurobarometer surveys covered several years. These showed some long-lasting trends. On voluntary information, she recognised that there was limited visibility. As for the HORECA, she explained that mandatory information needed to be shared with the HORECA sector, but that the information did not reach the consumers.

Marine Cusa (Oceana) highlighted that consumers had difficulty understanding the catch area. Nevertheless, if consumers want to make sustainable choices, the use of the catch area was useful. In her view, for the consumption of local products, the information on catch area was very relevant and straightforward. Therefore, it was necessary to keep in mind the reasons why consumers seek the information.

Séverine Renault (AND International) recalled that the 2013 reform of the Common Market Organisation Regulation introduced the obligation to indicate the name of catch area, rather than the FAO code. Therefore, the origin became partially clearer. Ms Renault expressed doubt that, in practice, consumers would understand the indication of a “Northwest Atlantic” fishing zone as “local”. The FAO classification referred to large geographical areas, while consumers could be looking for products from their local port or from their country. She added that the definition of “local product” varied across consumers.

Pierre Commère (PACT’ALIM) wanted to know whether the report was already publicly available. Mr Commère asked whether the study included recommendations for the future.

Séverine Renault (AND International) responded that the study had been approved and was in the process of being published. The study should be publicly available in the following weeks. The study did not contain recommendations. The consultants shared some recommendations with the European Commission, which could be integrated into the Staff Working Document.

Jérémie Souben (FEDOPA), on the role of consumer guides in making information more understandable, asked for information on the number of consumers using these tools.

Séverine Renault (AND International) responded that she did not have the requested figures. Ms Renault highlighted that several operators used the guides and shared information based on them. She added that several EU projects related to guides were ongoing.

María Luisa Álvarez Blanco (FEDEPESCA) asked for Ms Renault’s views on whether a consumer that wants to be well informed when shopping would also want to be informed in the HORECA context. Ms Álvarez argued





restaurants could use QR codes and digital menus, which would be easy to adapt. In the case of fishmongers, the changing of labels on a daily basis was more challenging.

Séverine Renault (AND International) emphasised that, under the existing legislation, the HORECA sector had access to the information. Therefore, if consumers ask for information, the HORECA operators should be able to provide it. Ms Renault agreed that practical ways existed for the HORECA sector to make the information available to consumers.

### Food Safety

- **Presentation of the Commission Delegated Regulation for fishery products frozen in brine on board vessels by SANTE G5 representative**

Paolo Caricato (DG SANTE) informed that the Commission Delegated Regulation arose from stakeholder feedback, Member States experience, and scientific advice, to address issues in the handling of tuna intended for canning. The Regulation introduces specific rules for tuna frozen in brine, in order for these products to be allowed to be placed in the market for direct human consumption.

Mr Caricato, on the background, explained that freezer vessels were required to freeze at  $-18^{\circ}\text{C}$  as soon as possible. The exception was tuna for the canning industry that could be maintained up to  $-9^{\circ}\text{C}$ . The attractive price of these products led to a rise in fraudulent activities. Tuna frozen at  $-9^{\circ}\text{C}$ , defrosted and then frozen again, treated with illegal additives, was diverted to the market for direct human consumption, increasing health risks, such as scombroid food poisoning. As an example, in Italy, there were intoxications due to nitrates, including one death. Therefore, the Commission decided to take measures in order to stop these fraudulent activities.

Mr Caricato highlighted that, according to the industry, technology is available to safely freeze tuna in brine at  $-18^{\circ}\text{C}$  on board certain freezer vessels, maintaining the colour expected by consumers without a need for nitrates. When the freezing process is possible, the Commission will allow it, but under strict operational and monitoring conditions. Contacts with national authorities showed that the mentioned technology is viable. The new Regulation sets the conditions for these freezer vessels in relation to products for direct human consumption. The authorised vessels would also be part of special listing under the TRACES platform.

Mr Caricato explained that the new additional requirements required continuous monitoring in real time as well as electronic records of the temperature of the brine. The new system allows for real time onshore monitoring, allowing access to the information by the competent authorities. The cost of implementing the mentioned technology was, according to data provided by the industry, of around €20.000. The food business operator will have to set up a validation plan, including kinetic studies and correlation curves between the brine and the cooling period, to be presented to the competent authorities. Certification of the temperature probes or sensors will be required. These will be verified by the competent authorities. The



Commission representative added that, in practice, the proposed approach should not be difficult to implement, providing the example of some vessels in the Basque Country that already implemented it.

Mr Caricato outlined the freezing process. For direct freezing, the total duration should not exceed 96 hours after the first capture. The tuna must reach a core temperature below 0°C within 24 hours and -18°C within 96 hours. For cooling in clean seawater, the temperature of the tuna and the seawater must reach 3°C within six hours and 0°C within 16 hours, with total duration to brining not exceeding 72 hours. Once in brine, the tuna must reach -18°C at the core within 72 hours. As additional requirements, food business operators must also monitor and adjust the brine's salt concentration. For verification purposes, food business operators must continuously record the temperature of a sample of tuna through a measuring instrument immersed in the temperature-sensitive part of the fish that will be frozen last on land.

Mr Caricato informed that the Regulation would enter into force 21 days after publication. The Regulation was expected to be published in October or November 2025. The transition period would be of 90 days. Therefore, the Regulation should be applicable from Spring 2026. The Commission representative emphasised that the special listing of freezer vessels in the TRACES platform would contribute to compliance with the new rules. In his view, the new Regulation would allow for tuna to be placed on the market for direct human consumption, while taking action to face the intoxication cases. Additionally, the tuna industry appeared to be satisfied with the measures, particularly to address the negative impact of the intoxication cases on the image of the sector.

- **Exchange of views**
- **Way forward**

Anna-France Mattlet (Europêche) thanked Mr Caricato for the inclusive approach in the development of the new rules, adding that these were important to ensure a level-playing-field in the market. Ms Mattlet recalled that the EU fleet represented a limited percentage of the tuna catches, expressing high expectation for audits, particularly for the foreign fleets that might want to list multiple vessels. She asked for more information on the online verification of the temperature records by the vessels and the flag State.

Paolo Caricato (DG SANTE) emphasised that the auditors were informed about the rule. The audits would not start immediately. The audits would start once the system is implemented. Mr Caricato recognised that, at the moment, not all freezing vessels would be able to comply with the new rules. In the case of the foreign fleets, the responsibility of listing vessels would be of the competent authorities of the third country. While the Commission will accept the listings, the Commission will consider these and undertake targeted audits. In the case of a very long list of vessels from a third country, the Commission might consider additional measures. He highlighted that, in a meeting with representatives from Mauritius, the competent authorities showed interest in the new rules, even it would only be relevant for a few vessels.



Christine Absil (Good Fish) requested more information on how the new rules would prevent poisoning, particularly in the context of tuna for sushi. Ms Absil highlighted that the consumption of sushi was increasingly popular.

Paolo Caricato (DG SANTE) responded that the Commission was strengthening the rules to make fraudulent activities increasingly more difficult. In his view, it was fairly easy for fraudulent operators to circumvent the existing rules. The new rules would impose clearer timelines as well as the list of authorised vessels. Through increased traceability, it would be easier to determine the responsible fishing vessel. If the new rules are applied, the use of nitrates would not be needed to maintain the colour of the tuna products. Additionally, the content of salt would be fixed. The Commission representative recognised that fraud could always take place but expressed confidence that it would be harder.

Juana Parada (OR.PA.GU.) explained that, in the case of her fleet, freezing took place at  $-40^{\circ}\text{C}$ . The labelling and packaging were per piece of tuna, while also ensuring traceability per lot. Thermometers were used to register the temperature at every moment. In the case of sashimi products, freezing was usually at  $-40^{\circ}\text{C}$ . Ms Parada, in relation to maintaining a level-playing-field in the market, expressed concern about the high number of steps to essentially fight fraud.

Paolo Caricato (DG SANTE) pointed out that there was a limited number of vessels operating at  $-60^{\circ}\text{C}$ , which serviced a specific market. In his view, these vessels would not be negatively impacted by the new rules. Mr Caricato emphasised that the Commission aimed to react to fraud, while allowing operators to continue to place healthy, affordable products, on the market. In the case of vessels servicing alternative markets, the only solutions were to fully ban these operations or to develop new rules to increase transparency and protect consumers. The new rules should allow honest operators to maintain their market, while excluding dangerous ones. The Commission representative added that, as a separate issue, the sanctions for these crimes are still too low in comparison with the enormous revenues and the sanitary risks to which the consumers are exposed.

Juana Parada (OR.PA.GU.) expressed concern that, under the same market segment, there would be products following different procedures based on the temperature.

Paolo Caricato (DG SANTE) said that the traditional system of freezing in brine at  $-9^{\circ}\text{C}$  destining the fish to the canning industry will remain untouched. The objective of the new rules was to allow, only to certain vessels, to freeze at  $-18^{\circ}\text{C}$  in brine for reaching a market, already existing, trying to put outside operators that put at risk the food safety (and the rules of the internal market).

Aurelio Bilbao Barandica (OPESCAJA) stated that he did not fully understand the reasons for the new rules. The procedures followed by the Basque tuna fleet already ensure food safety. Mr Bilbao wondered whether the problems identified related to the operators or to the vessels. He highlighted that there were cases of operators wanting to sell yellowfin tuna as if it was red tuna, adding that it was particularly difficult to undertake controls on vessels from third countries. He requested more information on the controls to be





done on processing taking place in third countries. He argued that, without a proper level-playing-field, the EU would be at a disadvantage, since it was an issue of competition.

Paolo Caricato (DG SANTE) responded that, after the implementation of the new rules, it would be possible to assess whether further actions were needed. Mr Caricato recognised that the frequency of sanitary controls on EU establishments could vary across the Member States. In the case of third countries, the competent authorities must ensure compliance with the EU rules, including through certifications. The audits carried out in third countries do not cover all the fishery establishments. The EU system is based on the confidence on the third country authorities after a long and difficult process where the authorities must demonstrate the full compliance with the EU rules. Only after that process a third country is listed for the export of fishery products to the Union. When developing the new rules, the Commission maintained contact with the stakeholders and with the authorities of various countries.

María Luisa Álvarez Blanco (FEDEPESCA) drew attention to the challenges faced by the retail sector in ensuring compliance with sanitary rules. In large cities, veterinarians were available every day and many sanitary controls took place. As food safety controls were a responsibility of local authorities, there could be issues on the transfer of information.

Paolo Caricato (DG SANTE) acknowledged that, in fish auctions and in the market of large cities, there were continuous controls. In the cases of the processing plants, specifically for canned tuna and tuna loins, veterinarians were not present every day. Each Member State set a percentage of controls per year, which could mean controls once or twice a year. In the case of imports, the documentary check is carried out on 100% of the imported containers, but the physical checks of the products are carried out on a sample. Therefore, achieving full control in the EU and in the third countries would be challenging. The Commission representative recognised that the new system is not perfect, but it surely represents an obstacle for fraudulent operators. In his view, it was necessary to hold a certain level of trust on operators, since a large majority of operators respect the rules. Consumers should not be afraid to eat tuna, he added.

### Labelling of Plant-Based Imitations of Fishery and Aquaculture Products

- **Presentation of the study “Labelling of plant-based seafood substitutes” by Bertrand Le Gallic (Université Brest)**

#### [Presentation](#)

Bertrand Le Gallic (Université Brest) explained that the plant-based seafood substitutes market is a recent phenomenon that has developed worldwide since the end of the 2010s, with particular acceleration in 2022 and 2023. Given this rapid expansion, new attention was required. The objective of the study was threefold: to provide a snapshot of the current state of play in the development of plant-based substitutes for fishery and aquaculture products; to discuss potentially misleading labelling practices in the EU market; and to review the relevant EU legal framework.



Mr Le Gallic outlined the methodology of the study. To document the progressive entry of firms into the plant-based seafood substitutes' market, first, the team analysed peer-reviewed articles, institutional documents and reports. Second, they explored the World Intellectual Property Organisation's database to track patents linked to these novel products. Third, they carried out web scraping, although language issues required the support of colleagues. This methodology enabled the creation of a comprehensive database describing the products supplied by each identified firm.

Mr Le Gallic highlighted that the study identified 102 companies supplying 228 different products, with firms located in 26 countries, including 12 EU Member States which account for around 47% of those listed. Large agrifood companies recently entered the market, including Nestlé, Birdseye, Unilever and Gardein. While distribution was initially limited to specialised shops and online sales, these products are now supplied by major retailers, such as Tesco in North America and Carrefour, Aldi, Spar, Auchan/Alcampo and Delhaize in the EU. Traditional seafood processing companies are also diversifying into this sector, for instance Thai Union, with its brands John West and Petit Navire, as well as Insuperabile and Karavela.

Mr Le Gallic explained that the species most frequently imitated are tuna, whitefish (for fish finger-style products), salmon, shrimp and crab. Together these account for 78% of the products listed, and they are also among the most consumed seafood species in the EU. This reflects how the substitutes market mirrors actual seafood consumption, making them direct competitors. The main protein sources are soy, peas and wheat, all of which are potential allergens. Additives, such as salt, fat and other ingredients, are always needed, meaning the substitutes differ significantly from the nutritional profile of authentic seafood.

Mr Le Gallic underscored that plant-based seafood substitutes are produced through highly complex industrial processes, which may involve extrusion, electrospinning, wet spinning or 3D printing. Therefore, the environmental footprint is not negligible, given the import of certain ingredients (such as konjac for imitated shellfish) and the high energy consumption of the processing methods. This challenges the perception of such products as inherently sustainable, organic or aligned with vegan values.

Mr Le Gallic, concerning labelling issues and corresponding regulatory framework, recalled that seafood products must comply with both the Common Market Organisation Regulation 1379/2013 and the Food Information to Consumers Regulation 1169/2011, while plant-based substitutes generally fall only under the latter one, except when based on algae or seaweed. Article 7 of the Food Information to Consumers Regulation specifies that food information should not be misleading as to the nature and identity of a product. However, the study's survey showed that 45% of substitutes use invented seafood-related names, such as "Crispy lemon shrimpz" or "Omni tuna," often with insufficient information to provide a clear descriptive denomination. In 57% of cases, there was a direct reference to "fish" or a fish species, and, in 13% of cases, both an invented name and a fish species name were used. He warned that this suggests potential non-compliance or at least ambiguity, particularly since national agencies may interpret and enforce rules differently.



Mr Le Gallic outlined the policy recommendations. The first action would be forbidding the use of the commercial designations of aquatic species for products that do not actually contain seafood, in order to avoid clearly eliminate misleading practices. This would be consistent with the 2017 European Court of Justice ruling against the use of dairy denominations for plant-based products. For invented names, he suggested requiring additional information to comply with Article 36 of the Food Information to Consumers Regulation, especially where names are reinforced by pictures imitating genuine seafood. A third action could be to mandate the inclusion of the main ingredient(s) in the product name, as already suggested by some marketing practices in the EU agrifood sector, such as the example of Fleury Michon.

- **Exchange of views**

Christine Absil (Good Fish) wanted to know whether Mr Le Gallic actually studied the climate impact of the plant-based substitutes, since the impact of transport could be very low. Ms Absil drew attention to potential issues of compliance with Article 7 of the Food Information to Consumers Regulation by surimi products. As an example, there were surimi products advertised in the market as “gambas made of surimi” or “eels made of surimi”, which did not make the fish ingredients clear.

Bertrand Le Gallic (Université Brest) responded that he had not specifically studied the climate impact. Mr Le Gallic highlighted that many distribution points emphasised the “natural” and “healthy” aspects of plant-based substitutes, even though these products resulted from highly complex industrial processes. In the case of organic products, consumers expected a natural development, not ingredients from different parts of the world. Mr Le Gallic explained that surimi products were not part of the study, since these are made of fish, meaning that surimi products have properties that cannot be found in plant-based products. He cautioned about claims on the market about the presence of omega-3 in products that are not the basis for it.

Christine Absil (Good Fish) reaffirmed the view that surimi products could be misleading in a similar manner to the plant-based imitations.

Guus Pastoor (Visfederatie) emphasised the relevance of the topic. In the context of agricultural policy, similar discussions were taking place about the product names for meat. In the case of fishery and aquaculture products, there were clear rules on the use of commercial designations.

Bertrand Le Gallic (Université Brest) highlighted that the study suggested an update to the Food Information to Consumers Regulation to introduce a chapter on plant-based imitations, as there are specific rules for the meat sector and for the fishery and aquaculture products sector. Mr Le Gallic acknowledged that, in the case of fishery and aquaculture products, there was a clear starting point, as the list of commercial designations was a transparent starting point.

Aurelio Bilbao Barandica (OPESCAJA) argued that the advertising for plant-based imitations was misleading, adding that his organisation was working for the development of specific legislation. Mr Bilbao highlighted that, according to the Commission, there was sufficient legislation in place, while it was up to the Member



States to undertake controls. He called for EU-wide legislation, to ensure consistency across the Member States. The misleading use of fish products names should not be allowed.

Bertrand Le Gallic (Université Brest) recognised that all countries have different concerns. The Commission previously clarified that the implementation should be addressed by the Member States.

Daniel Voces (CEPESCA) expressed support on behalf of Europêche. Mr Voces highlighted, in terms of recent developments, that, besides the study of the European Parliament, the Council discussed a resolution from twelve Member States on “The protection of traditional names of animal origin food”. Mr Voces suggested the development of a letter to the Commission requesting information on the next steps.

The Secretary General recalled that, in 2021, the MAC adopted advice to the European Commission on the labelling of plant-based imitations. In 2023, the MAC followed up with new advice on the topic. To avoid a mere repetition of previous advice, he advised to proceed with a letter, instead of new advice.

The Chair expressed support for the suggested approach.

Elena Ghezzi (COPA-COGECA) drew attention to the link to overarching EU food policy. Ms Ghezzi drew attention to recent work of the Aquaculture Advisory Council for a consistent approach to food policy.

Guus Pastoor (Visfederatie) stated that, if new advice was developed, it could be done in a succinct manner, recalling recent developments.

Bertrand Le Gallic (Université Brest) responded that, according to the feedback from the members of the European Parliament’s Committee on Fisheries, the study allowed for a quantification of the problem, something that was not available in 2023. Mr Le Gallic underscored that the market of plant-based imitations was not a microphenomenon. Misleading practices were expected to increase. Additionally, there were several examples of court cases that resulted in sanctions.

The Secretary General highlighted that the study included references to previous advice of the MAC.

### Packaging and Packaging Waste Regulation

- **Presentation on Lifecycle Assessment of Fish Boxes in Cold Chain Logistics by Javier Ojeda**

#### Presentation

Javier Ojeda (FEAP) presented a lifecycle assessment of fish boxes in cold chain logistics undertaken by RDC Environment in 2025. Mr Ojeda recalled that the Packaging and Packaging Waste Regulation requires at least 40% of packaging to be reusable by 2030 and 70% by 2040. The study aimed to evaluate and compare the environmental, economic, and social impacts of different types of packaging for transportation of fish, in order to determine whether the targets were realistic. In his view, the interinstitutional negotiations on the



legislative proposal led to the rearrangement of several provisions and to unexpected consequences for transportation fish boxes in contact with food.

Mr Ojeda explained that the study compared four types of packaging: expanded polystyrene (EPS), cardboard with PET coating, reusable polypropylene (PP), and reusable high-density polyethylene (HDPE). Cardboard is the only material with an exemption from the Regulation's reuse provisions. The study used a full life cycle approach, from raw material sourcing to end-of-life, considering factors such as insulation, energy use, waste management, and cost per kilogram of fish delivered. The results showed that the environmental performance of each material depends heavily on transport distance. For short distances up to 200 km, all options performed similarly, but, beyond that, single-use EPS boxes offered the best balance between insulation, cost, and environmental impact. For distances over 1250km, EPS boxes are the only recommended type of packaging.

Mr Ojeda emphasised the critical importance of food safety, as fish is highly perishable and sensitive to temperature fluctuations. EPS boxes, being single-use and food-grade certified, minimise the risk of microbial contamination and ensure consistent cold chain integrity. Reusable boxes, although beneficial in closed-loop systems, could introduce hygiene and safety risks if not managed under tightly controlled conditions.

Mr Ojeda informed that the overall conclusion of the study was that single-use EPS packaging remains the most sustainable and cost-effective solution for transporting fresh fish over long distances. The findings suggest that the EU's blanket reuse targets may not be appropriate for all sectors. For the logistics of fishery and aquaculture products, in particular, a more flexible and sector-specific approach would be necessary to maintain both environmental and food safety standards, avoiding unintended consequences such as higher emissions, costs, or product spoilage.

- **Exchange of views**

Daniel Voces (CEPESCA) expressed full support for the recommendations of the study.

Thibault Pivetta (EMPA) thanked Mr Ojeda for the comprehensive study. Mr Pivetta called for the application of the recommendations across different sectors, including packaging solutions for bivalves.

Aurelio Bilbao Barandica (OPESCAJA) emphasised the relevance of the study for landed fish.

Juan Manuel Trujillo (ETF) also expressed support for the recommendations of the study.

María Luisa Álvarez Blanco (FEDEPESCA) wanted to know whether the study covered single use fish boxes with or without lids, as it could impact the efficiency of the packaging. Ms Álvarez emphasised that producers of boxes should study ongoing developments and introduce new alternatives. She added that the issue was also being addressed in the Spanish technological platform for fisheries and aquaculture.





Javier Ojeda (FEAP) informed that the study would be made available in the near future. The study focused on fishery products, but, in his view, the blanket approach of the Regulation was not appropriate for various sectors, as different sectors have different starting points and logistical conditions. On the issue of lids, Mr Ojeda informed that the study was based on average conditions, meaning that both options were included. He recalled that the Regulation would be enforceable from 2030, which was insufficient time to implement new technological solutions, including the necessary manufacturing and certification processes. Therefore, while he welcomed new solutions, in his view, in the meantime, EPS boxes remained the most effective and practical solution for the transport of fish products.



### Summary of action items

- Labelling of Plant-Based Imitations of Fishery and Aquaculture Products:
  - o Recommend the drafting of a letter to the European Commission on ongoing developments.



## Attendance List

Representative	Organisation	Role
Adrien Simonnet	Union du Mareyage Français (UMF)	Member
Amandine Menu	PACT'ALIM	Member
Alen Lovrinov	Producer Organisation Omega 3	Member
Alessandro Manghisi	Aquaculture Stewardship Council (ASC)	Member
Alonso Abreu Lozano	OPP80 Punta del Moral	Member
Ângela Pécurto	ALIF	Member
Angeles Longa	European Molluscs' Producers Association (EMPA)	Member
Anna Rokicka	Polish Association of Fish Processors (PSPR)	Member
Anne-France Mattlet	Europêche	Member
Aodh O'Donnell	Irish Fish Producers Organisation	Member
Arthur Yon	FROM Nord	Member
Aurelio Bilbao Barandica	OPESCAYA	Member
Benoît Thomassen	Federation of European Aquaculture Producers (FEAP)	Chair
Bertrand Charron	Aquaculture Stewardship Council (ASC)	Member
Bertrand Le Gallic	Université Brest	Expert
Camille Maisonneuve	Market Advisory Council (MAC)	Secretariat
Catherine Pons	Federation of European Aquaculture Producers (FEAP)	Member
Caroline Gamblin	PACT'ALIM	Member
Christine Absil	Good Fish Foundation	Member
Daniel Voces	CEPESCA	Member
Dominic Rihan	Killybegs Fishermen's Organisation (KFO)	Member
Elena Ghezzi	COPA-COGECA	Member
Fabian Schäfer	Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.	Member
Fabijan-Hrvatin Peronja	OP Friska Riba	Member
Felicidad Fernández	ANFACO-CECOPECA	Member
Gaëtane Le Breuil	European Fishmeal	Member



Representative	Organisation	Role
Gerd Heinen	European Commission	Expert
Giuseppe Scordella	COPA-COGECA	Member
Grace Howe	The Nature Conservancy	Member
Guus Pastoor	Visfederatie	Member
Iñigo Azqueta Ruiz-Gallardón	ANFACO-CECOPECA	Member
Ioritz Bilbao Herrero	OPESCAYA	Member
Irina Popescu	European Parliament	Observer
Isabel Alonzo 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 (MSC)	Member
Jens Høj Mathiesen	Danish Seafood Association	Member
Jérémie Souben	FEDOPA	Member
Joanna Żurawska-Łagoda	Poland	Observer
João Pereira	FRUCOM	Member
Joaquin Garrido	European Molluscs' Producers Association (EMPA)	Member
Joe Emmanuel Seck	France	Observer
John Lynch	Irish South and East Fish Producers Organisation (ISEFPO)	Member
José Carlos Escalera Aguilar	FECOPESCA	Member
Josefa Ruiz Saez	CARBOPECA	Member
Juan Manuel Trujillo Castillo	ETF	Member
Juana Parada	OR.PA.GU.	Member
Jules Danto	European Association of Fish Producers Organisations (EAPO)	Member
Julian Lamothe	European Association of Fish Producers Organisations (EAPO) / ANOP	Member
Juliette Marguerite	European Salmon Smokers Association (ESSA)	Member



Representative	Organisation	Role
Justyna Radzewicz	Poland	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
Linda Zanki Duvnjak	OP Friska Riba	Member
María Luisa Álvarez Blanco	FEDEPESCA	Member
Mariano García García	FACOPE	Member
Marine Cusa	Oceana	Member
Mikel Ortiz	OPPAO	Member
Niall Gerlitz	European Commission	Member
Pablo Caricato	European Commission	Expert
Patrick Murphy	Irish South & West Fish Producers Organisation	Member
Paulien Prent	Visfederatie	Member
Pedro Hernandez Saez	CARBOPESCA	Member
Pedro Luis Casado López	OPP80	Member
Pedro Reis Santos	Market Advisory Council (MAC)	Secretariat
Pierre Commère	PACT'ALIM / Eurothon	Member
Pim Visser	NOVA	Member
Poul Jensen	Danish Seafood Association	Member
Rafael Piñero	EuroCommerce	Member
Rosalie Tukker	Europêche	Member
Sarah Hautier	EuroCommerce	Member
Séverine Renault	AND International	Expert
Sergio López García	OPP7 Burela	Member
Szilvia Mihalfy	FEAP	Member
Thibault Pivetta	European Molluscs' Producers Association (EMPA)	Member
Vanya Vulperhorst	Oceana	Member





Representative	Organisation	Role
Yoannis Pelekanakis	Hellenic Aquaculture Producers Organisation (HAPO)	Member
Yobana Bermúdez	EU Fish Processors and Traders Association (AIPCE)	Member

